

Hospital system elevates its approach to deciding when regulations are relevant

Executive Summary

As chief compliance officer for a hospital system, Scott Borsuk faced a two-fold challenge. He was overwhelmed by the endless stream of new and changing laws and regulations coming in. Deciding if changes pertained to his organization was an even bigger struggle.

Implementing YouCompli helped his compliance function to deliver greater value to the hospital system.

In fact, on day one of implementation, YouCompli flagged a billing regulation that would have otherwise been missed. The benefits of YouCompli multiplied from there.

Borsuk no longer dedicates hours to reading regulations and deciding if a change is relevant to his hospital. YouCompli handles these steps for him. Whether it's changing a code to match a regulatory change, completing a form, or modifying a policy or procedure, YouCompli helps Borsuk decide what regulations apply to him know what he needs to do to comply.

Read how YouCompli empowered Borsuk to make better informed compliance decisions and deliver greater value.

The Challenge

The complexities and challenges of managing compliance risks for a hospital system are endless. As chief compliance officer for Western Maryland Health System, Scott Borsuk faced a two-fold challenge.

He was overwhelmed by the volume of new and changing laws and regulations coming in. Deciding if changes pertained to his organization presented an even trickier challenge.

“We run pretty lean,” he explained. “Our surgery director, or emergency department or pharmacists – they don’t have a lot of time. And they’re trained to be clinicians. We don’t want them spending time reading regulations and figuring out what to do to comply.”

He relied on an alerting tool to notify him when language in existing regulations and laws changed. But he said it was “cumbersome.” And it did not flag specific changes or indicate if they were relevant to Borsuk’s organization.

As a result, he was required to read an entire national coverage determination, for example, to look for modifications.

“It’s not enjoyable reading,” Borsuk noted.

Even if Borsuk decided a change was relevant to his organization, he faced another problem. He had to decide who among his 2,300 colleagues should implement new policies or procedures in order to comply.

“I probably spent six to eight hours a week reading regulations, then copying and pasting them” to share with colleagues, Borsuk said. “It took a lot of my time.”

He also worried about missing a change in a regulation or law.

“We were not confident that we were catching everything,” Borsuk said. “We had the documents but didn’t know if we missed anything. At the end of the day, we didn’t know if we were making the right changes or not.”

Borsuk knew he needed a better system and a stronger approach to managing regulatory change. That’s where YouCompli came in.

The Solution

Deciding if a change is relevant is time consuming, and it can be a tough call for CCOs to make. Especially when their colleagues are focused on patient care and may not be easily accessible to weigh in.

With YouCompli, Borsuk can easily decide if a regulation relates to his hospital system and how to comply.

YouCompli analysts read entire regulations and flag relevant changes and translate technical legal documents into easy-to-understand business requirements. YouCompli also provides tools to help decide which changes apply and which tasks need to be performed to comply.

“YouCompli tells you exactly what to do,” Borsuk said.

For each requirement associated with a regulation, YouCompli creates a few relevance questions. Users may be asked, for instance, Is your organization is a Medicare contractor?

CCOs can answer a question directly or assign it to the appropriate person to answer. YouCompli maintains a directory of subject matter experts who provide compliance leadership within their departments.

YouCompli tracks the responses, including who answered and when. YouCompli uses these responses to decide whether a regulation pertains to an organization. Then YouCompli software prompts users through the decision process and to the next steps in their workflow.

The comprehensive YouCompli solution helped elevate the compliance function at Western Maryland.

The Impact

On day one of implementation, YouCompli saved Western Maryland from missing a billing-related local coverage determination, or LCD.

Days before Western Maryland went live on YouCompli, a hospital director saw that an LCD had been issued for services now deemed “not reasonable and necessary.” But she misunderstood the changes in the regulation and didn’t believe they were applicable.

The day that Western Maryland implemented YouCompli, the hospital director received a notification about the LCD. But she closed it, mistakenly thinking it was irrelevant. When Borsuk noticed she had not answered YouCompli’s relevance questions, he asked her to do so.

They quickly realized the LCD was indeed applicable. They used YouCompli’s model policies and procedures to ensure they were in compliance.

YouCompli saved them from possible delay or denial in payment from the Centers for Medicare and Medicaid Services. (CMS).

The benefits of implementing YouCompli have multiplied since the day-one discovery of the relevant LCD. Borsuk no longer dedicates hours to reading regulations and deciding if a change is relevant. YouCompli handles these steps for him. Whether it’s changing a code, completing a form, or modifying a policy or procedure, YouCompli helps Borsuk decide what to do to comply.

“I may just get a Word doc saying, ‘all you have to do is change this code,’” he said. “I don’t have to do a thing. If it comes into me, let’s say for orthopedic surgery, the person who runs our surgery department is copied. I assign it to him, and he runs with it. I get notified he’s accepted it, and it’s done. The audit trail is there. It took a convoluted process and made it idiot proof.”

Nearly four years after Borsuk implemented YouCompli, he remains convinced it was the right choice. Though return on investment can be tough to calculate, Borsuk noted YouCompli costs less than the competitor he had been using. “I didn’t have to cost justify a thing. We are continually demonstrating how the Compliance function delivers value for the hospital, rather than playing catch up.”

Relying on YouCompli to monitor regulations and help him decide when changes are relevant also saved Borsuk time. He estimates he got back one day per week. YouCompli also has enabled his colleagues to focus on managing patient care.

“Our folks love it,” Borsuk said. “They thought YouCompli was a godsend; I can’t imagine why any compliance professional would not want it.”

“If there’s a regulatory change, you know exactly what to do and you can track whether it’s done or not,” Borsuk said. “We have confidence that any time there’s a healthcare rule, law, or regulation that changes, we’re catching it.” ●



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—SCOTT BORSUK
Chief Compliance Officer
Western Maryland Health System

Keep on top of regulations affecting your organization and make sure those regulations are translated into policies and procedures that affect patient care.

YouCompli customers have access to notifications about changes to regulations, resources to inform policy and procedure updates, and tools to track compliance.

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