

## Texas Tech University Health Sciences Center El Paso Institutional Compliance Policy

<b>Policy: BCP EP 1.0 Policy Development and Implementation</b>	<b>Effective Date: November 19, 2009</b>
	<b>Last Revision Date: January 24, 2024</b>
<b>References: HSCEP OP 52.07</b>	

### **Policy Statement**

This policy defines the process of development and implementation of policies and procedures that (1) support the Billing Compliance Plan (HSCEP OP 52.07) and (2) provide guidance related to identified billing compliance risk areas.

### **Scope**

This policy applies to Texas Tech University Health Science Center El Paso (TTUHSC El Paso) for healthcare items and/or services billed under a TTUHSC El Paso tax identification number.

### **Policy**

TTUHSC El Paso Billing Compliance Policies shall be developed and implemented by the procedures outlined below.

### **Procedure**

1. **Policy Development.** The Institutional Compliance Officer (ICO) or their designee is responsible for the development of written billing compliance policies based on internally or externally identified billing risk areas. The Billing Compliance Manager (BCM) may assist in policy development by recommending policy topics and providing reviews and comments during the development stages, including any updates or revisions to existing policies.

2. **Policy Approval.** The ICO or their designee shall provide a final Policy draft to the BCM for review and comment before a new or revised Policy is submitted for approval. The BCM may provide the draft Policy to the Billing Compliance Advisory Committee (BCAC) to address potential operational impact or other issues related to the implementation of the proposed Policy. The BCAC will review and approve as appropriate.

3. **Approved Policies:** Notice and Education

- a. Website. The ICO or their designee shall maintain the Billing Compliance Policy and Procedure site on the TTUHSC El Paso intranet to publish new and revised Policies approved by the BCAC.
- b. The ICO, Billing Compliance BCM, or designee shall distribute to appropriate individuals in the Institution. Whenever necessary, education will be provided on approved Policies, including, but not limited to e-mails, memoranda, postings, newsletters, and/or in-person meetings

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### **Frequency of Review**

This policy will be reviewed on each even-numbered year by the Billing Compliance Manager, and the Billing Compliance Advisory Committee. This policy may be amended or terminated at any time, to reflect the changes in the TTUHSC EP policies or applicable laws and regulations.

Questions regarding this policy may be addressed to the Billing Compliance Manager or the Institutional Compliance Officer.

**Review Date:** March 1, 2016, January 13, 2022, January 24, 2024

**Revision Date:** June 1, 2015, March 1, 2016, April 2019, January 13, 2022, January 24, 2024