



# Auditing Provider-Based Operations to Ensure Compliance with CMS

Webinar T2507

Tuesday, July 14, 2009  
8:30 a.m. – 10:00 a.m. (CST)

## Overview

The overall purpose and function of the provider-based rule is addressed as well as critical information concerning physician supervisory changes. CMS has recently made significant changes in the interpretation of physician supervision for on-campus (out of hospital) provider-based operations. While CMS claims these are not changes, but simply *clarification*, hospitals must take appropriate action to maintain compliance. If the new interpretations are not changes, then the RACs will be able to apply the clarified interpretations back to October 1, 2007. Additionally, the overall compliance issues surrounding provider-based status will also be discussed in the context of conducting an audit.

## Target Audience

CEO, COO, CFO, Personnel Involved with Provider-Based Clinics and/or Clinical Operations, Coding Personnel, Billing and Claims Transaction Personnel, and Compliance Personnel

## Objectives

At the completion of this program, the participant will be able to:

- Discuss the Provider-Based Rule (PBR)
- Update critical physician supervisory rule changes
- Identify the different areas in which the PBR applies
- Describe the attestation and request for determination processes
- Discuss the need for updating and the documentation of organizational structuring relative to the PBR
- Describe the review process for assessing current and/or potential provider-based situations
- Identify the economic benefits versus the compliance requirements
- Describe the relationship of PBR relative to the Conditions for Payment, Conditions of Participation and gaining billing privileges

## Program Topics

- Review of the Provider-Based Rule (PBR)
  - Development of the PBR
  - 42 CFR §413.65
  - Review of Definitions
  - Rules and Regulations
  - Recognition by Non-Medicare Third-Party Payers
- Economic Advantages of Provider-Based Status
  - Clinics
  - Clinical Services
  - Costs for Provider-Based Status
- Physician Supervisory Requirements
  - Recent Changes and Clarifications
  - In-Hospital
  - On-Campus
- Off-Campus
- Possible Recovery Audit Contractor (RAC) Issues
- Compliance and Obligations Under PBR
  - Meeting All PBR Criteria
  - Reporting Requirements
  - Attestation versus Determination Process
- Related Issues
  - Conditions for Payment
  - Conditions of Participation
  - Other Third-Party Payer Relations
  - Coding and Billing for Provider-Based Clinics
- Case Studies – Provider-Based Clinics

## Faculty

**Duane Abbey, PhD, CFP** is a management consultant and president of Abbey & Abbey Consultants. For over 20 years, Duane has provided healthcare consulting services to hospitals, physicians and medical clinics. The focus of his consulting has been in the areas of compliance, payment and delivery systems. In addition to his consulting, Dr. Abbey is an invited presenter for hospital associations, medical societies and other groups. He also has published both articles and books on healthcare topics. Dr. Abbey earned his graduate degrees from the University of Notre Dame and Iowa State University.

## Continuing Education

Certificates of Attendance will be issued to all registrants attending this audio conference. These certificates should be placed on file at your hospital as evidence of attendance. Certificates of Attendance will not be awarded for taped sessions.

## Registration

### **\$170 for AHA members**

The registration fee includes **one connection and site fee**. One or more individuals from the same facility may participate for the same fee. Participants are encouraged to log in 15 minutes prior to the start of the program, as the program will begin on time.

Participants should register at least five business days prior to the event to ensure optimal processing of conference materials. To register, please submit the attached registration form. If you have not received confirmation via the e-mail provided on the registration form at least three business days prior to the event, please contact Romeeka Taylor at 501-224-7878, or via e-mail to [rtaylor@arkhospitals.org](mailto:rtaylor@arkhospitals.org). **Without payment (via check or credit card), your registration cannot be processed, and you will not receive connection instructions.**

Prior to the event, you will receive instructions and passwords for accessing the event, along with the slide presentation and other resource materials. It is the responsibility of the registrant to download and/or access presentation materials prior to the day of the event. If your e-mail address changes, you do not receive an e-mail with instructions from AHA or if you are unable to download or open presentation materials, please contact AHA two days prior to the event to allow time to address the issue.

### **Substitution, Transfer and Cancellation Policy**

Refunds, minus a \$25 processing fee, will be granted if requests are received in writing by the AHA at least 5 business days prior to the program. No refunds will be issued after that date. Substitutions, however, are permitted. Fax refund requests to Romeeka Taylor at 501-224-0519.

---

## REGISTRATION FORM

# Auditing Provider-Based Operations to Ensure Compliance with CMS

Webinar T2507

Tuesday, July 14, 2009

### **Registration Fee**      **\$170 for AHA members**

Registration fee covers one or multiple participants at one location (**one connection per registration**) and includes one set of instructional materials/handouts. Upon receipt, additional handouts can be copied.

Name and Title of Contact Person \_\_\_\_\_

Organization \_\_\_\_\_

Mailing Address \_\_\_\_\_

City, State, Zip \_\_\_\_\_

Telephone \_\_\_\_\_ Fax \_\_\_\_\_ E-mail \_\_\_\_\_

### **Method of Payment**

Check in the amount of \$\_\_\_\_\_ payable to the Arkansas Hospital Association is enclosed.

Credit Card # \_\_\_\_\_ Visa      MasterCard

Cardholder's Billing Address (including zip code) \_\_\_\_\_

Expiration Date \_\_\_\_\_ Name on card \_\_\_\_\_

Signature \_\_\_\_\_

### **Mail form and payment to**

Romeeka Taylor, Registrar, Arkansas Hospital Association, 419 Natural Resources Drive, Little Rock, AR 72205; 501-224-7878; or fax form with credit card information to 501-224-0519.