

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

2.2 Training: Annual Education	
Approved Date: September 8, 2010	Effective Date: January 1, 2011
Last Revised: February 1, 2012	

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 billing staff, in the Schools of Medicine, School of Nursing, School of Pharmacy 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.

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

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 (1) one-hour live or on-line annual billing compliance education.

2. Content of Billing Compliance Education

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

- Fraud, Waste and Abuse (The Institutional Compliance Officer shall provide this training content for use by Directors).
- Identified Billing Compliance risk areas for the specific SOM Department, or School.
- Process improvement recommendations related to identified billing compliance risks for the SOM Department and/or School (See BC Policy 5.4, Annual Risk Assessment)
- 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 or the Department Chair in the case of the School of Pharmacy shall provide the Director, for the Schools of Medicine, or Institutional Compliance Office (ICO), for the other Schools, 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.

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

4. Schools of Medicine

a. Provision of Education Sessions.

- i. *Education Sessions.* The Director shall conduct a one-hour annual billing compliance education session (live and/or on-line) for each clinical department at his/her campus. The Billing Compliance Advisory Committee (BCAC) is responsible for determining whether annual education sessions can be provided on-line only (without live training) based on information provided by the Director indicating that the on-line training adequately educates providers and staff on billing compliance risks and how to avoid them.
- ii. *Live Education Sessions.* Live annual billing compliance education sessions must be scheduled and completed on or before April 30 of each calendar year, unless a written extension has been granted by the ICO. If the Director provides live training, the Director shall provide on-line training as outlined in (iii) below.
- iii. *On-Line Education Sessions.* On-line training shall be recorded by the Director and shall be activated and available on or before the last day of March, or thirty (30) days after a live training, whichever is later. The on-line training shall include a 10 question quiz related to the materials covered that must be successfully completed to satisfactorily complete the annual billing compliance training. 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.

- b. Tracking and Reporting. The Director, or his/her designee, shall track and record attendance at the live education session. The Director shall routinely 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.

- c. Continuing Medical Education. The ICO shall coordinate with the Office of Continuing Medical Education to obtain CME credit for the on-line education modules. Directors shall assist the ICO as necessary to meet the requirements established by the Office of Continuing Medical Education to obtain CME credit.

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

5. School of Nursing (Anita Thigpen Perry SON), School of Pharmacy & School of Allied Health Sciences

- a. Scheduling of Education. The Institutional Compliance Officer (ICO), or his/her designee, shall coordinate with the School's clinic manager or relevant Department Chair to schedule one or more billing compliance education sessions for the School's providers and, as applicable, coding staff.
- b. Education Session.
 - i. The ICO shall prepare a one-hour billing compliance education session. The educational session may be provided by the ICO or designated individuals within the School who have been trained by the ICO. The annual education session provided by the ICO shall be scheduled to occur no later than April 30 of each calendar year unless otherwise agreed to by the Schools.
 - ii. The ICO shall record his/her billing compliance education session and make it available on-line via the ACME training system within 30 days of the live education session for those unable to attend the live session. The on-line training shall include a 10 question quiz related to the materials covered that must be successfully completed to satisfactorily complete the annual billing compliance training.
 - iii. Those using the on-line training module must complete the training within thirty (30) days of receiving notification via e-mail that the on-line module is ready.
- c. Tracking & Reporting. The ICO, or his/her designee, shall track and record attendance. The ICO shall report to the Billing Compliance Committee (BCC) on the progress of each clinical department's completion of the annual billing compliance education.

6. Response To Non-Compliance.

- a. Failure to complete the mandatory annual billing compliance education within the time frames outlined above, shall 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.

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

- 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 BCC for further action.

7. ADMINISTRATION AND INTERPRETATIONS

Questions regarding this policy may be addressed to regional Billing Compliance Director or the TTUHSC Institutional Compliance Officer.

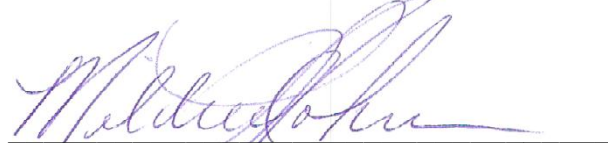
8. AMENDMENTS, REVISIONS OR TERMINATION

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

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

9. CERTIFICATION

I certify that this policy was approved by the Billing Compliance Committee, as reflected in the minutes dated February 1, 2012.



Mildred L. Johnson, JD, CPC, CCEP
Institutional Compliance Officer