Prepare Your Office for a Payer Audit Site Visit

Your office receives a letter stating that your practice has been scheduled for an audit/site visit from the Centers for Medicare and Medicaid Services or a private payer. Here is a checklist to help you prepare for the event. Of course, no list is exhaustive and no generic resource is a substitute for legal counsel.

- ☐ **Immediately contact the auditors by telephone.**
  Confirm that the audit will take place, and verify the time and the exact location. Make sure the auditors are aware if you have an address change or correction from the one listed on the audit letter. Provide them with a suite number, as well as gate, or parking lot, if relevant. Follow up in writing by fax and mail.

- ☐ **Immediately call your attorney and ask him or her to attend the audit and site visit.**
  You have the right to have an attorney present while the auditors are in your office and during employee interviews. The attorney you involve needs to be experienced with the audit process.

- ☐ **If the site visit is set for a satellite office, make sure the appropriate administrative personnel and at least one of the physicians who sees that payer's patients are in that office on the day of the site visit.**
  Make sure that satellite office is open and staffed when the auditors arrive. It is preferable, but not mandatory, that one of the doctors or other treating health professionals from that office be present, even if schedules must be rearranged. If it is not possible to have one of the doctors onsite, then advise the auditors during your initial telephone contact (see above) and ask whether they would like to reschedule for a date when the physician(s) is available.

- ☐ **Verify that your office is "visitor ready." Inspect your office immediately and address anything that needs attention. Call for an emergency housekeeping visit, if necessary.**
  Everything in your office should be clean, secure, neat, and presentable. Visually inspect all areas of your office. Although you may not have any claims denied or overpayments claimed against you as a result of an unkempt office, first impressions set the tone for the visit.

  Some auditors open every cabinet and drawer and photograph what is inside them. Inspect all cabinets and drug sample lockers and closets ahead of time to make sure no expired or inappropriate medications are in them, especially in your patient examination rooms. Make sure your patient waiting areas, examination rooms, and wash rooms are spotless. This may be the time for an emergency visit from the carpet cleaner.

- ☐ **Make sure all displayed licenses and certificates are current.** Many auditors take close-up photographs of every diploma, certificate, photograph, letter, award, and license hanging on your office walls. Be sure that none of these is expired.

- ☐ **Designate a separate room with chairs and a desk or table for the auditors to use as their meeting, conference, and interview room.**
  In most cases, the auditors will request this. The auditors will want to interview your employees while they are there. It's a good idea from your perspective, too. It will allow you to manage what the auditors see and here. You don't want them to go on a fishing expedition triggered by an injudicious employee remark.

- ☐ **Require proper photographic identification information from each member of the audit team.**
  When the auditors arrive, ask for their photographic identification and business cards. They all should have proper photographic identification from their company or agency. They should have business cards, but new employees and people in training sometimes do not. Write down the names, addresses, job titles, and telephone numbers of any person who does not have a business card. This shows that your office has proper security policies and protocols.

- ☐ **Assign one staff person to be the liaison with the auditors (and your attorney).**
  Usually, the communication liaison will be your office manager or practice manager—or the physicians with top administrative authority. This person should be the sole communication conduit. He or she should know where to obtain all of the documents and information the auditors request. This person should stay with the auditors when they tour and inspect your office. Your attorney should accompany them as well, but he or she probably will not be able to answer most questions about your office or practice.

  The liaison should follow parameters for communication with the auditors.

  - Always tell the auditors the truth.
  - It is acceptable not to know everything. If you don't know the answer to a question, tell the auditors you will get back to them with an answer.
  - It is not reasonable to be expected to make photocopies of every medical and personnel record that the team requests during the audit. Advise the auditors that they can view everything during their visit, and make copies of documents as requested when possible (not interfering with patient care or office operations). Then tell the auditors that you will be happy to copy and mail the remaining documents to them within several days after the site visit.

- ☐ **Keep a copy of every document or paper you provide to the auditors during the site visit.**
  Don’t make only one copy for the auditors. Make two, and keep one to give to your counsel. This will be invaluable should there be follow up inquiries from the auditor.

- ☐ **If the records needed by the auditors are in a different office location, don't overextend yourself trying to obtain them during the site visit.**
  Explain the location issue to the auditors and offer to send them copies within the next several days. Remember, they could have conducted the audit and site visit at the other office (and still may do so).

- ☐ **Don't guess the answers to any questions the auditors ask you.**
  Before the site visit, instruct your staff members that if they don't know the answer to a question, they simply should say so to the auditor when they are interviewed. Remind staff members that an audit is not an intelligence test and that staff members cannot fail the audit because they do not know an answer. Instruct employees to answer questions truthfully, however. It is much better to say that you don't know the answer (if you don't) rather than provide incorrect information.

- ☐ **Do not voluntarily advise the auditors of suspicions of wrongdoing or ask whether your policies or procedures are correct.**
  Do not alert the auditors to problems and issues in your practice that they may not have been going to audit or ask about. Even if the information you provide is not under their jurisdiction, they will pass it along to the agency or law enforcement authority that has jurisdiction over it.

- ☐ **Send all documents in sufficient time to be received by the auditor's deadline.**
  Keep track of deadlines and plan work to meet them.

- ☐ **Keep good, legible copies of your transmittal of documents to the auditors, and maintain a record of what you sent.**
  Photocopy both sides of forms and records. Number every page of every copy provided. Keep at least one exact copy for you and your counsel to use later. Transmit the documents to the auditors with a properly formatted and clearly worded business letter itemizing what you are providing. Send it via a reliable means that provides confirmation of what you sent and a receipt. Consider using U.S. express mail, return receipt requested, or an overnight delivery service. Keep copies of all delivery receipts. Track your parcel using the delivery service's Web site, and keep this information for your records.

- ☐ **Call the auditors to make sure they have received what you sent. If they did not receive it, then send it again.**