

### Policies and Procedures

Every healthcare organization must develop facility specific protocols that define the rules of engagement for the operations to detect, deter and mitigate fraudulent activity. In addition, these Policies and Procedures are dynamic, refined and current with the changing landscape related to regulatory, reimbursement and technological changes. For example, the innovation of cell phones with readily accessible camera functionality spurred a wave of HIPAA violations across the nation. Skilled Nursing Facilities immediately responded with additional policies on the parameters for employee, resident and visitor cell phone usage. This situation exemplifies the importance of the dynamic, refined and current policies and procedures..

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By [deleted]  
[cheatography.com/deleted-2754/](https://cheatography.com/deleted-2754/)

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