

# **The Podiatric Practice Manual**

## **A Guide to Running an Effective Practice**

**Joseph S. Borreggine, DPM, FACFAS**

### **Table of Contents**

#### **SECTION I CLINICAL CARE**

##### **I-1 A. Treatment Algorithms**

- I-1 Diabetic Foot Care Algorithm
- I-2 Plantar Fasciitis Algorithm
- I-3 Onychomycosis Treatment Algorithm
- I-4 Local Anesthetic Injections Protocol
- I-5 Injection Safety Checklist
- I-6 Proactive Safety Measures to Prevent Local Anesthetic Toxic Dosing
- I-8 In-Office Anaphylactic Shock Treatment Algorithm
- I-9 Phenol and Alcohol Ingrown Nail Correction Procedure
- I-11 Fiberglass Impregnated Sock Application for Custom Molded Shoes and Rx Braces
- I-13 Ancillary Podiatric Services Algorithm
- I-13 Preparing Patients for Surgery

##### **I-14 B. X-ray Positioning**

- I-14 Anterior Posterior (AP) View (or Dorsoplantar View)
- I-15 Lateral Projection, Weight Bearing (Medial View)
- I-15 Lateral Oblique Projection (Medial Oblique View)
- I-16 Medial Oblique Projection (Lateral Oblique View)
- I-16 Lateral Projection of the Ankle (Medial Oblique View)
- I-16 Axial Sesamoid View
- I-17 Anterior Posterior View of the Ankle
- I-17 Mortise View of the Ankle
- I-18 Axial Calcaneal View of the Heel
- I-18 Harris-Beath View of the Heel
- I-19 Billing for Intra-Op Fluoroscopy

##### **I-20 C. General Clinical Care Policies and Procedures**

- I-20 World Health Organization Surgery Safety Checklist
- I-21 Patient Being Left Alone
- I-21 Redressing Surgical Wounds
- I-21 In-Office Emergency
- I-22 Hand Sanitation
- I-22 Exposure Control Plan

<b>I-22</b>	<b>D. Documentation</b>
I-22	Patient Medical Record
I-23	Documentation Basics
I-23	Documentation Format
I-24	Documentation of Lab Work
I-24	Documentation of Prescriptions
I-24	Documentation of Complimentary Foot Exams
I-24	Using Dictation
I-25	Privacy Issues/HIPAA Compliance
I-25	ONC Guide to Privacy and Security of Health Information
I-26	Medical Record Maintenance
I-26	How Long Should I Keep My Medicare Records?
I-27	Medical Record Retention
I-27	Hospital Medical Records
I-28	Hospital X-rays
I-28	Closure of Facility
I-28	Statute of Limitations Considerations
I-29	Immunization Records
I-29	HIPAA
I-29	Other Considerations
I-30	Risk Analysis Checklist

<b>I-38</b>	<b>E. Medical Instruments, Equipment, and Supplies</b>
I-38	Medical Instruments
I-38	Sterilization Procedures
I-38	Cold Sterilization Procedures
I-39	Steam Sterilization (Autoclave) Procedures
I-40	Sterile Instrument Handling and Storage
I-40	Medical Equipment
I-40	Nail Grinder Care
I-40	Durable Medical Equipment (DME) Procedures
I-40	Medicare DMEPOS Supplier Standards
I-48	Diabetic Therapeutic Shoes and Insoles
I-48	CMS Requirements for Coverage of Therapeutic Shoes for Individuals with Diabetes
I-52	Non-Prescription Diabetic Shoes and Insoles
I-53	Placing Orders for DME
I-53	Receiving DME
I-53	Scheduling Patients for DME Pickup
I-53	Dispensing DME
I-54	Documentation Requirements for DME Dispense
I-55	Therapeutic Shoes — Documentation Requirements
I-55	Medical Records Fail to Document Coverage Criteria
I-56	Certification Statement Is Not a Prescription
I-57	Certification Form Is Obtained Yearly
I-58	No Valid Detailed Written Order

- I-58 Supplier Records Fail to Document Necessity for Custom Fabricated Shoes
- I-59 Information Not Provided to Confirm Correct Coding of Shoes
- I-59 Medical Necessity Not Documented for Patients in Nursing Facilities
- I-59 No Delivery Slip
- I-60 No Documentation Received
- I-60 DME Billing
- I-61 What is Covered by Medicare?
- I-61 Diabetic Inserts & Partial Feet Inserts (09/12/2012)
- I-61 Billing Codes
- I-62 Code Modifiers
- I-62 DME Billing for the Non-Medicare Patient
- I-65 DME Checklist and Verification
- I-67 DME Returns
- I-67 Supplies
- I-67 Ordering Supplies
- I-67 Pharmaceutical Samples

**I-69 F. Clinical Care Forms**

- I-69 Updates
- I-69 Established Patient Medical Record Update
- I-70 New Patient Consultation
- I-72 Foot Screen Evaluation Form
- I-73 Six-Month Foot Care Update for Patients with Diabetes
- I-75 Questionnaire for Patients with Diabetes
- I-77 Annual Comprehensive Diabetes Foot Exam Form (NDEP)
- I-78 Comprehensive Diabetic Foot Exam
- I-81 Letter to MD/DO Treating the Patient with Diabetes Who May Qualify for Diabetic Shoes and Inserts
- I-85 Medicare Certificate of Medical Necessity Requirements
- I-88 Consent for Treatment–Patient with Peripheral Vascular Disease or Diabetes
- I-89 Surgery Forms
- I-89 Pre-Operative Patient Questionnaire
- I-90 Pre-Surgery Form
- I-91 Consent for Outpatient Podiatric Surgical Procedure
- I-98 DVT Risk Factor Assessment
- I-101 Pain Management
- I-101 For Illinois Podiatrists: Prescription Drug Monitoring Program
- I-103 Opiate/Pain Management Agreement
- I-105 Podiatric Surgery Instructions
- I-105 Patient Expectations from Foot Surgery
- I-106 Refundable Cash Deposit Disclaimer/Advanced Beneficiary Notification

I-107	What to Expect for Day/Outpatient Surgery
I-110	Special Health Risks
I-113	Important Information
I-116	Immediate Post-Operative Instructions
I-118	FAQs
I-120	Progress Note Demand Letter for Diabetic Shoes
I-123	Primary Physician Affirmation Statement
I-124	Statement of Certifying Physician for Therapeutic Shoes
I-127	Therapeutic Shoes for Diabetes: Physician Documentation Requirements
I-130	DME Forms
I-130	Diabetic Shoe Order Form
I-131	Diabetic Shoe Prescription Form
I-133	Required CMS Diabetic Shoe Dispense Forms
I-133	Diabetic Shoe Break-in
I-134	Patient Authorization for Payment and Warranty Statement for Diabetic Therapeutic Shoes/Inserts
I-136	CMS Required Documents for Dispensing DME
I-136	DME Prescription/Order
I-139	Patient Receipt for DME
I-140	Patient DME Payment Authorization to Insurance/Supplemental Insurance Carrier
I-141	Protocol to Resolve Complaints for Medicare Beneficiaries
I-141	Return Policy for DME Products/Items
I-142	Patient Authorization for Payment and Warranty Statement for Braces
I-143	Orthotic Insurance Letter of Medical Necessity
I-144	Custom Foot Orthotics Prescription Order
I-145	Orthotic Rx Disclaimer
I-147	Orthotic Information
I-148	Rx Orthotics Proof of Delivery, Dispense, Dispense Instructions, and Disclaimer
I-150	Return Policy for Non-Prescription Shoes (Orthopedic Shoes)
I-151	Disclaimers
I-151	“At Risk Foot Care Tissue” Injury Disclaimer
I-152	Consent for Steroid Injection
I-155	Patient Education Materials
I-155	Bunion Surgery
I-156	Prescription Custom Molded AFO Break-In Schedule
I-157	Compression Wrap Wear Instructions
I-158	Workers’ Compensation
I-158	Workers’ Compensation Patient Information
I-160	Forms for Medicare Beneficiaries
I-160	Notice to Medicare Beneficiaries about Coverage for Foot Care and Services

I-161	Medicare/Medicaid Authorization – Assignment Agreement for Payments
I-162	Home Health
I-162	Face-to-Face Encounter Certification
I-164	Home Health Agency Request for Health Care Plan Oversight
I-166	Physician Services for Certification and Recertification of Medicare Covered Home Health Services

**SECTION II PATIENT RELATIONS**

<b>II-1</b>	<b>A. Scheduling</b>
II-1	Appointments
II-2	House Calls
<b>II-2</b>	<b>B. Recalls</b>
II-2	Diabetic Shoe and Insoles Recall
II-3	Orthotic and Orthopedic Brace Recall
<b>II-4</b>	<b>C. Insurance</b>
II-4	Insurance Predetermination
II-4	Secondary Insurance
II-4	Guarantor Status for Minors/Patients under Guardianship
<b>II-5</b>	<b>D. New Patient Processing</b>
II-5	New Patient or Not?
<b>II-7</b>	<b>E. No Shows</b>
<b>II-7</b>	<b>F. Patient Care Outside the Practice</b>
<b>II-8</b>	<b>G. Prescription Refills</b>
<b>II-9</b>	<b>H. Resolving Complaints from Medicare Beneficiaries</b>
<b>II-11</b>	<b>I. Patient Relations Forms</b>
II-11	Appointment Reminder
II-12	Medicare Beneficiary Complaint Log
II-13	Orthotic Recall Letter
II-14	Advance Beneficiary Notice (ABN)
II-21	New Patient Paperwork
II-23	Improving Your Office Visit
II-25	Acknowledgment of Receipt of Notice of Privacy Practices
II-26	Insurance Assignment Acceptance
II-28	Medicare or Medicaid Authorization-Assignment Agreement
II-30	Authorization for Treatment and Release of Medical Information
II-33	E-mail Consent Form

II-36	Notice of Privacy Practices
II-42	Patient Information Form
II-44	Authorization for Release of Information
II-46	Medical Records Copying Charges
II-47	Sample Office Fax Disclaimer Following HIPAA Regulations
II-48	Discharge Due to Missed Appointments
II-49	Patient Discharge Disclaimer
II-50	Discharge Letter Due to Other Situations

<b>II-51</b>	<b>J. Articles on Patient Relations</b>
II-51	Is Patient Compliance Possible?
II-54	Blackmailed By Our Patients
II-57	Five Must-Track Metrics for Practice Profitability

## **SECTION III OFFICE ADMINISTRATION**

<b>III-1</b>	<b>A. Job Responsibilities</b>
III-1	Office Manager Job Responsibilities
III-3	Podiatric Medical Assistant Job Responsibilities
III-5	Receptionist Job Responsibilities
III-5	Administrative Assistant Job Responsibilities
III-6	Accounts and Billing Specialist Manager
<b>III-8</b>	<b>B. Office Management Policies</b>
III-8	Bulletins/Policies
III-8	Practice Policy Creation
III-8	Marketing and Public Relations
III-9	Special Events
III-10	Special Events Materials Checklist
III-11	Meetings
III-11	Clinical Meeting
III-11	Business Meeting
III-13	Board of Directors Meeting
III-16	Shareholders Meeting
III-17	Responding to Telephone Calls
III-18	Placing Callers on Hold
III-19	Telephone Triage
III-19	Delays in Waiting Room
III-19	Office Cleanliness
III-20	Hand Sanitation
<b>III-20</b>	<b>C. Financial Policies</b>
III-20	Annual Budget
III-21	Accounts Payable (AP)

III-21	DME Accounts Payable
III-22	Storage of Accounts Payable Invoices
III-22	Business Taxes
III-22	Patient/Insurance Refund Checks
III-23	Accounts Receivable
III-23	Daily Deposits
III-23	Billing/Superbills
III-23	EOB Processing
III-24	Patient Statements
III-24	Deceased Patients
III-24	Aging Analysis Reports
III-25	Medicare
III-25	Medicare Part B Claims Processing
III-26	Pre- and Post-Submission Review
III-26	Medicare Deductible
III-26	Collection Policies
III-27	Referral to Collection Agencies
III-27	Referral to Attorney
III-28	Financial Hardship
III-28	Coding and Fee Schedules
III-29	Public Assistance
III-29	Deposits
III-30	Deposits for Durable Medical Equipment
III-30	Non-Covered Services
III-30	Insurance Information for New Patients
III-31	Billing Secondary Insurance
III-31	Cash Payments
III-31	Office Statistical Information
III-31	Coding
III-32	Medicare Coding
III-33	Year-End Activities
<b>III-34</b>	<b>D. Administrative Forms</b>
III-34	Insurance Assignment Acceptance
III-36	Authorization for Treatment and Release of Medical Information
III-37	Refundable Deposit Receipt
III-38	Request for Financial Hardship Status
III-39	Collection Letter

**SECTION IV PERSONNEL POLICIES**

- |             |  |
|-------------|--|
| <b>IV-1</b> | <b>A. Employee Break Periods</b>             |
| <b>IV-1</b> | <b>B. Educational Seminar/Travel Expense</b> |

<b>IV-2</b>	<b>C. Compensation and Benefits</b>
IV-2	Work Hours
IV-2	Timesheets and Pay Periods
IV-3	Unsupervised Work
IV-3	Health Insurance
<b>IV-3</b>	<b>D. Time Away from Work</b>
IV-3	Vacation Time
IV-4	Sickness/Disability
IV-4	Unpaid Leave
IV-4	Inclement Weather Days
<b>IV-5</b>	<b>E. Employee Cross Training</b>
<b>IV-5</b>	<b>F. Employee Memos</b>
<b>IV-6</b>	<b>G. Hiring Practices</b>
IV-6	New Employees
<b>IV-7</b>	<b>H. Behavioral Expectations</b>
IV-8	Smoking Policy
IV-8	Telephone Usage
IV-9	Uniforms/Work Attire
IV-9	Office Cleanliness
<b>IV-10</b>	<b>I. Performance Evaluation, Recognition, and Discipline</b>
IV-10	Evaluations
IV-10	Employee Recognition
IV-11	Discipline
IV-11	Warnings
IV-11	Observations
<b>IV-13</b>	<b>J. Employee Forms</b>
IV-13	Absence Request
IV-14	Employee Warning Notice
IV-15	Employee Performance Review
IV-16	Payroll Disclaimer
IV-17	Employment Agreement and Morals and Ethics Clause
IV-18	Job Training Disclaimer
IV-19	Business Associate Agreement

**SECTION V**

**APPENDICES**

V-3	Appendix A: OSHA
V-4	5 Tips for Proactive OSHA Compliance
V-4	Model Plans for the OSHA Bloodborne Pathogens and Hazard Communications Standards
V-37	Appendix B: Medical Malpractice
V-38	“How to Avoid Patient Lawsuits”
V-42	“Reducing Malpractice Risks in the Podiatric Office”

V-53	Appendix C: Online Resources
V-55	Appendix D: Routine Foot Care Claim Submission Requirements
V-61	Appendix E: Medicare Updates and Information Bulletins
V-137	Appendix F: HIPAA Information
V-139	Appendix G: Physician Payment Sunshine Act (Open Payment)
V-145	Appendix H: Medicare News
V-191	Appendix I: Medical Legal
V-199	Appendix J: Local Coverage Determinations
V-201	Appendix K: American Disability Act Requirements Section 1557
V-213	Appendix L: Quality Payment Program
V-217	Appendix M: Calendar Year 2019 Medicare Physician Fee Schedule Proposed Rule
V-225	Appendix N: Acronyms