

**Texas Tech University Health Sciences Center
Billing Compliance Program Policy and Procedure**

1.1 Billing Compliance Record Management	
Approved Date: September 8, 2010	Effective Date: September 8, 2010
Latest Revision:	

A. PURPOSE

To provide guidance to Billing Compliance staff on the maintenance and destruction of billing compliance records and documents.

B. SCOPE

This policy applies to all Billing Compliance staff.

C. POLICY

Unless otherwise stated in [TTUHSC OP 10.09](#) or other billing compliance policies, billing compliance records shall be maintained and destroyed pursuant to the procedures contained in this policy.

Billing compliance records shall be maintained in a secure and confidential manner. Billing compliance records that contain Protected Health Information (PHI) shall be maintained in accordance with [TTUHSC Privacy Policies](#).

D. PROCEDURE

1. Defined Terms

- a. "Billing Compliance Records" include, but are not limited to, monitoring results, memoranda, letters, reports, graphs, charts, spreadsheets, related e-mails and any other type of document, whether in paper or electronic form.
- b. "Destruction" means in the case of paper documents, shredding; and in the case of electronic documents deletion from the electronic file and any "trash" file that collects deleted files.

3. Maintenance – Electronic Billing Compliance Documents

- a. Schools of Medicine – Billing Compliance Records.
 - 1) Unless otherwise directed by the Institutional Compliance Officer (ICO), each Billing Compliance Director ("Director") shall maintain any and all electronic billing compliance documents related specifically to his/her campus billing compliance program in the

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designated campus folder on the Albany shared file. For example, the Lubbock Director will store any electronic files related to the School of Medicine, Lubbock campus in the folder named "Lubbock" in the Albany Billing Compliance file.

2) The ICO shall maintain any and all electronic billing compliance records in the appropriate campus file for the Schools of Medicine or in the appropriate billing compliance files in Albany.

b. School of Nursing, School of Allied Health & School of Pharmacy. The Institutional Compliance Office shall maintain any and all electronic billing compliance documents related to his/her activities for the School of Nursing, School of Allied Health and School of Pharmacy in the appropriate file designated for that School in the BCO Administration file within the billing compliance files in Albany.

4. Maintenance – Paper Billing Compliance Documents

Each Director and the ICO shall maintain paper billing compliance documents in secure manner to maintain confidentiality of the information contained in those documents.

5. Maintenance & Destruction Schedule

a. Draft Documents. Billing compliance documents marked as "draft" may be destroyed once the document has been finalized.

b. Billing Compliance Documents. All other billing compliance documents that are not marked as "draft" shall be maintained for 10 years (120 months) from the date of creation and may be destroyed at any time thereafter unless otherwise directed by the ICO.

6. Government Investigations – Suspension of Destruction Schedule

Any and all destruction schedules outlined in this or any other TTUHSC policy shall be immediately suspended upon notification of a government investigation of suspected fraud and/or abuse.

E. ADMINISTRATION AND INTERPRETATIONS

This policy is effective upon approval by the BCC. Questions regarding this policy may be addressed to the ICO.

Failure to comply with this policy shall result in appropriate disciplinary action.

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F. AMENDMENTS, REVISIONS, OR TERMINATION

This policy shall be reviewed no later than February 1 in each even-numbered year.

This policy may be amended or terminated at any time, subject to approval by the BCC.

G. CERTIFICATION

I certify that this policy was approved by the BCC, as reflected in the minutes dated September 8, 2010.


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Institutional Compliance Officer