

Practical HIPAA Compliance Strategies for Medical Groups, IPAs and Clinicians

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Who is MGMA?

- Medical Group Management Association
- Trade association founded in 1926
- Nation's principal voice for medical group practice
- 19,000+ members in 10,000+ group practices nationwide (200,000+ physicians)
- Headquartered in Englewood, Colorado
- Government affairs office in Washington, DC



Key Partnerships:

1. Practice Management System Vendors

2. Health Plans



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Compliance Strategy

Preparing for October 16



Easy First Steps

- Learn from your colleagues -- NETWORK!
- Prepare early and know your costs
- Gain executive "buy-in"
- Identify your data gaps
- Adopt industry "best approaches"
- Identify critical resources
- Don't wait for vendors to come to you!



Compliance Strategy

Working with your Practice Management System Vendors



Increasing concern that PMS vendors will:

- 1. Not be offering any HIPAA solution
 - Out of the health care business
 - Insufficient resources to develop new product
 - Moved to a new platform / application



- 2. Offering a "HIPAA Ready" solution, not "compliance"
 - Concern regarding versions and HHS timing
 - Utilizing clearinghouse
 - charging fees



- 3. Offer a "compliance solution" but:
 - May not provide solution to meet October deadline
 - May not be ready to test by April
 - Will only be providing solutions to <u>certain</u> transactions
 - Will be viewing this as an opportunity to gouge providers



- 4. Offer a "compliance solution" but:
 - No solution with older products--must purchase latest and greatest version of software
 - Often this latest version requires faster computers with more memory
 - Potentially very expensive



Vendor Readiness

- New Vendor HIPAA Readiness Directory
 - Developed by coalition of 14 medical specialty and industry groups including MGMA, AAFP, WEDI, and NCHICA
 - Non-commercial free access site donated by Claredi
 - Self-reported data
 - Increasing number of vendors listed
- www.hipaa.org/pmsdirectory



PMS VENDOR DIRECTORY

- Contents
 - Vendor name and contact information
 - Product name and release date
 - For each transaction
 - Transaction standard name and number
 - Version
 - Clearinghouse (if a specific one is required)
 - Is a clearinghouse required (Y/N)
 - Tested Certified by (name of certifying organization)
- Links to Vendor Websites



HIPAA.ORG EDI PI	ractice Manageme	ent System Directo	ry	
Directory Create Lis	sting Instructions	HIPAA Transactions	Terms / Cond	litions
Brought to you by: AFEHCT American Academy of Dermatology Association American Academy of Family Physicians American Academy of Pediatrics American College of Foot and Ankle Surgeons American College of Physician Executives American College of Physicians - American	management and billing systems and certification. Visitors should This directory is for informational about their companies and produ- companies listed or verify the information decisions. To interpret correctly the technico begin by reading the Instruction access information about a partic	st medical practices locate important s vendors, on HIPAA transactions read the Terms and Conditions (I purposes only. The individual vend ucts. The organizations bringing you formation posted, but we encourage regarding their HIPAA-readiness that al information presented by vendors, NS and other hyperlinks located at th cular product by clicking on the vend on how to use this Directory.	and code sets implements governing their use of t ors have supplied their this website do not en- practice managements twill guide medical pro- it is important that me top of each page in	entation, testing, his website. own information dorse the systems vendors to actices' business dical practices
Society of Internal Medicine	Company Name		State	Last Updated
American College of	A&F Networking, Inc.		ст	Jan 5, 2003
Obstetricians and Gynecologists	ACOM Solutions		CA	Jan 7, 2003
American Academy of	AdvancedMD Software (For	merly PerfectPractice.MD)	UT	Nov 18, 2002
Neurology	Alpha Global IT		On	Jan 6, 2003
American Osteopathic	Apex Medical Reimbursem	ent Solutions,Inc.	AZ	Oct 31, 2002
Association	ASAP Medical Systems, Inc		WA	Jan 9, 2003
American Society of	Automation Medicine		NY	Dec 16, 2002
Anesthesiologists	Availity, L.L.C.		FL	Jan 17, 2003
American Urological Association, Inc.	Benchmark Systems of We	estern Virginia	VA	Dec 19, 2002
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Management Association	Casey Group		NJ	Jan 9, 2003
NCHICA	Companion Technologies		SC	Oct 8 2002

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Compliance Strategy

Contact your Vendor ASAP



Vendor Readiness

- Write your practice management system / billing system vendor(s). Ask them the following questions:
 - When will you be ready to upgrade my system?
 - Will I require any new hardware?
 - Will you send me a schedule of upgrades and testing?
 - Can I upgrade incrementally?
 - Will my system accept the NPI?
 - Do you offer data mapping?
 - What are the expected costs?
 - Have you been listed in the Directory?



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Compliance Strategy

Working with your Health Plans



Health Plan Readiness

Concerns:

- Who will and will NOT be ready?
- WHAT transactions?
- When will testing begin?
- Any payment contingencies?
- Will they reject claims?
- Will they slow payment of paper claims?
- Minimum necessary issue

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Strategic National Implementation Process

a catalyst for positive change

SEARCH

SNIP

SNIP HOME

vendors, provider representatives and healthcare / HIPAA industry experts.

HIPAA Transactions Testing and Implementation Schedule

WEDI

WEDI HOME

Welcome to the WEDI / CAQH joint initiative website.

SNIP

WORHGROUPS & Listservs

ABOUT SNIP

WHAT'S NEW Calendar of

EVENTS

REGIONAL SNIP Efforts

SNIP WORH Products

OTHER HIPAA Resources

DISCUSSION Forum

WHAT IS HIPAR? The CAQH/WEDI HIPAA Transactions Testing and Implementation Schedule initiative was designed to facilitate industry-wide collaboration on the communication of HIPAA X12N and NCPDP Standards testing and production schedules. Plans can complete the standard template developed by CAQH and WEDI in order to communicate their plan-specific HIPAA X12N transactions and NCPDP Standards testing and production schedules on a central website. Ultimately, CAQH and WEDI hope this centralized site will assist in easing potential provider confusion related to HIPAA-driven changes in payer-provider interaction.

The Workgroup for Electronic Data Interchange (WEDI) and the Council for Affordable Quality Healthcare (CAQH) have joined forces to develop tools to assist healthcare organizations in their implementation of the X12N HIPAA transactions. Both initiatives were developed with input from multiple health plans, system

Any plan can participate at no cost and it takes only a few minutes to download the template. For instructions about how to participate, please click here "Testing and Implementation Timeline". If you have questions please contact Laura Strombotne at 202-861-1493, or Istrombotne@cagh.org between the hours of 8:00 AM - 4:00 PM EDT.

"Best Practice" Companion Guide

As a supplement to the X12N Implementation Guide, many plans are creating a "companion guide" that describes the specifics of how they will implement the HIPAA transactions. Currently, different plans are creating companion guides that vary in format and structure. The CAQHAVEDI "Best Practice" template provides guidelines on companion guide structure and topical areas plans should address, with the understanding that the content of a companion guide needs to be plan-specific.

All or part of the CAQH/WEDI "Best Practice" Companion Guide template can be used by any interested health plan. For instructions about how to download the template, please click here "Best Practice Companion Guide". If you have questions please contact Laura Strombotne at 202-861-1493, or Istrombotne@caqh.org between the hours of 8:00 AM - 4:00 PM EST.

Other Important Links Include:

- WEDI HIPAA Glossary, http://www.wedi.org/snip/public/articles/hipaa_glossary.pdf
- <u>CAQH website</u>, <u>www.caqh.orq</u>
- Washington Publishing Company (WPC), http://www.wpc-edi.com/
- National Council for Prescription Drug Programs (NCPDP), www.ncpdp.org



WEDI – CAQH HEALTH PLAN TRANSACTION STATUS RESOURCE

- WEDI and the Council for Affordable Quality Healthcare (CAQH)
 - Health Plans present readiness status for X12N and NCPDP transactions
 - Standard approach to Companion Guides
 - Providers and clearinghouses need to know when health plans will be ready to test and go into production
 - Health plans need an efficient way to communicate readiness
 - Health plan transactions test and production data on one free site



http://www.wedi.org/snip/caqhimptools/





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Ask your major health plans:

- When will you be ready to accept a HIPAA claim?
- Have you tested internally?
- Will you be providing any billing software?
- Will you send me your schedule of upgrades and testing?
- When will you be able to handle the additional transactions?
- Medicare is providing free billing software For more information on this go to: http://cms.hhs.gov/medicare/edi/edi3.asp.
- Can I submit using the Medicare billing software?



October 16--a Potential Train Wreck

- What happens if:
 - Provider is ready but Plan is not?
 - Plan is ready but Provider is not?
 - Your Clearinghouse is not ready?
 - Medicare / Medicaid is not ready?

Keep your practice on the right track by:

- <u>Setting aside</u> cash reserves to handle payroll and critical bills
- <u>Establishing</u> a line of credit with your financial institution
- <u>Developing</u> a relationship with a clearinghouse in the event that you must send non-compliant claims and/or revert (temporarily) back to paper



Health Plan Readiness

Some hope:

- WEDI recommendations to HHS in development:
 - Safe harbor for compliant plans
 - Communication between plans/providers
 - Get ready for paper deluge
 - EOB "missing data elements"
- Standard DDE coming?



Web Resources

- http://aspe.os.dhhs.gov/admnsimp/
 - The administrative simplification law, process, regulation, and comments
- http://www.cms.hhs.gov/hipaa/
 - Learn about HIPAA
 - Complaint submission process
- http://www.mgma.com
 - HIPAA Resource Center
- http://snip.wedi.org
 - Strategic National Implementation Process (SNIP)
- http://www.nucc.org
 - National Uniform Claim Committee



WEDI Strategic National Implementation Process (SNIP)

- Cross industry group co-chaired by MGMA
- Focused on critical implementation issues and solutions
- 35+ workgroups looking at:
 - transactions
 - security
 - privacy
 - provider issues
- 5,000+ on listserv
- Conferences/Webcasts/SNIP Synopsis



Http://snip.wedi.org

🚰 Strategic National Implementation Process Home Page - Microsoft Internet Explorer
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Address 🔄 http://www.wedi.org/snip/
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WORKGROUPS & Click here for the HIPAA Resource Directory
REGIONAL SNIP About SNIP What's New Calendar of Events Workgroups and Listservs EFFORTS Regional SNIP Efforts SNIP Work Products HIPAA Resource Directory Discussion Forum
SNIP WORK What is HIPAA? Search Home PRODUCTS Strategic National Implementation Process
OTHER HIPAA RESOURCES 12020 Sunrise Valley Dr., Suite 100 Reston,VA. 20191 (t) 703-391-2714
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Transactions and Code Sets White Papers

- Impact on DDE Services White Paper, Version 3.0 released
- Testing and Certification White Paper Version 3.0, August 2002
- <u>Sequencing Version 2.</u>
- Coordination of Benefits, Version 1.
- <u>A White-Paper Assisting the Industry in Translator Selection, Draft</u> Version 1.0 (1/11/02)
- Front-end Edits (draft)
- <u>Clearinghouse Transactions and Connectivity (draft)</u>
- Business To Business White Paper
- Data and Code Set Compliance
- Trading Partner Agreements
- National Drug Code (NDC)



SNIP "Small Practice Implementation" Ver. 2.0

- An estimated 400,000 small medical entities will need to be compliant
- Few can afford a consultant or expensive solution
- Paper grew out of a need in the industry for a concise, easy to read guide to HIPAA
- Two central goals:
 - Present a HIPAA strategy from a "trusted source"
 - Give specific guidance to enable smaller CEs to become HIPAA compliant



SNIP "Small Practice Implementation" Ver. 2.0 Appendices

- Model HIPAA Transactions Audit
 - Discussion of critical implementation issues:
 - What does my practice have to do to make sure I'm ready for the new standards?
 - What specific questions should I ask my software vendors and billing services?
 - Why do I need to be concerned so far in advance?
 - Software or billing service check list



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QUESTIONS