

THE CENTER FOR DISCOVERY

SUBJECT: Disclosure of Overpayments and Deficiencies	MANUAL: Corporate Compliance
	SECTION: Section 7

Purpose:

To ensure accuracy in all reimbursement activities, and prompt disclosure and remediation of any identified overpayments.

Overpayment means the amount of money the Center for Discovery has received in excess of the amount due and payable under the federal healthcare programs' statutes, regulations, or program directives, including carrier and intermediary instructions.

Material Deficiencies means anything that involves:

1. A substantial overpayment or improper payment relating to a federal healthcare program
2. Conduct or policies that clearly violate federal healthcare program statutes, regulations, or program directives
3. Serious quality-of-care implications for federal healthcare beneficiaries or recipients

Policy:

1. Third-party payers will be notified in writing within 30 days of the date of discovery of any overpayments discovered subsequent to the submission of a claim for reimbursement or the filing of a cost report, regardless of the financial impact on the Center for Discovery.
2. Overpayments that constitute material deficiencies will also be disclosed (contemporaneous with the notification to the payer) in writing to the OMIG.
3. Remedial steps will be taken within 60 days of discovery of any overpayment to correct any billing, coding, or other policies, procedures and/or practices that caused the overpayment.

Procedures:

1. All overpayments will be immediately reported to the Corporate Compliance Officer.
2. Within 30 days of discovering an overpayment, written notice will be sent to the payer which shall include the following:
 - Statement that it is a refund as result of the discovery of an overpayment
 - Description of the complete circumstances surrounding the overpayment
 - Methodology by which the overpayment was determined
 - Amount of the overpayment
 - Claim-specific information used to determine the overpayment (e.g., beneficiary health insurance number, claim number, service date, and payment date)
 - Cost reporting period

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- Identification number under which the repayment is being made.
3. If the Center for Discovery determines that an overpayment represents a material deficiency, contemporaneous with the notification to the payer, the Center will also notify the OMIG of:
 - Complete description of the material deficiency
 - Amount of overpayment due to the material deficiency
 - Action(s) taken to correct and prevent such material deficiency from recurring
 - Payer's name, address, and contact person where the overpayment was sent
 - Date of the check and identification number (or electronic transaction number) on which the overpayment was repaid
 4. Within 60 days of discovery of any overpayment, the Corporate Compliance Officer will ensure remedial steps are taken to correct any billing, coding or other polices, procedures and/or practices.

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