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Policy/Guideline Custodian: Associate Dean of Clinical Affairs and Quality
Category: Finance, Operations-Clinical

Title

Professional Fee Compliance Plan

Policy

Policy Statement

The College of Dentistry (UFCD) is committed to professional fee billing that is in accordance with applicable laws and regulations. Professional fee billing encompasses:

- proper selection of diagnostic coding, category and level of service;
- documentation of clinical services;
- submission of claims;
- patient billing;
- collection of payments;
- payment posting;
- error correction;
- retention of records for physician professional services.

UFCD has developed a Professional Fee Billing Compliance Plan which describes the College’s commitment and procedures for proper billing of dental and medical services.

The Compliance Plan was reviewed and adopted by the following:

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| • College of Dentistry Executive Advisory Board | Date: August 16, 2007 |
| • Clinical Affairs Committee | Date: July 5, 2007 |
| • Quality Assurance Sub-Committee | Date: August 2, 2007 |
| • Dean of the College of Dentistry | Date: August 16, 2007 |

Section 1 – Introduction

UFCD is committed to professional fee billing that is in accordance with applicable laws and regulations. Professional fee billing encompasses:

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- documentation of clinical services;
- submission of claims;
- patient billing;
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Compliance with laws applicable to professional fee billing is challenging because the regulatory requirements governing reimbursement for professional services are complex and evolving. To underscore the commitment of UFCD and to better assist clinical providers and appropriate clinical/billing staff in this area, UFCD is implementing a compliance program for professional fee billing. The compliance plan has the following key features:

1. Assigning program oversight to an individual (the “Chief Compliance Officer” or “CCO”) functioning at a high level within the organization.
2. Incorporation of formalized policies and standards that guide UFCD personnel with regard to professional fee billing throughout the organization;
3. Through ongoing training and feedback ensure that all clinical providers and appropriate clinical/billing staff are aware of, and understand the regulatory requirements governing reimbursement for professional services.
4. Regular chart and billing reviews to assess compliance and to identify potential issues;
5. A secure process for employees to report instances of possible noncompliance and for such reports to be fully and objectively reviewed;
6. An established process to enforce established standards through disciplinary mechanisms when necessary.
7. Formulation of corrective action plans to address any instances on noncompliance with UFCD policies or billing requirements.

UFCD is large and complex with many diverse clinics throughout the State of Florida. Each clinic is responsible for a large portion of the billing process. All clinics are administratively housed within a department of the college. The college has an Associate Dean for Clinical Affairs &

Quality whose is responsible for broad oversight of all clinics. One of the roles of this position is to ensure uniformity in the provision of services within individual clinics.

Section 2 – Chief Compliance Officer

Responsibility for implementing and managing the Compliance Plan will be assigned to the Chief Compliance Officer who will be the Associate Dean for Clinical Affairs & Quality. The CCO reports directly to the Dean of the College.

The CCO will work closely with departmental leaders, established committees and a compliance committee to ensure compliance with all applicable billing requirements. The CCO shall have the authority to direct specific billing practices, including, but not limited to: the use of particular codes for designated services, the procedures and practices used to handle billing, and the imposition of restrictions on billing if necessary. The authority of the CCO shall extend to all billing for clinical services-whether on a fee for service basis or otherwise provided by UFCD employees.

Section 3—Policy Guidelines

It is the policy of the UFCD that all claims (regardless of payor) for professional fee reimbursement use the proper code for the service provided, that the documentation in the medical record supports the code, and that the claim is submitted in the name of the most appropriate provider. To guide clinical providers and appropriate clinical/billing staff in meeting this objective, the CCO shall review existing policy statements, revise those statements as necessary, and develop any additional statements that seem advisable. UFCD policies concerning billing should be considered an integral part of this Plan. These policies may change periodically.

All written guidelines and training programs must include detailed information on the federal False Claims Act, federal administrative remedies under that act, applicable State false claims act, and whistleblower protections under these laws.

Section 4—Education and Training

The CCO shall be responsible for disseminating and explaining UFCD policies concerning billing. To accomplish those objectives, the CCO shall work with departments to implement a systematic and ongoing training program to educate existing staff and new personnel about UFCD billing policies. All training materials concerning billing issues shall be submitted to the CCO for review and approval before use.

Training shall be mandatory for all clinical providers who bill for their services and appropriate clinical/billing personnel. A system shall be developed to document that such training has occurred. Moreover, the CCO can require that these individuals attend additional training

sessions on particular issues. The training materials shall identify the specific people who should be contacted by clinicians, residents, other healthcare providers or appropriate clinical/billing staff about billing questions.

Orientation

Initial training will include an orientation in the charge/encounter process and with all internal billing compliance documents. Training will be provided to all providers in the clinical environment including students, residents and faculty as well as support staff involved in the billing process.

Continuing Education

Mandatory attendance at a coding workshop is a yearly requirement for all clinical faculty and staff involved in the billing process. This continuing education may also include mandatory sessions or review of materials provided by the UFCD. The College's central human resources offices will notify clinical faculty of the workshops and maintain records of attendance.

Section 5—Monitoring

Under the supervision of the CCO, a sample of medical records and corresponding bills for each department and program shall be periodically reviewed for compliance with UFCD billing policies and legal requirements. Each department shall be reviewed at least annually, but the CCO may require more frequent reviews. If any of these reviews identify possible instances of non-compliance with UFCD billing policies and with legal requirements, the CCO shall report the matter to the Dean of the college, and legal counsel for the UFCD. In consultation with legal counsel, the CCO then shall review the particular matter to determine whether there has been any activity inconsistent with UFCD billing policies and legal requirements.

Process:

The UFCD has an existing, routine auditing process established for clinical review. It includes the verification that required documentation on the claim supports, but is not limited to:

- a. Identification of the physician who provided the actual service.
- b. The CPT or CDT procedure code matches the ICD-9-CM diagnosis code c. Valid codes are utilized by the department.
- d. Ensure that appropriate codes are being utilized for purposes of establishing medical necessity.

Post Review:

Auditors and reviewers will prepare findings in a simple, readable format. If any review identifies instances of possible non-compliance, the auditor shall report them to the individual out of compliance in report form, the Department Chair and the CCO.

Section 6—Reporting Compliance Issues

. Employees who report possible compliance issues will not be subjected to retaliation or harassment as a result of the report. Concerns about possible retaliation or harassment should be reported to the CCO.

Section 7—Investigating Compliance Issues

Whenever conduct that may be inconsistent with a billing policy or requirement is reported to or discovered by the CCO, an investigation will be undertaken with the assistance of legal counsel. After review and investigation, the CCO shall prepare a written report of findings for the Dean of the college. UFCD employees must cooperate fully with any investigations undertaken by the CCO.

Section 8—Corrective Action Plan

Whenever non-compliance is identified, corrective action will be taken. The CCO will meet with the departmental Chair to review the findings and develop a corrective action plan within the department. If applicable, overpayments will be returned. Overpayments are the financial responsibility of the Department. If and when the CCO determines that departmental remedies have not corrected the problem or problems, further corrective action will be taken, depending upon the severity of the offense. In all cases, faculty will be given the opportunity to appeal decisions either at the department or UFCD level.

The appropriate level will be determined by the CCO. It will be based on the severity of the non-compliance or repetitive instances of non-compliance. In most first time cases of incorrect coding, formal notification and additional training is appropriate. However, the CCO reserves the right to impose the harshest possible remedies should it be found that a clinician is intentionally miscoding or otherwise falsifying charts.

Section 9—Revisions to this Plan

This Compliance Plan is intended to be flexible and readily adaptable to changes in regulatory requirements and in the healthcare system as a whole. The Plan shall be regularly reviewed and modified, as necessary. Revisions to this plan require approval from the Faculty Practice Associates, Inc. Board of Directors, the Clinical Affairs and Quality Assurance Committee and the Dean.

References

Physician Billing and Compliance Training

Contact Information

Policy Contact

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Important Dates

- Original Effective Date: August, 2007, Approver: Dr. Teresa A. Dolan, Dean
- Revised: September 2015, Approver: Dr. A. Isabel Garcia, Dean
- Reviewed and Revised: June 2023, Approver: Dr. A. Isabel Garcia, Dean