To Our Valued Clients,

I am writing this as I return from the annual HIMSS conference, where MRO had the opportunity to participate with the ONC in the Interoperability Showcase. Specifically, we helped demonstrate the esMD process by showing attendees how a RAC submission would flow seamlessly from our system, through the esMD Gateway, to the CMS auditor.

What really struck me as I wandered the exhibit floor is the amount of interest and money flowing into healthcare information technology. The good news is that this will help drive innovation and improved processes in our industry; however, the bad news is that the implementation of any fundamental change may be burdensome for existing stakeholders.

Please be assured that MRO is investing significant research and development resources to stay abreast of these changes and ensure our services and applications meet your organization’s forward-looking business needs.

Another new development is the recently-released Stage 2 Meaningful Use requirements. Of particular interest is the requirement to participate in the Direct Project. In short, the Direct Project will enable healthcare providers to change the way they share information with each other, such as through secure email as opposed to fax. MRO has already agreed to participate in Direct as a pilot vendor and will make sure that the necessary capabilities to leverage Direct are embedded in our application. In our view, we see a convergence of disclosure management with health information exchange via programs such as this. The need to disclose information will not change, but how the information is disclosed will. MRO is uniquely positioned to help our clients take advantage of these changes and maximize the current EMR and other system investments made by your organization.

We are also aiding clients with handling the fees associated with patient copies of records. As you are aware, the HITECH Act includes language governing the fees that can be charged. In short, providers can only charge “the entity’s labor costs in responding to the request” plus the cost of consumables and postage. MRO is finalizing the formula that we will recommend our clients utilize to determine this cost (hint: we can auto-calculate it for you) and will distribute a detailed memo in the near future. While this may have a small impact on your ROI revenue, the potential liability associated with failing to properly comply with this new requirement could be significant.

Additionally, we have just heard that HHS may release the final Accounting of Disclosures rule in the very near future. I can assure you that MRO will monitor this closely, determine how the new requirements will impact our clients and take the necessary actions to make sure our software and services meet your requirements.

Finally, I would like to announce that MRO is proud to be celebrating our 10 Year Anniversary in 2012. We thank you for your loyal support and for choosing MRO as a trusted service partner. I can truly say it has been an exciting, fun and quick decade! Should you have any questions or comments, please do not hesitate to contact me.

Best regards,

Stephen Hynes
President
888.252.4146 ext. 304
shynes@mrocorp.com
2012 HIPAA Audits: What to Expect and Tips to Prepare

By Kathy Jakeway, Esq., Compliance Officer

Since HIPAA went into effect in 2003, the Department of Health and Human Services’ Office of Civil Rights (OCR) has levied only one formal civil monetary penalty and has settled six other cases for monetary amounts. However, HITECH has now given the OCR new, stiffer penalties to enforce compliance. Recently, the director of the OCR announced that in 2012, it will audit 150 covered entities for compliance with the HIPAA and HITECH privacy and security regulations. OCR also plans to audit business associates of covered entities in future audits.

HHS has notified the first 20 covered entities that they are being audited. Those entities include: three hospitals, eight health plans, two clearinghouses, three physician offices, one lab, one dental office, one nursing facility and one pharmacy. The remaining 130 covered entities will be announced and visited later this year. The OCR will choose hospitals that vary in both facility size and geographical location.

Audits will be conducted by KPMG, a consulting company hired by the OCR. They will include interviews with key personnel, including medical records department directors, as well as an inspection of the operations. It is expected that KPMG will be on-site for three to 10 days, depending on the size of the facility. If the audit reveals serious compliance issues, the OCR could announce a “compliance review.”

If you are notified that you have been selected for a HIPAA audit, please notify MRO immediately. We are here to help you achieve superior privacy and security compliance.

Although it is statistically unlikely that your facility will be chosen for a HIPAA audit, it is clear that the OCR is serious about HIPAA compliance—and MRO urges that you be equally concerned.

To be prepared for a HIPAA audit:

• Step up employee HIPAA training.
• Gather all HIPAA training materials to one primary location.
• Keep accurate records of employee training.
• Make sure you have written documents covering privacy and security policies as well as training materials.
• Identify the employees who should address questions concerning privacy and security matters in your department.
• Keep in mind that, if you are chosen for an audit, you will have only 10 business days to provide any requested information. It is a good idea to check on the availability and location of your training and policy documents now.
Meet the ROI Production Team

By Mike Reilly, VP of Client Operations

MRO is pleased to spotlight the ROI production team, which is part of our client operations organization. This department is responsible for “back-end” transaction processing and quality control at our corporate King of Prussia, Pa location. Members of the production team are responsible for the consolidated processing and fulfillment of ROI requests from all of our client locations, and they utilize a strategic integration of industry-leading technology and human intervention that, when combined, form MRO’s sound and proven quality record.

Specific functions within ROI production include: assigning and invoicing requests, payment processing, collections, record distribution, and performing specific quality control checks throughout the processes. These quality control checks translate directly to the company’s strong compliancy reputation and minimal improper disclosure record (.00006 percent of total requests released). MRO performs comprehensive quality assurance checks on 100 percent of MRO delivery requests.

Assigning – Within one business day after a request is logged in the ROI Online® system, our assigners review each request letter and authorization, as a “second set of eyes,” to ensure HIPAA compliance, accuracy and completeness. They cross-reference MRO’s national database of requesters to ensure that the recipient address is entered correctly into the system. Additionally, we fax notification letters to requesters to confirm receipt of the request or to notify them that there is a problem with the request.

Invoicing and Quality Assurance – Through a series of QA steps, MRO verifies that the correct patient records are being processed for each request prior to processing the invoice. If any issues surface, MRO communicates the findings back to the facility for resolution. Our invoicers also monitor payer audit due dates and addresses to ensure proper delivery.

Mailing and Distribution QA – Our centralized print operation either batch-prints paper records or burns shipments to CDs. To ensure accuracy of delivery, the shipments are bar-coded, scanned and cross-referenced with the envelope through our batch-integrity process. If shipments are sent via UPS or FedEx, tracking codes are uploaded into the ROI Online system. Note: MRO continues to expand our electronic delivery options such as Requester Portals, e-Request processing and the esMD gateway!

As mentioned in a previous newsletter edition, MRO also created a post-payment audit team to focus on proper billing and collections for managed care and post-payment audit requests. MRO has experienced great success with properly identifying post-payment audit types, invoicing the correct state or contract rate and advocating for our clients to discourage over-aggressive audit submissions by letting the auditing organizations know that they have to pay for records up front.

Tech Review: Interoperability and Beyond

By David Borden, Chief Technology Officer

In partnership with CMS and the ONC, MRO demonstrated its esMD capability at the HIMSS 2012 Interoperability Showcase, Feb. 21-23. Along with dozens of other vendors and government agencies who are developing state-of-the-art technology to assist healthcare providers in lowering costs and improving patient care, MRO displayed its process of electronically delivering medical records to CMS RAC contractors via the Nationwide Health Information Network (NHIN) Exchange.

MRO is a leader in providing technology to assist HIM departments with gathering and distributing records electronically. As Meaningful Use moves towards Stage 2, MRO is committed to building the certified capabilities that allow hospitals to meet the growing needs for health information exchange, quality measure reporting and timely access to health information.

Some of the initiatives on which MRO is working include:

• Developing Patient Portal capabilities on behalf of our clients;
• Exploring additional Meaningful Use certifications that can assist our clients in their attestations, including expanding into the eligible professional domain;
• Expanding interfaces with leading EMR vendors to streamline the process of extracting patient data from those systems;
• Building software security modules to inspect PHI access and report on suspicious patterns in order to assist hospitals in complying with HIPAA privacy audits;
• Developing capabilities around creating, exchanging and interpreting CCDs to assist with transfer of care and the sharing of data between HIT systems and among providers;
• Forming the capability to handle NHIN Direct/Direct Project messaging—a capability that will be required in Meaningful Use Stage 2; and
• Creating an automated interface with the SSA for processing DDS requests over the NHIN.

We look forward to continued discussions with our clients to learn which of these initiatives are on your radar screens, and to hear what other technical needs you may have surrounding the exchange of health information. ■

Totals From 2011

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Paper pages printed 15,116,335
Distributed requests 699,486
Processed checks 138,433
New Features Update

Updated Reports – MRO recently developed new reporting capabilities and will gradually upgrade many of our existing reports, as well as create new reports, to help our clients better evaluate data that is stored within MRO’s systems. Updated reporting software will greatly improve the aesthetics of existing reports, offering colorful, graphic portrayals of data that were previously available only as text.

- Updated ROI Turn-Around Time Report – This report displays data similar to that which was previously provided; however, it is designed in a format that is much easier to read. Additionally, expanded location names and better filtering options are now available. This is the first of many existing reports that will be revamped using the new report-building tools.

- AudiTrends™ Online Won/Lost Report – This is a new report that is designed to give a high-level view of the financial impact of various audit types within MRO’s AudiTrends Online system. After a date range is entered, amounts that are “pending” or have been “won” or “lost” can be viewed; this report offers the ability to dissect the data by location and audit type. Within each view, a detailed list of each audit and colorful graphic representations of the data are available.

Duplicate Checker for Internal Portal Requests – For years, MRO has had a duplicate check notification during the logging process for MRO delivery requests. Recently, we added similar functionality to the Internal Portal logging process so that any Internal Portal user will be notified before submitting a request to the HIM department for the same patient.

Reporting Groups – This new feature allows multi-location facilities to run reports that include a subset of their total locations. Hospitals that are a part of larger health systems can now run reports that include their specific hospital and associated clinics without running individual reporting for each location and compiling results.

ROI Audit Log Enhancements – The auditing capabilities of user activity within the ROI system have recently been improved. Administrative users may now access an audit log report that is located under the “users” dropdown; it allows auditing by date, request, user or a specific action within the system.

esMD Update

By Mike Rodgers, Director of Product Management

As the technology leader in the ROI industry, MRO has continued to expand our use of esMD (electronic submission of medical documents) and is currently the nationwide leader in esMD submissions to RAC auditors. To date, MRO has shipped more than 2,500 RAC audits via this new, CMS-sponsored electronic method.

Delivery of records through esMD helps MRO clients in a number of ways, including direct cost savings by elimination of expensive FedEx and UPS shipping fees. Clients also benefit from a completely automated delivery that removes the need for manual intervention and reduces the chance of errors. Additionally, clients can be assured of same-day receipt of records.

MRO clients continue to have the ability to track the RAC audits, as each record shipment is assigned with a unique transmission ID. The ID is viewable on the request status screen for each request, and clients can use the delivery report to track and monitor delivery of each batch of RAC audits.

Currently, only DCS and CGI are accepting esMD shipments, but Connolly and HDI will begin receiving these in March 2012, according to CMS. While still in the pilot process, MRO plans to completely transfer all RAC shipments to esMD in the near future. Certain limitations remain, as CMS still encounters sporadic downtime, and there is a 19 MB upload limit per record shipment. CMS is working to address these issues in upcoming weeks, and MRO will still deliver the records in paper when issues arise.

Moving forward, MRO will begin to send additional shipments via esMD, such as appeal shipments to esMD-approved appeal entities and other government contractors, such as CERT, PERM and MAC audits. Many times, these appeal shipments occur outside of the purview of the HIM department and are handled manually by an audit/appeals team. Allowing clients to take advantage of esMD for appeals will bring the aforementioned advantages to additional client stakeholders and will lessen the chance of missing an appeal deadline.

Phase II expansions of esMD, expected to be implemented in late 2012, will allow for the receipt of the ADR (Additional Documentation Request) letters, resulting in an end-to-end, fully electronic process. As with Phase I, MRO will continue to embrace this new technological capability to further streamline the audit shipment process.

If you have any questions about esMD, or you wish to learn more about MRO’s AudiTrends™ Online (formerly Audit Tracker Online) solution, please contact Mike Rodgers at 888.252.4146 x 303 or mrodgers@mrocorp.com.

MRO celebrates its 10th Anniversary in 2012. We would like to take a moment to express our gratitude for your continued business that has aided us in achieving 10 years of success—Thank You!