

Compliance Today – April 2023



Jay P. Anstine (jay.anstine@bannerhealth.com, [linkedin.com/in/jay-anstine-90736610/](https://www.linkedin.com/in/jay-anstine-90736610/)) is Compliance Program Director, Western Division, at Banner Health, Greeley, CO.

Need to deliver bad news? Develop a strategy

by Jay P. Anstine

One of the givens in our role is that we must be the messenger of bad news from time to time. That is true whether it's explaining to a healthcare leader that he or an employee is suspected of drug diversion; the organization has a large refund to Medicare or anything in between.

If you find yourself needing to deliver “bad news,” spend time developing a communication strategy for *how* you will deliver that message to your leader(s). For example, let's assume you're resolving an identified billing and coding issue for a high-dollar surgical procedure in a hospital setting. You have conducted an investigation and determined the organization does not have documentation to substantiate medical necessity as required by the Centers for Medicare & Medicaid Services. Consequently, you have identified a six-figure refund to Medicare. Given the facts, it's probably safe to assume the hospital CEO is not going to be too thrilled to hear this news. Additionally, the CEO may take the news personally, feeling that one of their direct reports should have been aware of the deficient documentation and taken steps to proactively address it.

This document is only available to members. Please [log in](#) or [become a member](#).

[Become a Member Login](#)