





AHA Solutions
Signature Learning Series

The State of Security in Today's Hospital

HCCA Annual Compliance Institute
Pre-Conference Session
P13 – Florentine III/IV
2:00-5:00pm
Sunday, April 26th, 2009










AHA Solutions
Signature Learning Series

Agenda

- Introduction to AHA and AHA Solutions
- Operational Alignment of Compliance and IT
- Panel Discussion Healthcare Compliance Scenarios
- Q&A and Wrap-up



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Presenters

- **Brad Hunter**, Director, and Moderator
AHA Solutions, Inc.
- **Stefan Keller**, President
Certiphi – Endorsed for Background Investigation & Drug Testing Services
- **Sean Tippett**, Product Manager
Cisco IronPort – Endorsed for Secure Email Messaging
- **Joseph Zebrowitz, MD**, Executive Vice President
Executive Health Resources (EHR) – Endorsed for Clinical Revenue Cycle Management







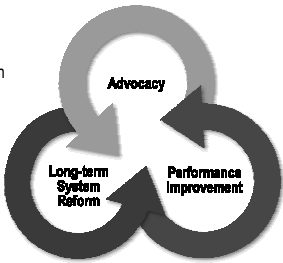
AHA Solutions, Inc. Overview








Principle Areas of Focus




- AHA has 100+ year history
- 5,000 member hospitals, health care systems, networks, other providers of care
- 38,000 individual members




About AHA Solutions

AHA Solutions, Inc. is a resource to hospitals pursuing operational excellence. As an American Hospital Association (AHA) member service, AHA Solutions collaborates with hospital leaders and market consultants to conduct product due diligence and identify solutions to hospital challenges in the areas of finance, human resources, patient flow and technology. AHA Solutions provides related marketplace analytics and education to support product decision-making. As a subsidiary of the AHA, the organization convenes people with like interests for knowledge sharing centered on timely information and research. AHA Solutions is proud to reinvest its profits in the AHA mission: creating healthier communities.






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Compliance Cost Reduction
Preparation & Remediation

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Healthcare Industry Expert Panel – Compliance Scenarios

- **Stefan Keller**, President, *Certiphi*
- **Sean Tippett**, Product Manager, *Cisco IronPort*
- **Joseph Zebrowitz**, MD, Executive Vice President, *EHR*









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Compliance Scenario 1




A hospital has a billing clerk from a temporary staffing agency working in their accounting department. The clerk is taking the personal information of critically ill patients and emailing it to a relative who uses the information to open credit cards in the patients' names. The clerk is eventually caught and it is learned their name is on the OIG excluded parties list from a previous billing scam.






 **Healthcare Solutions**

Compliance Scenario 1 - Recommendations




- Know what your contract staffing companies and temporary firms are doing in terms of screening. Specific background searches such as OIG exclusions and federal criminal records (for Medicare/Medicaid fraud) are not standard outside of healthcare
- Assess what data is available to what groups. Adjust access controls on a need-to-know basis. Monitor or restrict communications to detect potential abuses
- Be aware of data breach laws and have a response plan in place


  

 **Healthcare Solutions**

Compliance Scenario 2

You review your PEPPER report and find you are in the 90th percentile for 1-day stays and Chest Pain, but in the 20th percentile for Congestive Heart Failure. You audit observation admissions and 1-day stays and find significant errors in each (observation that should be inpatient, inpatient that should be observation) The next day, your CFO invites you to a meeting to help establish a reserve for the RAC program. What do you do?




  



 **Healthcare Solutions**

Compliance Scenario 2 - Recommendations

Problem: Your Admission Review Process is Broken
Solution: Implement process as per CFR 411.406(e)

- Case Management applies strict admission criteria to 100% of medical cases placed in a hospital bed and documents this review in an auditable format
- ALL cases that do not pass criteria (regardless of admission order status) are referred to a Physician Advisor who is an expert in CMS rules and regulations and clinical standards of care (Easily adopts variations of ACMP)
- Physician Advisor reviews case, speaks with admitting physician when needed, renders final decision based upon UR Standards and documents decision in auditable format on chart or in UR documentation
- Attending physician changes order as appropriate
- Must run 7 days a week/365 days a year




Compliance Scenario 3



A lot more organizations under HIPAA or HIPAA-like Legislation Requirements now...

Nevada Hospital sends employee-specific information to Benefits Company

Examples




- HITECH is a HIPAA-boost and requires a lot more companies to comply to HIPAA
- New State Privacy Laws have HIPAA-like requirements
 - Nevada, Massachusetts, New York, Connecticut



  

Compliance Scenario 3 - Recommendations




- Scan outgoing email for different personal identifiers
 - SSN, Credit Card Numbers
 - (automated methods exists – e.g. DLP)
- Look to see if violations are from business-process gaps or education gaps
- Business-acceptable reasons to partners establish business to business encryption links
 - Talk to IT and see what your options are
 - “Automatic” encryption to your trusted business partners is a lot easier on the users and reduces corporate risk
- Reach out to other organizations with respect to compliance
 - Be a source of compliance best-practices
 - Learn how others are attacking the problems


  


 

Compliance Scenario 4

In hiring employees, a hospital verifies the employment and education information listed on the employment application, but does not keep records of how, when or by whom the verification was conducted. An audit determines that the hospital is not in compliance with the Joint Commission Standard HR.1.20, which says hospitals must “verify and document that the applicant has the education and experience required by the job responsibilities.”




  







Compliance Scenario 4 - Recommendations

- To comply with the Joint Commission standard, hospitals should verify an applicant's education, employment and professional licensure
- When conducting that verification by phone, write and file when the call was placed, to whom the hospital's HR representative spoke, the information given by the source and, if applicable, the applicant's license number and expiration date
- When conducting verification via the Internet, print out the information found online and ensure it is time and date stamped. File the printed documentation







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Compliance Scenario 5

As part of the CERT program, your MAC denies 24 elective Inpatient PCI's. You review the process of assignment of status and find some doctors make all PCI inpatient, some make all outpatient. You know that the RAC's are also auditing Cardiac Procedures. You get a letter from the DOJ requesting 100 Kyphoplasty Admissions for audit. Is this the same issue? How did this happen – what do you do?




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Compliance Scenario 5 - Recommendations

IP/OP Procedural setting is RAC and DOJ target




- Use IP only list – but recognize its limitations
- Buy or Build evidence based content to allow for risk stratification of high risk targets
- Begin Concurrent UR process for Cardiac Procedures, Kyphoplasty going forward
- Determine from a data analysis – is this an error or something more?
- Determine whether a repayment strategy or self disclosure is appropriate
- Audit charts using trained Physician Advisors (who understand both clinical and regulatory guidance pertaining to these procedures)
- Use audits to set reserves, make paybacks, extrapolate etc.
- Ironically, a proactive process and cooperation with the MAC may save you a lot of headaches down the road




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Compliance Scenario 7 - Recommendations

The floor is open for discussion!








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Interesting General Sessions

- Running Successful Hospital Exercises: Planning, Execution, and Assessment**
 - Tuesday April 28, 11:00am-12:00pm; Session 512; Capri Room
 - Mitch Saruwatari, VP Quality and Compliance, **LiveProcess**; Michael Bowers, Director of Facilities & Engineering, Riverside County Regional Medical Center
- Where's That Policy? Solving the Pitfalls of Paper-Based and Internally Built Policy & Procedure Systems**
 - Tuesday April 28, 3:00pm-4:00pm; Session 711; Genoa Room
 - Robert Tietjen, President/CEO, **Policy Technologies International, Inc.**; Wayne Soo Hoo, Director, Quality Management & Patient Safety, Mercy San Juan Medical Center

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Plans Monday Night?

Join Us for Dinner, Networking & Learning

When: Monday, April 27th
7:00-9:00pm

Where: The Palm Restaurant (in the Forum Shops at Caesar's Palace)

Invitation to Dinner, Network & Learn at HCCA 2009




VEGAS

If you are or someone from your organization is planning to attend the HCCA Compliance Institute in Las Vegas, join **AMM Solutions for Discussion, Network and Dinner** on the day following the final day of compliance training and the live case studies. With the help of experts in the field, we will discuss and share insights, ideas and confidence in our efforts to build, update, control, administer, maintain, and evolve. Expert panel includes:



- Robert Tietjen, President, **Policy**
- Mitch Saruwatari, VP of Quality and Compliance, **LiveProcess**
- Robert Tietjen, President, **Policy**

Don't miss out!

Space is limited!
To register, call 512.885.2540 or email rdh@hccainstitute.org. We look forward to seeing you on Monday, April 27th!




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AHA Solutions Signature Learning Series - Upcoming Events

- Powerful Results in Heart Failure Care through Patient Engagement; 4/30
- Medicare & Medicaid Integrity Contractors (MACs, RACs, MIPs): Making Sense of the Alphabet Soup!; 5/13
- State Security Regulations & HITECH – Complying with Increased Mandates for Privacy and Security; 5/21
- Optimizing Patient Placement at Presbyterian Intercommunity Hospital; 6/3

All events are 1:00-2:00pm EDT




Question & Answer Session and Thank you!



To our Expert Panel

- **Stefan Keller**, President, *Certiphi*
- **Sean Tippett**, Product Manager, *Cisco IronPort*
- **Joseph Zebrowitz**, MD, Executive Vice President, *EHR (Executive Health Resources)*

Visit **AHA Solutions** at **Booth #407**

- Visit AHA-Endorsed Solution Provider Booths too!
 - Certiphi; Booth #206
 - EHR; Booth #109/111
 - PolicyTech; Booth #711

Contact Information

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