Policy Statement

The purpose of this policy is to establish mandatory annual billing compliance education for Texas Tech University Health Sciences Center El Paso (TTUHSC El Paso) health care providers, residents, administrators, coding staff and the Medical Practice Income Plan (MPIP) billing staff.

Scope

This policy shall apply to all TTUHSC El Paso employed or contracted physicians, non-physician providers, administrators, coding staff and billing staff, in the Schools of Medicine, who provide or are involved in the billing of health care services or items under a TTUHSC El Paso tax ID number.

Policy

All TTUHSC El Paso health care providers, residents, administrators, coding staff and MPIP billing staff shall receive the Annual General Compliance Training in accordance with this policy.

A. DEFINITIONS

For purposes of this policy, these terms shall have the meanings set forthbelow:

1. “Providers” include, but are not limited to Physicians (M.D. or D.O.), Advance Practice Nurses, Physician Assistants, Certified Nurse Mid-Wife, Licensed Clinical Social Worker, Psychologists, Pharmacist, Speech Language Pathologist, Audiologist and any other health care professional licensed and credentialed by TTUHSC El Paso to provide and bill for health care items or services, either using their own provider number or the number of a supervising TTUHSC El Paso physician.

2. “Schools of Medicine” means the Texas Tech University Health Sciences Center School of Medicine and the Paul L. Foster School of Medicine.

3. “Administrators” include those holding the title of “Administrator” or “Clinic Manager” in any clinical department and/or those who have management oversight of clinic related operations.

4. “Coding Staff” means staff working on behalf of clinical department who provide coding support, including, but not limited to coding and billing of health care items/services, review of claims, evaluation of claims denials and related work.
5. “MPIP Billing Staff” means staff working within the Schools of Medicine Medical Practice Income Plan (MPIP) area, including those who handle denials and appeals.

B. PROCEDURE

1. Mandatory Annual Billing Compliance Education

Providers, Residents, Administrators, Coding Staff, and MPIP Billing Staff in each clinical department at TTUHSC El Paso are required to complete the on-line Annual General Compliance Training.

2. Content of Billing Compliance Education

The annual billing compliance education content should include, but is not limited to, information regarding the following:

- Fraud, Waste and Abuse
- Any other information relevant to minimizing the risk of fraud, waste and abuse as it pertains to health care billing activities.

3. Identification of Providers, Residents, and Staff

In January of each calendar year, the Administrator of each clinical Department shall provide the Billing Compliance Director, for the School of Medicine current information, including names and e-Raiders, for all providers, residents and staff in clinical departments or support areas who are required to complete the Annual General Compliance Training.

4. Response to Non-Compliance

a. Failure to complete the mandatory Annual General Compliance education within 90 days, shall result in one or more of the following actions:

   i. Reported to the individual’s supervisor and/or chair for corrective action to include completion of the education required under this policy;

   ii. Suspension of a provider’s billing privileges until such time as the required education is completed.

   iii. Suspension of Resident’s clinical privileges until such time as the required education is completed.
iv. Disciplinary action, as applicable, in accordance with. HSC OP 70.31, Employee Conduct, Discipline and Separation of Employees

b. Non-compliance with this policy may be reported to the Billing Compliance Advisory committee (BCAC) and/or Institutional Compliance Committee (ICC) as appropriate for further corrective action. If necessary the BCAC may refer the matter to the ICC for further action.

5. ADMINISTRATION AND INTERPRETATIONS

Questions regarding this policy may be addressed to Billing Compliance Director or the TTUHSC El Paso Institutional Compliance Officer.

Frequency of Review

This policy shall be reviewed no later than February in each odd-numbered year. This policy may be amended or terminated at any time, subject to approval by the BCAC.

Review Date: February 2018, March 2019

Revision Date: February 2018, March 2019