

# **Applying Lean Thinking to Coding, Billing, and Collections**

How to Recoup Lost Revenue, Transmit More Clean Claims  
and Shorten Payer Payment Times

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# Key Learning Objectives

1

Impact of Medical  
Billing and Coding  
Errors

2

Identifying Defects  
in the Current  
Billing, Coding and  
Collection Process

3

Applying the  
Flawless Execution  
Model and Lean  
Concepts

# Learner Outcomes

Strategies to  
reduce the # of  
billing and coding  
errors

How to customize  
and utilize the  
Flawless Execution  
& Lean Concepts

Strategies to  
optimize  
collections

# Key Learning Objective #1

## Impact of Medical Billing Coding Errors



Medical Record Documentation



Consequences & Regulations



Stakeholders



Financial

# Key Learning Objective #1

## Medical Record Documentation

# Medical Record Documentation & Why it Matters !

Foundation of all coding and billing

Provides communication among health care professionals

Accurate and timely claim reviews and payments

Justification for claim payments

Legal protection for you and your patients

Revenue

Federal and state laws

# Importance of Medical Documentation

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Complete, accurate and timely

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Communication tool

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Ensures that patients receive services that are reasonable and necessary

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Supports claim payments

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Supports favorable medical review decisions and reduces appeals

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Outcome can cause unintended complications

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EHR improve quality, safety and efficiency

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Patient Encounters- avoid copy and paste (EHR cloning)

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If it wasn't documented, it hasn't been done.

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# 10 Principles of Medical Documentation

Complete, legible,  
correlate

Diagnoses

Reasons & Results

Health Risk Factor

Patient Progress

Written Plan

Patient Evaluation

Dates/Authorization

Coding



# General Principles of Medical Record Documentation

Complete and legible

Reason for each encounter, reason and relevant history, assessment diagnostic results

Rationale for ordering diagnostic and other ancillary services

Medical plan of care, health risks , patients progress, response to treatment

Diagnosis and treatment codes on the health claim form should be documented

# Documentation Best Practice

## Focus on the “5”

Accuracy

Relevance

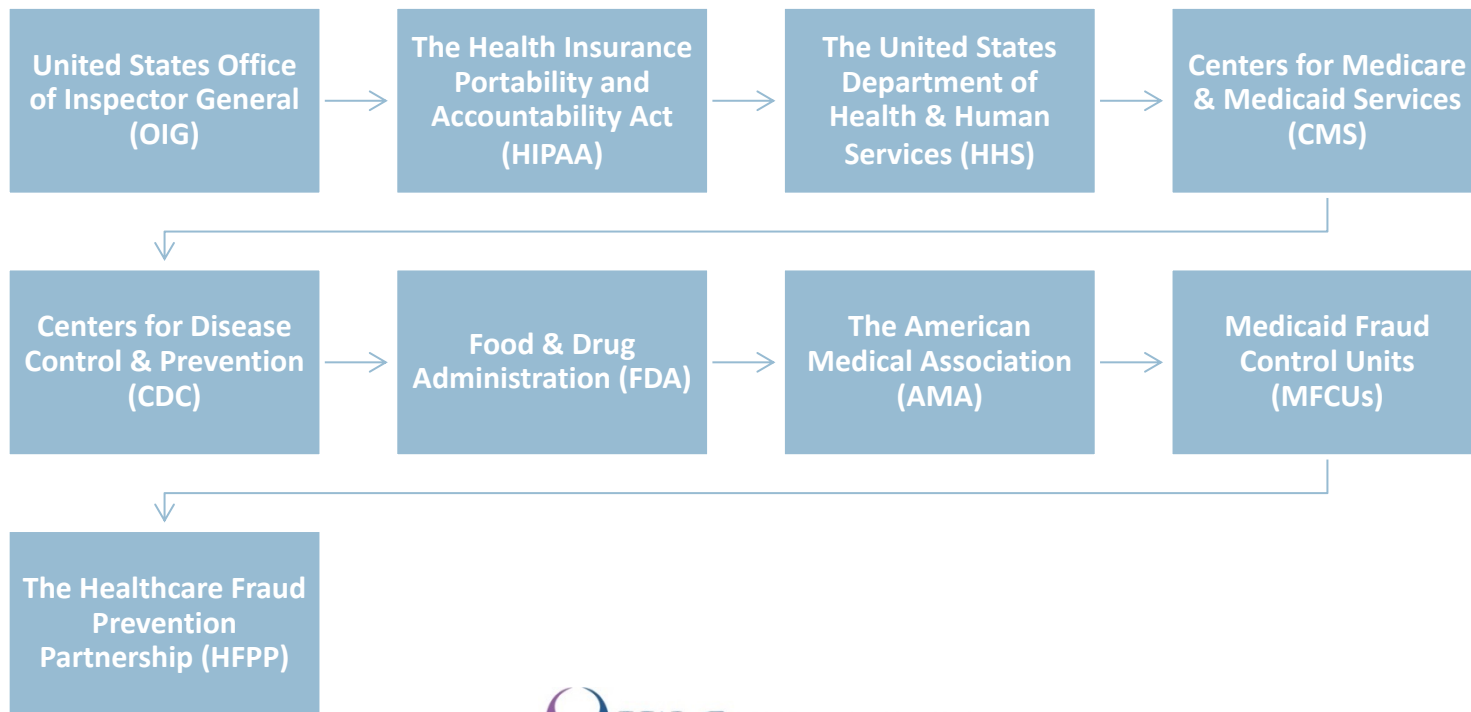
Completeness

Timeliness

Confidentiality

# Regulations

## U.S. Government Authorities for Medical Billing



# Consequences & Regulations

Clinical Laboratory Improvement Amendments (CLIA)

Federal False Claims Act

AntiKickback Statute

Physician Self-Referral (Stark) Law

Value-Based Healthcare

# Stakeholders

Office/Registration

Healthcare Team

Coders

Leadership

Patients

Healthcare Industry

# Office & Registration

Never assume

Verify patient and insurance information

Clarify tests/procedures/pre-authorization

Communicate

Understand payers and policies

# Healthcare Team

Physician, nurses, ancillary services

Provide complete and legible documentation

Provide medical necessity to support tests/procedures/coding

Respond timely to questions/Learn from errors

Communicate

Monitor and Audit

# Coders



Understand coding rules



Establish resources for assistance



Communicate opportunities identified



Manage industry updates



Never assume



# Leadership



CEO, CFO, CCO, CQO, CMO, CNO



Become involved!



Understand payer policies



Review data: finance and compliance rate



Establish a team



Provide support

## Patients

Negative impact treatment/health

Relationship with provider

Unnecessary expense

## Healthcare Industry

Increased Cost

Impact on Patient Care

Loss of Revenue

# Insufficient Documentation & Consequences

Loss of finance revenue

Critical to proper patient care

Reduces efficiency

Audits

# Rejected Claims : Financial Impact



Claims Resubmitted: Medical Group Management Association (MGMA), most practices spend an average of \$25 to \$30 each time they resubmit a corrected claim



Providers that never bother to resubmit claims

# Financial Impact

Let's do the math.....

Denied claims per physician per month

Denial follow-up: cost per claim

Denial follow-up: cost per month

Annual Denial follow-up cost

# Office of Inspector General (OIG)

## Medicaid Fraud Control Units ( MFCUs)

- Current Data February 21,2019
- 50 State MFCUs (except Medicaid expenditures)
- Includes:
  - ✓ Investigations- Total #, Fraud, Abuse/Neglect ( Total # of open at end of fiscal year)
  - ✓ Indictments- Total, Fraud, Abuse/Neglect
  - ✓ Convictions-Total #, Fraud, Abuse/Neglect
  - ✓ Civil Settlements & Judgements
  - ✓ Recoveries- Total \$ Amount, Total Criminal Recoveries \$ Amount, Civil Recoveries Global and Other \$ Amount

Chart Reminder : Expenditures- MFCU Grant and Total Medicaid not reported by OIG

MFCU Statistical Data for FY 2018

State	Investigations <sup>1</sup>			Indictments			Convictions			Civil Settlements and Judgements	Recoveries <sup>2</sup>				Expenditures <sup>4</sup>		Staff on Board
	Total	Fraud	Abuse/Neglect	Total	Fraud	Abuse/Neglect	Total	Fraud	Abuse/Neglect		Total Recoveries	Total Criminal Recoveries	Civil Recoveries		MFCU Grant	Total Medicaid	
													Global <sup>3</sup>	Other			
Alabama	59	45	14	11	9	2	18	10	8	8	\$7,827,694	\$2,232,440	\$5,595,255	\$0	\$1,315,157	\$5,768,025,506	10
Alaska	158	148	10	20	20	0	8	8	0	5	\$2,703,916	\$85,886	\$568,638	\$2,049,392	\$1,737,872	\$2,196,000,353	12
Arizona	206	170	36	83	74	9	63	56	7	8	\$11,973,830	\$835,168	\$11,138,662	\$0	\$3,482,650	\$12,406,620,828	27
Arkansas	214	124	90	36	12	24	28	14	14	30	\$6,639,874	\$530,414	\$5,400,464	\$708,996	\$2,377,754	\$6,709,044,022	21
California	1,766	1,200	566	222	146	76	186	113	73	22	\$15,373,635	\$6,176,649	\$4,592,861	\$4,604,125	\$44,507,337	\$88,895,768,297	205
Colorado	333	302	31	11	8	3	7	6	1	35	\$6,797,291	\$77,228	\$6,410,055	\$310,009	\$2,373,031	\$9,337,178,911	15
Connecticut	85	83	2	3	3	0	6	6	0	14	\$6,497,861	\$3,250,401	\$539,461	\$2,708,000	\$2,246,843	\$8,570,841,507	12
Delaware	601	577	24	12	7	5	14	4	10	12	\$2,373,579	\$8,580	\$2,054,120	\$310,879	\$2,059,739	\$2,327,046,971	17
D.C.	101	95	6	8	5	3	4	4	0	11	\$9,731,625	\$9,566,824	\$164,018	\$783	\$2,770,143	\$2,976,558,441	17
Florida	667	595	72	55	43	12	49	37	12	16	\$69,215,337	\$59,776,528	\$3,334,426	\$6,104,383	\$18,661,081	\$23,747,162,235	151
Georgia	522	513	9	24	20	4	14	13	1	34	\$27,184,015	\$1,363,274	\$21,897,076	\$3,923,665	\$4,810,190	\$11,398,504,876	44
Hawaii	472	429	43	7	7	0	4	3	1	11	\$754,357	\$37,671	\$657,198	\$59,488	\$2,168,237	\$2,311,151,261	16
Idaho	135	132	3	3	3	0	2	2	0	8	\$370,510	\$6,136	\$364,374	\$0	\$928,206	\$2,024,439,472	9
Illinois	388	335	53	56	47	9	49	42	7	19	\$6,429,594	\$2,934,900	\$2,037,953	\$1,456,741	\$7,815,424	\$23,112,241,735	42
Indiana	1,181	866	315	41	38	3	31	28	3	20	\$22,936,757	\$12,430,988	\$9,837,481	\$668,288	\$6,639,938	\$11,796,378,211	58
Iowa	372	331	41	59	26	33	50	25	25	17	\$4,752,977	\$491,379	\$3,782,659	\$478,939	\$1,066,130	\$4,992,488,405	9
Kansas	240	164	76	25	10	15	13	11	2	4	\$282,381	\$156,629	\$125,752	\$0	\$1,634,666	\$3,603,034,923	15
Kentucky	147	118	29	21	12	9	16	13	3	17	\$31,611,155	\$13,938,658	\$13,937,542	\$3,734,954	\$3,495,480	\$10,114,058,416	29
Louisiana	527	446	81	74	66	8	77	65	12	18	\$11,019,439	\$1,686,841	\$8,714,690	\$617,908	\$7,303,057	\$11,222,709,411	67
Maine	99	83	16	12	8	4	17	8	9	7	\$1,647,682	\$37,036	\$79,869	\$1,530,777	\$1,076,956	\$2,841,007,872	9
Maryland	396	364	32	13	10	3	17	16	1	32	\$15,508,773	\$407,087	\$11,797,353	\$3,304,333	\$4,344,751	\$11,867,520,808	34
Massachusetts	571	516	55	14	14	0	5	5	0	20	\$44,691,805	\$86,449	\$22,761,650	\$21,843,705	\$5,810,593	\$18,699,858,030	42
Michigan	439	389	50	13	6	7	15	11	4	16	\$24,596,799	\$3,008,070	\$20,594,285	\$994,445	\$5,114,491	\$17,085,638,296	30
Minnesota	270	265	5	64	62	2	54	51	3	12	\$8,428,634	\$4,549,579	\$2,129,055	\$1,750,000	\$2,863,917	\$13,130,373,020	26
Mississippi	666	111	555	59	6	53	60	6	54	14	\$12,104,381	\$1,511,171	\$5,377,168	\$5,216,041	\$3,526,284	\$5,443,612,233	34
Missouri	174	154	20	16	13	3	13	12	1	10	\$2,965,595	\$1,030,155	\$1,546,389	\$389,052	\$2,305,744	\$10,709,689,095	22
Montana	81	73	8	3	3	0	7	5	2	8	\$1,252,900	\$50,984	\$1,201,916	\$0	\$825,481	\$1,920,831,782	8
Nebraska	121	93	28	5	5	0	5	5	0	13	\$2,803,669	\$130,009	\$1,890,508	\$783,152	\$1,046,918	\$2,234,101,910	10
Nevada	425	422	3	15	15	0	11	9	2	19	\$5,485,042	\$1,353,711	\$3,931,030	\$200,302	\$2,003,056	\$4,127,315,581	16
New Hampshire	79	46	33	1	1	0	2	0	2	2	\$1,017,725	\$0	\$1,016,566	\$1,159	\$775,115	\$2,273,337,486	8
New Jersey	468	417	51	22	6	16	21	9	12	17	\$24,011,341	\$7,793,583	\$15,590,575	\$627,183	\$3,722,721	\$15,706,565,267	26
New Mexico	176	158	18	6	3	3	3	3	0	12	\$3,941,930	\$10,452	\$3,533,102	\$398,376	\$2,513,183	\$5,332,964,484	21
New York	762	619	143	87	54	33	97	67	30	91	\$61,709,156	\$725,944	\$3,423,561	\$57,559,650	\$54,691,331	\$75,262,657,182	304
North Carolina	359	354	5	16	15	1	21	20	1	17	\$38,494,796	\$13,827,950	\$23,491,849	\$1,174,997	\$5,588,969	\$14,060,675,775	41
Ohio	1,284	867	417	166	107	59	148	99	49	21	\$32,404,738	\$10,328,938	\$21,911,151	\$164,649	\$12,274,547	\$22,694,958,437	97
Oklahoma	261	190	71	39	23	16	24	12	12	17	\$8,727,497	\$1,422,831	\$6,293,203	\$1,011,462	\$2,465,829	\$4,659,329,936	26
Oregon	72	69	3	50	47	3	49	47	2	8	\$891,326	\$598,672	\$210,421	\$82,233	\$2,934,089	\$9,382,904,731	17
Pennsylvania	503	470	33	164	156	8	105	103	2	10	\$22,306,797	\$3,260,707	\$19,046,089	\$0	\$9,107,567	\$30,758,314,287	58
Rhode Island	100	81	19	8	7	1	3	3	0	10	\$3,408,545	\$307,842	\$3,052,541	\$48,162	\$1,373,714	\$2,783,542,978	11
South Carolina	195	124	71	17	11	6	15	10	5	18	\$16,455,698	\$4,646,673	\$2,220,958	\$9,588,068	\$1,362,869	\$6,357,022,896	16
South Dakota	43	43	0	4	2	2	4	2	2	7	\$1,125,285	\$131,804	\$639,476	\$354,005	\$420,014	\$913,990,729	5
Tennessee	221	199	22	22	15	7	30	26	4	20	\$50,942,917	\$5,709,325	\$12,830,079	\$32,403,513	\$4,968,914	\$10,301,164,426	38
Texas	1,319	1,199	120	89	73	16	69	64	5	21	\$182,511,442	\$128,843,966	\$49,958,655	\$3,708,822	\$22,894,423	\$38,962,764,740	172
Utah	162	122	40	16	5	11	14	7	7	13	\$982,072	\$532,299	\$371,838	\$77,935	\$2,092,903	\$2,578,963,871	13
Vermont	84	62	22	11	11	0	10	10	0	6	\$2,431,252	\$265,206	\$1,777,853	\$388,193	\$1,043,429	\$1,769,804,444	9
Virginia	385	385	0	52	52	0	27	27	0	19	\$14,112,278	\$5,094,774	\$4,421,180	\$4,596,325	\$11,525,764	\$9,934,971,320	86
Washington	530	321	209	3	2	1	4	3	1	15	\$12,343,705	\$19,713	\$12,250,834	\$73,158	\$5,205,464	\$12,827,331,385	36
West Virginia	112	105	7	7	5	2	4	4	0	8	\$1,913,942	\$770,034	\$961,829	\$182,078	\$1,006,092	\$3,996,923,158	13
Wisconsin	218	199	19	26	18	8	6	1	5	12	\$12,568,848	\$19,741	\$10,480,641	\$2,068,466	\$1,484,563	\$9,180,255,127	13
Wyoming	36	32	4	5	5	0	4	4	0	6	\$2,909,977	\$2,283,802	\$626,174	\$0	\$457,082	\$669,181,828	4
GRAND TOTAL	18,785	15,205	3,580	1,796	1,316	480	1,503	1,109	394	810	\$859,172,372	\$314,345,099	\$366,570,482	\$178,256,791	\$294,219,708	\$611,976,826,895	2,021



# Findings



Investigations: Total- 18,785



Indictments: Total-1,796



Convictions: Total-1,503



Total Recoveries: \$859,172,372

## Key Learning Objective #2

### Identifying Defects

Common Reasons for Denials

How to Avoid Denials

Responsibility

## Key Learning Objective #2

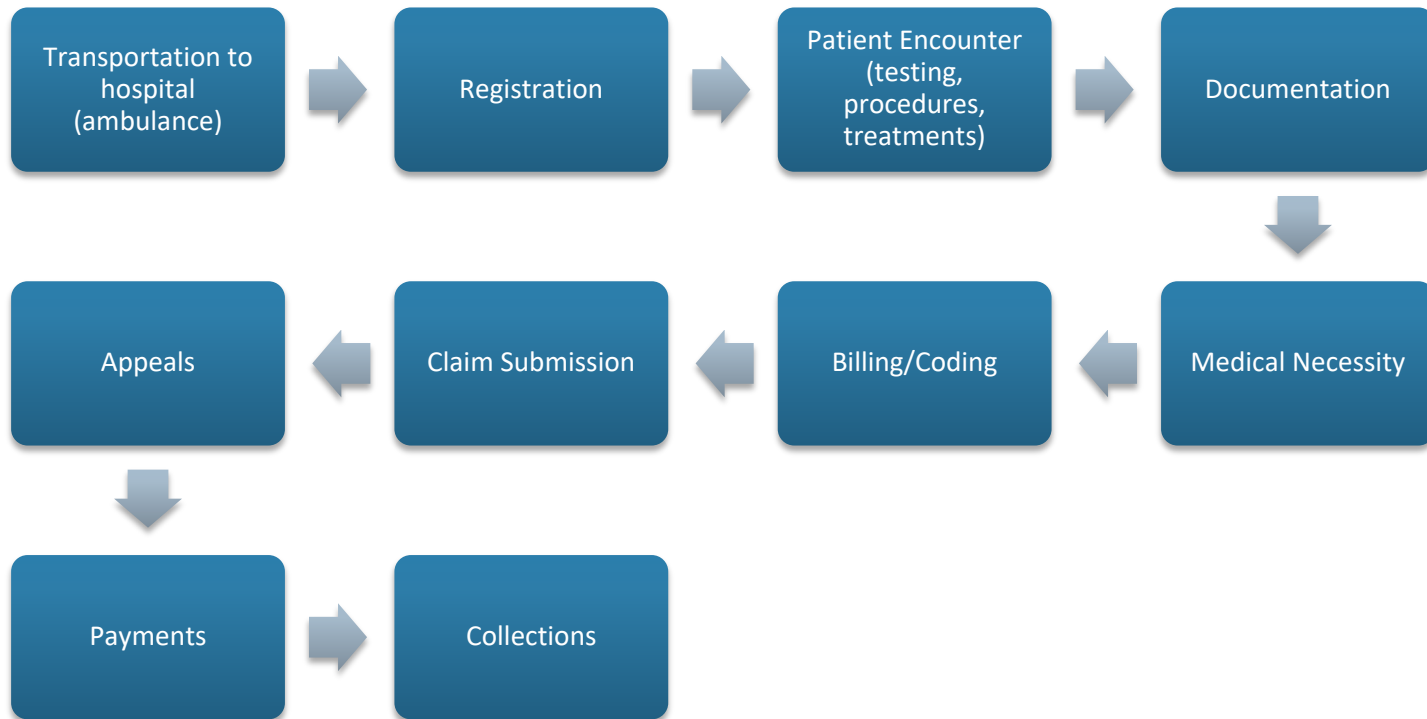
### Identifying Defects

Billing

Coding

Collection

## Start to finish



## 5 Documentation Errors

**Lack of Notes**

**Inadequate History**

**Missing Information**

**Careless Handwriting**

**Medication Problems**

# Must Do Documentation List

Every Encounter

Treatment & Plan Medical Necessity

History

Complete Information

Medication

Legible

# Claim Denials

“Not Medically Necessary”

Place of service coding errors

Misused modifiers

Insurance

Duplicate Claims

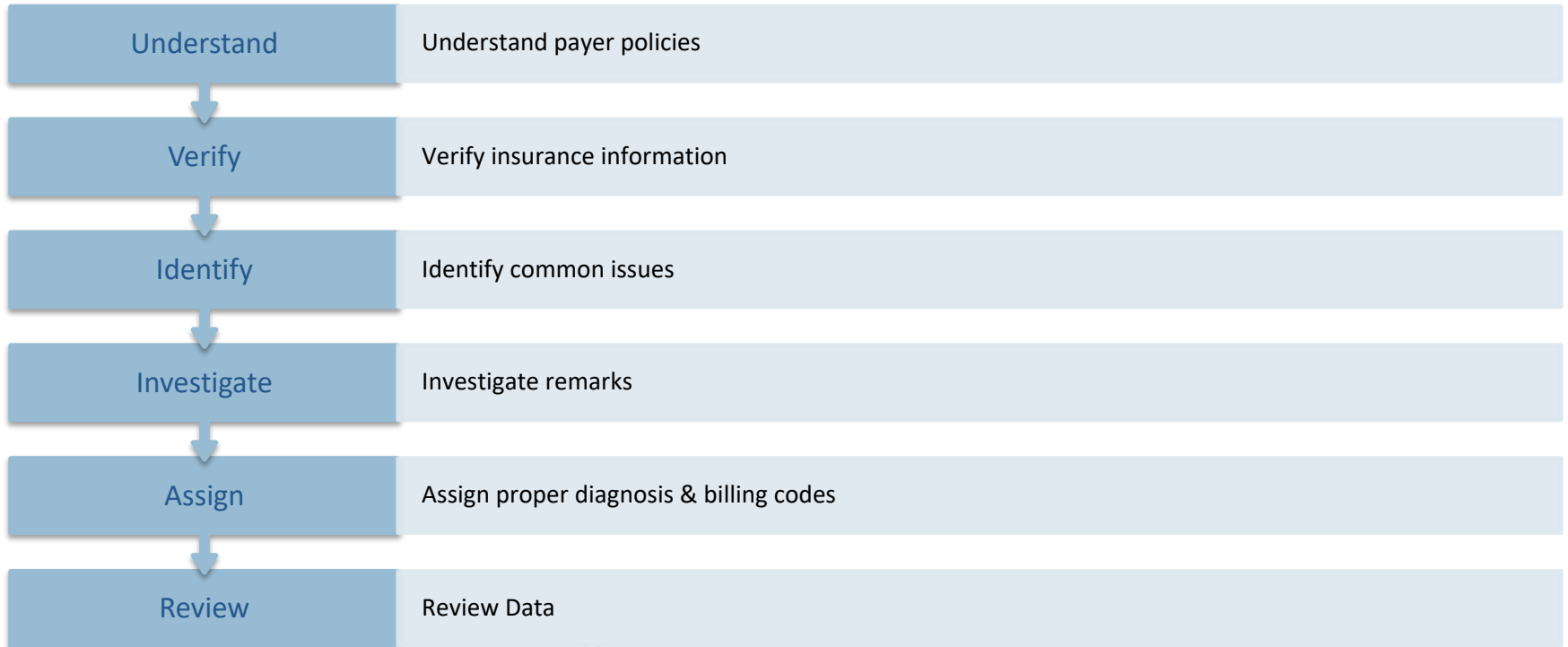
Patient Deductibles

Bundled Services / Provider Payments

Benefits

Deficient claims information.

# Resolving Denials





## Key Learning Concept #3

# Applying the Flawless Execution Model & Lean Concepts

# Continuous Improvement & Execution



# The Journey to Continuous Improvement

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Six Sigma- Lean-ISO 9001

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Flawless Execution

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Success

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# Flawless Execution

Effects based thinking

Examine intended effects of  
mission objectives

Accurately plan and execute  
missions

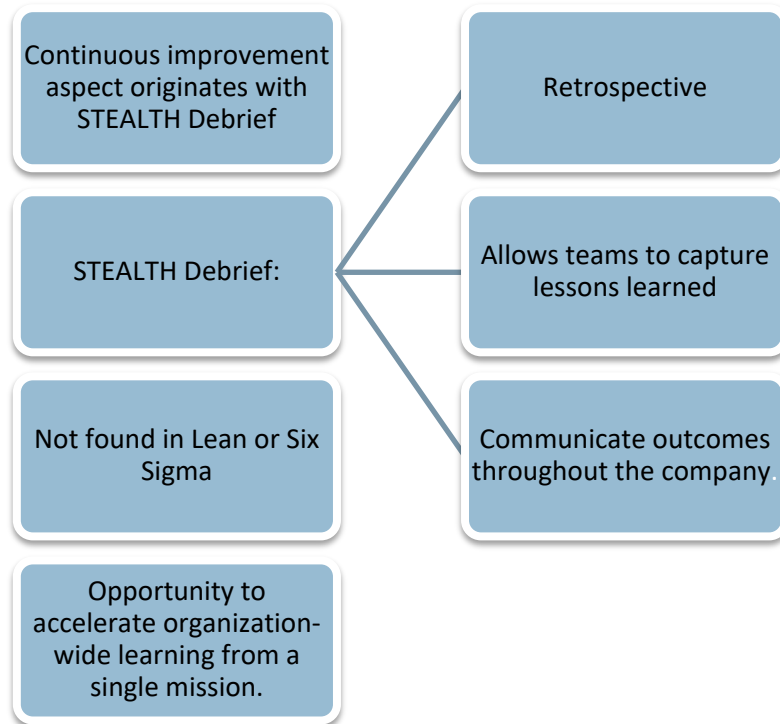
Decrease the scope of projects  
and even eliminate unnecessary  
projects

# The Flawless Execution Model

- Plan
- Brief
- Execute
- Debrief
- Win



# Flawless Execution Organizational Learning



# THE FLAWLESS EXECUTION CYCLE

STEPS

PLAN-BRIEF-EXECUTE-DEBRIEF-WIN



Flawless Execution brings structure and discipline to the day-to-day process that ultimately make the difference between success and failure.

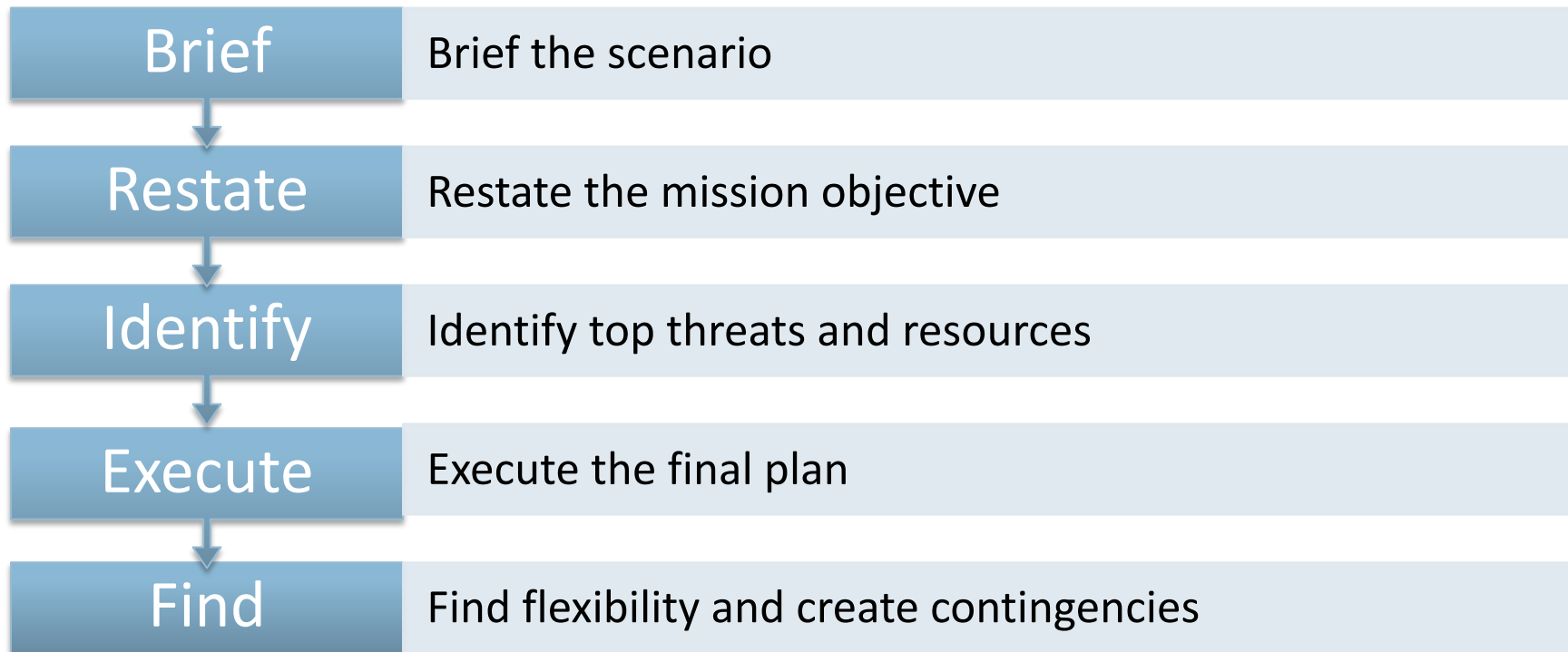
# Step 1: PLAN

## The Six Steps of Mission Planning





## Step 2: BRIEF



## Step 3: EXECUTE

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Execution rhythm

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X-Gap Meetings

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Six Fundamental Keys to Successful Execution — L.O.C.K.E.D on Teams

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Checklists

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Cross-checks and Task Shedding

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Mutual Support — The Wingman Concept

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## Step 4: DEBRIEF

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Set the time

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Tone -Nameless and rankless

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Execution -Analyze the execution towards the objective

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Analyze the execution and identify root causes

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Lessons learned -Develop actionable lessons

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Transfer lessons learned -Save and transmit throughout the organization

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High note -Recap results in a positive manner

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## Step 5: WIN

The process portion of the model is the Flawless Execution Cycle, an iterative approach to daily operations and strategic execution aimed at creating a shared mental model that breaks down silos and communication barriers with simple, scalable process.

# Flawless Execution

The goal is to win by implementing a disciplined management process.

We only really win if we have planned carefully, briefed the plan thoroughly, executed the plan with discipline, and debriefed the mission quickly.

Luck can lead to these results some of the time, but it can't be easily duplicated every time without a disciplined process.

# NEVER leave the Flawless Execution Model

"Talent wins games, but teamwork and intelligence wins championships."

~ *Michael Jordan*



# Learner Outcomes

Strategies to reduce the # of billing and coding errors

How to customize and utilize the Flawless Execution & Lean Concepts

Strategies to optimize collections

# Learner Outcome #1

## Strategies to Reduce Billing and Coding Errors

Communicate

Understand Insurer Billing Guides

Review/ Implement Processes/Systems/Manuals

Look at Improper Payments by Agencies

Conduct Internal Audit

Stay Current



# Claim Appeals

## Prepare

- Appeal letters/templates
- Coding Guidance, Coding Policies, and a Payer policies.
- Provide all relevant documentation to all involved parties.

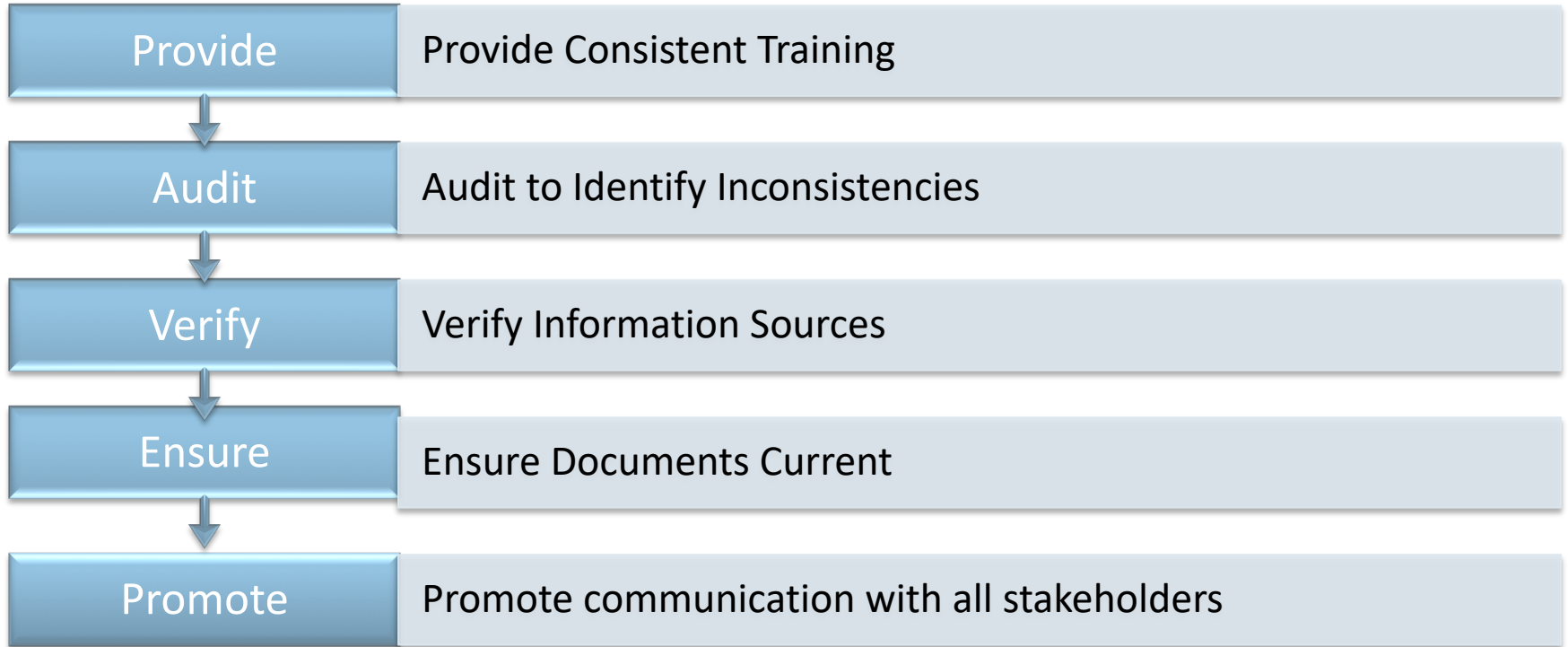
## Tell

- Provide the insurer with the purpose of your call.
- Review or re-evaluation, comparison with other claims.
- The amount that you expect to be paid and why.

## Explain

- Explain your justification with documentation
- Provide supporting documentation.
- Request Insurer to provide timely justification of denial.

## Keep on Track



## Learner Outcome #2

# How to Customize and Utilize the Flawless Execution & Lean Concepts

# Let's Get Started



# Checklist

Policies/  
Procedures/Processes  
( registration to  
payment)

Computer systems  
used for billing  
(outsourced or  
inhouse)

Current testing and fee  
schedule

Write off Reports

Denial Reports

Total number of  
orders/requisitions  
generated

% of claims submitted  
electronically

% of clean claims sent  
the first time

Average days to billing  
of claims

Edits: CCI edits, timely  
edit cleaning  
processes and  
crosswalks

Summary of gross  
charges, payments,  
and adjustments billed  
by month

CPT Utilization Report

YTD missing  
demographic  
information

Compliance plan

# Audit Example

Data Fields/Headers for Detailed Billing File
Patient Name
Patient ID or Medical Record Number
Date of Service
Insurance Payer
Provider/Physician
Facility/Practice Location
CPT Codes
Diagnosis Codes
Charges
Payments
Contractual Agreements
Write-Off
Account Balance
Paid Date

## Audit Example : Documents Needed for Audit

Manual requisitions or electronic orders

Claim form

Explanation of Benefits or Provider Remittance Summary (for billing review)

Electronic Orders entered into LIS (screen prints are ok if other formats are not available)

Lab Tests performed with results

Encounter/Superbill or Charge sheet if applicable

Provider Roster (with credentials)

Signature Log ( if applicable)

## Learner Outcome #3

# Strategies to Optimize Collections



# Optimizing Collections



Develop Policies/Processes



Verify Eligibility



Collect copays



Monitor invoices, statements and payments

## Successful Outcomes

1

Case Study #1  
Revenue Cycle

2

Case Study #2  
Medical Record  
Documentation

3

Case Study #3  
Competency

# Medical Professional Guidelines



## Develop

Develop a compliance  
program HHS OIG

<https://oig.hhs.gov/compliance/compliance-guidance/index.asp>



## Perform

Perform self audits  
Basic Self-Audit Rules  
Develop a medical record  
documentation policy  
Develop an audit tool  
Chose a staff member to select  
charts for review  
Perform the audit  
Use audit results



## Check

Check for exclusions

# Sources

## State Resources

- Washington State Department of Health - <http://www.doh.wa.gov/Home.aspx>
- Office of the Insurance Commissioner - <http://www.insurance.wa.gov/>

## Federal Resources

- CMS Online Manual System - <http://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/index.html>
- CMS Conditions of Participation (CoPs) and Conditions for Coverage (CfCs) - <http://www.cms.gov/Regulations-and-Guidance/Legislation/CFCsAndCoPs/index.html>
- Emergency Medical Treatment & Labor Act (EMTALA) - <http://www.cms.gov/Regulations-and-Guidance/Legislation/EMTALA/index.html>
- National Correct Coding Initiative Edits - <http://www.cms.gov/Medicare/Coding/NationalCorrectCodInitEd/index.html>
- Medicare Learning Network (MLN) - <http://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNGenInfo/index.html>
- U.S. Department of Health & Human Services - <http://www.hhs.gov/>
- Office of Inspector General - <http://oig.hhs.gov/>

# Resources

- Coding Networks
- Medical Association/Specialty Society
  - Advocacy on your behalf
  - Track common ongoing issues
  - Work with all parties to resolve issues
- AMA Resources
  - CPT Guidelines
  - CPT Network
  - CPT Assistant