



Morgan
Financial
Group

Making Sense of AI Technology
in Revenue Cycle Management

Making Sense of AI in RCM

- Introduction
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- Scope of AI Technology
 - Internal Use
 - Regulatory Concerns & Considerations
 - Patient & Payor Uses
- Practical Uses for AI RCM
 - Generative AI
 - Robotic Process Automation
 - Conversational AI
- Safeguards for AI Technology
- Best Practices of AI Technology Today





AI & WHAT IT MEANS FOR RCM

- We are living in the Decade of AI
- AI is everywhere – in the news, on social media, and in most healthcare marketing solicitations.
- 9 out of 10 of RCM leaders reported in a 2020 survey that they are utilizing or looking to utilize AI.
- There are no clear universal definitions of AI, and the term is used broadly and widely. Not all “AI” is true “Artificial Intelligence”

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AI

AI & WHAT IT MEANS FOR RCM

- Many AI technologies have been around in healthcare and RCM for the past 5 years.
- Many AI technology concepts of Data Aggregation, (including the Collection, Tracking, Analysis, and Monetization) have also been prevalent in RCM for the past 5 years
- Most RCM leaders indicate a hesitancy to use AI because of
 - Costs
 - Unsure about how to implement and use
 - Unsure about privacy/safety

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AI



- Enter ChatGPT, the iPhone of AI in November 2022 which saw 100 million users in the span of 2 months
- ChatGPT made AI affordable, understandable, and let users define how to use it.
- The AI Arms Race is Here - Google, Microsoft, Amazon, and Facebook are now all playing catchup with their own LLMs to capitalize on user experience
- Free GPTs are widely used, but have risks & limitations on how they can be used in RCM. The two largest concerns are:
 - Data Security & Privacy
 - Harmful & Incorrect Outputs

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AI



- ChatGPT's launch has set off ripples in adoption of Generative AI, Robotic Process Automation, and Conversational AI because these technologies are now affordable, easily adoptable, and can save hours of time and make employees more efficient.
- These technologies are collecting more data than ever.
- 5 Year Vision
 - Your employees will be coworking with AI bots & chatbots
 - Your patient and payor interactions will be mostly through chatbots, digital twins, and avatars

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AI



AI & WHAT IT MEANS FOR RCM

- The need is here for RCM departments to learn and embrace certain AI technology, if not for gain, but pain – as a defensive measure.
- You may not want to “adopt” new AI technology, but you will encounter it with:
 - Your Employees
 - Your Vendors
 - State & Government Regulators
 - Patients
 - Payors

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AI



AI, DIGITAL TRANSFORMATION & WHAT IT MEANS FOR RCM

- Top Take Aways:
- Create an AI policy for your department. Without one, your employees and vendors could be using AI without your knowledge.
- Create an AI committee for how your department will use and interact with AI technology including:
 - Data Collection & Monetization
 - Generative AI
 - Robotic Process Automation
 - Conversational AI

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AI



Scope & Definitions of AI in RCM

- Data Aggregation – combining PHI to provide analyses that relate to health care operations
- Data Analytics - examining data to find trends and draw conclusions
- Machine Learning - use of computers to learn and adapt without following specific instructions (Types: Deep Learning, Supervised, Unsupervised)
- NLP – Natural Language Processing - AI that enables computers to comprehend, generate, and manipulate human language. (Types: Content Extraction, Classification, Machine Translation, Question Answering, & Text Generation)
- Artificial Intelligence - use of computers to simulate human cognition.
- Generative AI - a type of AI capable of creating (i.e. generating) text, images, sounds, or other media based on specific training.
- GPT - Generative Pre-Trained Transformer
- LLM - Large Language Models
- Robotic Process Automation - business workflows created by software bots which observe existing business processes and create new workflows to reduce the need for human attention.
- Conversational AI - a type of AI that can simulate human conversation.

Scope AI in RCM

The Three Lenses of Which to View AI Technology:

1. Internal Use

- Provider Use
- Vendor Use (Intentional & Unintentional)

2. Government Regulations

- Federal Laws & Regulations on AI
- State Laws Governing AI
- Regulatory Generative AI Oversight

3. Patient & Payor Uses

- Consumer ChatBots
- Payor ChatBots
- Digital Twins

Industry Applications of AI in RCM

- Data Aggregation (Collection & Monetization)
 - Data Aggregation is the combining of PHI (by Business Associate or Covered Entity) to permit data analyses that relate to the health care operations of the respective covered entities
 - Providers capturing patient behavioral data for internal uses including maximizing communications and propensity to pay
 - Providers purchasing patient behavioral data for internal uses including maximizing propensity to pay
 - Providers selling internal patient performance data to sell to third parties
 - Third parties capturing & selling internal provider data and using externally with or without the entity's knowledge
 - Patient Engagement
 - Payor Engagement
 - Intelligent Reporting

Industry Applications of AI in RCM

- Generative AI
 - Compliance & Operations
 - Policies, Procedures, Controls, Reporting
 - Training Materials
 - Business Analysis Roles
 - Ideation & Analysis on new technology & initiatives
 - Patient Communications
 - Payor Communications
 - IT Reporting
 - Internal Department Chat Bots
 - Client Requirements & Work Standards
 - HR Reference Chat Bot
 - IT Reference Chat Bot
 - Compliance Reference Chat Bot

Industry Applications of AI in RCM

Robotic Process Automation

- Look for Tasks with Routine & Repetitive Workflows, and that require sifting through large data sets
 - Data Interface
 - Document Processing
 - Patient Communication Management
 - Payor Communication Management
 - Report Building
 - Payment Processing
 - Denials
 - Charge Capture
 - Coding
 - Claims Lifecycle
 - Quality Control

Industry Applications of AI in RCM

- Conversational AI
- Inbound conversational chat bots with patients
- Outbound conversational chat bots with patients
- Rule Based Conversational AI
- Generative Based Conversational AI

Safeguards of AI Technology

- Be Mindful of Harmful Outputs that could affect patients or the public
 - Outputs can be wrong
 - Outputs may lead to decisions that have negative affects on patients & public
- Be Mindful of Data Privacy & Security Requirements to protect patient data
 - Prohibition on AI that does not protect patient data and provide a right to delete
- Transparency
 - Clear Definitions & Distinctions for Technology Being Used
 - Rules based Generative AI v. Blackbox based Generative AI
 - Open sourced Generative AI v. Enterprise Generative AI
 - Patient Solicited Conversational AI v. Unsolicited Patient Conversational AI
 - Data Aggregation & Behavior Tracking vs. True Surveillance Capitalism
 - Look for requirements to be transparent and keep records of prompts

Patient Privacy in Use of AI Technology

Privacy Considerations

- Current Considerations
 - HIPAA
 - HITECH
 - GLBA
 - State Privacy Laws
- Future Privacy Rights & Regulations for Patients
 - Right to be Left Alone, Not Tracked, Used as Input or Output
 - Name, Image, Likeness Rights like HIPAA
 - Who owns copyright of input?
 - Who owns copyright of output?
 - Future Questions to Consider
 - HIPAA Rights for Patient Chatbots?
 - HIPAA Rights for Digital Twins?

Regulation of AI Technology

Potential Regulatory Considerations

- Federal Laws
 - HIPAA Privacy Rule & Security Rule
 - HITECH Act
 - 21st Century Cures Act
 - GLBA
- Regulatory Authorities
 - OCR
 - Bulletin published that announced they are heavily scrutinizing Health Care Websites with Tracking Technology that sell data to third parties
 - Look for future HIPAA rules to cover Data Aggregation
 - FTC & CFPB have both published guidance hinting about use of AI technology in regards to harmful outcomes and data privacy

Regulation of AI Technology

- State Laws
- Passed Legislation
 - TX HB 2060 Passed June 13, 2023
 - Creates Artificial Intelligence Advisory Council to study the effects of AI and report findings to the legislature.
- Proposed Legislation
 - TX HB4695
 - This bill would only allow mental health professionals to administer mental health care through AI, and requires that the mental health professional be available to monitor progress or communicate with the patient.
 - TX HB 3633
 - This bill would establish a committee to decide whether to establish a program that would train individuals in the workforce on the use of AI.

Potential Regulation of AI

- Liability for entities that produce harmful content
- Liability for AI Systems that allow for production of harmful content
- Potential Consumer Privacy Regulations of AI
 - CFPB & FTC Joint Statements
 - Concerns: Fraud, Bias, Black Box Algorithms, Self Coding Algorithms, Technical Limitations & Security Risks, Keeping Consumer Data Safe
 - EU AI Act
 - High Risk AI systems are regulated, including those that could harm people's health, safety, fundamental rights, or environment
 - Companies must be transparent about how AI systems work & must conduct risk assessments before deploying them
 - Individuals have right to challenge decisions made by AI
 - Ban on real time biometric identification systems & social scoring systems

Patient & Payor use of AI

- Patient Uses
 - Digital Twins
 - Patient Chat Bots
- Payor Uses
 - Payor Chatbots
- Virus Agents & Uses – Bad Actors Who Will Use AI Against Your Systems
 - Stop Bothering Me
 - Avoid Paying Bills
 - Disputes
 - Generating AI Content That Documents They Did Not Receive Services
 - Baiting
 - Phishing
 - Ransomware

Best Practices in Adopting AI

- Embrace AI that can bring efficiencies and ROI
- Create AI Policy
- Create AI Committee
- Anticipate Proactive & Reactive Uses
- Risk Assessment on AI Technology
 - Categorize the type of “AI” Technology & Its Use
 - Categorize the data being used and generated
 - Categorize the costs & benefits to the patient
 - Compliance Assessment
 - Is this technology compliant with all current state and federal laws?
 - Is the technology compliant with regulatory guidance on uses?
 - Is there potential that this technology could be regulated in the future? If so, how?
 - Does the technology incorporate any legal but surveillance capitalism elements?
 - Does the technology incorporate any dark patterns?
 - Is the technology transparent and able to be explained?

Use Case – ChatGPT

- Generative AI to help create compliance content efficiencies
 - Content Curation v. Content Creation
- Designated Use – Internal use only, no patient communications
 - Use Forward Thinking Employees
- Designate Prohibitions – No PHI, confidential or proprietary information
- Designate Employees & Vendors Who Can Use
- Test GPTs in your facility to identify how you can save time, money, & resources & be ready for vendors selling technology
- Identify Uses:
 - Every Department & Responsibility has content that needs to get done that is not done
 - Identify Projects/Assignments that:
 1. are difficult to start,
 2. that fall out of employee's conscious competence,
 3. and that are important but not urgent
- Those are tasks & content that get put off

Practical Compliance of AI

- Create AI Policy & Committee to govern all aspects
- Compliance with Generative AI
 - Treat ChatGPT & Open-Sourced AI as Social Media
 - Do Not Share Consumer Data, Confidential, or Proprietary Information with OpenSourced AI
 - Designate which if any Vendors can use ChatGPT
 - Get Indemnification Clause from Vendors who Use
 - Designate Employees To Use ChatGPT & Train on Safeguards
- Compliance with RPA
 - Preference for Attended RPA v. Unattended RPA
 - Map use for all RPA v. AI Generative RPA
- Compliance with Voice AI Agents
 - Start with Inbound Calls – Outbound calls still have TCPA & consent considerations
 - Map use for Voice AI v. Generative AI



Questions



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