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Adapting to COVID-19, Provider's Compliance Program Assessment Was Partly Virtual

By Nina Youngstrom

Billings Clinic in Montana hadn't had a compliance program evaluation for a couple of years, and Compliance Officer Jeremy Lougee was anxious to get it underway, especially after a breach that had to be reported to the HHS Office for Civil Rights in 2018. Its ducks were in a row in November, with the consulting firm PYA due there in March. Then COVID-19 turned the world upside down. One way or another, however, Lougee was determined to forge ahead, even if it meant a virtual evaluation of the effectiveness of the compliance program.

"There was no way to do it in person, but there was never a question of if we would do it," he said. "The question was how we were going to do it. We needed to get it done."

So in another pandemic-driven adaptation, Billings Clinic wound up with a hybrid compliance program evaluation. PYA interviewed 84 clinic employees virtually and made one onsite visit to interview senior leaders, board members and physician leaders, said Shannon Sumner, principal and chief compliance officer with PYA in Brentwood, Tennessee. "There are some things you can't replicate virtually," she explained.

It worked out to Lougee's satisfaction. "We ended up with the product we needed," he said.

The compliance program assessment was a learning experience all the way around. One revelation: Despite rumors to the contrary, most physicians are receptive to information about regulations, billing and HIPAA, Lougee said. And they want data, including a new product introduced by Billings Clinic on monitoring physician coding. One physician "almost got up and kissed me," he said.

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