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Optimizing the business of healthcare

Meaningful Use

Avoiding Incentive Paybacks With Mock Audits

CMS has ramped up its auditing, putting your organization's Meaningful Use (MU) incentive dollars at risk. Consider the fact that over \$33 million in incentive revenue has been paid back to CMS by eligible hospitals as a result of MU non-compliance attestations and nearly one out of four audited eligible professionals failed to meet MU standards.

The best way to avoid a payback finding is to be prepared. Conducting a mock audit will dramatically increase the chance of a successful outcome should you be flagged for an audit.

It's been estimated that at minimum, one out of every six attesters should expect to be audited to ensure they are meeting the objectives and measures of their MU attestations.

1 The Meaningful Use Audit Process

MU audits can be performed directly by CMS and its contractors or from the individual states and their contractors. The audit process begins with a request for documentation. You will have to submit proof that a security risk analysis of the certified EHR technology was performed prior to the end of the reporting period. If deficiencies are identified in this analysis, you must submit a corrective action plan. The auditor will review the submitted documentation and if necessary will request additional information or clarification. This can be followed by a formal request for an onsite review.

2 Why conduct a MU Mock Audit?

Once you are scheduled for a formal audit, it's imperative that you thoroughly prepare to avoid a negative finding. One of the most effective ways to do this is to conduct a mock audit. The benefits of a mock audit include:

- Developing a replicable, systematic audit approach
- Ensuring timely responses to audit requests
- Confirming audit processes are compliant with internal policies
- Guaranteeing readiness of audit tracking tools
- Building senior leadership confidence

Conducting a comprehensive mock audit not only tests your systems and processes for effectiveness, but also prepares everyone in the organization for the formal audit to come.

3 Challenges of a Mock Audit

There are a number of challenges for organizations as they move through the mock audit process. They include:

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- Resource and time constraints on existing staff
- Lack of up-to-date expertise of critical audit areas
- Difficulty gathering, analyzing, and converting audit data into relevant corrective actions

In order to overcome these challenges, many organizations choose to partner with a qualified partner to help guide them through the process.

4 Benefits of Qualified Partner for Your Audit Preparation

By engaging a consultant to help prepare and conduct your mock audits, you are able to take advantage of someone with hands-on knowledge of the audit process. You will be working with an organization well versed in current audit practices. This allows you to leverage lessons learned from other audits in which they've been involved. An experienced consultant will help:

- Provide clarification and guidance on proper documentation of MU attestation process, documentation, and record retention
- Create MU governance structure
- Review and strengthen audit tracking tools
- Conduct a SWOT analysis of organization's operations to identify gaps and risks
- Ensure timely responses to audit requests
- Determine remediation approach and understand risks.
- Design, develop, test, implement, and monitor data collection and reporting capabilities
- Develop and deliver project closeout reports
- Formulate a comprehensive final report showing risks and mitigation advice

A negative audit finding has serious implications for your organization. Consequences can include loss of revenue, significant fines, imprisonment, loss of professional licenses, exclusion from Medicare participation for a period of time, civil liability, and a severely tarnished reputation. Performing a comprehensive mock audit can help significantly minimize or avoid these outcomes.

Hayes Management Consulting

Hayes Management Consulting is a leading, national healthcare consulting firm that partners with healthcare organizations to streamline operations, improve revenue and enhance technology to drive success in an evolving healthcare landscape. To learn how Hayes Management Consulting can help you with your MU audit preparation, call 617-559-0404 or requestconsultant@hayesmanagement.com.

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