Compliance is Everything, Everything is Compliance

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by Julie A. Brow

Everything, when reduced to its basic components, is a compliance issue," says Dorothy Wagg, JD, RHIA, vice president of HIM/compliance at Applied Management Systems in Burlington, MA. "It may seem pernicious to be thinking all the time, 'how will this look under the microscope?' but I think that attitude can be useful."

As HIM professionals become more and more specialized in order to manage volumes of information, this can be an important perspective in maintaining the continuity of quality and compliance across disciplines. Wagg points out that HIM professionals don't just "push paper," they also interact with patients, much like clinicians. "I am often touched by how often we, like clinicians, are privileged to share patients' stories and help them in times of great tragedy and pain. ... We can leave lasting impressions with those patients as part of a whole system of healthcare that is trying very hard to achieve excellence," she says.

Working Her Way Up

Wagg has gained her perspective through years of experience. "I will always be glad to have begun my professional life as a discharge analyst, working my way through each HIM position in that hospital," she says. "I think I understand healthcare delivery better because of that and always credit my years in a HIM department as the single most valuable professional experience I have had."

That was nearly 30 years ago. In the following years, she received her degree in health record administration and became assistant director of medical records at a community hospital. After earning her JD, she served as legal counsel to the Massachusetts Hospital Association (MHA), which at that time owned her current employer, Applied Management Systems, Inc.

"AMS expanded, adding hospital billing and collection services. I was fortunate to work with them on both business issues and on substantive issues they managed with clients," Wagg explains. In her many positions in the compliance arena, she oversaw billing and physician audits, managed law enforcement investigations, and provided training to physicians on compliance policies and procedures and federal and state laws, among other responsibilities.

With both legal and HIM experience, Wagg brings a unique background to her current position. She says of her consulting work, "My projects vary from traditional management engagements, compliance audits, and general HIM issues to HIPAA readiness evaluation, education, and preparedness." In her work, she has found that real fraud is scarce. It's mostly a matter of documentation and more documentation.

Bringing the Experience to Others

"My father once told me that learning was the hardest thing I'd ever have to do, but that it was my 'job.' He was right then and he's still right now," Wagg says. While she reads new publications, searches the Internet, and attends meetings and seminars, she believes experience has been her greatest teacher. It is her experience with both the legal side and the healthcare side of compliance that gives her a unique perspective.

The experience also makes her a one-of-kind teacher. Wagg teaches at colleges and universities as well as at peer events and seminars. But she claims she is the one who receives instruction. "In the struggle to 'explain it simply,' as Einstein said, I learn more than I will ever impart," she says.

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