

University of Minnesota School of Dentistry Billing Compliance Program

I. INTRODUCTION

The University of Minnesota School of Dentistry (SOD) has established this Billing Compliance Program (the "Program") to assure it continues to meet its compliance obligations. This Program will focus on improving compliance-related services and systems, awareness and education, oversight, and evaluation of billing practices and procedures. In adopting the Program, Clinical Systems affirms an ongoing commitment to identify to its employees areas of activity where standards of conduct are essential and conforming behavior expected.

II. GENERAL POLICY STATEMENT

The SOD is committed to operating in accordance with the highest level of professional, academic, and business ethics in compliance with applicable laws and University policies. This commitment is advanced and secured through the integrity and ethical actions of our officers, clinicians, students and employees.

All professional services rendered shall be provided and documented in accordance with federal and state laws, regulations, interpretations, and University policies. It is the policy of the SOD that all clinicians shall comply with the guidelines set forth in the Clinic Manual, Sections C and K. In accordance with this Program, SOD policy prohibits the submission of any bill or claim by or on behalf of any faculty or non-faculty member for services that fail to satisfy applicable requirements for payment by government and private payers.

III. SCOPE

This Program shall apply to medical and dental billing for clinical activity. The Dean of the University of Minnesota School of Dentistry approves this Compliance Program. It has been developed with the assistance of counsel and the University Institutional Compliance Office.

IV. PURPOSES AND OBJECTIVES

The purposes and objectives of the Program are to:

- (1) Improve compliance-related services and systems;
- (2) Identify and respond to compliance risks, including Clinic-specific compliance initiatives, to ensure that practices reflect current requirements;
- (3) Clarify roles and responsibilities associated with billing compliance;
- (4) Assure appropriate billing policies and procedures are in place and followed;
- (5) Assure effective education and training programs are delivered to improve awareness of the required standards for professional medical and dental billing and to ensure staff are updated in a timely manner on any changes in billing standards or policy changes;
- (6) Improve lines of communication to interested parties on billing compliance issues;
- (7) Provide a means for faculty, clinicians, students and staff to address questions and receive guidance, as well as a mechanism for individuals to report concerns of alleged non-compliance so that such reports can be investigated;
- (8) Adequately monitor and oversee billing activities;
- (9) Take corrective action to address issues of non-compliance with policies and procedures where appropriate; and
- (10) Continually evaluate the effectiveness of this Program and institute changes as appropriate based upon such evaluation.

V. ADMINISTRATIVE ORDER OF RESPONSIBILITY

1. Dean of the School of Dentistry (Patrick Lloyd)

The Dean of the School of Dentistry is responsible for the over-all maintenance of an atmosphere conducive to ethical conduct and compliance with the Program. The Dean, in consultation with the Compliance Officer will have authority for corrective action and the substance of corrective action for non-compliance with the Program.

2. Compliance Officer/Director of Quality Assurance

The Compliance Officer oversees dental quality assurance and compliance. The Compliance Officer has authority to implement corrective actions.

3. Compliance Director - Clinical Systems

The Compliance Director is responsible for implementation and maintenance of the program. The Compliance Director shall monitor the performance of the Compliance Coordinators. The Compliance Director will report to the Compliance Officer concerning the operation of the Program.

4. Compliance Coordinator - Program Associate

This specialist shall be responsible for documenting compliance efforts, prospective and retrospective chart audits, and education and training. This position will work with Information Systems to ensure accurate billing, and perform other billing compliance duties as assigned by the Compliance Director. This person shall report to the Compliance Director on all matters relating to the Program, including recommended Program changes and improvements.

5. Compliance Coordinator - HIPAA Privacy and Security

This specialist works closely with the Compliance Director and Compliance Coordinator – Program Associate, to ensure HIPAA privacy and electronic billing standards are followed, assists with claim and information system integrity, and other compliance duties as assigned by the Compliance Director.

VI. POLICIES AND PROCEDURES

Policy on Billing Responsibility & Record Documentation

The School of Dentistry abides by all laws, rules, regulations and University policies that apply to billing and record documentation. In selecting codes to describe services rendered, SOD faculty, staff, students and clinicians are to select codes that they believe, in good faith, correspond to services actually rendered, as documented in the patient chart. SOD faculty, staff, clinicians and students have a collective responsibility to be knowledgeable about the meaning of the codes applicable to their area of practice, including relevant directives from billing authorities. The SOD further recognizes the importance of maintaining accurate patient records in accordance with applicable requirements. Billing guidelines and educational material are located in the intra-net section of the School of Dentistry website in the Clinic Manual at <http://www.dentistry.umn.edu>, Sections C and K.

Policy on Direct Reports of Alleged Unethical or Illegal Conduct and Corrective Action

Anyone may report instances of alleged unethical or illegal conduct directly to the Dean, Compliance Officer, Compliance Director, Associate Dean for Clinical Systems, or other appropriate SOD or University official, or through UReport Confidential Reporting Service, located on the web at <http://www.ureport.umn.edu/> Such reports may be anonymous. No adverse action or any form of retaliation shall be taken against any person who in good faith reports alleged unethical or illegal conduct.

Billing compliance violations shall be reported to and acted upon by the Compliance Officer and Dean or Dean's designee. Such designee shall have sufficient authority to deal objectively with the reported matters. The existence and nature of the reporting system shall be communicated to all employees of the SOD. No person may intimidate or impose any form of retribution on any employee who utilizes such reporting system in good faith to report suspected violations (except that appropriate action may be taken against such employee if such individual is one of the wrongdoers).

Any alleged violation of the Code of Conduct that could have a material adverse effect on the SOD or that is otherwise of material importance to the University shall be promptly reported to the Dean's office.

- Investigation of Violations

If, through operation of the SOD's compliance monitoring and auditing systems or its confidential disclosure program or otherwise, the SOD receives information regarding an alleged violation of the Billing Compliance Program, the administrators of this Program shall take prompt corrective action, which may include:

- evaluate such information as to gravity and credibility;
- initiate an informal inquiry and/or, as the Compliance Officer shall determine is necessary, a formal investigation with respect thereto;
- prepare a report setting forth the results of such inquiry or investigation, including recommendations as to the disposition of such matter;
- present the matter to the Dean for imposition of such disciplinary measures as the Dean shall deem necessary and appropriate;
- if and as appropriate, recommend changes in the Program necessary or desirable to prevent further similar violations.

- Corrective Actions

a. The SOD shall consistently enforce its Billing Compliance Program through appropriate means of discipline and corrective action. The Dean shall review whether violations of the Program have occurred. If a violation has occurred, the Dean shall determine the disciplinary measures to be taken against any employee, agent or independent contractor of the SOD who has violated the program.

b. Corrective actions, which may be invoked at the discretion of the Dean may include counseling, oral or written reprimands, warnings, probation, suspension or loss of clinical privileges, demotions, reductions in salary, denial of a salary increase, denial of a bonus, incentive compensation or merit increase and restitution.

- Jurisdiction of the Dean

The Dean, together with administrative officers, is to be responsible to effectuate and maintain an effective Program.

Billing Policy for Teaching Clinician With Residents

The School of Dentistry will follow Medicare's Teaching Clinician Guidelines. Guidelines can be found in the intra-net Clinic Manual section of the School's website located at <http://www.dentistry.umn.edu> or hard copies may be obtained from the Privacy Coordinator - Program Associate.

Policy on Monitoring for Clinician's Using Procedure Codes

Under the supervision of the Compliance Officer and Compliance Director, a sample of patient records and corresponding bills will be periodically reviewed for compliance with the SOD's billing policies and with legal requirements. Billed services and records from each Clinic submitting procedure codes shall be reviewed at least biannually, but the Compliance Officer and Compliance Director may require more frequent reviews. The results of such reviews will be reported to the Compliance Officer and Compliance Director and appropriate Clinic Director and/or provider who were audited. The Compliance Director and Compliance Officer shall maintain audit records.

Policy on Revisions to this Program

The Billing Compliance Program is intended to be flexible and readily adaptable to changes in federal and state regulatory requirements. The Program will be regularly reviewed to assess whether it is working. The Program will be modified in response to evidence that indicates a certain approach is not effective or suggests a better alternative. The Compliance Officer and Compliance Director with the approval of the Dean shall have the authority to modify or revise the program.