



## **AHIOS Perspective: Five Signs That it's Time to Outsource Your PHI Disclosure Management**

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Hospitals and health system executives are facing unprecedented challenges in their PHI disclosure management initiatives including:

- managing skyrocketing volumes of record requests from payers, attorneys and auditors
- complying with complex and ever-changing federal and state regulations
- providing staff with the ongoing training to handle record requests that involve highly sensitive patient information related to mental health, HIV, genetic testing, etc.

The Protected Health Information (PHI) disclosure management process has become so complex and such a high risk endeavor that it has grown beyond the internal capabilities and risk thresholds of many hospitals and health systems. For many institutions, it's not a matter of if they need disclosure management outsourcing help, but rather is it the right time to make the move. That said, here are five critical signs that it's time for your hospital or health system to outsource some or all of its PHI disclosure management:

**Sign #1: You have many points of disclosure:** With many hospitals and health systems acquiring smaller hospitals, physician practices and other facilities to better serve their communities and build their brand, it's not usual these days for growing healthcare enterprises to have more than 20 points of PHI disclosure. If you have multiple points of disclosure across your healthcare enterprise and they are managed by staff with varying levels of skill and training on complex regulations, then that is a sign that your organization may need help from a disclosure management outsourcing company.

**Sign #2: You lack tools that can address pricing variances:** Pricing regulations for release of information (ROI) requests vary from state-to-state and by type of requestor e.g., workers compensation attorney rates may be different from personal injury attorney rates. Without pricing and billing capabilities that accommodate these variances, providers cannot bill accurately and collect all revenue due, and they risk overcharging, which can lead to significant amounts of bad debt, liability, denial of payments, and even litigation. If you don't have accurate pricing and billing tools (most EMRs don't have them), it may be time to turn to a disclosure management outsourcing company who provides these specialized tools and has a laser focus on tracking pricing fluctuations.

**Sign #3: You are continually missing ROI deadlines:** With limited resources, it's hard for a hospital's HIM staff to keep up with the high volume of record requests from payers and third parties, while also addressing time-sensitive requests including RAC audits as well as HEDIS, DRG and risk adjustment reviews. When your staff falls behind, even for a few days, it leads to additional status phone calls from requestors which further burdens workloads and can lead to errors, slower collections, and missed deadlines. If you are struggling to meet ROI deadlines and often request submission extensions, then it's time to consider outsourcing.



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**Sign # 4: Your ROI labor and supply costs exceed your collections:** When providers total all their internal costs for ROI (employee wages and benefits, paper, toner, envelopes, CDs, postage, equipment, accounting fees, etc.), their costs typically exceed their collections. HIM departments typically don't have the resources, relationships with requestors, staff and specialized systems to streamline and expedite the payment and delivery processes. If your hospital's ROI labor and supply costs are exceeding collections, then you should consider outsourcing.

**Sign # 5: Your staff is not up to speed on the latest compliance regulations.** Would your staff know if they could fulfill an ROI request from the birth mother of an adopted child? Training staff on complex, ever-changing federal and state regulations is a daunting task that requires continual effort. In today's environment with ICD-10, EHR implementation and meaningful use imperatives, HIM staff often lack the time for this type of ongoing, in-depth training. If your HIM staff repeatedly is seeking answers to compliance questions, then it's definitely time to consider outsourcing.

### **The Best Outsourcing Fit**

If you determine that the time is right to outsource your disclosure management, how do you determine which outsourcing firm is the best fit for your institution? Here are some of the questions to ask prospective disclosure management outsourcing companies to ensure they can address your needs:

- **Do you provide remote, on-site and hybrid services?** If your HIM Department has limited space then you might need a remote services option. This frees up valuable office space and eliminates the distractions of a busy ROI production area. However, an off-site option may require that all of your records are electronic. So determine if your organization needs on-site, off-site or a remote services partnership where you keep some on-site staff perhaps to interact with patients and internal hospital departments.
- **How do you accommodate organizational preferences?** An organization may have sensitivities about allowing an outside vendor to handle certain requests e.g., some may choose to outsource everything except RAC or legal requests, while others may want to handle all patient requests internally. Ask your ROI outsourcing partner how they would design a service model that addresses your organization's preferences and sensitivities.
- **How do you train employees on privacy and security requirements?** What type of training do your ROI reps receive? How often are education programs updated and how often do your ROI reps receive continuing education? Do you offer any kind of certification programs for staff members? It's critical to ensure that training is ongoing and that certification programs are in place to ensure ROI reps can handle even the most challenging requests.



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- **What type of technology does your firm offer?** Is the technology locally installed or is it web-based? Is the technology easy to use? What type of reporting functions does it offer? How secure is the technology? Providing specialized disclosure management systems is key to driving efficiency so make sure you understand their technology offerings and how they fit with your infrastructure.
- What are your total fees? Before asking an outsourcing firm for their total fees, determine all your internal costs e.g., staff, supplies, slow collections, etc. as well as your threshold for risk (missed audit deadlines, breaches, penalties, etc.). Many organizations believe they are turning a profit on ROI until they do a comprehensive cost analysis. Outsourcing companies are focused on streamlining ROI and outsourcing to the right partner can add significantly to your bottom line.

### **Right Time, Right Partner**

In this era of complex and increasing regulations and escalating record volumes, most hospitals and health systems executives are noticing the signs that it's time to outsource their PHI disclosure management. Asking the right questions, can help you identify the outsourcing partner that best addresses your organizations needs and sensitivities. In the long term, it is important to select an *outsourcing partner*, not a vendor. Choose a company whose values and culture align with yours, one that understands and appreciates the importance of each disclosure and will treat your patients and other requestors in a manner that is consistent with your brand and customer service goals.