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# The Pros and Cons of Outsourcing Components of Your DME Operations

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# About Your Speaker

## Mary Ellen Conway

- Nurse, healthcare consultant specializing in post acute areas of home health, DME, hospice, pharmacy and physician practice.
- President of Capital Healthcare Group
  - Consulting provider in Bethesda, MD founded in 200.
  - Helping both large and small providers and suppliers in managing their audit and regulatory compliance issues.
  - Accreditation and state licensure survey issues.

# Components We Will Review

## Outsourcing these Components

- Sales Staff
- Intake/Order Entry
- Call Center/CSR
- Billing
- Shipping/Warehouse
- Compliance Officer
- After Hours
- Contacting Patients



# Can You Outsource Members of Your Sales Staff?

# Sales Staff

## The attorneys will tell you No

- CMS looks at the role of Independent Contractors to be one of a “person who is not under your supervision”, thus an Independent Contractor **could** not be representing your business appropriately.
- Sales staff should be employees, even part-time.
- Non-Medicare DMEs could have this problem as well.
- Be aware of potential kickback issues in the way that you are paying your sales staff, keeping in mind the 2021 guidance — where you can pay a set salary or set amount per referral, but not bonuses on the amount of the sale, etc.



# Can You Outsource Your Intake/Order Entry/CSR Staff?

# Intake/Order Entry

## The attorneys prefer that you do not

- This is the time when you are assessing whether the patient meets criteria for service, making any other decisions about items you will provide, payer requirements, etc. Hard to leave that in someone else's hands — who might be looking to accept every referral — when you are always responsible for every order you fulfill.
- Maybe there's an easy way to do a pre-screening of referrals (bots, e-mails, etc.) that you could use, but you/your staff should do the intake.



# Can You Outsource Your Call Center Staff?



# Call Center vs Contact Center

## Yes, of course

- Call centers focus on one communication channel — the telephone.
- Contact centers can provide support from additional channels, such as email, chat, websites and applications. A contact center may include one or more call centers.
- Call Centers:
  - Online merchants, telemarketing companies, help desks, mail-order organizations, polling services, charities and any large organization that uses the telephone to sell products or offer services use call centers.

# Call Center Staff

- Customers have high expectations for customer service. They want their issues addressed and handled quickly and efficiently. Organizations must have representatives available when customers call for service or support, and those with call centers can more effectively assist customers in need. Call centers can make an organization available 24/7 or during a time window that matches customer expectations.
- Customer phone calls have value beyond customer service. With some products or services, phone calls are the only interactions organizations have with — therefore, the only opportunity to personally connect with customers.

# Call Center

## Three types

- The three most common types of call centers are inbound, outbound and blended call centers:
  - Inbound
  - Outbound
  - Combination/Blended

# Inbound Call Center

- Typically, these call centers handle a considerable volume of calls simultaneously and then screen, forward and log the calls. An interactive voice response (IVR) system can answer calls and use speech recognition technology to address customer queries with an automated message or route calls to the appropriate call center agents or recipients through an automated call distributor (ACD).
- Agents in an inbound call center may handle calls from current or potential customers regarding accounts management, scheduling, technical support, complaints, queries about products or services, or intent to purchase from the organization.
- Virtual Call Center. The organization employs geographically dispersed agents who answer calls using cloud call center technology. Call center agents work either in smaller groups in different offices or in their own homes.

# Outbound Call Center

- In these call centers, an agent makes calls on behalf of the organization or client for tasks, including lead generation, telemarketing, customer retention, fundraising, surveying, collecting debts or scheduling appointments. To maximize efficiencies, an automated dialer can make the calls and then transfer them to a live, available agent using an IVR system after the caller connects. Outbound call centers must ensure compliance with the National Do Not Call Registry, a list to which citizens can add their phone numbers to avoid unwanted solicitation calls.
- Also check the Telephone Solicitation Statute.

# Blended Call Center

- This type of call center handles both inbound and outbound calls allowing agents to make and receive calls as the demand and strategy dictate.

# Off-Shore Call Centers

- The organization outsources its operations to a company in another country, often to save money on wages and provide services around the clock. Drawbacks to an offshore call center include reduced customer satisfaction due to language issues and a lack of knowledge about the organization, product or service due to distance and potential HIPAA violations

# Call Centers

“\_\_\_\_\_ is a call-center provider. For 10 years we've been delivering customer support, labor, and technology solutions from cities in Northern Mexico.”

“Eliminate the risk of your call-center being down (and your customers getting angry) when the next disaster strikes.”

“Solve Any Call Center Problem. Leverage our Skilled Agents.  
And our AI and Machine Learning Tools. ”



# If Using Call Centers, Ensure You

- Have a signed and legally reviewed Business Agreement (BAA) in place.
- Include the Call Center Operations as a component of your QA/PI Plan:
  - Quality assurance (QA) is a practice that ensures products or services meet specific requirements, and QA teams put this into practice. These teams can monitor and evaluate agent phone calls in call centers to ensure the call quality and CX are up to the center's standards. In some cases, call center directors run the QA checks.
- Meet all HIPAA Requirements.

# How is Call Center Success Measured?

- Organizations should track key performance indicators (KPIs) to measure the success rates and efficiency of call centers and agents. The KPIs may vary depending on the center's function: An outbound call center may measure cost per call, revenue earned, total calls made, and tasks completed, among other metrics. Inbound call center metrics may include first call resolution (FCR), average wait time (ASA), and abandoned call rates.



# Can You Outsource Your Billing Staff/Services?

# Billing

## Yes, of course

- Use a company that specializes in DME Billing, not general medical billing because DME is too nuanced
- Even if you use a billing company, you are ultimately responsible for the billing and you are the one the payer will come after for overpayments and recoupments, not the billing company.



# Can You Outsource Your Shipping/Warehouse Staff?

# Shipping Services

**Yes, you can outsource them**

- Variety of Pros and Cons

# Shipping/Warehouse

## Pros

- Cost effective
- Might be able to rely on multiple locations
- Minimal weather/humidity issues

# Shipping

## Pros

- Reduction in staff cost- but maybe need an increase in operational costs
- Potentially better shipping times than from your location



# Shipping/Warehouse

## Cons

- Proof of Delivery – you still have to retain copies
- Limited flexibility
- Limited to the size of boxes they carry or their methods — limits some flexibility (Ex: samples)
- Make sure any contracts you have with vendors allow for 3<sup>rd</sup> party shipping
- Accreditation (vendor requirements)
- Retrieving customer service order info timely

# Shipping

## Cons

- Geographic – Could be problem if one location only handles shipping of certain product
- Returns – sometimes comes to the third party. Need strong policy and strong follow-through
- You potentially get charged a fee for re-stocking
- New patient packet – hard to prove patient receives one-electronic packet or one on your website would solve



# Can You Outsource Your Compliance Officer?

# Compliance Officer

**As discussed in last month's webinar,  
the answer is NO**

- You can have a consultant help you with compliance, perform a compliance audit for you, but an employee should be your Compliance Officer



# Can You Outsource Your After-Hours Services?

# After Hours

## Yes, of course

- Make sure you have a BAA. in place.
- Make sure you have coverage by licensed personnel (RT) if needed
- Save reports sent to show that you receive these calls as they occur
- Surveyors will perform a test of your after-hours system during their visit to ensure it works, so test it on your own well before survey.



# Can You Outsource Staff Who Contact Your Patients?

# Staff Who Contact Patients

- Think carefully if and in what circumstances you would want to do this.
- Make sure everything is consistent with anti-kickback statute and considerations.





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# Questions?



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# Thank you

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