



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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SUMMARY & PURPOSE:

To provide guidelines to all employees 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:

This policy applies to all Baptist Health employees.

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 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 employees 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.

SUPPORTING/REFERENCE DOCUMENTATION:

- Office of the Inspector General Compliance Program Guidance for Hospitals
- Office of the Inspector General Supplemental Compliance Program Guidance for Hospitals

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

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.