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Remote Coding Policy: Getting Started

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Leslie: I recently read in the Wall Street Journal that more than 25 million people telecommute today and the number of telecommuters is expected to jump to 40 million by 2004! Because of this increasing trend, human resource (HR) directors across the country are taking notice and leading their organizations in the exploration of telecommuting as a way of accomplishing work.

Patty: It is pretty amazing to think that so many people are working from home. And by the way Leslie, the new lingo is telework and teleworkers.

Leslie: Oh. I didn't know that. How interesting. As I was saying, HR directors are important players in approving the concept of telework and in developing an organization-wide telework policy. When possible, they should be included in the remote coding project team along with information technology (IT), business office and members of the health information management (HIM) department's coding and operations staff.

Patty: That is such an important point Leslie. HIM directors will want to build a coalition with the HR director. If there is precedence in the organization for telework, then there will be minimal work to adapt existing policies to remote coding. If there is no precedence, then one has to be realistic about how long it might take to achieve buy-in and consensus on what a telework program might look like. Developing a telework policy is more complicated than it might appear, isn't it Leslie?

Leslie: It is because it's not something the HIM director can do on her own. It requires a partnership with HR. In most instances, HR will be the owner of telework policies and therefore will be the final approval authority on telework programs. To get buy-in, the HIM director first needs to understand the current status of teleworking within the organization and be able to communicate the remote coding vision to HR. Communicating the vision includes how the program will work, what the telework arrangement might look like and how the organization, HIM department and staff will benefit from such an arrangement.

Patty: The HR department will also benefit because a remote coding telework program will increase the coder pool from which to recruit new coders. When it comes to telework policies, what do you think HR directors are most concerned about?

Leslie: As we mentioned in our March 2001 column titled "Home-based Coding: So When Already? Readers Want to Know," HR plays an important role in assessing the eligibility criteria developed for the remote coding program. In addition to eligibility, the HR director will be concerned about several aspects of the program such as employment compensation and classification, performance evaluations, safety, employee duties and who pays for office and computer-related equipment.

Patty: The HR director will also want to ensure that the telework program is seen as a work option and is not

treated as a benefit of employment such as vacation or health benefits, for example. Benefits are extended to all employees, where as telework is not typically made available to all employees across an organization.

Leslie: Given what we just discussed, how does the HIM director get started on developing a remote coding telework policy if this is an HR domain?

Patty: The approach will be unique to each organization and based on the status of teleworking in their organization. But here is an approach as an example:

Five Key Steps to Developing a Remote Coding Telework Policy

1. Become familiar with the key components of a telework policy:

There are typically four parts to a Telework Policy:

1. The policy, which is for all intents and purposes the telework "rules";
2. The telework agreement, which is signed by the teleworker and manager
3. Exhibits that describe work schedule, equipment, home office floor plans, etc.; and
4. Managers' and employees' training manuals. Thanks to the millions of teleworkers in other industries, there are many examples that can be applied to healthcare. Check out the Web site <http://telecommuting.about.com/cs/agreements> for sample polices and agreements. Also review the American Health Information Management Association's (AHIMA) telecommuting practice brief, which provides you with detailed checklists for decision-making.

The following topics are covered in detail within a telework policy and represent sections of the telework policy:

- telework objectives;
- definition of telework;
- responsibilities of managers, HR, teleworkers and information technology staff;
- eligibility criteria, job duties and obligations, work location and environment;
- supplies and equipment;
- work hours, compensation;
- safety and liability;
- family and work;
- confidentiality;
- and termination of telework assignment.

You'll also need to determine where you stand on the following topics:

- Who pays for computer and telecommunications equipment? Who pays for office equipment? Ideally, the organization will pay for the computer and telecommunications equipment so you can control its usage and ensure standardization; the employee will pay for office furniture.
- What are the eligibility criteria? Some examples are: minimum X years' coding experience, ability to work at high performance with minimum supervision; acceptable performance evaluations for the past X years; demonstrated ability to establish priorities and manage time; history of reliability.
- What are the job duties (inpatient and/or outpatient coding, abstracting, data entry, etc.)? What are the employee's obligations? (Communication requirements, attendance at meetings and conference calls)
- What are the productivity standards?
- What are the work hours?

2. Gather information about the current telework status by obtaining the answers to these key questions:

Do any other departments employ teleworkers? If so, what has been their experience? What do their specific

policies look like? What is HR's opinion of telework programs? What does my boss think of telework? Is there an organization-wide telework policy?

3. Meet with HR (include your boss if you need additional support): Discuss the remote coding vision and the current status of telework. Ask HR what concerns they have, if any, regarding telework as it relates to remote coding. Share your thoughts/positions regarding sections of a telework policy. Achieve consensus on key topics such as who pays for what, eligibility, performance reviews and program termination.

4. Determine who does what and the timeline: Offer to draft the policy and/or employee agreement for HR review. Or divvy up the work as appropriate. If the remote coding telework program will set precedence for the organization, discuss how the department can be used as a role model for other departments considering such an arrangement.

5. Include your boss in the process: Keep your boss informed of the status of the telework policy. If there are delays in approving the policy, it will delay your remote coding implementation plan.

Leslie: The eligibility criteria are probably one of the hardest parts of the plan. It needs to be objective and clearly defined to support the selection process. The reality of a remote coding program is that not everyone will be eligible. The HIM director has an important role in dealing with this selection process so that those not selected aren't unduly upset or frustrated by this decision. Managers will need to be prepared to communicate the reasons why someone was not selected.

Patty: You bring up a good point. In addition, the HIM director needs to build in processes that integrate non-teleworkers with teleworkers so that they work together as one team.

Leslie: Patty, you haven't mentioned the Health Insurance Portability and Accountability Act (HIPAA) in our discussion. Are there any HIPAA issues related to teleworking outlined in the privacy regulations?

Patty: There is nothing in the privacy regulations that prohibits covered entities from teleworking, but that doesn't exempt them. All it means is that teleworkers have the same compliance requirements as anyone else. Teleworkers are responsible for establishing and maintaining technical and physical safeguards of their work environment. The HIPAA training program should specifically address teleworker compliance to HIPAA. And the training should be required before the teleworker begins working away from the covered entity.

Leslie: What are some examples of technical and security safeguards?

Patty: At minimum, each teleworker should have a locking file cabinet to store confidential information. They should also password protect their computer and turn it off when they are not in their office. If the office door cannot be locked, then the computer workstation should be locked. In addition, a smoke detector and fire extinguisher needs to be in close proximity to the work area.

Leslie: Sounds straightforward. In addition to what you have mentioned, the organization will need to ensure, that electronic records obtained remotely do not reside on coders computers and that access to and transfer of data meets proposed HIPAA security recommendation.

Patty: Technology is an enabler of telework programs and HIPAA is providing guidelines to develop secure methods of deploying telework programs.

Leslie: In Europe and the United States, public and private sectors are taking advantage of technology and new ways of working because they are seeing positive results. Studies indicate that telework improves

recruitment and retention capabilities, employee lifestyles and often the bottom line. Overall, annual employee productivity increases because there is evidence of less absenteeism and disruptions during the workday.

Patty: This is the kind of information HR directors value. And these studies are easily found on the Internet when you search on key words telework or telecommuting.

Leslie: Developing a telework policy is the foundation of a remote coding program. It's as important as the technology one chooses. Once it's created, it guides managers and employees so that successful outcomes can be achieved.

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