



ST. LOUIS

A Lean Approach to Compliance and Audits

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SSM STL Demographics

- ▶ SSM Health Care–St. Louis includes:
 - Seven hospitals
 - 6 Adult Acute Care
 - 1 Pediatric Acute Care
 - SSM Managed Care Organization
 - Physicians' Organization
 - Organization restructure in 2008

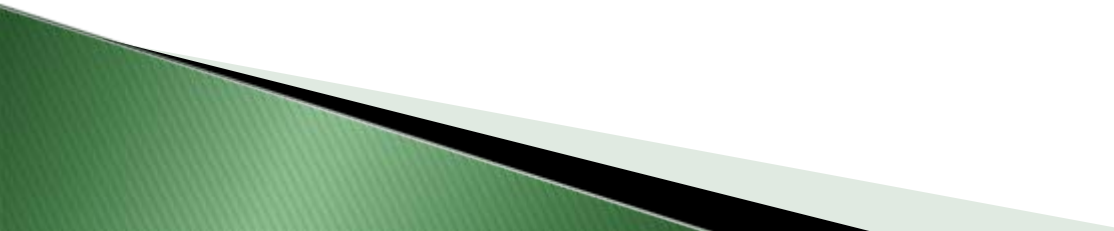


SSM St. Louis

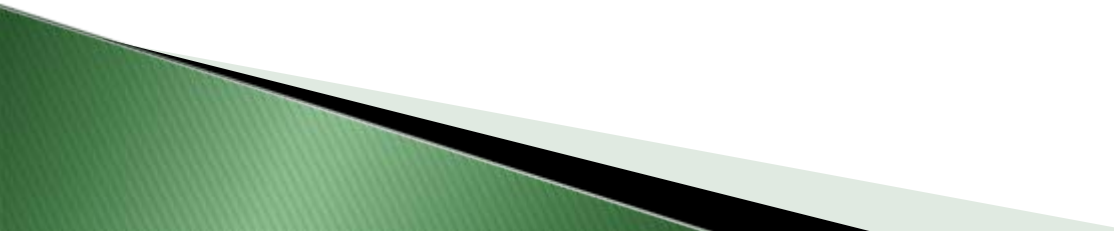
SSM around St. Louis, MO



RAC Preparations

- ▶ Began audit risk inventory end of 2008
 - ▶ Conferred with other providers who were in the demonstration RAC project.
 - ▶ Reviewed PEPPER reports
 - ▶ Identified main access points
 - ▶ Mapped ADR request process and TAT
 - ▶ Educated key stakeholders
 - ▶ Began search for tracking system
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Issues Identified

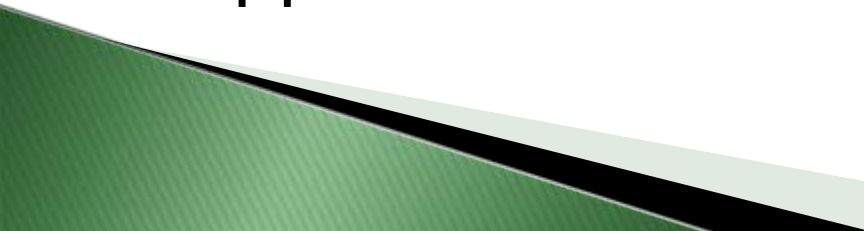
- ▶ Number of departments receiving ADR request
 - ▶ Delay in response time
 - ▶ Lack of learning from audit outcomes
 - ▶ Identification of potential compliance risks from audit outcomes
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Where does the letter go?

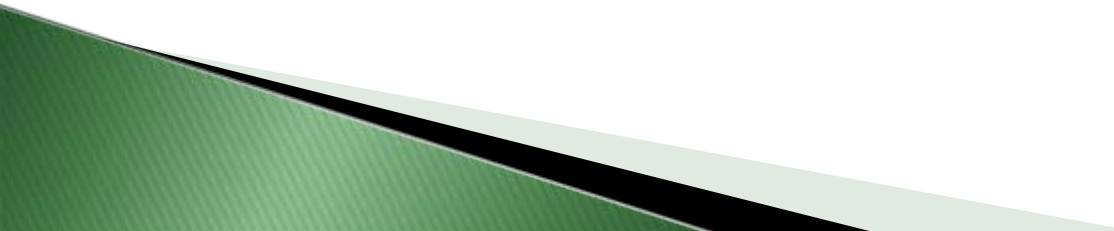


855 Form contacts

Pilot

- ▶ Began pilot project for RAC with QIO requests 2009
 - ▶ Created an Access tracking dbase
 - ▶ Designated a single point of contact for all STL hospitals.
 - ▶ Developed and electronic communication plan with HIM for ADR requests and approvals.
 - ▶ Established a process for results review and appeals.
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Key successes

- ▶ Records were submitted timely (no technical denials)
 - ▶ Able to quantify the number of requests and reasons for requests
 - ▶ Hospital staff able to focus on day to day activities
 - ▶ Appeals submitted and tracked.
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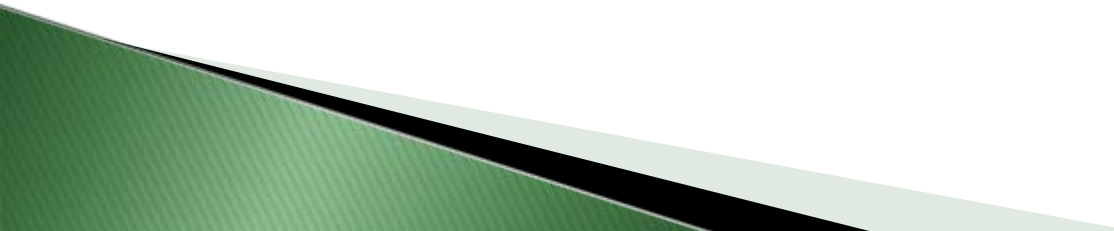
Ready, Set, Go

- ▶ First RAC request received February 2010
- ▶ Hard to quantify dedicated FTE (multiple hats)

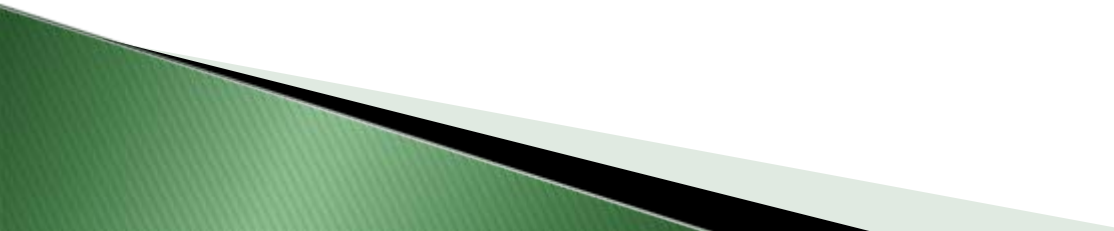


- ▶ Initial staff dedicated ~ 1.5 FTE for 7 hospitals

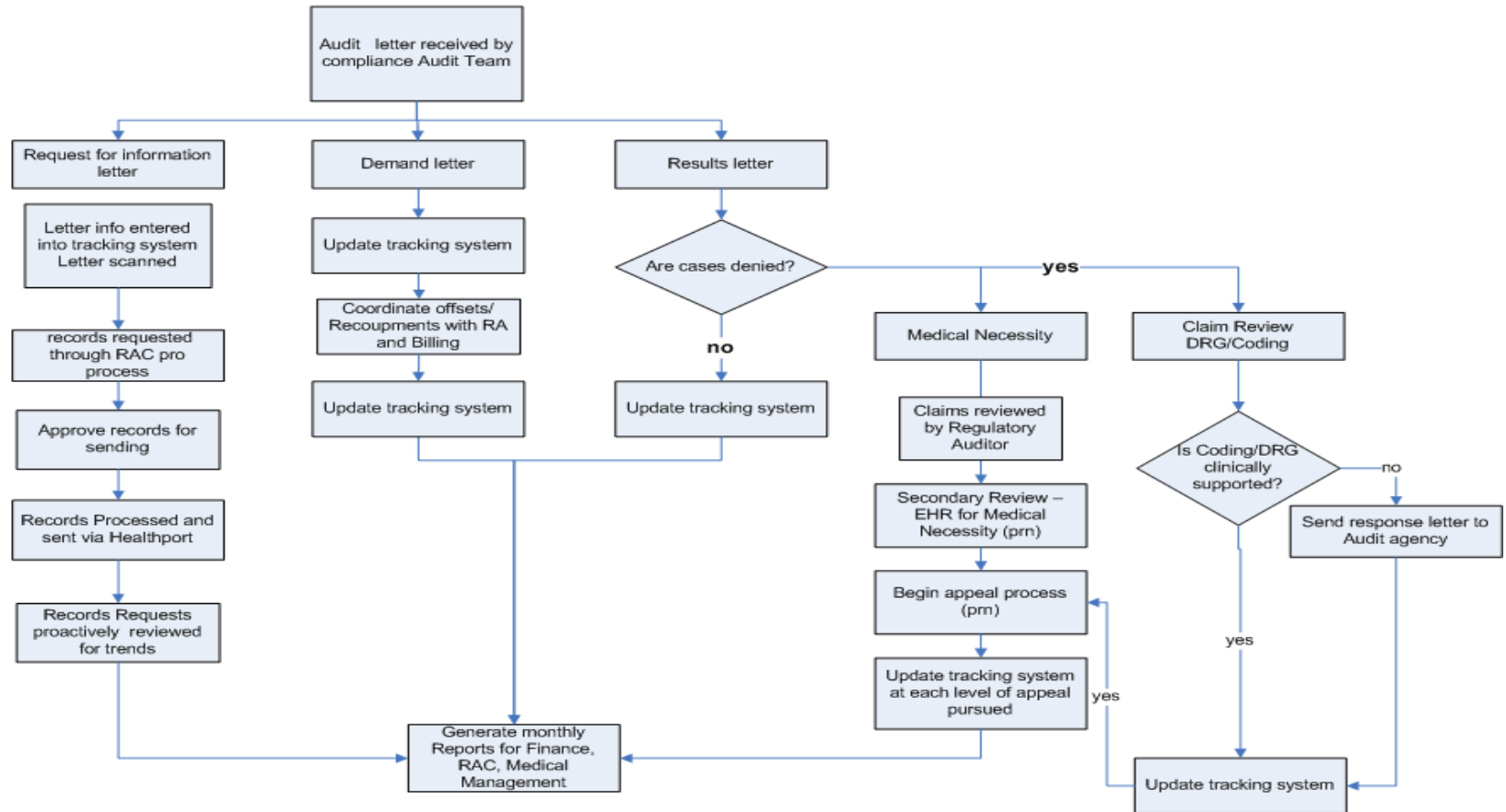
Current Lean Approach

- ▶ Single point of contact for all STL hospitals
 - ▶ Regional RAC – Audit team and Corporate RAC team
 - ▶ Integrated with HIM, Case Management, Compliance, Finance
 - ▶ Tracking RACs, MAC's, CERTs, PROBE, Medicaid, and beginning Medicare Advantage plans
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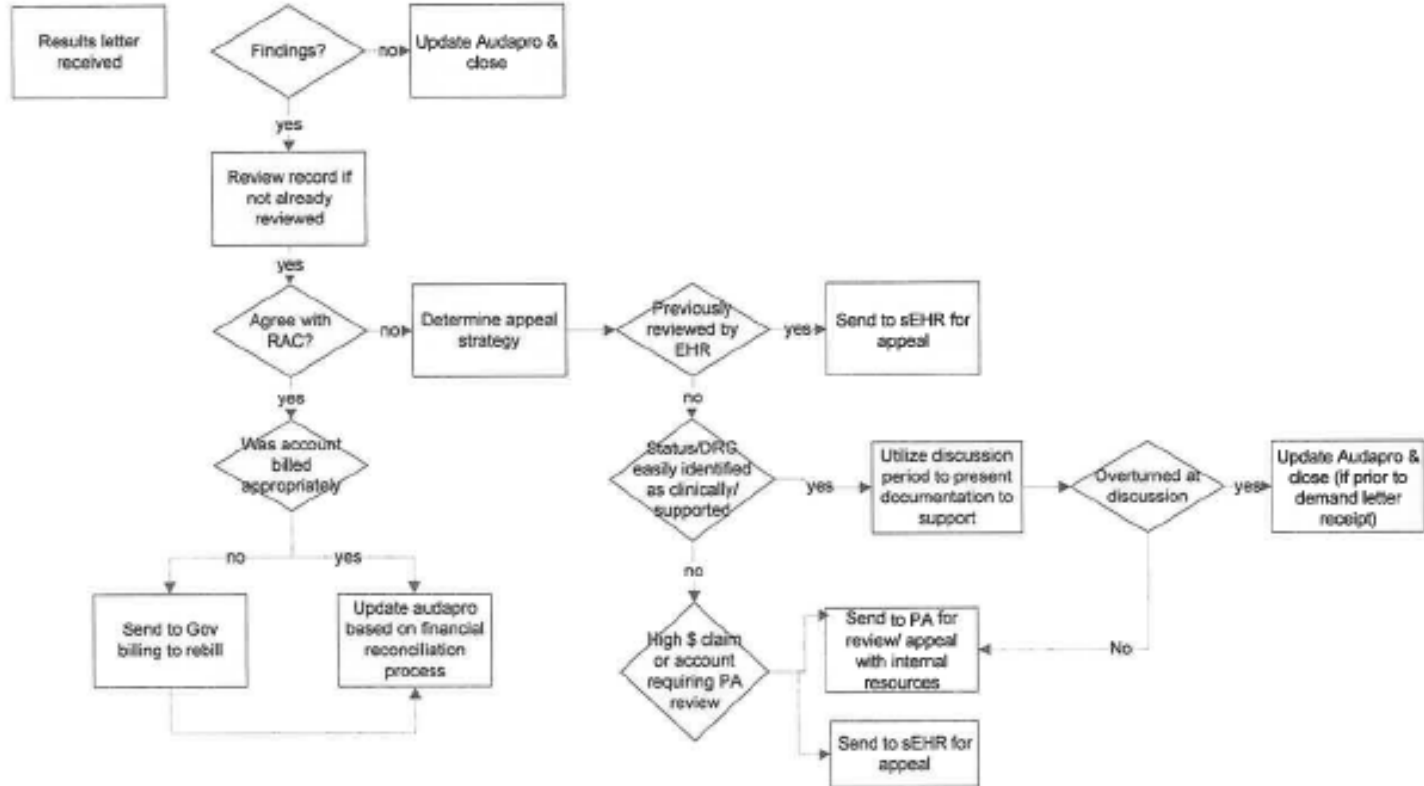
Current Lean Approach

- ▶ System wide tracking system for multiple government audits
 - Dispute tracking
 - Increased data on audit risk
 - ▶ Dedicated auditors for review and appeals (Case manager, RN and Coder, Physician Advisor)
 - ▶ Use of discussion period with RAC
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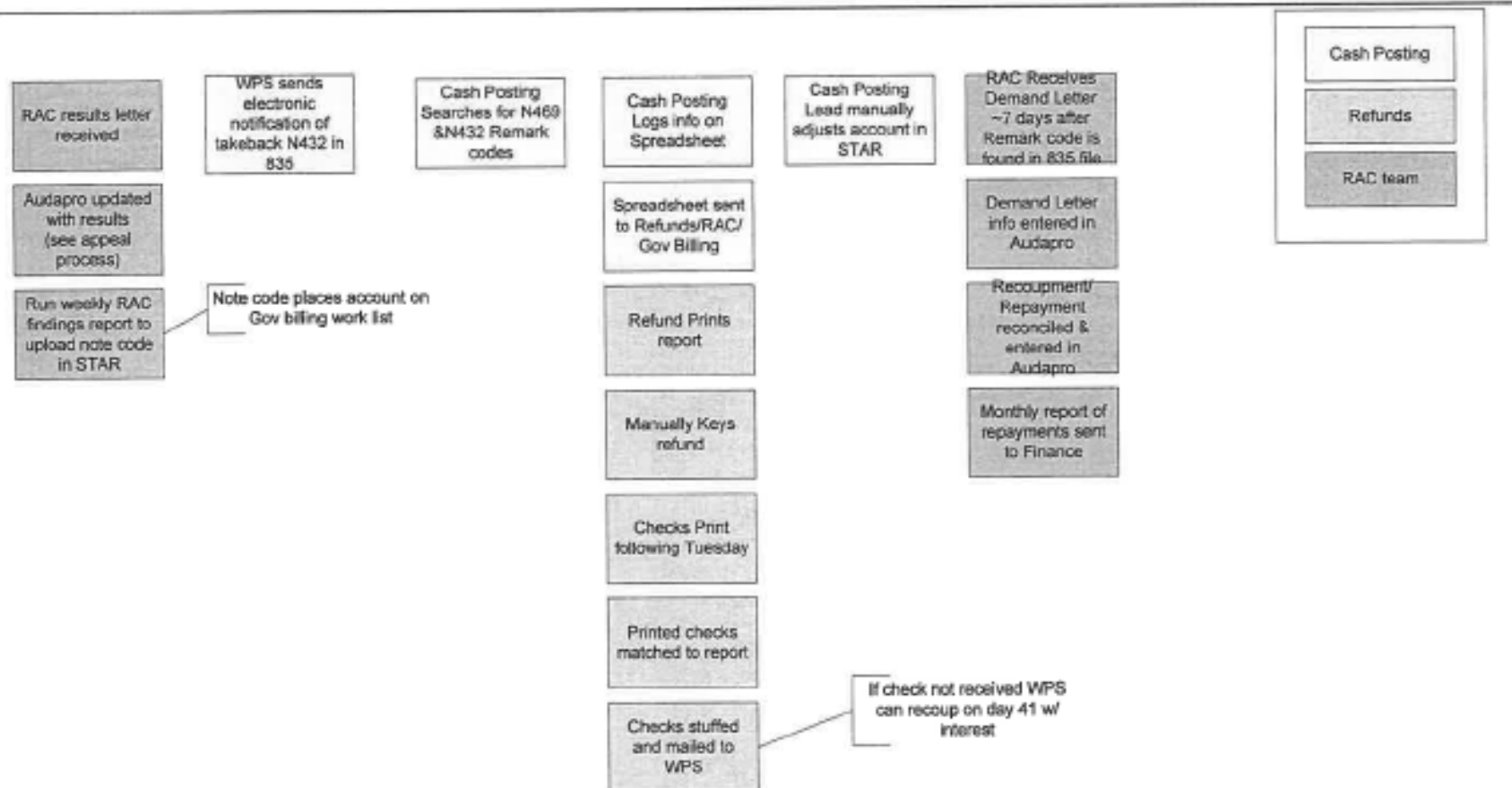
SSM St. Louis Compliance Audit Response Team Process flow



RAC Appeal Decision Tree

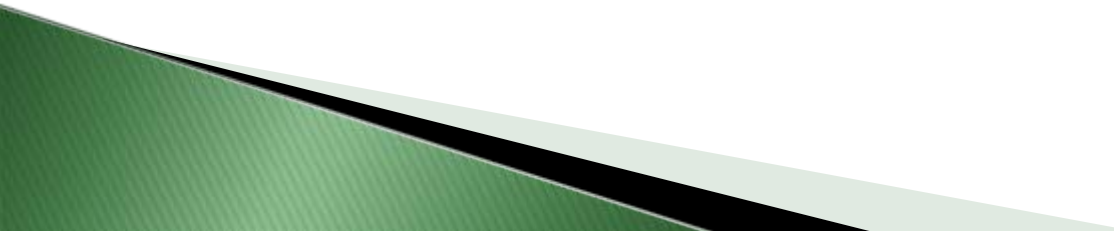


RAC Financial tracking of Recoupments

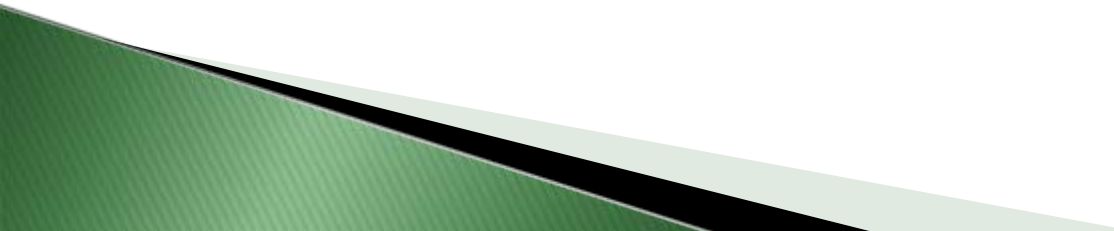


Standard Reports

Tracking only or Data Management?

- ▶ TAT for ADR request letter (48h or less)
 - ▶ # of requests by DRG & Hospital
 - ▶ # of denials, \$ of denials
 - ▶ % Denials by type and Hospital
 - ▶ # and \$ of denials by discharge year
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Challenges

- ▶ Multiple audit time lines expectations
 - ▶ Medicare 855 file – Correspondence
 - ▶ Pre–Payment reviews
 - ▶ Remit Advice N432– billers and follow up
 - ▶ Refunds, recoupments or immediate offsets
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To refund or allow recoupment

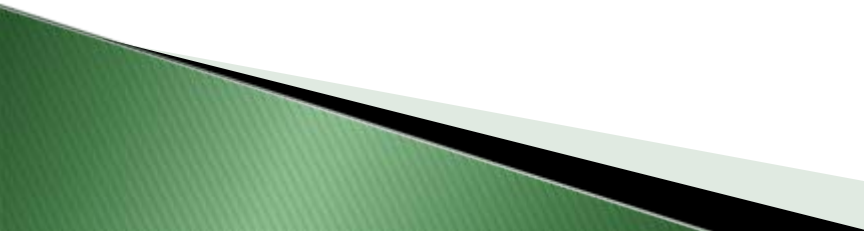
- ▶ Immediate offset
 - Challenges identifying account details on RA
 - Multiple offsets grouped on RA
- ▶ Recoupment– do the math
 - Cost of 30 days interest?
 - 1 mos interest on \$15,000 claim = \$134
 - 75 denials at \$134 = \$10,078.....
- ▶ Refund
 - check's cut within 5–7 days of receiving remittance advice
 - Better able to reconcile

Learning opportunities

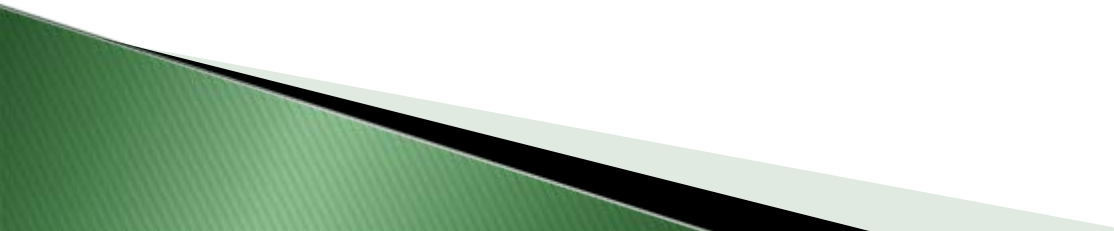
If you bill it they will come!

- ▶ Align with denials team use outcomes for all payors
 - Process improvement teams on top risk areas
 - Surgery
 - Conversion log
- ▶ Technology
 - Use EMR to your benefit
 - User friendly and intuitive
 - Address any type of audit
 - Email alerts
 - Create your own reports
 - Store and track the data that's important to you
 - Billing data
 - Coding data

Compliance Integration

- ▶ Balancing Internal Audits and external audits
 - Action plans
 - Probe Audit with 30 day turn around before re-audit
 - ▶ Assimilate with Coding Compliance and Clinical Documentation Specialist, and Charge Master
 - ▶ Education – OIG risk, PEPPER, Operational changes that impact Compliance
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Continious Opportunities for Improvement

- ▶ Financial Reconciliation process
 - ▶ ROI – electronic submission
 - ▶ Appeals
 - ▶ Reporting to show trends for improvement
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Questions??

