Data Trends in Compliance and Auditing

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Agenda

• Introduction
• Healthicity Compliance and Auditing Survey
• Audit Trends
• Compliance Trends
• Conclusion
Healthicinity Survey – April 2017

1,200 Healthcare Professionals
(Auditing, Compliance, Healthcare Executives)

50 Questions
Compliance Trends
Healthicity Survey - Compliance

88%: Orgs have a compliance program

57%: Orgs have a compliance committee
31%: Coding and Billing Risk

70%: 0-10 Incidents Reported in 2017
Survey Cont.

Drivers for Planned Audits:

34%: OIG Work Plan

26%: Org/System Mandates
Incident Reporting – Top Reported

- HIPAA Privacy: 29%
- HIPAA Security: 9%
- Coding/Billing/Payments: 28%
- Documentation: 5%
- HIPAA: 4%
- OSHA: 4%
- Human Resource: 3%
- Miscellaneous: 3%
- Clinical: 2%
- Quality: 2%
- General Issues: 2%
- Risk: 2%
- Patient Complaints: 2%
- Safety: 2%
- Compliance Program: 2%
- All Other: 2%
Audits – Top Audit Types

- Compliance Program: 29%
- Coding/Billing/Payments: 29%
- Documentation: 9%
- HIPAA Privacy: 6%
- HIPAA Security: 6%
- Desktop Audit: 4%
- Critical Security Control: 3%
- Quality: 2%
- OSHA: 1%
- HIPAA: 1%
- All Other: 9%
Most Common Risk Assessments

- Coding/billing/Payments: 22%
- HIPAA Security: 20%
- Compliance Program: 9%
- OSHA: 9%
- HIPAA Privacy: 7%
- Documentation: 5%
- Anti-Kickback/Stark: 3%
- HIPAA Human Resource: 3%
- Critical Security Control: 3%
- All Other: 15%
Audit Trends
12%: Orgs without coding/billing Compliance Prog

40%: orgs that perform annual audits
92%: Orgs that require formal audits

56%: Retrospective formal audits

23%: Orgs with no defined pass rate threshold

38%: Orgs that require re-audit within 30 days
75%: Orgs that do not use Data Analytics

31%: Orgs do not use audit software
30%: Didn’t know if results communicated

23%: Organizations link compensation to audit results
ICD-10 – How are we doing?

2015 ICD-9 CM

- 85%
- 15%

15% Error Rate Based on Audit Trends

2016 ICD-10 CM

- 93%
- 7%

7% Error Rate Based on Audit Trends
ICD-10 – Top Specialties with Errors

- Cardiology: 4%
- Family Practice: 19%
- Gastroenterology: 2%
- General Surgery: 3%
- Hospital Medicine: 5%
- Internal Medicine: 14%
- Obstetrics and Gynecology: 5%
- Pain Management: 4%
- Pediatrics: 4%
- Pulmonary: 3%
Top Specialties with Errors per state
ICD-10 Codes With Errors

- ICD-10 Root Codes with Errors: 1,228
- ICD-10 Codes with Errors: 5,679
  - Percent of top 10 codes to all errors: 8%
Top 10 Errors - with Specialty

<table>
<thead>
<tr>
<th>Code</th>
<th>Specialty</th>
<th>Error Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Z00.121</td>
<td>Peds</td>
<td>16%</td>
</tr>
<tr>
<td>Z00.01</td>
<td>FP</td>
<td>16%</td>
</tr>
<tr>
<td>Z79.891</td>
<td>PM</td>
<td>14%</td>
</tr>
<tr>
<td>Z00.01</td>
<td>IM</td>
<td>13%</td>
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<tr>
<td>E11.9</td>
<td>FP</td>
<td>9%</td>
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<tr>
<td>F17.210</td>
<td>FP</td>
<td>8%</td>
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<tr>
<td>Z00.121</td>
<td>FP</td>
<td>6%</td>
</tr>
<tr>
<td>Z01.411</td>
<td>OB/GYN</td>
<td>6%</td>
</tr>
<tr>
<td>G89.29</td>
<td>PM</td>
<td>6%</td>
</tr>
<tr>
<td>M25.561</td>
<td>FP</td>
<td>5%</td>
</tr>
</tbody>
</table>
Top 10 Procs with Errors

- Procedure Codes with Errors: 2,276
- Percent of top 10 codes to all errors: 30%
- Percent Non EM codes: 71%
- Percent Incorrect EM codes: 29%
Procedures – Top Specialties with Errors

- Cardiology: 6%
- Critical Care: 10%
- Family Practice: 28%
- General Practice: 2%
- General Surgery: 3%
- Internal Medicine: 11%
- Obstetrics and Gynecology: 3%
- Pain Management: 6%
- Pediatrics: 5%
- Unknown: 3%
Top Incorrect EM by State

- Connecticut: 99213
- Florida: 99214
- Maryland: 99233

Map showing states with incorrect EM codes:
- California: 99213
- Kansas: 99213
- Iowa: 99213
- Minnesota: 99231
- Wisconsin: 99214
- Texas: 99214
- Georgia: 99239

Connecticut: 99213
Florida: 99214
Maryland: 99233
Top Incorrect Non/EM by State

Connecticut: 59840
Florida: G0434
Maryland: 73501
Rhode Island: 99173
• Verify supporting documentation for specific procedure types:
  • EKG
  • Injection/Immunization
  • Lab
  • Radiology

• Trends:
  • Where procedure was applicable to the audit/documentation:
    • Majority of audits found that the documentation supported specific procedure type
    • Only two cases where the percentage of “No’s” were higher – most likely in 1 practice:
      • Biopsy billed, not documented
      • Radiology contrast was billed, but not documented
Documentation Element Trends

Lack of Supprting Doc, 31%
All Other, 28%
No Signature, 17%
Untimely Auth of Note, 6%
Phys Issues, 4%
Incident To Issue, 4%
Illegible, 4%
Cloning, 6%
Chart Level Comment
Categories

HCPCS
Diag
EM
Supports
Add
Not Supp
Conclusion

• **Compliance:**
  - Majority of organizations have some type of compliance program
  - Coding/Billing – biggest risk
  - Majority of incidents: HIPAA related issues

• **Auditing:**
  - Improvement with ICD-10
    - Top Errors among primary care specialties (Family Practice/Internal Med)
  - Non-EM codes made up majority of errors
  - Lack of supporting documentation key indicator
  - When looking at specific procedure elements – majority supported

• **Survey:**
  - Healthicity.com/resources