

**AAHAM Greater Florida Buccaneer Chapter**  
*Buc Bytes e-news for October 2010*

Greetings fellow AAHAM Florida Buccaneer's! We hope you enjoy the features in our AAHAM Florida Buccaneer e-newsletter which includes: A letter from our President, upcoming news and events, educational opportunities, our article of the day, and more.

Please be sure to visit our **newly redesigned web-site at the following link:** <http://FLBuccaneeraaham.org> for more information on upcoming education events. You also may download the presentation handouts from our previous conferences.

**AAHAM GREATER FLORIDA BUCCANEER CHAPTER**

**FALL UPDATE**

**NOVEMBER 12, 2010**

**9:00 am to 3:00 pm**

**BAYCARE ST. JOSEPH'S HOSPITAL NORTH**

4211 Van Dyke Road

Lutz, Florida

813-443-7000

**The cost for this full day program is only \$25.00.**

This **day of education** will include presentations on **Red Flag rules, Dreadful Audits, and the new patient identification process technology** implemented by the BayCare Health System.

Exhibitors are welcome and **lunch will be provided.**

To register you must log on to  
[www.flaahambuccaneer.org](http://www.flaahambuccaneer.org)  
or you can register with the below link:  
<http://www.asaponlinereg.com/Default.aspx?org=178>

**Hotel Reservations can be made via the following link for \$109.00 per night!**

<http://www.marriott.com/hotels/travel/tpasc?groupCode=ahmahmb&app=resvlink&fromDate=11/8/10&toDate=11/15/10>



# FALL UPDATE - Agenda

## BAYCARE ST. JOSEPH'S HOSPITAL NORTH

9:00 am

Presentation: **Red Flag Rule  
Developing Your Identity Theft Prevention Program**

**Laura Kinder- Healthcare Compliance Officer**

**Firstsource Solutions USA, LLC**

Laura has been in the healthcare industry for more than 15 years and as the Privacy/Compliance Officer she works as the focal point for all compliance activities. Such as overseeing the development, coordination, and participation in multifaceted educational and training programs that focuses on the elements of compliance, and seeks to ensure that all employees are knowledgeable of, and comply with, pertinent federal and state standards.

10:00 am

Presentation: **Demonstration of the current patient identification technologies in use at BayCare Hospitals in the registration flow and Central Business Office**

- Patient Identity challenges in healthcare
- What the patient wants and expects at registration
- Remedies through team member training and procedural processes
- Naming convention issues
- Built-in scripting and real time payer verification/logic to identify errors in the registration process
- Why the EMR makes the registration process so critical
- Technology use of bolt on solutions- Biometric scans, Enterprise Access Directory, Photo identification, USPS Address Checking, Signature pads, and optical scanning of registration documents
- Patient Identity theft tracking and alerts
- Future plans

**Jim Schwamb**

**Vice President, PFS BayCare Health System**

Jim has a Masters Degree in Business Administration from Southern Illinois University and a BS in Business Administration from University of Missouri. He has achieved fellowship status in the American College of Healthcare Executives and has taught Bachelors and Masters students at several universities.

Noon **LUNCH will be provided**

1:00 pm

Presentation: **Charity Care Audits**  
**The role of Patient Business Professionals and the Affects to Reimbursement**

Challenging and ambiguous government regulation, inconsistent hospital policies and process and the lack of understanding by patient access personnel can lead to devastating affect to hospital reimbursement. Learn how Sarasota Memorial navigated a series of Charity Care Audits that ultimately affected their Medicaid Reimbursement and what they did to address this.

**Mr. Charles E. Kramer– CEO – The Kramer Group, Inc. & Kramer Healthcare Technologies**

Charles E. "Chuck" Kramer is a successful entrepreneur and Healthcare Executive and Consultant in revenue cycle management. He is the founder and CEO of The Kramer Group, Inc., and TKG Healthcare Technologies. Chuck has owned and operated several successful Healthcare Consulting, Claims Management, and "software as a service" companies during the past 15 years. Chuck has over 15 years Medicare cost report, Medicare and Medicaid reimbursement and area wage index consulting experience and has provided consultation services to over 100 hospitals around the country since 1995. Kramer Healthcare Technologies currently provides web-based Software Services for over 250 healthcare providers throughout the country. Chuck graduated from the University of Central Florida with a BS in Finance and a BA in Political Science. He served on the board of the Florida Chapter of the Healthcare Financial Management Association (HFMA) and is a member of NAHAM and HIMSS.

**Janet Krail – Director of Reimbursement – Sarasota Memorial Hospital**

Janet Krail is Director of Reimbursement of Sarasota Memorial Health Care System, a regional medical center consisting of an 806-bed hospital, physician practices and a network of specialized medical campuses and clinics that include a nursing home and rehabilitation center, home health, psychiatric hospital, walk-in medical centers and outpatient care centers that offer the latest diagnostic and imaging services available. Among its many achievements, Sarasota Memorial has been repeatedly listed in U.S. News and World Report's "America's 50 Best Hospitals" issue. Sarasota Memorial also is the only hospital in the region with "Magnet" status – the nation's highest honor for excellence in nursing. A number of other quality awards continually recognize Sarasota Memorial as a national benchmark for clinical excellence, specialty care and patient safety. Janet has 20 years of reimbursement experience and has been with SMH for 9 years.

2:00 pm

Presentation: **"Creating a Comprehensive Assistance Program for the Uninsured/Underinsured"**

Navigating today's healthcare delivery system is a challenge under the best of

circumstances when you are insured. If you are uninsured, these challenges are vastly increased. Learn how BayCare Health System is supporting uninsured residents in the Tampa Bay area of Florida one patient at a time. Hear about advocacy, outreach and

community partnerships which have been formed for increasing access to community based healthcare for at risk patients to ensure their ability to obtain assistance for their healthcare expenses. Discussion on how healthcare reform will change our business in the next three years. By 2014 the Medicaid rules may change increase significantly. How will your facility handle the additional eligibility challenges?

**Lou Ann Watson, CPAM**

**Ms. Watson is the Medical Assistance Manager at BayCare Health System- Florida.** She has led eligibility teams in hospitals for over fifteen years and provided many years of leadership in community social service programs. Lou Ann received her BS in Psychology from Virginia Commonwealth University. She is an active AAHAM member.



October 26, 2010

Dear AAHAM Members,

President's Report:

The Buc chapter will have a quarterly report from the President or Vice President so we can keep you informed.

I wanted to report in about the 2010 ANI. As you know it was held in Ft. Lauderdale two weeks ago. The venue was beautiful and the sessions were pretty good. I especially enjoyed the general sessions. One general session had great audience participation.

I also wanted to remind you that November 12<sup>th</sup> we are having a one day education event. Log onto our web site [www.flbuccaneeraaham.org](http://www.flbuccaneeraaham.org) to register. It will be in Tampa and very easy to get to. I look forward to seeing you there. If you missed our summer conference, log on and review conference content under our education tab.

We just celebrated patient accounts week. I know my staff had a great week but is now complaining of all of the weight they gained!! Maybe next year we will just exercise to celebrate....NOT! I hope it was a good week for all of you. It is nice to be recognized for all of the hard work we do. (Remember, without us, there would be no payroll!)

We have several open positions on the Buccaneer Board. If you are interested in getting involved, we would love to have you. Please email me at [cplatonicosia@mmhs-fla.org](mailto:cplatonicosia@mmhs-fla.org) or call me at 772-223-5656. We do not require much time and the experience is rewarding. Anyone involved with Access or Patient Accounting is welcome, including vendors.

It is hard to believe that this year is almost over. There are so many changes affecting the revenue cycle in the next couple of years, and it seems to be coming on so fast, it is almost overwhelming. We need to network and stay educated. AAHAM is the best and easiest way to keep informed and excited.

Many of us will be going through conversions in the next year or so. It will not be an easy time. Staying in touch with your AAHAM peers will be critical. There are several corporate partners that support the Buccaneer Chapter that may be able to help you as you convert systems. Please remember to use the vendors listed on our web site. They help all of us with our educational events and will be able to help you with any specific needs you may have. Again, log onto the web site to see our list of corporate partners.

That is all for the 3<sup>rd</sup> quarter of 2010. I look forward to seeing you November 12<sup>th</sup>, or hearing from you real soon. We are here for you. Let us know how we can make our AAHAM chapter better for you.

Sincerely,

Carol Plato Nicosia  
Buccaneer AAHAM President



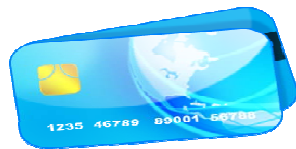
## NEW MEMBER RECRUIT CAMPAIGN



**All Greater Florida Buccaneer Members are eligible to participate in our New Member Recruit Campaign!**

**We have three award levels as follows and there is NO limit to the number of winners in each category, so start recruiting TODAY!**

### Level 1:



**Recruit \*ONE new AAHAM National member to the Buccaneer Chapter and receive one: \$25.00 AMEX Gift Card!**

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### Level 2:



**Recruit \*TWO new AAHAM National members to the Buccaneer Chapter and receive 50% off the registration fee for ONE Buccaneer Chapter Conference in 2011.**

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### Level 3:



Recruit \*THREE or more new AAHAM National members to the Buccaneer Chapter and receive one **FREE** registration to attend ONE Buccaneer Chapter Conference in 2011.

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\*In order for the sponsoring member to receive credit towards this incentive campaign, the new National AAHAM member application must list the sponsoring member's name on the new member application.

\*In order for the new National AAHAM membership to be counted towards this incentive campaign, the membership application MUST be received in AAHAM's National office no later than November 15, 2010.

AAHAM National Membership offers you educational opportunities, specialized programs, peer networking and services to enhance your knowledge and skills. You also have a voice in Washington, DC on legislative issues that affect your industry and you have access to information that gives you the competitive edge. As a member you can join the AAHAM List Serve, receive AAHAM Member Discounts at Alamo, Congressional Federal Credit Union Membership, 1-800-flowers.com, Platinum Plus MasterCard and Gateway Computers.

Support your National and Local AAHAM Chapter, as they are here to help support you!

AAHAM Buccaneer Chapter Officers and Board are not eligible for the awards offered in the membership incentive program.

## 2010 Certification Schedule

**CPAT online learning opportunities available with exciting new partnership with BridgeFront.**

Need training? Need CEU'S? Need to stay current with changes and regulations? Take educational courses from the comfort of your home or office. [Click here](#) to find out more.

### Professional Certification

**The Fall Professional exam dates have changed, they will now be October 25-30, 2010, the deadline to sign up for that exam was August 2, 2010.**

Be sure to take advantage of the great study tools available in the certification section of the chapter toolkits.

You receive the Professional Exam Study Guide when you sign up for the Professional exam. You can also order copies of the CD Rom versions of the webinars we held this summer. These were held to help examinees prepare for the Professional exam. Each CD Rom represents one section of the professional exam and there are 4 total. There is also a CPAM Practice exam available. It is an 80 question practice exam that gives you a feel for the type of questions that appear on the CPAM exam. You will receive your percentage score for each of the sections and will be able to review the questions you miss. If you would like to order any of these products, there is an order form available on the website <http://www.aaham.org/>.

### Technical Certification

**The Summer Technical exam dates are August 16-27, 2010, the deadline to sign up for that exam was June 1, 2010.**

Be sure to take advantage of the great study tools available in the certification section of the chapter toolkits.

Individuals who obtain a technical certification have two options to maintain their certification. They can join as a national member of AAHAM and earn CEUs, or they can retake the exam again every three years to keep their certification current. If the CEU and national membership option is chosen, individuals are required to earn 30 CEUs over their three year certification period, as well as maintain their national membership. Fifteen of the 30 CEUs must come from AAHAM sponsored events.

You can find out how many CEUs we have recorded for you at the AAHAM Website, <http://www.aaham.org/>, and clicking the link, in the left hand margin, titled "Technical CEU Status". Enter your last name and AAHAM Member ID#, printed on your membership card. The CEUs you have earned will be displayed.

#### **2010 Certification Schedule:**

August 16-27, 2010: Summer CPAT, CCAT, CCT exams

October 25-30, 2010: Fall CPAM CCAM exams

November 8-19, 2010 – CPAT /CCAT /CCT exams

**December 1, 2010 – Registration deadline for February 2011 exams: CPAT /CCAT /CCT**

#### **Maintaining your Professional Certification (CEUs)**

You can find out how many CEUs we have recorded for you by going to The AAHAM website and on the right hand side there is a link title "Professional CEU Status" Click on the link and then enter your last name and AAHAM Member ID#, printed on your membership card. You can also use the following link:

<http://www.jcams.com/trackCEU/AAHAM/checkCEU/checkCEU.php>

**The current CEU reporting cycle began January 1, 2010 and will continue through December 31, 2011**

**AAHAM**  
**Greater Florida Buccaneer Chapter**

**Thanks to our 2010 Corporate Partners**

**Support those partners who support AAHAM!**

**PLATINUM PARTNERS**

**Gulfstream Outsourcing & Specialized Billing- "GO-SB"**

5220 Hood Road, Suite 101, Palm Beach Gardens, FL 33418

Telephone: 561-727-4728, Fax: 877-358-6737

Contact: Abby Birch, E-mail: [abirch@go-sb.com](mailto:abirch@go-sb.com)

Web Page: [www.GO-SB.com](http://www.GO-SB.com)

Gulfstream Outsourcing & Specialized Billing ("GO-SB") is a specialized Third Party Liability (TPL) vendor created by Healthcare Attorneys and TPL Billing Specialists. GO-SB services hospital clients in all MVA, WC and Third Party lien billing and collections. GO-SB is dedicated to providing the best services in the industry at the most aggressive rates. GO-SB handles day 1 billing (from your most complicated and time-consuming accounts) while handling coordination of benefits, credit balance, increasing revenue and lowering A/R days.

**Millennium Receivable Solutions, Inc.**

2919 W. Swann Avenue, Suite 301, Tampa, FL 33609

Telephone: 813-876-4944; Fax: 813-877-8949

Contact: Tony DeBenedictis, E-mail: [clientservices@millrs.com](mailto:clientservices@millrs.com)

Web Page: [www.millrs.com](http://www.millrs.com)

Millennium provides healthcare organizations with excellence in receivable management services. By utilizing highly trained management, staff and technology, we provide the resources required to ensure timely, complete and maximum reimbursement. We follow a patient accounting orientation ensuring that your reimbursement is maximized while your valued relationships are preserved.

For over 10 years Millennium has provided excellence in:

- Accounts Receivable Reduction and Recovery Services
- Managed Care Payment Review and Recovery
- Medical Appeal Services

Millennium follows a customer-focused philosophy tailoring its services to unique client needs.

## **GOLD PARTNERS**

### **emdeon**

3055 Lebanon Pike, Suite 1000, Nashville, TN 37214

Telephone: 615-932-3000

Contact: Vann Whisenhunt, Email: [vwhisenhunt@emdeon.com](mailto:vwhisenhunt@emdeon.com)

Web Page: [www.emdeon.com](http://www.emdeon.com)

Emdeon is a leading provider of revenue and payment cycle solutions that connect payers, providers and patients to integrate and automate key business and administrative functions throughout the patient encounter. Through the use of Emdeon's comprehensive suite of products and services, its customers are able to improve efficiency, reduce costs, increase cash flow and more efficiently manage the complex revenue and payment cycle process.

### **Financial Credit Services**

628 ByPass Drive, Clearwater, FL 33764

Telephone: 800-788-7827, Fax: 727-462-5550

Contact: Deb Kelly, E-mail: [dkelly@fcsservices.com](mailto:dkelly@fcsservices.com)

Web Page: [www.fcsservices.com](http://www.fcsservices.com)

Providing effective debt recovery services to healthcare organizations for twenty-nine (29) years. Financial Credit Services (FCS) maintains the highest levels of customer service while re-defining the practices of process improvement. FCS customizes each collection procedure based on individual client needs to increase the rate of recovery

### **The M.A.R.C., Inc.**

3745 Broadway Ave., Suite 307, Ft. Myers, FL 33909

Telephone: 239-277-0006, Fax: 239-277-1365

Contact: Tonya Emerson, E-mail: [tonya@themarc.com](mailto:tonya@themarc.com)

Web Page: [www.themarc.com](http://www.themarc.com)

Our mission at The M.A.R.C., Inc. is to obtain maximum reimbursement for our clients and their patients, by timely recovery of maximum benefits from 3<sup>rd</sup> party payers; while building the best possible relationships with payers, clients and patients.

Specialized Insurance Claim Services offered by The M.A.R.C., Inc.:

- Auto Accident/Liability Program with MARC On-site Rep for Day One Programs
- Workers' Compensation Program
- Receivables Placement by Aging
- Early-Out Program
- Managed Care, PPO, HMO, & Commercial Claim
- VA and TRICARE Claims
- A/R Clean-Up Program

## **SILVER PARTNERS**

### **Gulf Coast Collection Bureau, Inc**

5630 Marquesas Circle, Sarasota, FL 34233

Telephone: 888-839-6999, Fax: 888-924-8872

Contact: Dick MacMillan; E-mail: [macr@gulfcoastcollection.com](mailto:macr@gulfcoastcollection.com)

Web page: [www.gulfcoastcollection.com](http://www.gulfcoastcollection.com)

Gulf Coast Collection Bureau, Inc. Established in 1978, is licensed in all 50 states and offers all clients web-based client access, high success rate of recovery and superior customer service.

### **OVAG International**

1 Alhambra Plaza, Suite 1425, Coral Gables, FL 33134

Telephone: 866-367-6824, Fax: 305-569-7704

Contact: Darrell Lassonde, E-mail: [Darrell.lassonde@ovagusa.com](mailto:Darrell.lassonde@ovagusa.com)

Web page: [www.ovagusa.com](http://www.ovagusa.com)

OVAG is the leading provider of international receivables management and debt collection services to the U.S Healthcare industry, handling accounts from billing to bad debt. Let our multi-lingual, Swiss-based agency assist your facility with your international receivable needs, including foreign and travel insurance, self pay and Embassy accounts. No collection, no fee.

## **BRONZE PARTNERS**

### **Bacen & Jordan, P.A.**

2901 Stirling Road, Suite 206, Fort Lauderdale, FL 33312

Telephone: 954-961-5544, Fax: 954-986-9751

Contact: Dwight Tillman, E-mail: [bacenjordan\\_tillman@msn.com](mailto:bacenjordan_tillman@msn.com)

Bacen & Jordan, P.A., A full service law firm exclusively dedicated to the provision of reimbursement and legal recovery services for the healthcare industry. We provide an integrated system of collection programs: managed care contract/compliance, third party denial/short pay resolution, workers' compensation, hospital lien early intervention, early-out projects, bad debt collations, RAC appeals/ALJ hearings, and litigation/arbitration.

### **Cymetrix**

2875 Michelle Drive Suite 250, Irvine, CA. 92606

Telephone: 321-537-3237

Contact: Maria Hallman, Email: [maria.hallman@cymetrix.com](mailto:maria.hallman@cymetrix.com)

Web page: [www.cymetrix.com](http://www.cymetrix.com)

Cymetrix teams with hospitals and healthcare networks to create custom revenue cycle solutions that drive long-term success. Since our founding in 2001 by a team of industry innovators, Cymetrix has helped more than 200 healthcare organizations unlock hidden financial opportunities, improving performance and profitability.

### **Merchants Association Collection Division**

134 S Tampa, St, Tampa, FL 33601

Telephone: 800-226-6188, Fax: 813-277-3688

Contact: Curt Flynn, E-mail: [curt.flynn@macd-inc.com](mailto:curt.flynn@macd-inc.com)

Web Page: [www.mafcollection.com](http://www.mafcollection.com)

Merchant's Association Collection Division is a full receivables management company. The Fitness Financial Services Division offers active receivables management services. The MAF Collection Services Division offers bad debt recovery services. We have served the Florida medical community since 1958.

### **Firstsource Solutions, USA, LLC**

1661 Lyndon Farm Court, Louisville, KY 40223

Telephone: 513-324-2549; 321-662-9655

Contact: Dee Schneider or Jamie Wiley,

E-mail: [Dee.Schneider@na.firstsource.com](mailto:Dee.Schneider@na.firstsource.com); [Jamie.Wiley@na.firstsource.com](mailto:Jamie.Wiley@na.firstsource.com)

Web Page: [www.firstsource.com](http://www.firstsource.com)

Firstsource Solutions, USA, LLC is your one source solution for managing your Accounts Receivable. Firstsource provides a comprehensive suite of innovative, technology-driven eligibility and revenue cycle management services to help drive financial results. Our suite includes Medicaid Eligibility, Receivables Solutions, Business Office Outsourcing and Bad Debt Collection Services, all of which have been Peer Reviewed by HFMA.

Firstsource is recognized as an industry leader in delivering the professional excellence required to improve cash flow, maximize reimbursement and reduce bad debt. Our unique combination of revenue cycle management solutions will allow you the freedom to focus on patient care.

## **BRONZE PARTNERS**

### **Noble Systems Corp.**

7041 Grand National Drive, Suite 128-H, Orlando, FL 32819

Telephone: 407-248-3400; Fax Number: 407-248-9463

Contact: Dan Donaldson; Email Address: [ddonaldson@noblesys.com](mailto:ddonaldson@noblesys.com)

Web Page: [www.noblesys.com](http://www.noblesys.com)

Noble Systems is a global leader with 4,000+ client installations worldwide. We empower personnel doing collections, customer service, patient access, pre-registration, appointment scheduling and reminders etc. to become substantially more productive. In addition to unlimited combinations of both live and automated interactive messaging including 24/7 payment options, we blend outbound and inbound calls: optimally inserting outbound calls as inbound call traffic decreases and vice versa. Our modular contact suite provides outbound predictive, progressive and preview dialing including blended inbound with skill-based routing, call recording with screen capture, point and click IVR with TTS, workforce management, speech analytics and an IP PBX.

### **Trace/ The White Stone Group, Inc.**

2030 Falling Waters Road, Suite 250, Knoxville, TN. 37922

Telephone: 865-531-4545; Fax Number: 865-291-2154

Contact: Jerry Thomas; Email Address: [jerry.thomas@TWSG.com](mailto:jerry.thomas@TWSG.com)

Web Page: [www.tracecommunication.com](http://www.tracecommunication.com)

Trace by The White Stone Group, Inc. is a communication management system that captures, indexes and archives routine communication for retrieval through a central web-based tracking system. Proven results include improved productivity, increased reimbursement, and enhanced quality across the revenue cycle.

**When you join AAHAM as our corporate Partner,  
You don't belong to it – it belongs to you!**

**JOIN NOW to take advantage of those BENEFITS!**

**Please contact Jamie Wiley, Corporate Partners Chair @  
[Jamie.Wiley@na.firstsource.com](mailto:Jamie.Wiley@na.firstsource.com)**

## Some Questions Compliance Professionals Should Ask As They Prepare for Health Care Reform

*Excerpt from a keynote address delivered by Daniel R. Levinson, Inspector General for the Department of Health & Human Services, at the Health Care Compliance Association's Annual Compliance Institute on April 19, 2010*

### Transparency: Are you prepared to operate in a more transparent health care system?

- Does your organization have the right systems and technologies to meet new demands to collect, organize, track, retain, and report information and data accurately and completely?
- Do you have security and privacy protections in place for creating, transmitting, and storing data?
- Do you have systems in place to meet enhanced reporting and disclosure requirements applicable to your industry segment?

### Quality: Are you focused on quality as a compliance issue?

- Do your clinicians understand that quality is a compliance concern and that quality of care is increasingly integral to payment?
- Do you have systems that will ensure that charting, collection and reporting of quality data, and clinical documentation are accurate, complete, and sufficient to justify payment?
- Are you present during conversations and involved in decisions about quality in your organization?
- Does your compliance department have the expertise to address quality-related compliance issues?
- Are your board of directors and management informed about the heightened role of quality of care under health care reform?

### Accountability: Is your organization prepared for greater accountability?

- Do you have a compliance plan in place? If not, is your organization prepared to create and implement one?
- Do you know with whom your organization does business?
  - Does your organization have affiliations with excluded, suspended, or Medicare debt-owing individuals and entities?
  - Are you prepared to meet new requirements for background and licensure checks?
  - Are the persons furnishing services through your organization qualified to do so?
- Are you focused on identifying and addressing new fraud and abuse risk areas that may arise as your organization becomes involved with new payment and delivery systems (such as medical homes, accountable care organizations, bundled payments, and value-based purchasing)?
  - For example, are you thinking about risk areas such as inappropriate stinting on care, “cherry picking” patients, “lemon dropping” patients, gaming of payment windows, and misreporting of quality or performance data?
  - Will you have safeguards in place to address these and other risks?
  - Will compliance be part of the conversation as your organization contemplates new business and reimbursement arrangements?
- Is your organization addressing its increased compliance and quality responsibilities under health care reform?
  - Are managers, staff, and contractors aware of their responsibilities?
  - Are your training systems robust enough to support a new learning curve?
- If you represent a private insurer or employer organization preparing to participate in new public programs (e.g., participating on the exchanges or in the temporary employer retiree reinsurance program), does your organization have systems in place to ensure compliance with applicable program requirements?
- Do you have systems in place to screen for improper claims before they are filed?
  - Are you using data mining and other techniques and technologies to detect improper claims?