

COMPLIANCE CALENDAR 2019

We have all played Monopoly. As you move your piece around the board, both good and bad things can happen. You can collect \$200, or you can go directly to jail. Such is life. And such is compliance.

This year's Compliance Calendar uses a Monopoly theme to spur us around the year and to help us better endure the activities.



January

Monopoly was first sold by Parker Brothers in 1935.

- Give Expired samples the Boot.** Did you know the Monopoly token, the Boot, dates back to 1937? If you have out dated medicine samples, now is a good time to give them the boot.
- Review all those 1099 forms** that the accountant sent against the list of your practice's Business Associates. Make sure your practice has a current Business Associate Agreement (BAA) with all contractors. And while you are at it, review all BAAs with vendors who have access to your PHI to make sure they are current, too.
- Plan ahead and schedule continuing medical education now.** Resolve that this year there will be no need for last minute CME!



February

- The Monopoly Man's real name is "Rich Uncle Pennybags."** He will be 83 this year and eats a diet heavy in red meats. He could have a heart attack at any time. You better make sure your staffs' CPR training is up to date. Don't forget to note all training in your OSHA log.
- In 1998 the "Bag of Money" was added by Hasbro as a token to the Monopoly game.** In the spirit of this token... It's time to fill your practice's bag of money by using an E&M Analyzer to see what billing opportunities you may be missing.

Save yourself time and hassle by using the [E&M Analyzer](#), an Excel-based product that graphically illustrates whether physician code usage patterns are above or below their peers. All you have to do is generate an E&M code frequency report from your practice management system and enter that data into the [E&M Analyzer](#). Oh, and of course you'll need to file the results of the analysis in your Compliance Program.



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March

We at Medical Risk Institute do not condone illegal gambling, but we do understand it. If you are going to bet on the NCAA brackets, good luck.

In 1999, Hasbro introduced the Millennium Edition of Monopoly. It featured two jewel-like dice. These dice became the subject of a royalties lawsuit which cost Hasbro \$446,182. So, when tossing the dice, be careful.

- It is March Madness!** While offices across the country are conducting random drawings of NCAA teams, the Office of Civil Rights is randomly selecting practices for HIPAA audits. Prepare your practice's HIPAA Risk Analysis before the NCAA Championship Game.
- Wow, we are already nearing the end of Q1.** If you have not scheduled coding and billing training for staff and physicians, do that now. Contact the hospital to find out if courses are being offered locally. If you are a surgical specialist, register for regional workshops or Webinars taught by [Karen Zupko & Associates](#). [AAPC](#) and [AHIMA](#) are also good resources for general coding training and certification.



April

In honor of April 15th, Tax Day, this is Community Chest month. In any effort to avoid the Community Chest card that sends you to jail, you had best:

- Be prepared.** Update your Disaster Recovery Plan.
- Update your software.** HIPAA considers unsupported software a violation. That 1990's version of TurboTax might land you in jail!
- Use the February analysis of your provider's E&M codes to randomly select medical records and conduct a chart audit.** Follow the documentation evaluation procedure outlined in your Compliance Program. Still you do not have a Compliance Program?

Stop everything and put one together now.



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May

Prior to 2008, Monopoly games came with \$15,140. Today games come with \$20,580. Neither of these amounts are enough to cover your practice if an employee gets injured. You should focus on employee safety this month.

- Hepatitis Awareness Month reminds all of us to be careful with those sharps and avoid blood borne pathogens. So, this month, conduct annual OSHA training for staff.
- While we are on the topic of OSHA, make sure all proper documentation and signage is current and available. <https://www.osha.gov>



June

By 1943, Monopoly games came with ten tokens. (Remember the Boot from January?) One of those tokens is and has been a Battleship. This reminds us of another fun Hasbro game, Battleship.

- Do not let your battleship sink by a lack of Security Risk Analysis. Conduct an annual HIPAA review and staff training on patient privacy.
- Boot those expired drug samples. It has been six months since you last did this.



July

It is time for summer vacation. Pack your Monopoly game and head for some place fun. Perhaps you will go to Atlantic City, NJ which was the location for the names of properties on the original Monopoly board.

- This month ask someone else do the work. Direct your insurance agent to review your practice's liability coverage. Ask for premium analysis and coverage options too.
- Mr. Monopoly is an octogenarian with possibly failing eyesight. Make sure your practice and your website are compliant with the American with Disabilities Act.



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August

Did you know that Monopoly games come with 32 houses and 12 hotels? Houses are green, and hotels are red. All that property requires lots of maintenance.

- You should schedule maintenance on each piece of equipment in your practice that requires calibration and servicing.



September

In 1941 the British Secret Intelligence Service licensed the ability to manufacture Monopoly in the U.K. A special edition for World War II prisoner of war held by Nazis was created. Hidden inside these games were maps, compasses, real money, and other objects useful for escaping. These special Monopoly games were then distributed to prisoners via fake charities created by the British Secret Service.

- Labor Day is upon us.** Complete those employee evaluations before September 30.
- While you are thinking about those who labor for you, review the Employee Handbook to make sure it is up to date.**



October

Hasbro conducts a worldwide Monopoly tournament. Since 1988 the tournament has been held in seven countries on three continents. The tournament was last held on Macau. It was won by Nicolo Falcone from Italy. Falcone beat players from twenty-six countries. ESPN has televised the Monopoly tournament.

- Check your fire extinguishers, replace batteries in the smoke alarms, review fire safety with staff, and conduct a fire drill. They are not just for school children. The safety of your patients and staff depend on everyone knowing how to flee to safety in the event of a fire.



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November

In 1987 McDonald's started a Monopoly themed sales promotion. This promotion ran each year until 2016. Drinks and food items came with game pieces, some of which were valuable. McDonald's hired a company to run McDonald's Monopoly.

Jerome Jacobson was chief of security for the game pieces. Jacobson stole winning game pieces. He then sold winning pieces for percentage of the winnings in advance. Between 1995-2000, Jacobson won almost all the top prizes. He and his associated pocketed over \$24 million. Jacobson did anonymously mail a \$1 million Monopoly game piece to St. Jude Children's Hospital in 1995.

Clearly some auditing should have been done on Jacobson. You should conduct chart audits.

- Conduct your second and last round of chart audits for the year.** Document what was learned, and what actions you will take, in your Compliance Program.
- The Monday after Thanksgiving is Cyber Monday.** Perhaps you feel slightly exploited by this commercial overreach. Now imagine how badly you would feel if your practice's website resulted in a privacy breach or a legal claim. Update and review the website for any compliance issues before the end of the month.



December

End of year; end of the game...

One of the common criticisms of Monopoly is that the game can take an unlimited amount of time to win the game. Edward Parker, President of Parker Brothers, once said, "In Monopoly you keep going around and around."

Compliance is like that. You have that feeling of going around and around each year. If you have kept up with your compliance schedule, take a break. If you missed some tasks, December is your last chance to get caught up before you "go around" next year.

If there is anything that the Medical Risk Institute can do to make your Compliance Program, HIPAA issues, or legal matters merry and bright, please contact us. We promise to make risk management as joyful as possible.



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