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THE CHANGING DEMAND FOR THE ED

Problem Statement-The Opioid Crisis is undeniably front and center as a major health care issue, and well it should be. According to the **Centers for Disease Control and Prevention (CDC)**, opioid addiction accounted for over 64,000 deaths in 2016 due to drug overdose, which has nearly doubled in the past decade. Of these overdose deaths, 20,101 were related to prescription pain relievers, and 12,990 overdose deaths were related to heroin. The magnitude of this rampant societal epidemic has received immense amounts of press, has reached each of our hometowns and other prominent cities from Hollywood, CA to Washington, DC. On Thursday, October 26, 2017, President Donald Trump declared the opioid crisis a public health emergency and talked about his late brother, Fred Trump, Jr., who battled alcoholism before passing away nearly 40 years ago. Alcohol alone is linked to 88,000 deaths each year which includes all potential alcohol deaths: liver cirrhosis, poisonings, crimes related to alcohol, and driving while intoxicated. This translates to a significant increase in these cases presenting to our emergency rooms; cases that require more in depth education and training of staff in terms of direct care protocols, security, social work, and comprehensive clinical documentation. Patient placement within our EDs—triaging potential overdoses from potential myocardial infarctions, for example, has continued to be a hospital administrative challenge. Depending on the time of day, day of week, and/or lack of other health care and community resources available, the ED is the home base for this patient population.



AMS Input-Although much work has been done to assure proper ED utilization while meeting EMTALA regulations with respect to treating everyone who presents themselves at the ED (regardless of ability to pay), we are still left with the inability to divert patients to other EDs due to capacity and trying to siphon off volume to clinics or urgent care centers, leaving the main EDs busting at the seams. More and more urgent care centers, including those owned or co-branded by the hospitals, have opened in the last ten years, however, that has only reduced main ED volume by 10% or less according to AMS experience. This was based on reviewing over two dozen Urgent Care Centers and 60 Emergency Departments. The primary study focus has been to offer efficiency and throughput opportunities all while considering the crisis patient population.

Case Study-A recent ED Operational Analysis at **Baystate Medical Center (Baystate)**, Springfield, MA, focused on how to properly accommodate ALL 100,000 patients per year arriving to this Level 1 trauma center. Boarder patients—those admitted to the hospital but who remain in the ED due to lack of an inpatient bed—is the number one

MASSACHUSETTS PAYMENT INTEGRITY COMPLIANCE REVIEWS CHANGES IN BEHAVIORAL HEALTH PAYMENTS

Payment Denial to providers that they were previously compensated –

AMS is aware of the increasing and more stringent audits by third party payers pertinent to behavioral health and reimbursement (Evaluation/Management Codes).

Beacon Health Options (Beacon) published a bulletin on December 17, 2017 with findings from their 2017 “Payment Integrity Compliance Reviews.”

- Results of this review were highly negative to providers and included findings from the simple (failure to use black or blue pen) to more complex (lack of documentation, incomplete documentation, documentation spread over multiple entries).
- Beacon temporarily broadened acceptable documentation standards for authentication and duration of services for Massachusetts providers only. Beacon will accept “progress notes, psychotherapy notes (redacted to meet HIPAA requirements), encounter forms, and billing sheets to authenticate the services and to confirm the duration of services reported on claims submissions services” for services provided through December 31, 2017.

AMS thinks this appears to contradict the Federal Register 2007, 72 CFR 66789, which states there are no coding standards for ED facility codes. The regulation, further, states hospitals “should continue using their own internal guidelines to determine the appropriate reporting of different levels of clinic and emergency department visits until formal guidelines are developed.”

This temporary accommodation will end on February 1, 2018 and providers will be expected to meet documentation requirements for authentication and duration of services on the progress notes. Extraneous documentation will not be accepted.

AMS has staff members who are very experienced in coding/documentation audits for all health care entities (i.e. hospitals, medical staff offices, clinics, EDs, ambulatory centers) in all aspects (i.e. facility, staff) of Evaluation/Management coding, documenting and auditing for all services including behavioral health. Our “day to day” experience includes “hands-on” coding, management of coding services, denials coding, pre-denial coding (billing departments), teaching coding/documentation requirements to coding/medical staffs, auditing/coding compliance and creating/implementing documentation tools to ensure proper documentation.

There is much more background and information on this that AMS has to share. Contact our HIMC vice presidents Linda Mancini at lmancini@aboutams.com or Jeanne Beando at jbeando@aboutams.com.

Project Management for Healthcare



Friday, March 16, 2018

8:30 am to 3:00 pm

MHA Conference Center | Burlington, MA

