

Do you know who your problem patients are and do you have a sound strategy for addressing their concerns and keeping your practice out of the line of spin-off complaints?

Your physical environment

Starting with physical layout and patient safety issues, you will want to carefully survey every square foot of your clinic. Look for loose tiles or carpet, cords and wires that might have found their way into hallways, corners, on tables, desks, filing cabinets and any other physical items into which patients might easily bump, trip over or fall on. Also, don't forget to look at anything with which your patients come into contact, including the coffee machine if you have one, making certain that it is up far enough so that it is out of reach of children. Likewise any water cooler, making sure that it is stable and not easily tipped over. Don't forget to look at the outside of your clinic, including parking facilities, your sidewalk and entrance ways.



The next category of items and issues you should review relates directly to your professional activities, and starting with the adjusting tables, make sure that all are stable, in good repair and functioning as they were intended to function. Don't minimize the importance of keeping your tables in tip-top shape. Injuries to patients because of faulty equipment are 100 percent preventable, and heavy, power-driven lift tables represent an important risk management area.

The physical plant is the easiest part of your practice to review from a safety point of view, but the clinical operations are by far the most important dimension of any periodic risk management review. It makes sense to look at the various aspects of any busy clinic from the point of view of where the greatest likelihood of problems can develop and prioritize your efforts on that basis. Here are some other areas for you to consider:

Record-keeping

Good records are your best defense in all contested arenas, from claims processing to, heaven forbid, malpractice claims. On the other side of the equation, inadequate records are the major reason



doctors have claims rejected or disputed, regardless of the necessity for the care given, the validity of the procedures applied or the wishes and needs of the patient. Now is the perfect time to examine your office procedures and to see how you can

strengthen and enhance your management of patient records. It is your basic responsibility as a doctor and the right thing to do for your patient. You will also be making a positive and proactive contribution toward meeting a new wave of scrutiny and record-keeping demands which all practices will be confronting in the coming months.

Are your clinic files up-to-date, in complete and defensible shape, and secured in a HIPAA compliant format? It is frequently said that record-keeping is the chiropractor's Achilles Heel, and that could very well be true. A sound clinical record system, maintained on a timely basis is vital to minimizing your malpractice risks, as well as the best guarantee that third-party payment agencies will honor your claims. This could very well be the area on which you might look to do a major overhaul of your procedures. This is also an area where you will likely want to look at the emerging technologies for patient records and the many computerized systems that are available for the chiropractic profession.

There is a growing national focus on record-keeping and documentation, and no where is this more intense than in the Medicare program, where a high-profile campaign led by the US Department of Health and Human Services' Office of the Inspector General has targeted chiropractic documentation issues. The Medicare situation, escalating battles with third-party payment agencies over "necessity" and other issues, and a new interest on the part of state regulatory boards in upping the record-keeping requirements are all signs of things to come as far as demands for patient records. Take the time and invest the resources to make sure this is a strong point in your practice, not an on-going weakness. This is vital since it is inevitable that you will be challenged by Medicare, a private third-party payer, a regulatory board or in a contested claim situation because lawyers, state boards and insurance companies know this is usually a productive means to gain the upper hand against a chiropractic practitioner. Be ready to win with good patient records.

Problem patients

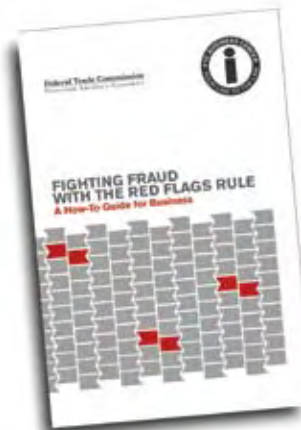
Do you know who your problem patients are and do you have a sound strategy for addressing their concerns and keeping your practice out of the line of spin-off complaints? This is where you need to make sure that your staff is sharing

everything that might be problematic in any way with any patient. Don't hesitate to seek the help of professional colleagues whose judgment and experience you trust, seek advice from your malpractice carrier and your professional organizations. This is another ChiroSecure benefit in having a fellow chiropractor to speak directly to. You do not and perhaps even should not go it alone in such cases. But, you shouldn't let things go unaddressed either.



Compliance

Have you reviewed your state, province or national rules and regulations lately? Understanding the current state of the law is a key element in keeping your practice in compliance at all times and out of harm's way. Again, this is an area in which you have the ability to prevent issues and incidents by being fully up to date on what the official rules are. Also look at your HIPAA status. This is an easy one to overlook since after the first rush of attention and concern a couple of years ago, this federal privacy program has receded into the background. It is, however, still the law. Visit the official US Department of Health and Human Services, Office of Civil Rights, HIPAA website at <http://www.hhs.gov/ocr/hipaa/> for free, accurate and up-to-date information.



Also, sometime in 2010 the Federal Trade Commission (FTC) will certainly finally implement their "Red Flags" program intended to help guard against identity theft and credit card and other related types of fraud. The FTC has published their final rules on Identity Theft protection responsibilities for business, educational and health care institutions or any entity that has in its possession data that might put a consumer at risk for identity theft. Those rules require each financial institution and creditor that holds any consumer account, or other account for which there



is a reasonably foreseeable risk of identity theft, to develop and implement an Identity Theft Prevention Program for combating identity theft in connection with new and