

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

<b>Policy: BCP EP 1.1 Billing Compliance El Paso Record Management</b>	
<b>Approved Date: September 8, 2010</b>	<b>Effective Date: September 8, 2010</b>
<b>TTUHSC El Paso Billing Compliance Website: <a href="http://elpaso.ttuhsu.edu/compliance/BillingCompliance/">http://elpaso.ttuhsu.edu/compliance/BillingCompliance/</a></b>	

## **Policy Statement**

To provide guidance to TTUHSC El Paso Billing Compliance staff on the maintenance and destruction of billing compliance records and documents.

## **Scope**

This policy applies to all TTUHSC El Paso Billing Compliance staff.

## **Policy**

Unless otherwise stated in [HSC E P OP 10.09, Records Retention](#) or other billing compliance policies, billing compliance records shall be maintained and destroyed pursuant to the procedures contained in this policy.

Billing compliance records shall be maintained in a secure and confidential manner. Billing compliance records that contain Protected Health Information (PHI) shall be maintained in accordance with [TTUHSC El Paso Privacy Policies](#).

## **Procedure**

### **1. Defined Terms**

- a. “Billing Compliance Records” include, but are not limited to, monitoring results, memoranda, letters, reports, graphs, charts, spreadsheets, related e-mails and any other type of document, whether in paper or electronic form.
- b. “Destruction” means in the case of paper documents, shredding; and in the case of electronic documents deletion from the electronic file and any “trash” file that collects deleted files.

### **2. Maintenance – Electronic Billing Compliance Documents**

Unless otherwise directed by the Institutional Compliance Officer, (ICO) the Billing Compliance Director (BCD) shall maintain any and all electronic billing compliance documents related specifically to his/her campus billing compliance program in the designated campus folder.

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### 3. Maintenance – Paper and/or Electronic Billing Compliance Documents

Each BCD and the ICO shall maintain paper and/or electronic billing compliance documents in secure manner to maintain confidentiality of the information contained in those documents.

### 4. Maintenance & Destruction Schedule

- a. Draft Documents. Billing compliance documents marked as “draft” may be destroyed once the document has been finalized.
- b. Billing Compliance Documents. All other billing compliance documents that are not marked as “draft” shall be maintained for 10 years (120 months) from the date of creation and may be destroyed at any time thereafter unless otherwise directed by the ICO.

### 5. Government Investigations – Suspension of Destruction Schedule

Any and all destruction schedules outlined in this or any other TTUHSC El Paso policy shall be immediately suspended upon notification of a government investigation of suspected fraud and/or abuse.

### Administration and Interpretations, Revisions, Termination

Refer to Billing Compliance El Paso Program Policy and Procedure [1.0 Policy Development and Implementation](#).

Failure to comply with this policy shall result in appropriate disciplinary action.

### **Frequency of Review**

This policy shall be reviewed no later than April of each odd-numbered year.

**Review Date:** March 1, 2016

**Revision Date:** June 1, 2015, March 1, 2016