

TITLE: Instructions from Government Carrier Representatives

POLICY/PURPOSE:

The University of Florida College of Medicine (the “University”) and the University of Florida Jacksonville Physicians, Inc. (“UFJPI”) have a strong and abiding commitment to ensure that its affairs are conducted in accordance with applicable law. A critical focus of any compliance plan for an academic health center relates to professional fee reimbursement. Compliance in this area is challenging because the regulatory requirements governing such reimbursement continue to change and are complex.

The Office of Compliance is responsible for staying abreast of regulatory changes as they relate to billing and reimbursement of professional fees. In this regard, the Office of Compliance must rely on information published by federal and state agencies and their designated carriers/intermediaries in order to support the billing compliance efforts of the University and UFJPI. Conversely, verbal guidance or instructions received from carrier representatives or federal or state government agency representatives (“Carrier Reps”) often cannot be supported or collaborated at a future point in time. As such, verbal instructions cannot be relied on to support billing.

DEFINITIONS:

PROCEDURE:

1. When guidance or instruction is received from Carrier Reps, The Office of Compliance must be notified in order to ensure the information received is credible, applicable, understood, and memorialized. Exceptions to this policy would include information communicated in a routine fashion through carrier publications, newsletters, websites, review letters, bulletins, transmittals, memoranda, RV Banner Announcements, handbooks, provider notices and provider messages.
2. Instructions or guidance received from Carrier Reps that are contrary to established, published guidelines or accepted coding practices must be in writing in order for the organization to memorialize the guidance and the source of information. This includes verbal guidance provided during meetings or training sessions with Carrier Reps. The Office of Compliance cannot accept verbal guidance or instructions, as these instructions often cannot be supported at a later point in time.
3. Employees must also be sensitive when sending Electronic Mail (“E-Mail”) to Carrier Reps to ensure the information conveyed is accurate, relevant, specific and objective. Requested guidance or instruction received via E-Mail from Carrier Reps must be forwarded to the Office of Compliance if the guidance or instruction received is contrary to established, published carrier guidelines or accepted coding practices.

REFERENCES:

APPROVED BY: Maryann C. Palmeter
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