



PALOMA PRINT PRODUCTS

# 3 Reasons You Need to Automate Document Quality Assurance

Regulatory compliance, migration to new document production workflows, and consolidation combine to make manual document reviews obsolete - and risky!

# Introduction

Joe Pigeon



The business of document production is always changing. New printing devices, sophisticated customer communications management software, and multi-channel messaging techniques are in a constant state of innovation. Even though software and hardware to create, produce, and distribute documents has never been better, the challenges of doing so accurately and intelligently are unprecedented.

Automation is present in all phases of the document workflow.

Communications can be efficiently generated and delivered, but the speed at which it all happens makes it tougher to verify all the content is correct. Most of the quality control processes that served document production operations for decades are no longer adequate to protect against privacy violations, regulatory infractions, and expensive or embarrassing mistakes.

In this book we've taken a look at three of the challenges our customers tell us are concerns for them as they adjust to new processes, equipment, and functionality. Regulatory compliance, cross-branding risks, and questions about white paper workflows always seem to come up in conversations about how document operations can protect themselves from the consequences of serious mistakes that can happen remarkably easy in highly automated production environments.

If, after reading through this material, you've got questions about your own company's ability to verify the accuracy of the documents you produce, please get in touch. There's a link on the last page of the book to our free analysis consultation request form. We've got the experience, know-how, and tools to help you understand the level of exposure your organization faces in your existing workflow and suggest improvements you can make to minimize your risk.

Of course more information about Paloma Print Products and our offerings are available on our website, [www.palomaprintproducts.com](http://www.palomaprintproducts.com). The site has just undergone a major overhaul. You'll discover the information you need is easier than ever to find and use.

I hope we have a chance to chat.

A handwritten signature in black ink, appearing to read 'Joe', with a stylized, flowing script.

Joe

# Regulatory Compliance



In-Plant document and print service providers are concerned about their exposure to regulatory enforcement actions, and rightly so.

Getting in front of any potential problems is the best strategy.

# Don't Make a Million Dollar Mistake!

Document producers have a responsibility to protect private health information. If they don't, HIPAA/HITEC enforcement actions could be an issue.

It should come as no surprise that data privacy is a big issue. It seems any organization, no matter how careful, is susceptible to privacy breaches. Though high-profile cases of malicious intrusion and data theft get all the headlines, a good many incidents happen by mistake. A particularly dangerous area for print and mail service providers involves protected health information (PHI) covered by the HIPAA and HITEC laws. Over the last two years, enforcement of these regulations and punishments for unlawful disclosures have increased.

Protecting the information on printed or electronic documents is not to be taken lightly. In their Fifth Annual *Benchmark Study on Privacy & Security of Healthcare Data*, Ponemon Institute LLC reports the average healthcare privacy breach affects 5,000 records and costs Business Associates \$1 million.

HIPAA/HITEC enforcement authorities consider service providers who process documents containing billing and insurance information, medical data, prescription details, or lab reports as Business Associates (BA's). If your company handles any such data and a privacy breach occurs, your firm could be subject to regulatory fines and audits.

Though criminal activity against healthcare organizations has risen 125% over the last 5 years, Business Associates attribute only half of their privacy incidents to malicious activity. The rest are the result of mistakes, errors, and accidental violations, of which many are easily avoidable. If you have the right tools you can protect your business from expensive consequences that can materialize because of an innocent error.



## What's on the Page?

The products and methods print/mail service providers employ to control data that prints on a page, and which pages to insert into an envelope, continually evolve and change. Software upgrades, migrations, or conversions can inadvertently expose previously hidden information or errantly mix data from more than one patient.

More aggressive compliance activity has motivated shops processing healthcare documents to upgrade their old-style manual quality control measures, thereby lowering their risk of accidental infractions. With sophisticated print stream comparison tools like **Print Perfect™** from Paloma Print Products, print/mail service providers can make sure the pages generated by Customer Communication Management (CCM) software haven't changed in a way which exposes private information on their customers' documents.

## Legacy Print Verification Methods Ineffectual

In the past, document producers would perform quality control by printing the same documents from the old system and the new CCM systems. An employee would then sit at a conference table and page through the stacks of paper, visually comparing the data on corresponding pages. This approach has several drawbacks:

- Fatigue – After a certain amount of time, humans stop really examining the pages. Errors slip by unnoticed.
- Time – Manually comparing pages is an extremely slow, labor-intensive, and subjective process. Time is wasted and many errors go undetected. In addition, employees assigned to this task are invariably pulled away from other important, often core, duties such as development.
- Knowledge Blindness – Often, the programmers or document designers who created the documents are also the inspectors. Because they know how things are supposed to work (and are confident in their ability to code it correctly) they can overlook errors. They literally do not see the problem.

- Too Many Variables - Instead of relying on the mass-produced documents of the past, organizations today are crafting their communications for an audience of one. They use information about individual document recipients to control text blocks, graphics, and options. It may be impossible to find examples of every variable combination with manual spot-checks.

## Automated Testing Scans Every Page

Automated document quality assurance solutions solve all the challenges of manual quality control. Because automated systems quickly review every page with a high degree of accuracy, print/mail service providers can test their documents more often and more thoroughly. They catch more errors and detect them sooner. This allows them to make corrections and limit their exposure to regulatory punishment.

Print/mail service providers are likely to spend proportionally more money responding to a privacy breach than their healthcare provider customers. Hospitals, insurance companies, and pharmacies may already have policies, procedures, and teams in place to deal with the fallout of a health information privacy incident. They frequently have greater financial resources than their print/mail vendors who must learn how to respond to HIPAA/HITEC incident inquiries, gather documentation, arrange for audits and certifications, and handle lawsuits or public relations issues. Spending a million dollars to recover from a privacy breach would be a severe financial blow to many print/mail service providers. Prevention is much less expensive.

One factor determining the extent of punishment and fines levied upon a HIPAA violator is neglecting to establish procedures that would have prevented or minimized the effects of a breach. Organizations have been disciplined for lacking written procedures, not training employees, or failing to enforce existing policies. Adding comprehensive print-comparison capabilities to your workflow could be looked upon as insurance against punishments for such “failure to prepare” conditions.

As threats continue to escalate and enforcement steps up, HIPAA/HITEC Business Associates are recognizing their exposure to expensive regulatory violations. Unlike the constantly-changing challenge to protect networks from data hackers, accidental PHI exposure through printed documents is easily managed by implementing an automated testing solution.



# Cross Branding



Mixing the data or graphics from multiple customers is easier than you think.

Ironically, some of the workflow changes most desired by printing operations increase the risk.

# It's Too Easy to Mix Brands

Cross-branding can happen at several steps in the workflow. When it does, negative effects are felt by at least two customers.

Mixing document elements from one customer or business unit with another, a condition we call cross-branding, can be one of the most devastating mistakes an in-plant or outside print service provider can make. Some minor errors may be forgivable. Others are definitely not. Preventing these particular mistakes is practically impossible for print operations that rely solely on manual document quality control methods.

## Consider the Following Scenario

A print and mail service organization handles bill production duties for several businesses, perhaps even companies which compete against each other. To facilitate efficient and low-cost processing, print service providers often print the documents on plain white paper loaded into their laser printers. Printed bills for all customers are then folded and inserted into identical double-window envelopes.

Now suppose their Customer Communication Management (CCM) software crashes one day. Instead of reinstating the software to the most current version, a technician accidentally restores from an old backup. Production runs flawlessly after the recovery – except that any changes made to document layouts or form elements since the old backup was created have disappeared. If a customer underwent a merger or re-branding during that period, the documents produced in the next production run would seem like a step back in time.

A visual quality check will, in many cases, not catch the mistakes. Under casual inspection the documents will seem to be correctly formatted.

Service providers of all sizes use comparable workflows and face similar challenges. Perhaps this method is similar to the way your company produces documents.

## Cross-Branding Errors Can Be Serious

The impact of such a mix up can range from minor embarrassment, such as printing an old logo design, to a disaster. An errant remittance address, for instance, may cause payments to be delivered to the wrong place. Relying on manual inspection by human eyes to recognize errors generated in high speed print and inserting environments is a dangerous practice.

A system crash isn't the only way errors can creep into documents. Human form designers and programmers can easily insert graphics or text such as terms and conditions, or even regulatory verbiage, into the wrong documents. This often happens when designers copy source code or document definitions from one customer into the documents of another. Forgetting to replace all the customer-specific portions of the documents can cause a case of cross-branding. When print providers make these mistakes they generally reprint the job (along with a mea culpa apology letter), losing money on printing, materials, SLA penalties and postage – not to mention reputation damage.

In the worst cases service providers can be responsible for regulatory infractions. Printing the legal language required by one state on documents pertaining to a different state can be considered a violation that results in fines or penalties in the insurance industry. Insurance companies will expect the service provider responsible for the error to compensate them for any extra expenses, including penalties levied by regulatory agencies.

## Killing Two Relationships with One Stone

In a worst case scenario, cross-branding incidents can have doubly damaging effects. When text or graphics from one customer appear on a different customer's documents, both those companies will notice the error. *A service provider could conceivably lose two customers from a single cross-branding mistake.*

Cross-branding mistakes can easily contribute to the loss of major clients. Customers unhappy with service provider performance may take their business elsewhere, switching to a company that employs a more comprehensive and automated quality control system. Companies

have lots of money invested in their brand identity and will not work with a service provider that cannot sufficiently protect their image.

Automated document quality assurance solutions solve the challenges of manual quality control. These systems can quickly compare specific elements on every page to a control file. Print/mail service providers can test print streams more often and more thoroughly. Instead of testing documents for accuracy only after programming changes, they can catch otherwise undetectable errors that slip into live production – whenever they occur. This allows them to make corrections quickly and avoid costly cross-branding mistakes.

# Inkjet and White Paper Workflow



Everyone seems to be interested in inkjet printing. The volume of pages migrating from toner and offset environments is impressive.

What do print operations managers need to know about converting applications and producing output in this new workflow?

# The Hidden Risks of Inkjet Conversion

Migrating to inkjet has a lot of benefits - and plenty of risks that aren't always obvious as organizations consider major workflow changes.

Companies worldwide are converting to inkjet printers and a white paper workflow. Eliminating costs associated with production, stocking, and handling pre-printed document “shells” commonly used in cut sheet print environments is a primary advantage to this transition. A color inkjet print operation needs to stock and load only blank paper, which can reduce costs and increase productivity.

Digitally imaging the form presents new document integrity challenges though. The old issue of accidentally printing on the wrong paper stock doesn't go away. Rather, it simply gets transferred to a digital equivalent. A simple mistake of merging the wrong electronic form during document composition yields the same erroneous results.

Ironically, detecting such an error with traditional quality control methods can be tougher in inkjet environments. To improve efficiency, document operations may co-mingle documents from multiple jobs into a single print run. Visually spotting documents printed with an incorrect form overlay is more difficult when documents are merged; particularly if the document center has re-sorted the job for postal discounts. Unlike workflows based on pre-printed forms, printed pages in a white paper workflow are not sorted by application or customer and stacked on a cart waiting to be inspected.

## Errors are Harder to Find at Vulnerable Times

Migrating to inkjet print technology impacts many aspects of the production workflow. Document centers may need new or modified finishing equipment, software to create or transform print files into new print description languages, Customer Communication Management

(CCM) software to create form overlays and merge variable data, sophisticated job and piece tracking systems, and more. Operators must be trained on new equipment or new talent brought on board. All these changes only serve to amplify the need for a close eye on product quality. There are new areas of the workflow where errors can occur.

Unless they upgrade their document integrity methods as part of the inkjet conversion, independent print service providers and in-plant print operations risk making un-catchable mistakes during and after the migration. The savings expected from an efficient white paper workflow could be erased by costly errors and reruns.

Print service providers often specialize in certain vertical markets. Many of the documents they produce are very similar – perhaps distinguishable only by logos or a return address. Under visual inspection methods, a credit union statement or doctor bill for example, might line up perfectly on a competitor's forms. In a co-mingled printing and inserting environment even the sharpest eyes would not detect a cross-branding error. Document operations managers will discover the manual quality control procedures that served them in the past are inadequate after migrating to white paper workflows.

Associating form elements assigned to one customer with the production data of another can happen easily. Failing to update customer-specific parameters in copied code, running the wrong script, or adding data to an incorrect hot folder causes such mistakes. These errors can also occur when switching to new CCM software systems – a move many document centers may make in conjunction with their conversion to inkjet.

Imagine the problems of mismatched addresses on remittance stubs. Payments meant for one customer could actually be delivered to another before anyone discovered the error! A mistake like this would affect customer accounts and remittance processing companies. The fallout would be severe. A print service provider might easily lose the business of two customers from a single error and be accountable for damages.

In-plant print operations can encounter problems with form overlays too. Consider the ramifications when a static backer contains obsolete terms and conditions because an archived resource library was



accidentally restored to the production environment. Most shops do not proof-read the legal language found on the backs of statements and bills; in the past this content was always pre-printed. It is unlikely the mistake would be noticed before distribution. Organizations can be fined or sued if company practices fail to match the printed statements.

## Regulatory Infractions

Companies working with data in regulated industries such as healthcare or finance are subject to fines and penalties if errors in the white paper workflow cause private information to be revealed to unauthorized individuals. With HIPAA violations, for instance, companies can be forced to undergo audits and are required to produce extensive documentation and policy manuals. Not only are these measures expensive undertakings, they distract key company employees from their main duties which can trigger further business problems.

One aspect of a HIPAA investigation causing concern among Business Associates (BA's), such as print/mail providers, is the prospect of being found negligent regarding prevention. If a privacy incident happens, and the inquiry shows a BA did not have adequate processes in place to prevent breaches from occurring, the fines can be larger. This can be the case even if there is no evidence anyone used the compromised information to commit a crime or harm an affected individual. The financial cost and reputation damage caused by a HIPAA action can easily exceed investments in document accuracy software that would have prevented the breach.

Inkjet printing and the advantages of a white paper workflow are very attractive. Most print operations have at least considered migrating their production to inkjet. Many have already begun this transition, which involves much more than a hardware swap. Ensuring output accuracy and integrity during a time of shifting hardware, software, personnel, and procedures should be included in everyone's inkjet conversion project plan. Constant and consistent document quality assurance processes will allow document centers to automate their workflows with confidence and realize the benefits of their investments in new technology.

# About Paloma Print Products

Paloma Print Products of Cedarburg, Wisconsin was established in 2004

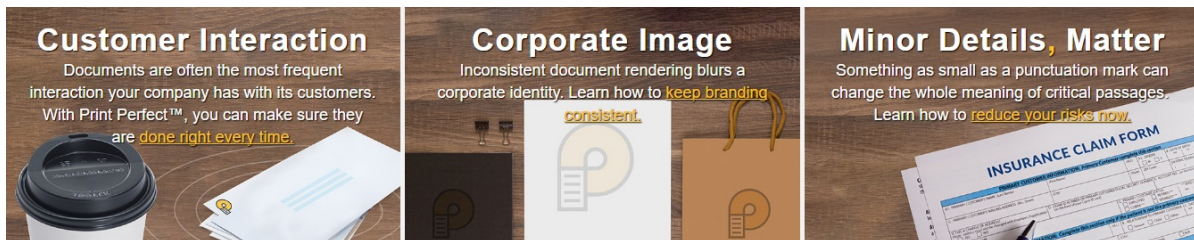
Our mission is to help our clients produce the highest quality customer communications at the lowest possible cost

Paloma Print Products specializes in providing document quality assurance and print automation solutions that increase developer and tester productivity and document quality. We work with mid to large-scale producers of customer-facing documents such as statements, bills, invoices, policies, contracts, and letters.

Whether your company produces its own documents or creates materials for other companies, Paloma Print Products offers solutions that lower document creation and production costs while dramatically improving document quality.

Paloma Print products offers two primary solutions:

- Print Perfect™ automates document quality assurance and testing, including STREAMdiff™ and Switch™
- ADEPT Suite™ transforms print streams and extracts legacy data.



# What's Next?



Every document center has accuracy and quality requirements, but they are not all the same.

If you are concerned about your organization's ability to keep up with changing technology, market, and regulatory conditions, call us for a complimentary analysis. We'll help you identify your vulnerabilities and suggest how to address them.

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