

## ***Policies and Procedures - Billing Compliance Office***

<b>SECTION:</b> <b>BILLING COMPLIANCE</b>	<b>Approved</b> 7/24/98	<b>Effective Date</b> 7/24/98	<b>Revised</b> 03/16/04
<b>CHAPTER:</b> <b>GENERAL PROCEDURES</b>	<b>Revises Policy Revised: 02/18/03</b>		
<b>POLICY:</b> <b>BILLING COMPLIANCE HOTLINE</b>	<b>Retired:</b>		
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### **I. PURPOSE**

The primary purpose of the Billing Compliance Hotline (402-280-2107) is to provide a means for employees and agents of Creighton Health Sciences Schools to report any activity or conduct which he/she suspects is not in compliance with the Compliance Plan for Health Sciences Billing and Patient Services (the "Plan") or federal or state laws and regulations applicable to health care providers. Information received through the Billing Compliance Hotline ("Billing Hotline") will be used to investigate and verify whether or not noncompliant activity has occurred and give the University the opportunity to correct noncompliant conduct or behavior that is identified.

### **II. POLICY**

A Billing Hotline shall be available to report conduct and/or activity which is believed to be in non-compliance with federal and/or state billing requirements or the Plan. Employees and agents within the Health Sciences Schools are expected to use the Billing Hotline to report noncompliant activity if all other means to address and resolve the issue have failed or are otherwise not available.

### **III. SCOPE**

This policy applies to all faculty, staff, agents and volunteers within the Health Sciences Schools.

### **IV. PROCEDURE**

- A. Communication of Existence of Billing Hotline:** All employees and agents working within the Health Sciences Schools shall be advised of the Billing Hotline number. The Compliance Officer shall provide a Notice of the Billing Hotline number to the Deans of each School; the clinical departments in the School of Medicine; and the Dental School, to be posted in noticeable locations for employees/agents within those areas.
- B. Anonymity of Hotline Callers:** Except as required by law, no one shall disclose the name of any caller to the Billing Hotline without the express consent of the caller. Callers to the Hotline who wish to remain anonymous

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(unnamed) shall be given a four (4) - digit reference number which shall be used to identify that caller.

- C. Use of Billing Hotline:** Employees and agents of Creighton University Health Sciences Schools shall be informed to use the Billing Hotline when all other available reporting mechanisms are ineffective. The Billing Hotline should only be used to report conduct or activity which the caller believes or suspects is not in compliance with the Plan or with federal or state laws and regulations applicable to billing for health care services.
  
- D. Billing Hotline Procedures:** General Counsel's Office receives calls to the Billing Hotline. The following procedures are to be followed in answering a call to the Billing Hotline.
  - 1. Hotline Information:** Persons handling Billing Hotline calls shall use the Billing Hotline Information Sheet, Attachment "A" to obtain information necessary to allow for investigation of the complaint. The completed Billing Hotline Information Sheet shall be maintained in a secure location.
  
  - 2. Calls During University Business Hours (8:00-4:30):** In most cases, calls to the Billing Hotline during University business hours will be handled by the Associate General Counsel. If he/she is unavailable, the caller will have the option of either leaving a message on voice mail or contacting General Counsel (402-280-5589) to report any suspected noncompliant activity or conduct. If General Counsel is unavailable, his/her administrative assistant shall obtain the necessary information from the Billing Hotline caller.
  
  - 3. Calls Outside Regular Business Hours (including Weekends and Holidays):** A caller to the Billing Hotline outside regular business hours will have the option of either leaving a message on the voice messaging system, or of calling back during regular business hours. The Associate General Counsel, Compliance, shall regularly check the voice messaging system for any calls to the Billing Hotline and shall promptly follow-up with the caller if they have left a telephone number or other contact information.

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**E. Billing Hotline Call Protocols:** Billing Hotline calls must be handled in an appropriate manner to assure the caller that the information they have is important and will be handled in a confidential manner. All calls to the Billing Hotline must be handled in a confidential manner. These guidelines should be followed by anyone handling a Billing Hotline call:

**1. Handling a Billing Hotline Call Personally:**

- a. Identification:** Ask the caller if he/she wants to give his/her name, department and contact phone number. If the caller does not want to give this information, then given him/her a four (4) - digit tracking number, which will be used to identify that caller. If the caller does not want to leave a telephone number, then advise the caller of the tracking number assigned and that he/she can follow-up by calling the Hotline and referencing the tracking number.
- b. Information:** Obtain as much information from the caller regarding the suspected noncompliant conduct or activity utilizing the Billing Hotline Information Sheet.

**2. Billing Hotline Calls to Voice Mail:** During non-business hours, calls to the Hotline will be handled through the voice-messaging system for the Associate General Counsel, Compliance. The Billing Hotline caller will be given three options:

- The caller can call back during business hours if he/she does not want to leave the information on the voice-messaging system.
- The caller can leave his/her name and phone number and will be contacted within a reasonable time, preferably the next business day.
- The caller can leave a message regarding the suspected noncompliant conduct or activity.

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- F. Investigation of Billing Hotline Calls.** General Counsel's Office shall review each Billing Hotline call and determine the appropriate means, if any, to investigate the matter. In some cases, General Counsel's Office may delegate investigation of the matter to another department within the University, in which case, the investigation will be subject to Attorney work product privilege. Any information obtained through an investigation should be kept confidential and should only be distributed under the direction of General Counsel's Office.
- G. Maintenance and Retention of Billing Hotline Records:** General Counsel's Office shall be responsible for maintaining and retaining any and all documentation and records related to Billing Hotline calls and subsequent investigations, if any, for at least ten (10) years from the date the file is closed. Billing Hotline Records may be destroyed after the retention period has elapsed.

### **V. ADMINISTRATION AND INTERPRETATIONS**

Questions regarding this policy may be addressed to General Counsel's Office.

### **VI. AMENDMENTS OR TERMINATION**

This policy may be amended or terminated at any time.

### **VII. REFERENCES/RELATED POLICIES**

None.

**BILLING HOTLINE INFORMATION SHEET**

Date: \_\_\_\_\_ Time (if applicable): \_\_\_\_\_

Caller's Name (Optional and Confidential): \_\_\_\_\_

If anonymous, 4-digit tracking Number: \_\_\_\_\_

Caller's Department (Option and Confidential): \_\_\_\_\_

Caller's Phone Number (Optional and Confidential): \_\_\_\_\_

Received By: \_\_\_\_\_

Method of Contact             Personal contact             Hotline  
    E-mail     Other: \_\_\_\_\_

Information Obtained From Caller:

a. Name(s) and Department of Individuals Involved in Alleged Non-Compliance: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

b. Description of Suspected Non-Compliance, including date(s) and location(s), as applicable: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

c. Name(s) of any other persons who may have knowledge regarding this matter (to remain confidential for purposes of investigating the alleged misconduct): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

d. Was the suspected non-compliant conduct reported to anyone?  Yes  No

e. If Yes, obtain the following information:

1. Name of person(s) reported to: \_\_\_\_\_

2. Date the report was made: \_\_\_\_\_

3. Was the report written or oral? \_\_\_\_\_

f. Can the caller provide any documentation to assist in an investigation?  Yes  No

g. Is the caller willing to meet?  Yes  No

Forwarded to (check all that apply) for investigation and follow-up	<input type="checkbox"/> Compliance Director	<input type="checkbox"/> Legal Counsel
	<input type="checkbox"/> Compliance Committee	<input type="checkbox"/> HR
	<input type="checkbox"/> Risk Management	<input type="checkbox"/> Internal Audit
	<input type="checkbox"/> Department	

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Attach information related to investigation, follow-up and any disciplinary action taken

Date Investigation and File Closed: \_\_\_\_\_

**NOTES**