

UConn HEALTH

Administrative Policy 2023-07 Coding, Billing and Charging

Title	Coding, Billing and Charging
Policy Owner and Contact Information	Office of Healthcare Compliance & Privacy Phone: 860-679-6060 Email: ohcp@uchc.edu Home Office of Healthcare Compliance & Privacy (uconn.edu)
Campus Applicability	All UConn Health campuses, including John Dempsey Hospital
Applies to	UConn Health Workforce Members
Effective Date	October 3, 2023

PURPOSE:

This policy sets forth requirements for accurate and appropriate coding, billing, and charging for healthcare items or services.

POLICY STATEMENT:

1. UConn Health shall comply with all applicable federal and state laws and contractual requirements relating to coding, billing, and charging.
2. UConn Health shall charge and bill only for health care services properly authorized, ordered, and performed.
3. UConn Health shall not submit charges that knowingly exceed amounts allowed by Medicare or other federal or state payers. (Refer to policy 2007-12: Reporting and Refunding Overpayments to Federal Healthcare Programs).
4. UConn Health shall prohibit the use of upcoding or inappropriate alteration of all charge forms, bills, or medical records to increase charges.
5. UConn Health shall prohibit Workforce Members from altering all charge forms, bills, or medical records except in accordance with applicable policies, laws, and regulations.
6. UConn Health shall promptly refund identified overpayments made by patients or payers.
7. Workforce Members with billing and coding job duties shall exhibit working knowledge of applicable billing practices, policies, regulations, and laws.
8. Workforce Members shall report known or suspected coding, billing, or charging errors to:
 - a. Their chain of command;
 - b. A member of the Office of Healthcare Compliance & Privacy;
 - c. The Chief Healthcare Compliance & Privacy Officer;
 - d. UConn's REPORTLINE 1-888-685-2637.

DEFINITIONS:

Workforce Members: Employees, volunteers, trainees, and other persons whose conduct, in the performance of work for UConn Health, is under the direct control of UConn Health, whether they are paid by UConn Health.

REFERENCES:

Deficit Reduction of 2005. Public Law 109-171 (Feb. 8, 2006)
OIG Supplemental Compliance Program Guidance for Hospitals, Vol 70, 4858 FR, No. 19 (Jan. 31, 2005)
Publication of the OIG Compliance Program for Hospitals, Vol. 63, 8987 FR, No. 35 (Feb 23, 1998)
False Claims Act (FAC), 31 U.S.C. §§ 3729
Connecticut False Claims Act (CFAC), C.G.S. §§ 4-274-275

PROCEDURES/FORMS:

None

RELATED POLICIES:

2018-02: Prevention and Detection of Fraud, Waste and Abuse
2007-12: Reporting and Refunding Overpayments to Federal Healthcare Programs

ENFORCEMENT:

Violations of this policy or associated procedures may result in appropriate disciplinary measures in accordance with University By-Laws, General Rules of Conduct for All University Employees, applicable collective bargaining agreements, the University of Connecticut Student Code, other applicable University Policies, or as outlined in any procedures document related to this policy.

APPROVAL:

Bruce Liang (Signed)
Bruce Liang, MD, FACC
Interim Chief Executive Officer, UConn Health
Executive Vice President for Health Affairs

10/3/2023
Date

Elle Box (Signed)
Elle Box
Chief Healthcare Compliance & Privacy Officer
Administrative Policy Committee Co-Chair

10/2/2023
Date

Janel Simpson (Signed)
Janel Simpson
Chief Administrative Officer
Administrative Policy Committee Co-Chair

10/2/2023
Date

POLICY HISTORY:

New Policy Approved: 10/23
Reviewed Without Changes:
Revision: