



**POLICY TITLE:** Appropriate Routing of Requests for Information and Notifications of Billing Discrepancies by Federally Funded Programs

**Responsible Department:** Audit and Compliance

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**SUBMITTED BY (AUTHOR):** Beth Gillis

**Title:** Corporate Assistant Vice President, Compliance

**APPROVED BY:** Wendy Kemp

**Title:** Corporate Assistant Vice President, Audit

**APPROVED BY:** Karen Brady

**Title:** Corporate Vice President and Chief Compliance Officer

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**SUMMARY & PURPOSE:**

To provide guidelines to all Covered Persons regarding the appropriate routing of requests for information from regulatory agencies

**POLICY:**

All requests for information from any regulatory agency must be complied with in an accurate and timely manner and in conformance with applicable laws and regulations governing such requests for reports or information.

**SCOPE/APPLICABILITY:**

All owners, officers, directors, and employees of South Miami Hospital; all contractors, subcontractors, agents, and other persons who furnish patient care items or services or who perform billing or coding functions on behalf of South Miami Hospital, excluding vendors whose sole connection with South Miami Hospital is selling or otherwise providing medical supplies or equipment to South Miami Hospital; and all physicians and other non-physician practitioners who are members of South Miami Hospital's active medical staff. (Covered Persons)

**PROCEDURES TO ENSURE COMPLIANCE:**

1. For claim payment purposes, routine requests are generated from federally funded programs for medical record information and itemized breakdown of charges. Such requests must be responded to according to the policies of the department responsible for fulfilling such routine requests.
2. All non-routine requests for information and non-routine notifications of potential billing discrepancies received from federally funded programs must be referred to Audit and Compliance for immediate attention.
3. Such non-routine notification/request from federally funded programs may take the form of a written communication or a telephone call. If the notification/request is in the form of a telephone call, document the

All references to Policies must go to the BHSF Master Copy on the BHSF Intranet; do not rely on other versions / copies of the Policy.

date and time of the call, the person spoken to and their employment position with the federally funded program, a summary of the conversation and the caller's telephone number.

4. Management of each department is responsible for assuring that all Covered Persons are aware of this policy and the importance of immediately reporting any non-routine request for information and non-routine notification of a potential billing discrepancy to Audit and Compliance.
5. Within 30 days after discovery, South Miami Hospital must notify the Office of Inspector General, in writing, of any ongoing investigation or legal proceeding known to South Miami Hospital conducted or brought by a governmental entity or its agents involving an allegation that South Miami Hospital has committed a crime or has engaged in fraudulent activities. This notification must include a description of the allegation, the identity of the investigating or prosecuting agency, and the status of such investigation or legal proceeding. South Miami Hospital must also provide written notice to the Office of Inspector General within 30 days after the resolution of the matter and a description of the findings and/or results of the investigation or proceeding, if any.

**SUPPORTING/REFERENCE DOCUMENTATION:**

- Office of the Inspector General Compliance Program Guidance for Hospitals
- Office of the Inspector General Supplemental Compliance Program Guidance for Hospitals
- South Miami Hospital Corporate Integrity Agreement

**RELATED POLICIES, PROCEDURES, AND ASSOCIATED FORMS:**

- BHSF Administrative Policy: 801 Department Responsibilities and Charter – Audit and Compliance
- BHSF Administrative Policy: 819 Code of Ethics – Audit and Compliance
- SMH Administrative Policy: 819 Code of Ethics
- BHSF Administrative Policy: 850 Appropriate Routing of Requests for Information and Notifications of Billing Discrepancies by Federally Funded Programs

**ENFORCEMENT & SANCTIONS:**

Enforcement of this policy is the responsibility of management throughout Baptist Health. Failure to comply with or report a violation of a compliance program policy can lead to disciplinary action up to and including termination.