

THE CENTER FOR DISCOVERY

SUBJECT: Reimbursement Practices and Billing Errors

MANUAL: Corporate Compliance

SECTION: Section 7

Purpose:

The Center for Discovery is committed to accuracy and integrity in all its billing, coding, and other reimbursement operations. To reinforce this commitment, the Compliance Officer works in conjunction with the Chief Financial Officer who is responsible for general oversight of billing, coding, and other reimbursement operations in accordance with this policy.

Policy:

The Center for Discovery is committed to ensuring that its reimbursement practices comply with all federal and state laws, regulations, guidelines, and policies. The Center for Discovery prohibits the intentional submission for reimbursement any claim that is false, fraudulent, or fictitious. Furthermore, the Center is committed to ensuring against the accidental submission of any claim that is false or inaccurate.

This commitment includes a policy of ensuring accurate billing of claims for services that are actually rendered and deemed medically necessary. This policy and the following procedures were adopted to ensure that general guidance is available for all employees.

Procedures:

1. The Compliance Officer is responsible for ensuring that all reimbursement and billing procedures contained in this policy are integrated into the operations of the organization.
2. All affected individuals will receive compliance training that will reinforce the following policies:
 - a. Anyone who has knowledge of a problem related to reimbursement (e.g., submission of a claim that is false or contains false information) must report that problem to management, the Corporate Compliance Officer, or call the Corporate Compliance Hotline (1-845-707-8811).
 - b. Failure to report a known problem related to reimbursement will subject an employee or agent to disciplinary action or sanction related to their role within the agency.
 - c. Anyone reporting a problem or concern in good faith will be protected by the non-intimidation non-retaliation policy.
3. The Compliance Officer is responsible for ensuring that the Code of Conduct provides adequate general guidance concerning documentation requirements and appropriate reimbursement practices.
4. The Compliance Officer is responsible for making sure that the compliance training program includes training on documentation requirements and reimbursement practices.

ORIGINAL DATE: 2/2012

SUPERSEDES: N/A

REVISION: 3

DATE: 7/24/19

FILE NUM: CC-7.1

PAGE: 1 OF 3

THE CENTER FOR DISCOVERY

SUBJECT: Reimbursement Practices and Billing Errors

MANUAL: Corporate Compliance

SECTION: Section 7

5. All services rendered to individuals shall be documented in a proper and timely manner so that only accurate and properly documented services are billed.
6. The documentation within the service recipients' records shall include the identity and title or professional certification of the individual providing or ordering the service.
7. The Center for Discovery has developed and maintains written procedures for the documentation of services. Procedures include, at a minimum, the following:
 - Attendance records;
 - Receipt and maintenance of service plans (including but not limited to ISP, IEP, Treatment Plans, and Habilitation Plans);
 - Service documentation requirements specific to the respective program;
 - Contemporaneous documentation; and
 - The forms/templates used for documentation and billing purposes.
8. The Compliance Officer in conjunction with the Chief Financial Officer must approve the billing and documentation procedures and/or any revisions to procedures or forms before implementation.
9. The Center for Discovery will perform random reviews of its documentation practices for each program to verify that practices conform to the written procedures. Results of the review will be reported to the Corporate Compliance Committee.
10. Program and reimbursement staff will communicate regularly, effectively and accurately with each other to assure compliance and avoid the potential for billing irregularities and/or errors.
11. The Compliance Officer is responsible for responding, in a timely manner, to all problems, concerns, or questions related to reimbursement practices. The Compliance Officer is also responsible for ensuring that appropriate remedial actions are taken for any irregularities uncovered.
12. If a billing error is discovered, the billing error should be immediately reported to the Chief Financial Officer and the Compliance Officer.
13. The Compliance Officer is responsible for the investigation of any billing errors or irregularities. Appropriate steps will be taken to prevent recurrence.
14. Any overpayment received as a result of such billing error will be promptly repaid to the appropriate payer, with interest, if appropriate.

ORIGINAL DATE: 2/2012

SUPERSEDES: N/A

REVISION: 3

DATE: 7/24/19

FILE NUM: CC-7.1

PAGE: 2 OF 3

THE CENTER FOR DISCOVERY

SUBJECT: Reimbursement Practices and Billing Errors

MANUAL: Corporate Compliance

SECTION: Section 7

15. Results of any investigations and recommended remedial actions will be discussed with the Executive Team upon completion of the investigation and reviewed with the Governance and Corporate Compliance Committee at the quarterly meetings.
16. The Compliance Officer will work with the Chief Financial Officer to verify on an annual basis that all reimbursement and billing manuals and materials are current and accurate.

ORIGINAL DATE: 2/2012

SUPERSEDES: N/A

REVISION: 3

DATE: 7/24/19

FILE NUM: CC-7.1

PAGE: 3 OF 3