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| <b>DEPARTMENT:</b> Regulatory Compliance Support           | <b>POLICY DESCRIPTION:</b> Billing & Billing Related Continuing Education Requirements  |
| <b>PAGE:</b> 1 of 4  | <b>REPLACES POLICY DATED:</b> 2/8/01, 1/1/02, 5/1/02, 9/1/02, 5/15/03, 1/1/04, 4/15/04, 11/30/04, 1/1/06 (GOS.GEN.007); 3/6/06; 5/1/08; 1/24/09 |
| <b>EFFECTIVE DATE:</b> February 1, 2017                    | <b>REFERENCE NUMBER:</b> REGS.GEN.007   |
| <b>APPROVED BY:</b> Ethics and Compliance Policy Committee |   |

|   |                                 |                |                                |               |                                 |               |                        |                   |                  |
|---|---------------------------------|----------------|--------------------------------|---------------|---------------------------------|---------------|------------------------|-------------------|------------------|
| <p><b>SCOPE:</b> All Company-affiliated facility and corporate personnel who work more than 160 hours per calendar year involved in the performance of billing and/or billing-related services resulting in the submission of claims on behalf of HCA for Federal healthcare programs. This includes personnel at Company-affiliated facilities, Service Centers, Corporate Departments, Groups and Divisions and particularly the following departments/personnel:</p> <table border="0" style="width: 100%;"> <tr> <td style="width: 50%;">Patient Access</td> <td style="width: 50%;">Ancillary Department Directors</td> </tr> <tr> <td>Billing Staff</td> <td>Emergency Department (ED) Staff</td> </tr> <tr> <td>Case Managers</td> <td>Shared Service Centers</td> </tr> <tr> <td>Revenue Integrity</td> <td>Facility/SSC ECO</td> </tr> </table>  |                                 | Patient Access | Ancillary Department Directors | Billing Staff | Emergency Department (ED) Staff | Case Managers | Shared Service Centers | Revenue Integrity | Facility/SSC ECO |
| Patient Access  | Ancillary Department Directors  |                |                                |               |                                 |               |                        |                   |                  |
| Billing Staff   | Emergency Department (ED) Staff |                |                                |               |                                 |               |                        |                   |                  |
| Case Managers   | Shared Service Centers          |                |                                |               |                                 |               |                        |                   |                  |
| Revenue Integrity   | Facility/SSC ECO                |                |                                |               |                                 |               |                        |                   |                  |
| <p><b>PURPOSE:</b> To ensure that all personnel involved in billing and/or billing-related services for Federal healthcare programs are aware of billing guidelines and regulatory changes, which may impact complete, accurate and consistent billing. The purpose of training shall include the following: (a) the submission of accurate bills for services rendered to Federal healthcare program beneficiaries; (b) policies, procedures and other requirements applicable to the documentation of medical records; (c) the personal obligation of each individual involved in the billing process to ensure that such billings are accurate; (d) applicable reimbursement statutes, regulations, and program requirements and directives; (e) the legal sanctions for improper billings; and (f) examples of proper and improper billing practices.</p>   |                                 |                |                                |               |                                 |               |                        |                   |                  |
| <p><b>POLICY:</b></p> <ol style="list-style-type: none"> <li>Each person involved in the performance of billing and/or billing-related services for Federal healthcare programs as well must complete the required education per calendar year in billing and/or billing-related services. This includes individuals meeting the definition of a biller as well as those individuals not defined as a biller but who perform job functions that have mandatory education requirements defined by Regulatory Compliance Support (e.g., Patient Access Directors and staff, Case Managers, Revenue Integrity, as well as relevant Ancillary Department Managers and staff, and ED staff). Education requirements will be reviewed and announced annually by Corporate Regulatory Compliance Support. Required education may also be announced throughout the year due to Federal regulatory changes. Only Company-designated programs may count towards this requirement.</li> </ol> <p>All mandatory education requirements defined by Regulatory Compliance Support are included in the "Regs Education Requirements" document for the appropriate calendar year. These documents are located on ATLAS Connect using the following link:<br/> <a href="http://connect.medcity.net/web/regs/regs-education">http://connect.medcity.net/web/regs/regs-education</a></p> |                                 |                |                                |               |                                 |               |                        |                   |                  |

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2. Newly hired personnel involved in the performance of billing and/or billing-related services for Federal healthcare programs must complete the required education within the first 90 calendar days of employment. The work of newly hired personnel (within the first 90 calendar days of employment) must be carefully monitored by a fully-trained employee until the training requirements have been met.
3. This policy does not replace other policies that address continuing education requirements specific to functional areas (such as the Coding Continuing Education Requirements Policy, (REGS.COD.006), the Coding Continuing Education Requirements for Outpatient Services Group Entities Policy (REGS.OSG.006), the Outpatient Rehabilitation Therapy Services Policy (REGS.APS.002), the HCA Laboratory Billing Compliance Plan, and Revenue Integrity education and/or policies).

**DEFINITIONS:**

**Federal healthcare program:** Any plan or program that provides health benefits, whether directly, through insurance, or otherwise, which is funded directly, in whole or in part, by the United States Government (other than the health insurance program under chapter 89 of title 5 of the United States Code - the Federal Employees Health Benefit Program); or any State health care program, as defined in 42 U.S.C 1320a-7(h).

Federal healthcare programs include, at a minimum, the following:

- Medicare Program, Parts A & B (Title XVIII of the Social Security Act); (but not Medicare managed care plans)
- Medicaid (Title XIX of the Social Security Act); (but not Medicaid managed care plans)
- Federal Prison Hospitals (prisoners);
- Indian Health Service;
- OWCP (workers' compensation for federal employees);
- Public Health Service;
- Railroad Retirement Board;
- The Black Lung Program;
- TRICARE/CHAMPUS/Department of Defense healthcare programs (Chapter 55 of Title 10, United States Code); and
- Veterans Administration (VA).

**Billers:** A biller (inpatient or outpatient) is an individual who prepares, reviews, updates and/or submits claims to third party payers for reimbursement of medical services provided. The billing function includes the verification and correction of billing data for accuracy and completeness following regulatory requirements prior to claim submission. This function also includes resolving

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edits or exceptions detected during system processing of the claim. These claims may be submitted on a CMS 1450 (UB-04) or on a CMS 1500.

The definition of biller also includes any employee's immediate supervisor who supervises the preparation, review, updating and/or submission of claims to a third party payer for reimbursement of medical services provided.

All billers who bill Federal healthcare programs must be tracked in the Company's HealthStream Learning Center (HLC).

Example:

If an employee is making changes/editing directly into EP Billing Vendors, Common Working File (CWF), Fiscal Intermediary Shared System (FISS) or Medicaid on-line systems or if the employee changes or signs a manual claim, this employee **is** considered a biller.

If an employee is reviewing the medical record and making recommendations to the biller and not making changes/editing directly into EP Billing Vendors, CWF, FISS or Medicaid on-line systems, this employee **is not** considered a biller. However, an employee performing these tasks may be performing billing related services and subject to certain billing education requirements based on their job functions.

Employees who only make changes to the CDM or only enter charges through Meditech **are not** considered billers.

**PROCEDURE:**

1. The facility/SSC Ethics and Compliance Officer (ECO) or Corporate Responsible Executive must designate an appropriate person (e.g., Institution Administrator, Department Director) to track the required education hours for each person involved in billing and/or billing-related services for Federal healthcare programs.
2. It is the responsibility of the direct supervisor to ensure that each person who is performing billing and/or billing-related services for Federal healthcare programs receives the required billing education per calendar year.
3. The completion of required billing and billing-related education hours, as defined in this policy, is tracked using the Company's HealthStream Learning Center (HLC).
4. Any person involved in performing billing and/or billing related services for Federal healthcare programs who does not meet the designated time-frame for completion of the required hours of

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training must be reported to the ECO by the person's direct supervisor and must immediately complete the training before resuming job responsibilities. If the training is not completed within two business days of the designated time frame, the employee must be suspended without pay until the educational requirements are met.

The facility/SSC ECO must confirm that an action plan has been developed for the person to complete the required training immediately. For facility employees, the facility ECO must also include this in his/her report to the Facility Ethics and Compliance Committee (FECC).

5. The facility/SSC ECO or Corporate Responsible Executive must designate an appropriate person to distribute/assign billing education and/or billing-related communication to the appropriate personnel.
6. The facility/SSC must be able to prove compliance with this policy when requested.

The FECC is responsible for implementation and monitoring of this policy within the facility. The SSC ECO is responsible for the implementation and monitoring of this policy within the SSC.

**REFERENCES:**

1. Coding Continuing Education Requirements Policy, [REGS.COD.006](#)
2. Coding Continuing Education Requirements for Outpatient Services Group Entities Policy, [REGS.OSG.006](#)
3. Outpatient Rehabilitation Therapy Services Policy, [REGS.APS.002](#)
4. HCA Laboratory Compliance Plan