# Filling a Critical Niche: HIM and the Corporate Compliance Committee

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Having served on a corporate compliance committee, I know HIM professionals can bring a lot to the table. If we are not already acting as the chief compliance officer, as committee members we can assist in identifying compliance issues and more importantly, assist in solving problems of noncompliance.

#### **Tackling Coding Compliance Challenges**

The coding and documentation arenas have great potential for noncompliance, and the OIG's increased scrutiny has everyone from coders to physicians worried. HIM professionals can educate physicians on the coding and documentation guidelines that must be followed to decrease the chance of an audit by an external party or being placed on focused reviews by third-party payers.

Internal coding audits are crucial to a successful compliance plan, and HIM professionals can provide support here by explaining audit results and identifying the causes of and solutions to noncompliance. Further, our connection to the medical staff allows us to serve as an intermediary between them and the chief compliance officer. We can listen to both sides and provide feedback.

### **Other Compliance Challenges**

One of an HIM professional's major roles on a compliance committee is to emphasize the importance of health information confidentiality and assist in ensuring that confidentiality is maintained when addressing HIPAA and other regulatory policies and when working with external vendors. Educating hospital and clinical staff about confidentiality is another responsibility: minor breaches such as discussing how a patient is doing in the hallway or not verifying the identity of a person picking up medical records are just two examples of incidents where HIM professionals can provide much-needed instruction on behalf of the compliance committee.

Reimbursement issues and regulatory standards can be compliance pitfalls, but HIM professionals' knowledge of these matters can protect a facility by ensuring that the regulations are being interpreted the same way within each department. If changes are necessary, HIM professionals can offer suggestions on how to implement them while ensuring that the flow, authenticity, and confidentiality of the patient medical record are maintained.

## **Sowing Future Opportunities**

Once members of the corporate compliance committee, HIM professionals are often asked to become members of other compliance-related committees, such as the laboratory compliance committee, because of our expertise in coding and documentation requirements. We can provide education on medical necessity and the need for signed advance beneficiary notices for specific tests.

Once a compliance committee sees HIM professionals' vast knowledge base on health information, there will be no end to the questions we are asked. Being a member of the compliance committee is an excellent and easy way to get the word out that HIM professionals are crucial to the success of the compliance plan and the healthcare organization.

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#### **Article citation:**

Wieland, LaVonne. "Filling a Critical Niche: HIM and the Corporate Compliance Committee." *Journal of AHIMA* 71, no.9 (2000): 22.

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