

Report on Medicare Compliance Volume 28, Number 43. December 09, 2019

With Exit Surveys, Employees Have Another Chance to Reveal Compliance, Culture Problems

By Nina Youngstrom

After a nurse left Trinity Health for a new job, she exploded a potential bomb in an exit survey that she apparently hadn't been comfortable doing with the compliance officer or hotline while still an employee.

"Dr. [X] noted in a patient's chart that he had done a full exam, which he did not. We then billed Medicare for the full exam. This is not the first time this has occurred with Dr. [X]," the nurse wrote in her response to the question on the exit survey, which asks outgoing/former employees whether, in their opinion, there have been "any compliance issues related to fraud, abuse, unethical or illegal practices or any other misconduct" at the hospital or other facility where they worked.

Although an internal audit of the physician's billing and documentation practices exonerated him, if the nurse's perceptions had been accurate, Trinity Health could have continued to pile up overpayments or perhaps faced a whistleblower complaint, says Andrei Costantino, vice president of integrity and compliance. "In this situation, it came down to a misunderstanding of billing and coding, so nothing more came of it," he says.

Sometimes, however, the reports are accurate, underscoring why exit interviews are a valuable adjunct to the hotline and other reporting methods used by health care organizations to encourage employees to expose possible errors and misconduct, compliance officers say. Without exit surveys, organizations may never learn of certain problems in their organizations. "This is a chance to sit with an employee who is voluntarily going somewhere else and see what they have to say," Costantino says. "I think it's a best practice."

Exit surveys can be time consuming and lead compliance officers and human resource managers down blind alleys, but on balance, the information they provide is enlightening. "Sometimes people leaving the organization are more open than people in the organization," says Rebekah Stewart, chief ethics and compliance officer at Diamond Healthcare in Richmond, Virginia.

Hospitals use various approaches to exit interviews. Some surveys have one direct question about compliance, while others ask similar questions in different ways and use them to evaluate the overall culture of the organization. "There is so much richness you can build through your questions," Stewart says. The way questions are asked also may affect the quality of the information that organizations glean. "How questions are framed avoids putting people on the defensive," she says.

This document is only available to subscribers. Please log in or purchase access.

[Purchase Login](#)