TAKEAWAYS FROM

hfma national institute   June 26-29
Las Vegas, NV

AGENDA

- Improving data accuracy/team accountability
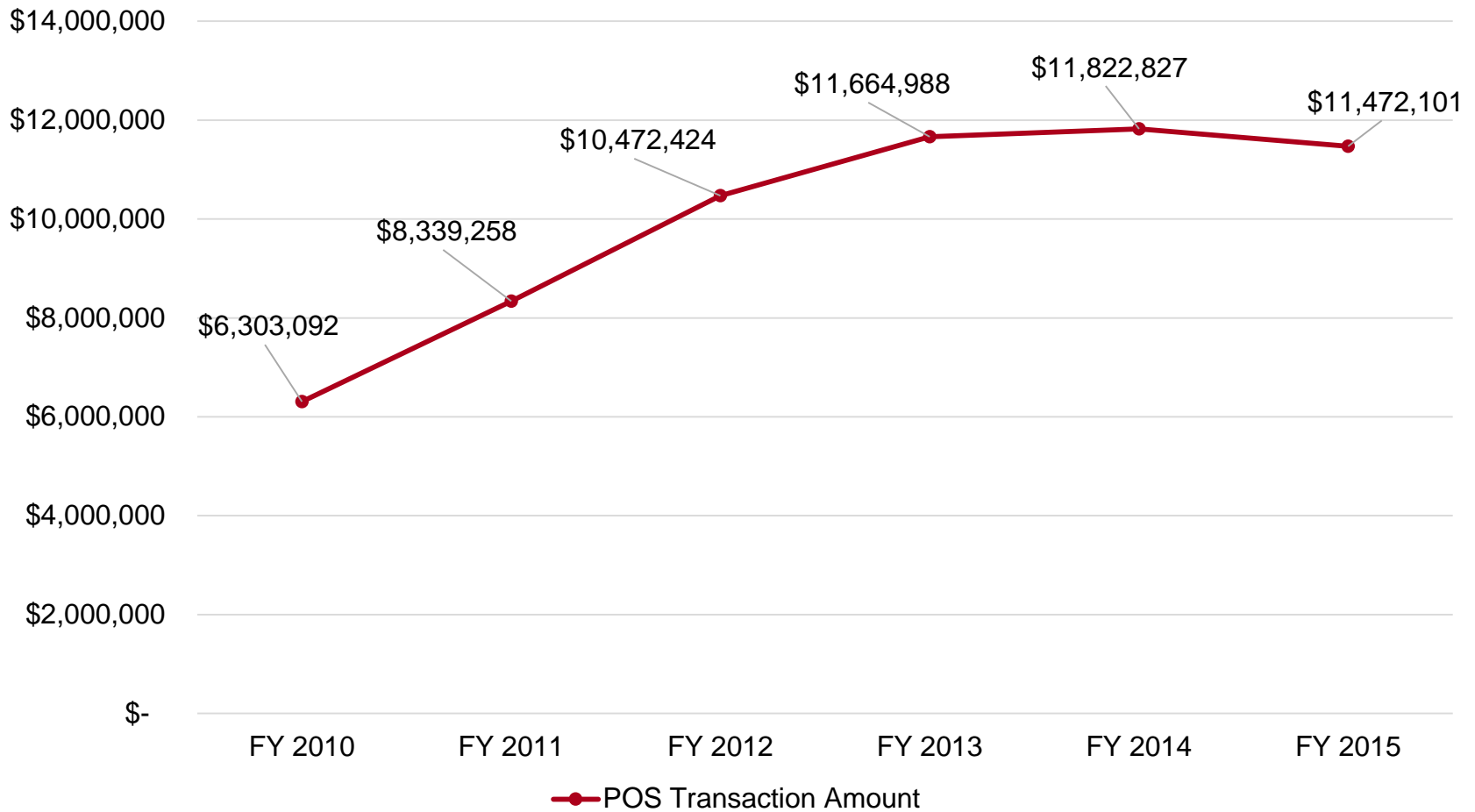
- Legal update

POS COLLECTIONS

CHALLENGES:

- Stagnant POS collections
- Difficulty identifying presumptive care patients
- Staff accountability and process consistency across the organization

RESULT: POS COLLECTIONS

POS Transaction Amount – Increased 45% since 2010

- FY 2010: $6,303,092
- FY 2011: $8,339,258
- FY 2012: $10,472,424
- FY 2013: $11,664,988
- FY 2014: $11,822,827
- FY 2015: $11,472,101

POS Transaction Amount
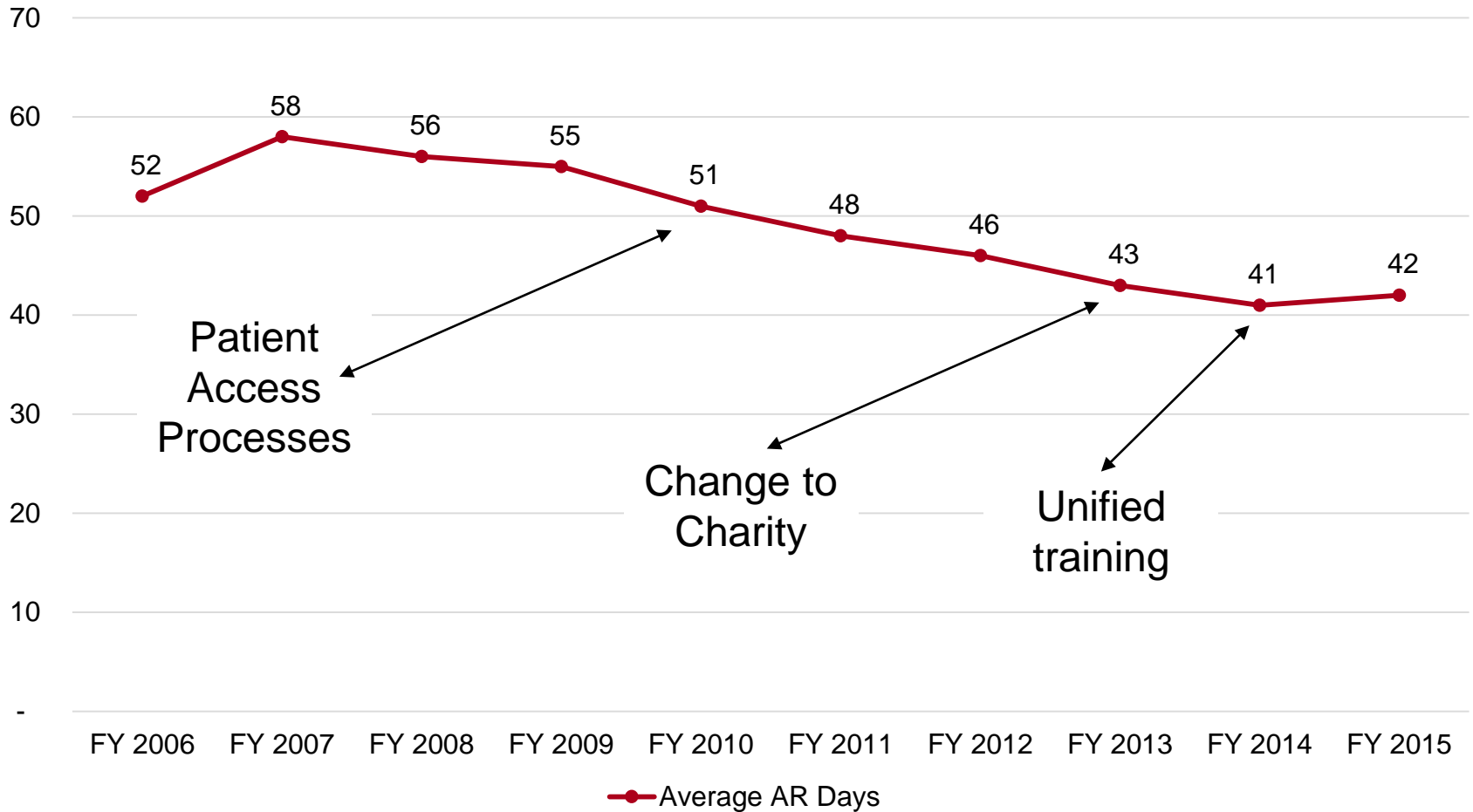
STAFF ACCOUNTABILITY
& TRAINING

CHALLENGES:

- No formal training process
- 'Homegrown' registration error application did not allow for real-time edits
- Low clean claim rate/high denials

OVERALL ENTERPRISE RESULT

AVERAGE AR DAYS

LEGAL UPDATE

CYBER SECURITY

- Hackers and cybercriminals increasingly targeting medical data
- Cybersecurity law recently passed by the Senate carves out the health-care industry for "special attention"

2010   **2014**   **2015**

37 million health care records were exposed through data breaches

nearly 100 data breaches led to the disclosure of more than 99 million health care records

CYBER SECURITY

- Nearly 90% of surveyed health care organizations experienced a data breach in the past two years (May 2016 Ponemon Institute survey)

- 45% of health care organizations had more than five breaches in the same time period

- Could be costing the health care industry $6.2 billion

- Average cost of data breaches for covered entities surveyed was more than $2.2 million, while average cost to business associates in the study was more than $1 million

HIPAA – NEW GUIDANCE ON ACCESS

- New guidance issued by Office for Civil Rights streamlines and clarifies earlier regulations regarding the rights of patients to access their medical information
- Addresses in detail:
    - permissible charging for copies of records contrasted with inspection of records,
    - right of individuals to have records sent to a third party,
    - access by a personal representative, and
    - breach obligations

http://www.hhs.gov/hipaa/for-professionals/privacy/guidance/access/index.html#.VzHuukhIU0k.mailto

HIPAA

PHASE 2 OF THE OCR HIPAA AUDIT PROGRAM HAS BEGUN:

- Selected entities will receive OCR notification letter via email, and all covered entities and business associates are eligible for an audit

- Prompt communication with OCR is key. Unresponsiveness will result in OCR pulling publically available data to increase its audit pool

- Audits will be conducted remotely and onsite, and are expected to last over two months
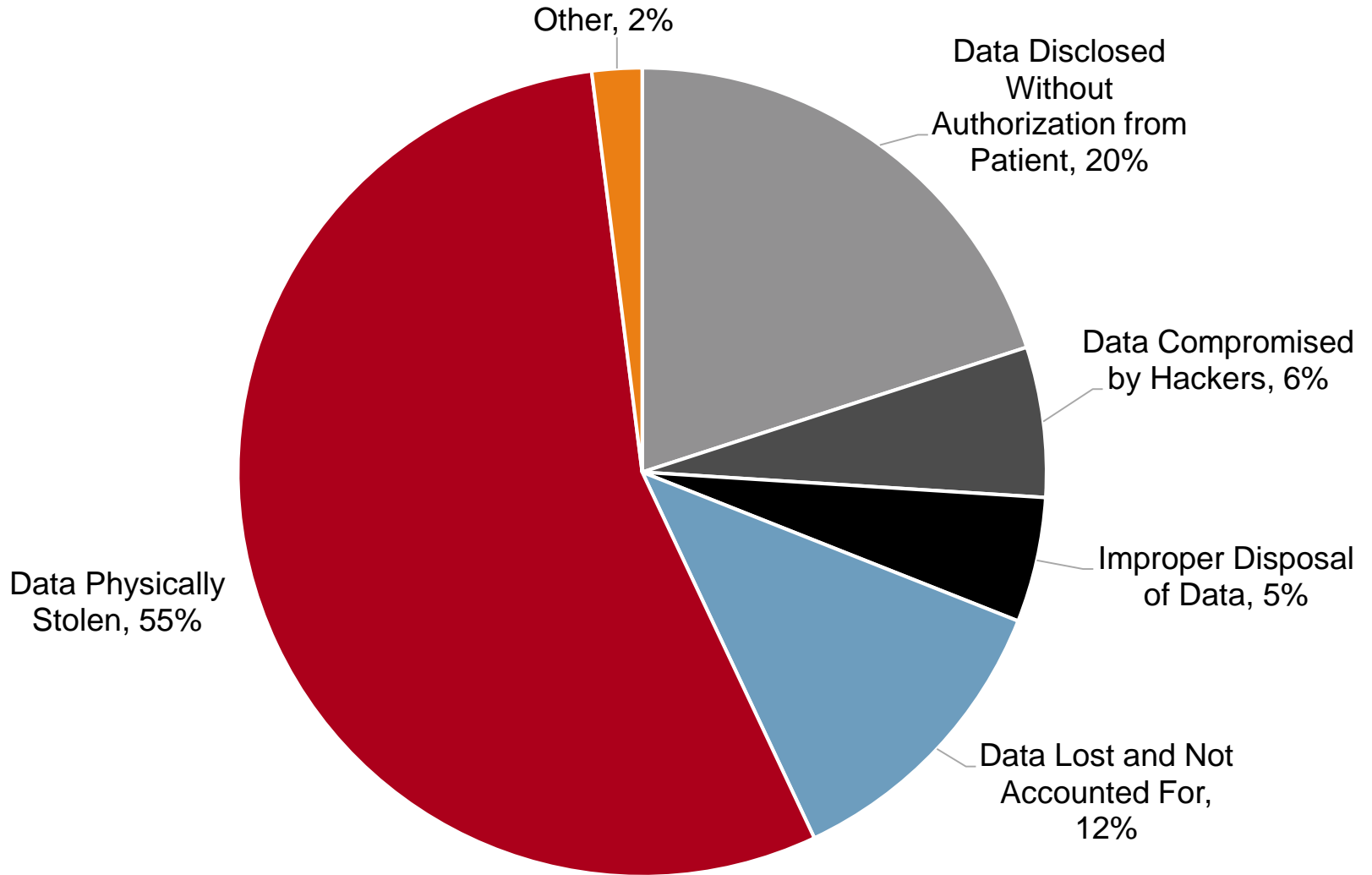
HIPAA

- Before any potential HIPAA audit, covered entities and business associates should:

  - locate all HIPAA compliance policies and procedures, and find out when they were last updated;

  - review all risk assessments;

  - update any policies as necessary; and

  - schedule training

- Organizations need to cooperate completely with an audit request

HIPAA – SOCIAL MEDIA

- Case brought against Facebook, alleging it violated HIPAA when various healthcare websites allow Facebook to collect personally identifiable information

- Also alleges the healthcare websites "failed to obtain the express written authorization required by HIPAA for disclosure relating to marketing or any other purpose not specifically exempted by HIPAA"

HIPAA PRIVACY VIOLATIONS BY TYPE

Other, 2%

Data Disclosed Without Authorization from Patient, 20%

Data Compromised by Hackers, 6%

Improper Disposal of Data, 5%

Data Lost and Not Accounted For, 12%

Data Physically Stolen, 55%

ANTITRUST

- Federal Trade Commission and state agencies are interested in the healthcare consolidation trend and will challenge any merger or acquisition they view as reducing consumer choice

- Expect heightened scrutiny in 2016 as industry consolidation continues among and between health systems, long-term care providers, physician practices and providers

ANTITRUST

- Gov't has issued waivers to encourage consolidation and new cooperative initiatives blessed by ACA

- Mergers continue to be attacked for antitrust behavior and foreclosing price competition in specific markets

- Private antitrust litigation will likely increase with an emphasis on alleged exclusionary practices of providers and manufacturers with large market shares

QUESTIONS?

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