

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

2.2 Training: Annual Billing Compliance Education	
Approved Date: September 8, 2010	Effective Date: January 1, 2011
Last Revised: August 31, 2016	

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 physician and non-physician providers (including part-time providers), administrators, coding staff and MPIP billing staff, in the School of Medicine, School of Nursing, and School of Health Professions, 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. "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.
3. "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.

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

4. "MPIP Billing Staff" means staff working within the School 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.

If a part-time provider finishes their assignment and leaves TTUHSC before completing the annual Billing Compliance Education and then returns for a subsequent assignment, the Billing Compliance Office will send the current year's Billing Compliance Education to the part-time provider's agency. The provider must complete and submit to the TTUHSC Billing Compliance Office before beginning a new assignment at TTUHSC.

TTUHSC-employed providers who are contracted to work in non-TTUHSC clinics or facilities and whose services are billed by the non-HSC clinic or facilities, e.g., UMCP clinics are considered members of the HSC workforce, and expected to fulfill the same training requirements as HSC-assigned providers, e.g., HIPAA education. However, these providers are not required to complete new or ongoing TTUHSC billing compliance education as their health care services are not billed under the TTUHSC tax ID number. Such training will be provided by the contracting institution responsible for the contracted providers' billing and collection activity.

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

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

In January of each calendar year, the Administrator of each clinical Department shall provide the Billing Compliance Director/Officer (BCO) 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 BCO or his/her designee is responsible for offering on-line education. Departments may have the option of scheduling live session(s) with the BCO.
- b. Education Session.
 - i. At each clinical department's discretion, the BCO may conduct live annual billing compliance education for the clinical department.
 - ii. Those clinical departments electing to use the on-line training module must complete the training within 120 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 BCO, or his/her designee, shall track and record attendance at the live education session. The BCO 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.](#)

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

- 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 BCO.