

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

1.0 Policy Development and Implementation	
Approved Date: 11-19-2009	Effective Date: 12-01-2009
Latest Revision: 6-1-2015	

A. PURPOSE

This policy defines the process for development and implementation of policies and procedures (Policy or Policies) that (1) support the Billing Compliance Plan (TTUHSC OP 52.07¹), and (2) provide guidance related to identified billing compliance risk areas.

B. SCOPE

This policy applies to all TTUHSC Schools that bill for health care items and/or services under a TTUHSC tax identification number.

C. POLICY

TTUHSC Billing Compliance Policies shall be developed and implemented in accordance with the procedures outlined below.

D. PROCEDURE

- 1. Policy Development.** The Institutional Compliance Officer (ICO) is responsible for the development of written billing compliance policies based on internally or externally identified billing risk areas. Billing Compliance Director/Officer (BCD/O) may assist in policy development by recommending policy topics, and providing review and comment during the development stages, including any updates or revisions to existing Policies.
- 2. Policy Review.** The ICO shall provide a final Policy draft to the BCD/O for review and comment before a new or revised Policy is submitted for approval. The BCD/O may provide the draft Policy to their Billing Compliance Advisory Committees (BCAC) to address potential operational impact or other issues related to implementation of the proposed Policy. The BCAC will review and approve for submittal to the Institutional Compliance Working Committee (ICWC).
- 3. Policy Approval.** After Policy review as outlined above, the ICO shall submit the proposed Policy to the Institutional Compliance Working Committee for final approval. Minor revisions to a policy (e.g., changes in

¹ <http://www.ttuhscc.edu/hsc/op/op52/op5207.pdf>

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position titles, review dates, hyperlinks to reflect current versions of referenced documents) which do not have operational impact on the OIC or Institution can be made at the ICO's discretion and approval.

4. Approved Policies; Notice and Education.

- a. Website. The ICO shall maintain the [Billing Compliance Policy and Procedure](#) site on the HSC intranet to publish new and revised Policies approved by the ICWC. Additional Billing Compliance related policies are found on the HSC intranet under Operating Policies at [52 - Compliance](#)
- b. The ICO, Billing Compliance BCD/O, or designee shall distribute to appropriate individuals in the Institution. Whenever necessary, education will be provided on approved Policies, including, but not limited to e-mails, memoranda, postings, newsletters, and/or meetings.

E. ADMINISTRATION AND INTERPRETATIONS

This policy is effective upon approval by the ICWC. Questions regarding this policy may be addressed to the ICO or Billing Compliance BCD/O.

F. AMENDMENTS, REVISIONS, OR TERMINATION

This policy may be amended or terminated at any time, to reflect changes in TTUHSC policies or applicable laws and regulations.

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