Office of Institutional Integrity

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<th>Topic:</th>
<th>ECU Division of Health Sciences Procedure for the Review and Completion of Charge Corrections</th>
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<td>Approval Date:</td>
<td>5-12-2017</td>
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<td>(Adopted May 12, 2017 by the Health Sciences Senior Academic Officers Committee)</td>
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I. PURPOSE: This procedure sets forth the process which will be used to ensure that billing charge corrections identified and recommended by the Office of Institutional Integrity (OII) are completed in a timely fashion.

  **Background**
  a. This procedure is based on the mandates created by the federal False Claims Act (31 U.S.C. §§ 3729–3733) and other relevant state and federal legislation.
  b. The “60-day rule” requires anyone who has received an overpayment from Medicare or Medicaid to report and return the overpayment within 60 days after the date on which the overpayment was identified.
  c. Overpayments are those payments and charges that were reimbursed by federal providers that should not have been.

II. PROCESS:
  A. The Office of Institutional Integrity (OII) staff members conduct ongoing, monthly documentation reviews of billing providers who provide and charge for health care in the School of Dental Medicine, the College of Allied Health Sciences, and the Brody School of Medicine.

  B. Completed billing provider review results include individual graded provider results, identified errors and deficiencies, explanations, and OII recommendations for charge corrections to the appropriate payor.

  C. Billing provider review results—with explanation—are sent to the reviewed provider, the departmental chair, clinical director, Dean, medical director, clinical dean, or any other appropriate party as requested by the individual School or College.

  D. There is a 14 calendar day “discussion and review” period during which queries regarding the completed OII reviews may be raised by the reviewed provider, department chair, clinical director, Dean, medical director, or dean of clinical affairs depending on the School or College.
E. The OII Associate Director, Compliance Billing or other OII staff will discuss such questions and queries and provide feedback and explanation.

F. Departments of business/clinical financial services will not directly participate in the discussions, questions, queries, with the OII.

G. However, the School or College can rely on anyone (including business and financial services personnel) to advise them during the “discussion and review” process.

H. The initial charge correction recommendations will be revised if OII errors are discovered during the “discussion and review” period.

I. If an issue regarding a recommended charge correction is unresolved after the “discussion and review” period the original recommendation of the OII will stand.

J. After 14 calendar days, the “discussion and review” period will be complete. At that time, the OII decision on the recommended charge corrections will become final.

K. Immediately following the “discussion and review” period, the OII will provide charge correction spreadsheets to the appropriate School or College’s business/clinical financial services office with instructions to repay the identified charges to the appropriate payor.

L. The OII will not participate in the School or College’s internal discussion and decision on whether to follow the OII repayment recommendations after the initial “discussion and review” period has expired.

M. The business/clinical financial service will complete the charge corrections within 30 calendar days of receipt of the charge correction spreadsheet.

N. The business/clinical financial service will inform the OII in writing when the charge corrections have been completed. If OII does not receive notification that the charge corrections have been completed within the 30 day time period, or, if the School of College does not complete a recommended charge correction, OII will notify the:
   1. Vice Chancellor of Health Sciences
   2. Associate Vice Chancellor for Health Regulatory Affairs;
   3. Dean of the appropriate College or school; and
   4. Office of Internal Audit.

O. The College or School can raise the areas of disagreement with the OII recommendations after the 30 day period with the Vice Chancellor of Health Sciences and the Associate Vice Chancellor for Health Regulatory Affairs.