



**POLICY TITLE:** Compliance with Regulations Governing Third Party Billing

**Responsible Department:** Audit and Compliance

**Creation Date:** 05/98

**Review Date:** 01/18, 01/19, 01/20, 01/21, 01/22, 01/23

**Revision Date:** 05/14, 01/17

**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

**PUBLISHED (Released):** 02/01/2023

---

## **SUMMARY & PURPOSE:**

To describe the organization's commitment to following the applicable regulations governing submission of claims to third party payers.

## **POLICY:**

Claims submitted for reimbursement to third parties will be filed according to all applicable regulations governing such claims. Intentional submission of any claim for payment that is false, fraudulent, inaccurate, incomplete or fictitious will not be tolerated. Employees who perform billing will take every reasonable precaution to ensure that their work is accurate, timely and in compliance with the applicable policies and federal and state laws and regulations.

## **SCOPE/APPLICABILITY:**

This policy applies to all Baptist Health employees.

## **PROCEDURES TO ENSURE COMPLIANCE:**

1. All departments involved in the claim submission process must establish policies and procedures that will delineate the steps that will be taken to collect and enter accurate claim data. This includes, but is not limited to, charge data, demographic data, diagnosis and procedure data, and patient disposition data.
2. Audit and Compliance is available to consult on compliance with regulatory requirements as they relate to the appropriateness of claims submitted to federally funded programs, such as Medicare, Medicaid and Champus/Tricare, at each facility under Baptist Health South Florida, Inc.
3. Audit and Compliance will review facility policies and procedures as part of the standard audit process. In addition, Audit and Compliance will provide education and/or educational resources in order to provide support

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.

to various departments throughout the organization in their efforts to ensure compliance with regulatory requirements as they relate to the submission of claims to federally funded programs.

**SUPPORTING/REFERENCE DOCUMENTATION:**

- United States Federal Sentencing Guidelines
- Office of the Inspector General Compliance Program Guidance for Hospitals
- Office of the Inspector General Supplemental Compliance Program Guidance for Hospitals
- International Standards for the Professional Practice of Internal Auditing (Standards)

**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 the organization. Failure to comply with or report a violation of a compliance program policy can lead to disciplinary action up to and including termination.