Enticing a new physician to the Grand Traverse region is a job that requires careful planning, ample personal skills, and persistence in a field whose new graduates mostly seek warm weather and urban living. Fortunately for Munson Healthcare, the Physician Services and Recruitment team has honed these traits into successful placements for both the in- and outpatient settings.

Deborah Glicker and Tracey Kukla-Aleshire make up the two-person office responsible for annually placing physicians in northern Michigan.

“What many private physician practices don’t know is that we can assist in posting opportunities, sourcing resumes, and helping coordinate on-site visits,” said Deborah Glicker, Director of Physician Services and Recruitment.

“Ideally, any physicians thinking about retiring in the next three years should give us a call now so that we can begin screening candidates and arranging site visits,” she said. “Now more than ever, planning well in advance pays off for practices anticipating turnover or growth.”

New physician recruiting in Fiscal Year 2012 resulted in 27 physicians joining Munson Healthcare-affiliated hospitals. Physician practices in need of recruiting services are welcome to contact either Deborah Glicker at dglicker@mhc.net, (231) 935-5890 or Tracey Kukla-Aleshire at tkuklaaleshire@mhc.net, (231) 935-7692.

Online Resources for Regional Physician Opportunities

- munsonhealthcare.org/physicianopportunities
- Facebook (MunsonHealthcareRecruitment)
- Twitter (MHCRecruitment)

NATIONAL PRESCRIPTION DRUG TAKE-BACK DAY IS APRIL 27

Unused or expired prescription drugs in the medicine cabinet can be safely disposed of on Saturday, April 27 from 10 am – 2 pm at local Sheriff’s Department and Michigan State Police posts.

National Take Back Day is a federal initiative aimed at reducing the amount of prescription drugs, especially narcotics, which languish in many homes and are highly susceptible to diversion, misuse, and abuse.

Patients may not drop off prescription drugs at physician offices or hospitals, including Munson Medical Center. The sheriff’s offices and state police posts are the only drop-off facilities allowed by law to receive prescription drugs.

Permitted locations in the region include those listed to the right.

For more information on National Take Back Day or to find the nearest drop off location, please visit www.deadiversion.usdoj.gov/drug_disposal/takeback/.
Strong HIPAA policies are the cornerstone of good compliance. Policies drive the development of privacy and security procedures and needed HIPAA staff education. Policies are often the first thing that the Office of Civil Rights asks to see in an audit. The HIPAA privacy rule is complicated and can seem overwhelming. To make things easier for you, below is a list of key privacy policies that need to be updated and what to include.

**THESE POLICIES MUST BE UPDATED BY SEPTEMBER 23, 2013:**

**INCIDENT MANAGEMENT AND BREACH NOTIFICATION POLICY**

**OVERVIEW**

The new HIPAA Rule has lowered the threshold for reportable breaches; more breaches will be required to be reported now than before. It’s not that the nature of breaches will change; bad things and unfortunate things happen. Laptops get stolen, mobile devices get lost and sometimes staff access charts out of curiosity or concern, or worse, for financial gain. But the total number of reportable breaches will likely increase, along with the number of risk assessments and required documentation. All breaches now require a risk assessment and documentation.

The Final Rule replaces the “harm threshold” with a presumption that that any acquisition, access, use, or disclosure of Protected Health Information (PHI) not permitted under the Privacy Rule would be considered a breach unless the covered entity or business associate could demonstrate that there is a low probability that based on a risk assessment, the PHI had been compromised. In other words, the covered entity under HIPAA bears the burden of proof. It’s a bit like being guilty until proven innocent.

**Before:** Unauthorized use/disclosure of PHI → only if significant risk of harm to the affected individuals → notify patient/report

**Now:** Unauthorized use/disclosure of PHI → risk assessment → if can’t demonstrate PHI has not been compromised → notify patient/report

**POLICY POINTERS**

Policies should state that your practice will conduct and document a more formalized risk assessment for each breach, and the assessment must include the following factors:

1. Whether the acquisition, access, use, or disclosure of the PHI violates the HIPAA Privacy Rule
2. Whether the PHI involved was “unsecured,” or “secured” “secured” means unreadable, as in shredded or encrypted
3. Whether an exception to the definition of breach may apply
4. Whether there was a low probability that the PHI has been compromised

Low probability of PHI compromise is determined by the following four factors:

1. The nature and extent of PHI involved, including the types of patient identifiers and the likelihood of re-identification
2. Who was the person who accessed the PHI and to whom was it disclosed?
3. Was the PHI actually acquired or viewed?
4. The extent to which the risk to the PHI has been mitigated.

**Examples**

*Example 1:* If a mailing containing detailed patient medical information went to the wrong address by staff error, and was opened and read, then the information has been “accessed” and both the patient and Health & Human Services (HHS) must be notified, as this is a reportable breach.

*Example 2:* Patient information is faxed to the wrong physician’s office. Since the physician office is also bound by HIPAA rules, there is low probability that they will further disclose or use the information, and will offer to shred the fax or return it to you. In this case there is low probability of compromise so patient and HHS doesn’t need to be notified.

Continued on page 3
SANCTIONS POLICY

OVERVIEW
A Sanctions Policy defines what the employee’s disciplinary consequence will be for privacy or security breaches.

POLICY POINTERS
When determining appropriate corrective action for a privacy violation, several factors to consider are:

1. How sensitive is the PHI in nature? Examples: social security number, credit card number, or information that could cause harm to the patient.

2. Was the PHI disclosed to another agency under HIPAA? Could staff give reassurances that the PHI would not be further disclosed?

3. How many patients are affected? How much PHI was compromised? What is the likelihood that the patient could be identified?

4. What other facts does the forensic analysis, audits, or investigation reveal?

5. Does the person who breached PHI stand to benefit from the use of the PHI?

6. Does the breach meet any of the HIPAA exceptions for
   1) unintentional or inadvertent disclosures not further disclosed or
   2) person not able to retain the PHI information accessed?

7. Does the PHI involve mental health, substance abuse, sensitive infectious disease or other sensitive information? Breaches of this type may result in higher levels of disciplinary consequences.

PATIENT RIGHTS

POLICY POINTERS
- Practice must agree to a patient’s request to restrict disclosure to a health plan if the patient pays in full for a service or item. Your practice will need to determine a process for flagging the service in the chart and preventing billing and disclosure to the health plan.
- Patients have the right to request that copies of their PHI be sent to third parties. The Authorization must be made in writing, and clearly identify the recipient and where to send the copy.
- Patients have a right to an electronic copy of their record.

USE AND DISCLOSURE OF PHI
- Practices may release immunization records to schools without an authorization if the parent agrees and you document the agreement.
- The Final Rule enables practices to continue communicating with relevant family and friends after a patient’s death.
- HIPAA no longer protects a patient’s record 50 years after patient is deceased.

I wish there was an “Easy Button” but there isn’t. The HIPAA final Rules changes will take work. Hopefully this article was helpful, but you will want to investigate further on your own as well as develop your practice’s policies with the assistance of a patient privacy consultant and/or legal counsel.

For HIPAA questions or privacy concerns, contact Rochelle Steimel, Munson Privacy Officer, at (231) 935-5765 or rsteimel@mhc.net. To schedule HIPAA training for your practice, please contact Deb Kimball at (231) 935-3388 or dkimball@mhc.net.
Thank you for the great response to the recent survey on Medical Necessity. Munson is developing education and materials to assist physician practices in meeting Medical Necessity and ICD-10 requirements, and your responses help us to better understand your needs in preparing for these initiatives.

Here are some highlights:

- Although most practices are familiar with how to document medical necessity under current ICD-9 guidelines, the majority are not fully prepared to document medical necessity for ICD-10.
- 98% of practices believe that the physician is responsible for determining Medical Necessity.
- In your opinion, a toolkit, seminar/education, and articles in Practice Pro are the best ways to receive information on Medical Necessity guidelines.
- 85% of practices are NOT aware that the Local Coverage Determination (LCD) guidelines are available on munsonhealthcare.org. FYI: LCD guidelines are available at munsonhealthcare.org/forphysicians > Resources > Clinical Resources > CMS Limitations Guide.

Results of April ICD-10 survey will be included in a future Practice Pro.

PRIOR AUTHORIZATION UPDATE

When requesting an authorization for Tricare Prime, visit their website, then print and complete the Service Request/Notification form (in left menu), and fax to 1-888-299-4181. A link to the Tricare Prime website is included in the updated Prior Authorization Requirements guide, which can be found at munsonhealthcare.org/ForPhysicians > Resources > Prior Authorizations. Please note that additional insurances now require a prior authorization for Sleep Studies. Also, a column for “Generic Commercial” has been added to the guide; Prairie States was removed due to low volumes.

Results of Medical Necessity Survey

Who to Call When Scheduling Exams at Munson Medical Center

Here’s a handy reference on which phone number to call when scheduling a patient for an outpatient exam.

<table>
<thead>
<tr>
<th>EXAM</th>
<th>PHONE NUMBER</th>
</tr>
</thead>
<tbody>
<tr>
<td>ARTC</td>
<td>935-2812</td>
</tr>
<tr>
<td>Bone Density</td>
<td>935-2812</td>
</tr>
<tr>
<td>Cardiac Diagnostic Suite</td>
<td>935-6370</td>
</tr>
<tr>
<td>Cat Scan</td>
<td>935-6433</td>
</tr>
<tr>
<td>EEG</td>
<td>935-2812</td>
</tr>
<tr>
<td>Mammogram – Diagnostic</td>
<td>935-2185</td>
</tr>
<tr>
<td>Mammogram – Screening</td>
<td>935-2812</td>
</tr>
<tr>
<td>Maternity Prepared Stay</td>
<td>935-2812</td>
</tr>
<tr>
<td>MRI</td>
<td>935-7200</td>
</tr>
<tr>
<td>MRI – Breast</td>
<td>935-2185</td>
</tr>
<tr>
<td>Pre-Op Assessment Center</td>
<td>935-2812</td>
</tr>
<tr>
<td>Respiratory Care (PFT)</td>
<td>935-6371</td>
</tr>
<tr>
<td>Ultrasound</td>
<td>935-2812</td>
</tr>
</tbody>
</table>

*Editor’s Note: The Mammogram – Diagnostic number was listed wrong in the March Practice Pro. The correct number is (231) 935-2185. We apologize for the error.

HIPAA FINAL RULE WORKSHOPS

Ready for September?

Thursday, May 30, 8:30 – 10:30 am
Park Place, Lake Rooms
- Policy Update Overview
- Business Associate Agreement
- Encryption

Guilty Until Proven Innocent

Thursday, June 20, 8:30 – 10:30 am
Park Place, Lake Rooms
- Incident Management Policy
- Risk Analysis and Documentation
- Sanctions Policy
- Mobile Device Security

Presenting will be:
- Rochelle Steimel, Munson Privacy Officer
- Linda Bower, Munson Security Officer

Hot breakfast will be provided. Space is limited.
To RSVP, please contact the Physician Liaison Program at (231) 935-5873 or physicianliaison@mhc.net.
ARRANGING AN INTERPRETER IS AS EASY AS UNO, DOS, TRES

By law, physician offices are required to provide certified translation services to patients for informed consent or treatment decisions. While it may seem appealing to use available bilingual family members for cost and convenience reasons, that temptation is one physicians should avoid, said Bonnie Schreiber, Director of Risk Management and Patient Relations for Munson Medical Center.

“Clear communication between health care professionals and patients is vital to successful medical care,” Schreiber said. “Because in reality, there are people out there, both English-speaking and bilingual, who would never choose to be the one to say, ‘I’m sorry, Mom; you have cancer.’”

In the Grand Traverse area, the languages most often needing an interpreter include Spanish, Russian, Ukrainian, and American Sign Language. Pre-scheduling appointments with a qualified medical interpreter is a great way to ensure compliance for proper communication with patients who have limited or no English.

HOW TO ARRANGE FOR A QUALIFIED MEDICAL INTERPRETER FOR YOUR PATIENT

1. Refer to the online Interpreter Directory at munsonhealthcare.org/ForPhysicians > Resources > Directories > Interpreter Directory
2. Arrange for a qualified medical interpreter to attend the patient’s appointment
3. After the appointment, your practice will be billed if the appointment was at your office. If the appointment was for testing at a Munson Medical Center location, Munson Medical Center will be billed for the service.

Recently a hearing-impaired patient went to Copper Ridge for a mammogram. The patient had requested an interpreter during her last visit so one had been arranged two weeks prior to her next visit. The mammogram visit went very smoothly with the help of the American Sign Language interpreter.

For more information about interpreter services, contact Carol Francisco, Clinical Risk Specialist, at (231) 935-5044 or cfrancisco@mhc.net or Bonnie Schreiber, Director of Risk Management and Patient Relations, at (231) 935-6590 or bschreiber@mhc.net.

Technology Fair
How to Make Electronics Work for You

Monday, June 3 from 9 am – 3 pm
Munson Medical Center – Conference Center (basement)

Technology experts and vendors will be on-site to provide demos and answer your questions. This event is hosted by Munson’s Information Systems Technology Committee. Detailed information on vendors and breakout sessions will be available online at munsonhealthcare.org/news/techfair.

No need to RSVP. If you have questions on this event, please contact John Rokos, Information Systems, at (231) 935-6999 or jrokos1@mhc.net.

INPATIENT PROGRESS NOTES AVAILABLE IN POWERCHART

Medical Records now scans all Inpatient Progress Notes (since Oct. 10, 2012) as well as ER and Outpatient Progress Notes (since March 4, 2013). However, this does not include Neonatal Intensive Care Unit (NICU), Obstetrical, or Nursery patients. Progress notes are scanned using the admit date of the patient’s visit.

Scanned progress note(s) can be located in PowerChart under:
- The Flow Sheet section of the patient’s chart, titled Progress Notes.
- Clinical Notes → Progress Notes → Progress Note – Scanned (see graphic).

In order to view the different scanned pages, use the blue arrows on the bar below the scanned image.

Note: there is a known delay to open scanned images.

If you have any questions, please call Jo Hicks, Medical Records Educator/Coordinator, at (231) 935-5173 or Sandy Braun, Medical Records Specialist, at (231) 935-7474.

munsonhealthcare.org/ForPhysicians
NEW PRESIDENT SELECTED FOR MUNSON MEDICAL CENTER

Al Pilong Jr. has joined Munson Medical Center as its new president.

Kathleen McManus, who is retiring this fall from her position as Chief Operating Officer and Executive Vice President of Munson Medical Center, will work closely with Pilong during her transition to retirement.

Ed Ness will continue in his role as Munson Healthcare President and CEO. “I will focus my efforts on developing a financially stable, clinically coordinated, integrated health system,” Ness said.

Pilong most recently served as president of the 445-bed Winchester Medical Center in Winchester, Va., where he also was senior vice president of the multi-hospital Valley Health System. Pilong holds an MBA from St. Joseph’s University in Philadelphia, Pa; a Master’s in Divinity from Alliance Theological Seminary in Nyack, NY; and a bachelor’s in Pharmacy from Rutgers University in New Brunswick, NJ.

JOIN US FOR MUNSON’S FIRST 5K WALK/RUN

Grab a friend, form a team, bring your family, or push a stroller – whether you are a seasoned runner, a first time runner, or a Sunday meanderer, you can “Run the Run”! Munson Medical Center’s first-ever fun 5k is for everyone.

Run the Run 5k Walk/Run (3.1 miles)

Saturday, June 8 – 9:00 am
Grounds of Munson Medical Center • 1105 Sixth Street, Traverse City

The event is open to all Munson Healthcare staff, physicians, providers, physician practice staff, families, and friends. Awards and prizes will be given for finish times, general participation, and best department spirit. T-shirts are available for purchase. There is no cost to participate in the race.

For more information and to register for the run, go to munsonhealthcare.org/runtherun.

Physicians Lecture Series – Save the Date

TOOLS FOR TRANSFORMATION
How to Make Health Reform Work for You

Wednesday, May 8
6 – 8 pm
Traverse City Golf & Country Club

Please have your physicians join the first in a series of informational presentations for physicians by physicians. This seminar is co-sponsored by Munson Medical Center and Northern Physicians Organization. A light dinner and refreshments will be served. Physicians will receive 2.0 hours of CME for attending. For presenter and CME information, go to: munsonhealthcare.org/news/toolsfortransformation.

To RSVP, please contact the Northern Physicians Organization at (231) 421-8505 by May.

Physician Name Update

Wanted to let practices know that Lisa Klassens, MD, has changed her name to Lisa Chimner, MD. Dr. Chimner practices at Grand Traverse Children’s Clinic and can be reached at (231) 935-8822. Please update Dr. Chimner’s name in your records, especially for practices with an electronic medical record.
MAY IS BETTER SLEEP MONTH

Eight hours...Are YOU getting it?

Many adults don’t get the recommended eight hours of sleep a night they need to be well rested. Poor sleep can lead to health problems, such as heart disease, depression, and obesity.

May is Better Sleep Month. Take quiz to see if you’re getting the sleep you need.

☐ Snoring: Do you snore loudly (loud enough to be heard through closed doors)?
☐ Tired: Do you often feel tired, fatigued, or sleepy during daytime?
☐Observed: Has anyone observed you stop breathing during your sleep?
☐ Blood Pressure: Do you have/are you being treated for high blood pressure?
☐ BMI: BMI more than 35?
☐ Age: Age over 50 years old?
☐ Neck circumference: Neck circumference >40 cm (16 inches)?
☐ Gender: Male

If you checked at least three boxes, you may benefit from a sleep consultation with one of Munson’s AASM boarded sleep specialists.

Munson Community Health Center: 550 Munson Ave., Ste. 201 | Traverse City, MI 49686

The Munson Sleep Disorders Center is accredited by the American Association of Sleep Medicine (AASM), offering a full line of sleep services for all ages in Traverse City, Frankfort, Kalkaska, Cadillac, and Grayling.

For more information about Munson Sleep Disorder’s Center or for a consultation, call (231) 935-9307 or toll free (800)358-9641. For a listing of physicians specializing in Sleep Disorders Medicine, go to munsonhealthcare.org/forphysicians.

GRAND TRAVERSE STROKE CLUB CELEBRATES 30 YEARS

The Grand Traverse Bay Area Stroke Club will celebrate 30 years during its monthly meeting on Wednesday, May 8. May is also National Stroke Awareness Month.

Munson Medical Center Medical Department Chairman Don Caraccio, MD, and Stroke Coordinator Kathleen Glaza, MSN, RN, ACNS, BC, will be on hand to congratulate the group and talk about the importance of the support group for stroke survivors. Other former facilitators and stroke club members will also be on hand to celebrate. Current members and newcomers are invited to attend.

The meeting will be from 2:30 – 4:30 pm at The Presbyterian Church, 701 Westminster Rd., Traverse City.

For more information, contact facilitators Melinda Hollands, LMSW, or Angela Leete, LMSW, at Munson Medical Center’s Social Work Department at (231) 935-6380.

The Grand Traverse Bay Area Stroke Club meets the second Wednesday of each month and offers stroke survivors and support persons the opportunity to learn, share, and connect with one another through speakers, demonstrations, and group discussions.

Upcoming Events

BARIATRIC SURGERY SEMINARS

Traverse City | Wed., May 15 | 6 – 8 pm | Munson Medical Center, Conference Rooms 1-3
Frankfort | Thurs., May 23 | 6 – 8 pm | Paul Oliver Memorial Hospital, REMEC Room
Gaylord | Thurs., May 30 | 6 – 8 pm | Otsego Memorial Hospital, Hospital Classroom

➤ For more information or to register, go to munsonhealthcare.org/MMCclasses.
PAHCOM Spring Seminar

Wednesday, June 5
8 am – 4 pm
Hagerty Conference Center
Great Lakes Campus, 715 East Front Street | Traverse City

Please join your fellow practice managers for an all-day seminar on critical health care management topics. Presentations include: Todd Welter, RT Welter and Associates in Colorado, a nationally-recognized presenter on ICD-10; Joshua Richmond, MSMS, with a legislative update; and motivational speaker Megan Raphael. In addition, key regional updates will be provided by Munson Medical Center as well as Northern Physicians Organization. The seminar is brought to you by the regional chapter of PAHCOM (Professional Association of Health Care Office Management). Cost is $125; $100 for PAHCOM members.

To register or for more details, including discount information, please visit pahcom.com (under the Traverse City Chapter) or contact Jennifer Coleman, MHSA, FACHE, CMM, Membership Director, at (231) 935-0497 or jcoleman@munsonhealthcare.org.