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After Medicare Compliance Review, Michigan Medicine Develops SOP for Certain Audits

By Nina Youngstrom

For University of Michigan Health System, a Medicare compliance review, with its six audits rolled into one, was a turning point for compliance. When the comprehensive audit by the HHS Office of Inspector General (OIG) began in 2016, University of Michigan Health System, known as Michigan Medicine, had no written process for responding to audits of that magnitude, which involve multiple areas of review and various clinicians and subject matter experts. That added to the challenges of pulling records, responding to OIG's questions and coordinating internally. But that was then, and this is now.

For the first six months of the audit, though, there was a lot going on, said Susanne Pryce, compliance director for revenue integrity. "We didn't have a standard operating procedure that guided responding departments on how to provide information in a consistent manner, especially in an audit of this level of complexity," she said. After the audit was publicly posted in 2018, Michigan Medicine heard from other compliance professionals who were in the early phase of their Medicare compliance review and wanted some insight.

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