Lessen Risk, Avoid Billing Delays by Working with Postal Service

Faith N. Mondry, JD

the March 9, 1929 cover of The Saturday Evening Post featured Norman Rockwell's "Doctor and the Doll," a painting that depicts a kindly physician spending a moment listening to the heart of a doll held up by a little girl. While the care and concern physicians have for their patients that Rockwell illustrated has not changed over time, how they manage the administrative details of their practices today is quite different from the simplicity of that scene. Today technology and automation have changed how medicine is practiced. Unlike the early 20th century doctor working from a roll-top desk in his home office, many physicians today exist in a world of high-tech equipment, paperless medical records, and electronic transmission of insurance and patient billing information.

Likewise, things have changed a great deal for the US Postal Service (USPS) since Rockwell's "Sorting the Mail" graced the cover of the *Post* in 1922. Gone are the days when mail was sorted manually by workers in local post offices that were business and social hubs in the communities they served. Physicians might think of the USPS in terms of the friendly mail carrier, those blue streetside mail boxes, or the stamps they buy for their holiday cards. What they typically don't think about are compliance or risk management, or the fact that one day their clinic's

• • •

Faith Mondry is a US Postal Inspector in Milwaukee, Wis.

business may become the USPS's business.

The USPS is a business that charges for its products and services. The US Postal Inspection Service (USPIS) is a federal law enforcement agency charged with maintaining the integrity of the US mail. Both of these organizations recently have stepped up education and outreach efforts with the health care community, as well as with the legal community and other businesses, in hopes of increasing awareness and protecting the nation's mail system and the people who use it.

As part of those efforts, the following are a few practical tips that will help ensure that your facility and staff are in compliance with current postal rates and regulations.

Postage Due is a USPS Don't

A review conducted in the Milwaukee, Wisconsin, area last year by the USPIS showed a large amount of underpaid postage was applied to outgoing mail by businesses using postage meters. A surprising quantity of the underpaid mail originated from medical facilities and health care and insurance businesses. While some of the meter holders were using old postage rates to send out their mail, others were simply miscalculating rates. While underpaid mail may not seem like a significant concern, it can affect a medical facility's business practices by creating unnecessary delays in getting the facility's mail to the intended recipient, as well as deteriorating the facility's customer service.

A targeted effort has been made by both

the USPS and the USPIS to educate customers about the importance of paying the right amount of postage for each mail piece. The USPS has the ability to deliver mail "postage due," meaning that if underpaid pieces are detected, payment can be requested from the recipient for the balance due. Pursuant to the *Domestic Mail Manual*, larger quantities of mail pieces determined to be underpaid may be returned to the sender to collect proper postage prior to being sent on.

For medical facilities, insurance companies, even medical practices that send monthly statements to their patients, the return of this mail could be disruptive financially and administratively. Staff will need to spend time reprocessing the mail, and the extra time may result in a slowing of payments by patients. Additionally, medical facilities often mail records or other documents to their patients that contain sensitive or confidential patient information (eg, copies of medical records, summaries of care, paperwork for disability or workers' compensation claims). Ensuring such information is mailed in a manner that protects patient confidentiality is paramount. When postage is underpaid, manual processing is necessary to collect payment. You can provide the best protection of your patients' privacy by adhering proper postage to your mail, which will prevent the mail from being manually processed, returned, or held for proper postage. Adhering proper postage also will ensure the correspondence is delivered in a timely manner, facilitating continuity of care and efficient business operations for the medical facility.

USPS implemented a rate change in April 2011, and it is important to make sure your facility is paying current rates. Assistance is available to postal customers to ensure they are aware of current postage rates and that their equipment and software are up to date. A periodic postage compliance check of your practice or facility helps ensure the most efficient, timely, and secure communication via US mail. Contact your postage meter vendor to be sure you have the current software installed. Physicians or administrators can visit www. usps.com to obtain information about current postal rates and services. Using a postage rate calculator, such as USPS's Postage Price Calculator, can also assist with compliance.

Safeguarding Against Identity Theft

Identity theft, another investigative arena for the USPIS, has become an area that should concern health care professionals. Last year, more than 9.9 million Americans were victims of identity theft.¹ One might think of identify theft primarily in terms of credit card and Internet fraud, but recently patient information was stolen from a large regional medical center's files by a custodian who cleaned the medical offices after hours. Because this type of information can be used for criminal activity through the US mail, the USPIS was the lead investigative agency in this case. Many identity theft and credit card frauds involve criminal misuse of the mail, and the USPIS often is called upon to investigate on behalf of victims or institutions suffering losses from these types of crimes.

Paper and digital files alike should be safeguarded. Tools such as locks, encryption, and password protection for files should be used to maximize the preservation of patient confidentiality. A common-sense approach and a periodic review of office practices can help develop policies, no matter the size of the medical office or facility, to deter identity thieves from preying on sensitive patient information and to prevent breaches from occurring.

The Postal Inspection Service website, https://postalinspectors.uspis.gov, has specific information about fraud prevention and how to protect personal identifying information in your organization.

Working Together to Increase Compliance and Safety

The USPS makes every effort to assure the efficiency and security of the mail service. However, medical practices also have an important part to play in safeguarding patient communications and records. While there is no way for medical practices to completely eliminate risk to their practices and patients, there are many ways to mitigate such risks. The USPS and USPIS encourage physicians and their staff to use the resources available to assist them in protecting their practices and their patients. For issues affecting patient privacy and the preservation of sensitive information-whether paper or digital-an ounce of prevention is likely worth more than a pound of cure.

Reference

1. US Postal Inspection Service. Identity theft is America's fastest growing crime. https://postalinspectors.uspis.gov/investigations/MailFraud/fraudschemes/ mailtheft/IdentityTheft.aspx. Accessed May 10, 2011.



WMJ (ISSN 1098-1861) is published through a collaboration between The Medical College of Wisconsin and The University of Wisconsin School of Medicine and Public Health. The mission of *WMJ* is to provide an opportunity to publish original research, case reports, review articles, and essays about current medical and public health issues.

 $\ensuremath{\mathbb{C}}$ 2011 Board of Regents of the University of Wisconsin System and The Medical College of Wisconsin, Inc.

Visit www.wmjonline.org to learn more.