

## "Is The Platform Burning?" RAC Education Is Key



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As seen on the RACMonitor.com

Last month in my initial article for the RAC Monitor, I presented a thesis that the elements of a Model Compliance Program, as detailed to us on numerous occasions by the Department of Health and Human Services, Office of Inspector General's office, does present healthcare providers with an appropriate structure from which to prepare for the Recovery Audit Contractor program.

As a refresher, the seven elements of a model compliance program are as follows:

- Designation of a compliance officer and compliance committee
- Development of compliance policies and procedures, including standards of conduct
- Development of open lines of communication
- Appropriate training and education
- Internal monitoring and auditing
- Response to Detected Deficiencies
- Enforcement of disciplinary actions

I am asked frequently, "which is *most* important element" or "do I really need to complete *all* elements?" My responses include that I don't think you can say that one element is always most important and certainly "yes" you need to address each element or you are opening your organization up for increased risk. Having said this, I must comment that a very important element for all of your compliance efforts is always training and education.

### **Education and RAC**

For those of us assigned to manage or prepare our organizations for RAC, one of the first tasks to accomplish, after gaining the appropriate knowledge about the topic ourselves, is to determine how to get the key stakeholders "on board" that this is an important topic that demands their attention and the potential need for an allocation of additional resources. One of the most effective ways to accomplish this is to begin to educate those stakeholders with an outcome goal for this initiative being appropriately identified. By this, I mean after providing education to a group, what is it that you want them to walk away from the meeting with?

Depending upon the audience you will need to structure your education appropriately. Consider each of the following audiences with some suggestions for the "take-away message" for each:

- **Board Members**

Provide a general overview of RAC including some findings from the RAC Demonstration Project, what the threat is to their organization, what measures the Senior Management team is taking and what financial resources (personnel, technology, consultants, etc...) are needed to accomplish these measures.

- **Senior Management**

Provide a detailed overview of RAC including detailed findings of the Demonstration Project, Project Preparation Planning Overview and Strategies to Protect, Management Assignments to Specific Tasks and other necessary actions including having dollars available to get outside consulting assistance, if you deem it necessary.

- **Physicians**

Provide a general overview of RAC, focus time and attention on areas of documentation inconsistencies that were discovered during the Demonstration Project, spend time on specific documentation examples in your own medical records, some which are done appropriately and some that are not done appropriately that might result in a payback to the RAC.

Please note for each of these audiences I mention utilizing the Demonstration Project results as a major component of your presentations. Many times as a former Compliance Officer when making presentations, I would hear from audiences, "*well, that will never happen here*" or "*this is nothing but another scare tactic by the government.*" These types of responses are normal and should be expected (unless, of course you are in a facility that has already paid back to the RAC).

There is a strategy to handle these types of objections in a concise and productive manner and that is with quantifiable and factual data. The value of the Demonstration Project results is that they give you quantifiable results to allow you to "impress" upon your audience the need to prepare. Some presenters use these results to convey that the "Platform is Burning" to those audiences who have yet to react and prepare appropriately for the RAC.

Whether the "Platform is Burning" is the proper approach to take in your organization when doing RAC Education is clearly a decision the presenter needs to make. Due to the inherent difficulties that may be present with internal management making these types of presentations, some organizations are electing to hire consultants to perform this education and other associated RAC preparation functions.

Hopefully, this information can assist you to serve as a starting or refresher point for the goals of your RAC education efforts. In future articles we will discuss other compliance plan elements which might be a good structure to follow as you prepare for the RAC.