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Audit, Compliance & Education

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**The critical focus for the Office of Audit, Compliance & Education (ACE) relates to professional fee reimbursement. The Office of Audit, Compliance & Education has the responsibility of:**

1. Keeping abreast of the rapidly changing rules for billing and documentation;
2. Continually providing education to physicians and others on new and existing rules;
3. Continually monitoring compliance of physicians and others (including overseeing outpatient department reviews);
4. Receiving and responding to questions related to billing and documentation issues and to reports of noncompliance;
5. Working with affiliate hospitals' compliance teams to coordinate compliance efforts;
6. Thoroughly documenting and reporting on all compliance activities;
7. Performing analytical review on the appropriate billing data; and
8. Engaging external billing auditors as appropriate.

#### **Statement of Values**

##### **We value:**

1. Integrity, proficiency and due care in performing our work;
2. A service attitude that is responsive to the needs of the School of Medicine departments;
3. Quality products and services that are timely and relevant;
4. Each team member's role in the Compliance process; and
5. Confidentiality for individuals reporting possible billing compliance issues in good faith.

#### **Compliance Committee**

The Committee membership, which shall be nominated by the Governance committee and approved by the CU Medicine Board of Directors, is comprised of:

- Chairperson who shall be a Member of the CU Medicine Board of Directors and serves for a term of 3 years,
- Committee members include at least one Department Chair
- Clinical Department Director of Finance and Administration
- Committee members serve for a 3 year term, renewable for one 3 year term

#### **Mission:**

Assist the CU Medicine Board of Directors in fulfilling its oversight responsibility for the CU Medicine compliance plan and to ensure that the programs, policies, and procedures conform to all applicable regulatory requirements and that the plans are implemented and monitored.

## **Duties:**

- Approve the annual CU Medicine billing audit plan
- Review and approve CU Medicine internal billing audit findings
- Recommend actions in response to identified trends or issues
- Review and approve new and revised documentation and billing compliance procedures and policies
- Develop and recommend new policies or policy changes to the CU Medicine Board
- Advise the compliance and audit staff regarding policies and processes to ensure adequate auditing and education activities and remediation
- Review and approve plans related to other regulatory requirements
- Provide guidance to the CU Medicine Organizational Compliance Officer for issues/activities that overlap with UCD Regulatory Compliance.
- Provide reports to the CU Medicine Board as requested
- Advise CU Medicine Board regarding disciplinary policies related to compliance

## **Compliance Audits**

Both routine and special monitoring is the responsibility of the ACE department. ACE department directives and goals include monitoring compliance, identifying problems, and developing action plans when warranted. ACE will perform random and regular reviews of medical records. This monitoring effort includes sampling of clinical department medical records and corresponding bills to verify documentation accuracy and consistency.

Individual provider audits will also be conducted regularly, with special emphasis on performing ambulatory provider outpatient reviews.

CU Medicine staff performing coding functions will be subject to semi-annual reviews to ensure accuracy and compliance.

## **Education and Training**

- The ACE Director shall be responsible for ensuring that CU Medicine policies concerning coding and documentation are disseminated and understood. To accomplish this objective, the Director will work with the Revenue Cycle Director, Coding Services Director, the Faculty Group Practice or other billing organizations to ensure that there is a systematic and ongoing training program that enhances and maintains awareness of coding and documentation policies among existing staff and that introduces new personnel to CU Medicine coding policies.
- All training materials directed to coding and documentation issues will be submitted to ACE Director for review and approval before implementation.
- Training shall be mandatory for all physicians or other health professionals within the School of Medicine who bill for their services, and CU Medicine coding and billing personnel. Documentation that such training has occurred will be kept on file.
- No outside billing consultant may be retained by the Faculty Group Practice, the School of Medicine, or any Department or division, without the review and concurrence of the CU Medicine Executive leadership.