Office Policy/Procedure:

OSHA / BOD-VA / HHS-HIPAA Inspector visits the office:

1. Request a picture ID badge and make a copy if available.  If the inspector does not have an ID badge, view their picture ID and make sure the name matches their business card.
2. Call the Dept. of Labor: <https://www.osha.gov/dcsp/osp/> or the Board of Dentistry; <http://www.ada.org/en/education-careers/licensure/licensure-dental-students/state-dental-boards>. For HIPAA you would search the Internet for the first six digits of their business card phone number (area code and first three digits) this will verify that the number is in fact going to HHS-HIPAA.
3. While you are calling to validate the inspector - give notice to the doctor and staff that an inspector is here and you are verifying the inspector.
4. Do NOT leave the front office unattended. This would be a HIPAA violation.
5. Text your Regulatory Compliance Specialist - Linda Cannon with your name, doctor’s name and number. Along with what agency is there.  Text Only:  757-718-1515. Remember if Linda is teaching she will see your text as soon as she completes the seminar.
6. If inspector is not valid, call 911 and try to get his/her license plate #.  Do not try to contain the fraud inspector. If a valid inspector, hand them a copy of this policy.
7. Doctor may want to be introduced to the inspector prior to the inspection starting.
8. Doctor may also want to be part of the inspection. Either way let the inspector know which way the doctor has chosen.
9. If the inspector request to come back ask her how much time they need to have allotted for the inspection.
10. Give her the first day you have available with that amount of time. If no time equals in the near future, do not go past four working days. At the fourth day you may have to cancel patients.
11. When your Regulatory Compliance Specialist calls back, give Linda the date and time you scheduled for the inspector. Linda will then coordinate day/time with her schedule. Make sure you have the inspectors name and number or email address in the event the inspection day/time may have to be change in order to accommodate coordination with your RCS.
12. If inspector is from OSHA/VOSH give her a list of current employees and the ones who have been terminated/moved in the past 3 to 6 months.  This is added with the offices current OSHA-BBP roster of current staff and copy kept in the front office. The only reason OSHA would be at your office is if the compliant was from a current employee or life threat. If doctors or staff knows who has possibly made the call - give the inspector the names. Make sure he/she see’s a copy of my OSHA Authorization Card.
13. If this is an inspection of the Board of Dentistry, the complaint can be from an employee, x-employee, patient or pretty much anybody.
14. HHS-HIPAA will always give you the complainant’s name.
15. Meeting will begin with Inspector and whoever is in charge at the office. Inspector will go over the number of complaints that will be addressed.  BOD will give a copy of their inspection guidelines. Please make sure you have a clipboard, pen, paper and camera before you begin.
16. Office policy follows all manufactures directions. If question is about a specific policy, please make a copy of the policy for the inspector. Staff and Doctor never have to verbalize any policy or directions. You may hand a copy to the inspector or you may read the policy. If inspector states by law you must tell her verbally, then request the code that states that you must speak from memorization. This policy follows all state and federal laws.
17. Whoever is authorized to be with the inspector will always be with the inspector.
    1. Authorized personnel will write down everything the inspector questions.
    2. Repeat what has been written. To verify if the question she heard is correct.
    3. Acquire the policy, manufactures direction or product that will answer the question. \*\*If the office can fix the problem the inspector notices - please do so immediately.  If not, write it down and correct as soon as possible.
18. The Inspector will take pictures.  If the inspector takes a picture, ask why, and write it down. Also take a picture yourself so you can have it fixed as soon as possible.
19. If they need something that you cannot find, be honest with them.  Tell them another staff takes care of that policy/procedure and you will be happy to forward the info to him/her when the staff is available or comes back from lunch/vacation.
20. All copies of patient charts will route through our lawyers/Attorney’s for Insurance Chart Audit, Board of Dentistry, or by the request of another legal firm.
21. If Doctor is on vacation...  Explain the situation.  If inspection states that they will have to get a warrant if they cannot inspect immediately, know your office policy.  Offices in this predicament have been honest and confident and explained to the inspectors if they can get in touch with the doctor. Past experiences from my clients dictate the inspector’s set up later appointments if they can get the doctor to email or call the inspectors back.
22. If policy or manual has been misplaced or missing and the office feels the staff who was recently terminated was the authorized personnel in charge, remind the inspector that this office has done everything to Federal and State regulations and you have a Regulatory Compliance Specialist - Linda Cannon with MSDS, who will make sure the policies will be back in order ASAP.  Manual Missing Example:  If the Global SDS manual is missing, then the office always has a secondary policy on securing the same information.  The office staff has also been trained to find the Global SDS on their suppliers website.
23. If the inspector wants to interview the staff. \*\*\*THE STAFF - Has Every Right To Request Another Employee To Be With The Inspector\*\*\* This request must be from the staff only.  If the inspector states the staff must be interviewed alone, then ask to see this is writing.  There is no code stating you cannot have someone in the same room to be interviewed.  If the inspector is not budging, then request to have the office malpractice attorney called immediately.
24. After the inspector completes the inspection and interviews- there will be a closing meeting.
25. No money will be given to any inspector at any time! Have confidence. You know your office will pass any inspection and your Regulatory Compliance Specialist is just a text away.