

# **Your Guide to the 2012 OIG Work Plan: Does Anything on This List Worry You?**

Here are some highlights from the new OIG Work Plan for FY 2012. There are more items that apply to practices, as well as items for hospitals, nursing facilities, home health, and medical equipment and supplies. The link to the complete plan is at the end of the article.

## **Compliance With Assignment Rules**

If you accept assignment with Medicare (i.e. you accept what Medicare allows as payment for a service), the OIG wants to know if you are adhering to the allowable and not collecting more than the patient's deductible and co-insurance.

## **Physicians-Owned Distributors of Spinal Implants (New)**

Do physician-owned distributors (PODs) of spinal implants have a conflict of interest when they sell implants to hospitals? The OIG will investigate.

## **Place-of-Service Errors**

Because there is a payment differential between a service provided in a hospital outpatient department or ASC and the same service provided in the physician's office, the OIG wants to know if you provided the service where you claimed you did.

## **Physicians: Incident-To-Services (New)**

Incident-to services are reported on the honor system – the claim does not reflect that a mid-level provider performed the service under the supervision of a physician. The OIG will dig under the claims to see if practices really understand and follow the incident-to rules.

## **Physicians: Impact of Opting Out of Medicare (New)**

The OIG will be checking that physicians who opted out of Medicare are not filing claims for services, and also monitor disruption of service to Medicare patients due to opt-outs.

## **Evaluation and Management Services: Trends in Coding of Claims**

If you provided E/M services in 2009, you received part of the \$32 billion paid out as 19% of all part B payments. Did you pick a code and hope your documentation was up to the task, or did you review your documentation and choose the code that reflected what was there?

## **Evaluation and Management Services: Provided During Global Surgery Periods**

Are physicians correctly ascertaining which services are part of the global surgery period or are they mistakenly charging for services that are wrapped into the procedure or surgery? The OIG knows.

## **Evaluation and Management Services: Use of Modifiers During the Global Surgery Periods (New)**

Check those modifiers used during the global period. This item refers to services provided during the global period that were unrelated to the original service and thereby billable.

## **Evaluation and Management Services: Potentially Inappropriate Payments**

This is the review we've all been talking about. The OIG will be inspecting electronic records to see if identical documentation appears serialized in the records.

The original work plan can be found [here](#).