

# Summary of UNMC Physicians Professional Fee Billing Compliance Plan

UNMC Physicians is committed to conducting professional fee billing in accordance with federal, state and applicable third-party payor regulations. UNMC Physicians has a strong interest in making certain that its Members, employees and associates are fully informed about applicable laws and regulations so they do not inadvertently engage in conduct that may be out of compliance for the purpose of billing for professional services.

Compliance with laws applicable to professional fee billing is challenging because the regulatory requirements governing reimbursement for professional services are complex and in flux. To underscore and enhance the commitment of UNMC Physicians and to better assist physicians and non-physician providers (“Practitioners”) and appropriate clinical/billing staff\* in this area, UNMC Physicians has implemented a compliance program for professional fee billing. The compliance plan has the following key features:

1. Designation of UNMC Physicians management team members responsible for directing the effort to enhance compliance, including implementation of this plan;
2. Incorporation of standards and policies that guide UNMC Physicians personnel and others involved in the billing process with regard to professional fee billing;
3. Development, implementation, monitoring, and updating of compliance initiatives at all applicable levels;
4. Coordination and enhancement of training of Practitioners and appropriate clinical/billing staff concerning applicable billing requirements and UNMC Physicians policies;
5. Provision of a uniform mechanism for employees to raise questions and receive appropriate guidance concerning professional fee billing;
6. Regular medical record and billing reviews by UNMC Physicians employees (and external consultants, as necessary) to assess compliance, identify issues requiring further education, and detect potential problems;
7. A process, including a hotline for anonymous complaints, for employees to report instances of possible noncompliance and for such reports to be fully and objectively reviewed;
8. Regular reviews of the overall compliance effort, including departmental plans, to ensure that billing practices reflect current requirements and that other adjustments are made to improve the program;
9. Formulation of corrective action plans to address any instances of noncompliance with UNMC Physicians policies or billing requirements.

The compliance program described establishes a framework for legal compliance by UNMC Physicians and its employees. It does not set forth all of the substantive programs and practices of UNMC Physicians that are designed to achieve compliance. UNMC Physicians maintains various compliance practices and those practices continue to be a part of its overall legal compliance efforts.

(\* As used in the Compliance Plan, the term “billing staff” includes all persons or entities, including external billing companies, consultants and other vendors, who assist with or handle professional fee billing for clinical services as set forth in the scope of the policy.)