2.2 Training: Annual Billing Compliance Education

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A. PURPOSE

The purpose of this policy is to establish mandatory annual billing compliance education for Texas Tech University Health Sciences Center health care providers, residents, administrators, coding staff and MPIP billing staff.

B. POLICY

All TTUHSC health care providers, residents, administrators, coding staff and MPIP billing staff shall receive annual billing compliance education in accordance with this policy.

C. SCOPE

This policy shall apply to all TTUHSC employed or contracted physicians, non-physician providers, administrators, coding staff and MPIP billing staff, in the Schools of Medicine, School of Nursing, and School of Allied Health Sciences, who provide or are involved in the billing of health care services or items under a TTUHSC tax ID number.

D. DEFINITIONS

For purposes of this policy, these terms shall have the meanings set forth below:

1. “Providers” include, but are not limited to Physicians (M.D. or D.O.), Advance Practice Nurses, Physician Assistants, Certified Nurse Mid-Wife, Licensed Clinical Social Worker, Psychologists, Pharmacist, Speech Language Pathologist, Audiologist and any other health care professional licensed and credentialed by TTUHSC to provide and bill for health care items or services, either using their own provider number or the number of a supervising TTUHSC physician.

2. “Schools of Medicine” mean the Texas Tech University Health Sciences Center School of Medicine and the Paul L. Foster School of Medicine.

3. “Administrators” include those holding the title of “Administrator” or “Clinic Manager” in any clinical department and/or those who have management oversight of clinic related operations.
4. “Coding Staff” mean staff working on behalf of clinical department who provide coding support, including, but not limited to coding and billing of health care items/services, review of claims, evaluation of claims denials and related work.

5. “MPIP Billing Staff” means staff working within the Schools of Medicine Medical Practice Income Plan area, including those who handle denials and appeals.

E. PROCEDURE

1. Mandatory Annual Billing Compliance Education

Providers, Residents, Administrators, Coding Staff, and MPIP Billing Staff in each clinical department at TTUHSC are required to complete at least one one-hour live or on-line annual billing compliance education provided to their School, or, the individual's clinical department.

2. Content of Billing Compliance Education

The annual billing compliance education content should include, but is not limited to, information regarding the following:

- Identified Billing Compliance risk areas for the Department, campus, and/or School.
- Process improvement recommendations related to billing compliance risks
- Any other information relevant to minimizing the risk of fraud, waste and abuse as it pertains to health care billing activities.

3. Identification of Providers, Residents, and Staff

In January of each calendar year, the Administrator of each clinical Department shall provide the Billing Compliance Director/Officer (BCD/O) current information, including names and e-raider, for all providers, residents and staff in clinical departments or support areas who are required to complete annual billing compliance education.
4. Education Process

a. Scheduling of Education. The BCD/O or his/her designee is responsible for offering on-line education. Departments may have the option of scheduling live session(s) with the BCD/O.

b. Education Session.
   i. The BCD/O shall conduct at least one one-hour live annual billing compliance education for each clinical department at his/her campus.
   
   ii. Those using the on-line training module must complete the training within thirty (30) days of receiving notification through the ACME on-line e-mail notification system that the on-line module is ready. The on-line training shall include a quiz that must be successfully completed to satisfactorily complete the annual billing compliance training.

c. Tracking and Reporting. The BCD/O, or his/her designee, shall track and record attendance at the live education session. The BCD/O shall report to the BCAC on the progress of each clinical department’s completion of the annual billing compliance education. This information shall be included in the quarterly BCAC reports.

5. Response to Non-Compliance.

a. Failure to complete the mandatory annual billing compliance education within the time frames outlined above, may result in one or more of the following actions:
   i. Reported to the individual’s supervisor and/or chair for corrective action to include completion of the education required under this policy;
   ii. Suspension of a provider’s billing privileges until such time as the required education is completed.
   iii. Suspension of Resident’s clinical privileges until such time as the required education is completed.
   iv. Disciplinary action, as applicable, in accordance with HSC OP 70.31, Employee Conduct, Discipline and Separation of Employees.

b. Non-compliance with this policy may be reported to the regional BCAC and/or BCC as appropriate for further corrective action. If necessary the BCAC may refer the matter to the ICO and/or ICWC for further action.
F.  **ADMINISTRATION AND INTERPRETATION, REVISIONS OR TERMINATION**

Refer to Billing Compliance Program Policy and Procedure 1.0 Policy Development and Implementation

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

Questions regarding this policy may be addressed to the TTUHSC Institutional Compliance Officer or BCD/O.

This policy shall be reviewed no later than April 1 in each odd-numbered year.