Ten Commandments of Compliance

1. **Always bill under your own provider number**
   a. Regardless of what someone tells you, you are **NOT** a Locum Tenens or a Substitute Physician unless you work for a Locum Tenens service or are an independent contractor without a W2.

2. **Code and document what was done, not what “will get paid”**
   a. Understand that what gets paid and good medical practice are not synonymous. There may be times when your judgment overrides decisions about medical necessity as determined by the insurance company.

3. **Never accept or offer anything of value in return for referrals and pay fair market value for services**
   a. Stark regulations state that you may not accept or offer inducements for referrals and discounted supplies or space may be considered an inducement depending on the situation.

4. **Charge all patients uniformly**
   a. This does not mean you cannot offer a discount to self pay or indigent patients. Have a policy in place for determining who is allowed a discount and follow the policy.

5. **Never waive co-pays or deductibles**
   a. This practice generally violates the terms of your contract with third party payors as well as violates your contract with Medicare. Routine waiving of co-pays may be considered an inducement.

6. **Don’t offer “professional courtesy”**
   a. This practice may be considered a discriminatory practice as well as a Stark violation.

7. **Know what your billing service and or staff are doing**
   a. Institute proper accounting controls. It is your name on the claim and your bank account.

8. **Trust but verify**
   a. This applies to consultants, staff, lawyers, friends – ask for the regulation or specific reference that supports their claims. Background checks for everyone!

9. **Follow up**
   a. Compliance complaints, HIPAA complaints, and/or employee complaints

10. **Write legibly**
    a. If it wasn’t documented it wasn’t done, if two reasonable reviewers cannot read it, it isn’t documented.

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