

Texas Tech University Health Sciences Center El Paso Institutional Compliance Policy

Policy: Billing Provider Separation Procedure	Policy #: BCP EP 1.2
Effective Date: November 14, 2023	Last Revision Date: April 24, 2024
References: Section 6402, Patient Protection and Affordable Care Act; 31 U.S.C. §3729(b)(3); Tex. Occ. Code, Sec. 101.352(h); BCP EP 3.1 Report and Return of Overpayments; BCP EP 3.2 Coding Accuracy Audit	

Policy Statement

The purpose of this policy is to ensure the timely notification, consistency, and processing of billing provider separation from employment. This policy outlines the required steps that must be taken by a billing provider and their respective department when billing provider separates from Texas Tech University Health Sciences Center El Paso (TTUHSC EP). The process is a collaborative effort between all departments to safeguard against the submission of false claims.

Scope

This policy applies to the separation process at Texas Tech University Health Sciences Center El Paso (TTUHSC El Paso) as it pertains to billing providers.

Policy

This policy provides specific steps to be followed in order to ensure the timely processing of a billing provider separation. All appropriate departments will be notified and the necessary steps will be taken to complete the separation process in a timely, efficient and professional manner.

Definitions

1. **Billing Provider** – for purposes of this policy, billing provider means a health care professional who renders medical services for which a fee is charged. This includes, but is not limited to: physicians, advance practice providers, psychologists, and non-physician practitioners (NPP).
 - a. NPP is a healthcare provider who is not a physician but who practices in collaboration with or under the supervision of a physician. NPP include, but are not limited to: physician assistants, nurse practitioners, clinical nurse specialists, certified registered nurse anesthetists, anesthesiologist assistants and certified nurse midwives.

Procedure

1. Billing provider will notify the Department Chair and/or Administrator of their separation in accordance with their contractual obligations.
2. Billing provider is responsible for notifying all facilities regarding their separation. This notice must include their privileges with the facility to ensure those accounts are disabled or deleted and if termination of privileges is required.
3. Upon notification of billing provider separation, the Administrator or delegate is responsible for completing and submitting the required Online Separation form according to HSCEP OP 70.19, Exit Interview and Separation Checkout Procedures. Refer to policy for details.

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4. Department Administrator or delegate is responsible for notifying Medical Practice Income Plan (MPIP), Faculty Affairs (if the billing provider is a faculty member), Paul L. Foster School of Medicine (PLFSOM) Finance Department, Credentialing and Enrollment Department and Medical Coding School of Medicine (SOM) of the separation.

A. Medical Practice Income Plan (MPIP)

- i. Upon Department notification of billing provider separation, MPIP Managing Director will submit a SysAid ticket request to enter the billing provider's last Billable Service Date. This will disable entering charges past the billing provider's last day of employment. SysAid ticket request will be done on or before the billing provider's last day of employment.
- ii. MPIP will notify Credentialing and Enrollment Department, Medical Coding School of Medicine (SOM), Office of Institutional Compliance and Faculty Affairs (if the billing provider is a faculty member) once the provider's billing number has been turned off.

B. Paul L. Foster School of Medicine (PLFSOM) Finance Department

- i. Upon notification of billing provider separation, Paul L. Foster School of Medicine (PLFSOM) Finance Department, elpcontractpayments@ttuhsc.edu, will notify Contracting Department, ELPContractDept@ttuhsc.edu, to stop billing on contracts after the billing provider's separation.

C. Credentialing and Enrollment Department

- i. Upon notification of billing provider separation, Credentialing and Enrollment Department Unit Manager, will inactivate the provider from CACTUS system. Inactivation date is the separation date for billing provider.
- ii. Enrollment Division will notify health plans, via termination letters, 45 days after the billing provider's separation date.

D. Medical Coding School of Medicine (SOM)

- i. Upon notification of billing provider separation, Medical Coding SOM Director/Unit Manager, will notify Coding Managers. Coding Managers will notify third party vendors and coders of billing provider's separation.

5. Please note, if billing provider decides they are no longer separating or they will be returning as a PRN, departments must take all necessary steps to enable their billing number and to restore all necessary access. Departments listed in step 4 of this policy must also be notified, to include Office of Institutional Compliance.

Frequency of Review

This policy will be reviewed on each even-numbered year by the following members:

- Department Head/Administrator (Billing Compliance Advisory Committee)
- Human Resource (Vice President)
- Paul L. Foster School of Medicine (PLFSOM) Finance Department (Managing Director)

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- Medical Practice Income Plan (MPIP) (Managing Director)
- Credentialing and Enrollment Department (Unit Manager)
- Medical Coding SOM (Director/Unit Manager)
- Office of Institutional Compliance (Unit Manager)
- Faculty Affairs (Managing Director)

This policy may be amended or terminated at any time, to reflect changes in the TTUHSC EP policies or applicable laws and regulations.

Questions regarding this policy may be addressed to the Office of Institutional Compliance.

Review Date: April 24, 2024

Revision Date: April 24, 2024