

TITLE: BILLING AND CLAIMS REIMBURSEMENT

POLICY AND PURPOSE:

The Rogosin Institute ("RI") promotes compliance with all relevant billing and claim reimbursement laws and regulations. All personnel involved in the generation and submission of billing and claims are expected to maintain high ethical standards and a strong knowledge of the laws and regulations related to the submission of accurate claims and information.

APPLICABILITY:

All RI Staff

PROCEDURE

It is important that all claims and requests for reimbursement to federal and state government programs and other third-party payors as well as all documentation supporting such claims or requests – be complete and accurate and must reflect reasonable and necessary services. Billing and claims reimbursement activities include but are not limited to: patient registration/admission, charge entry, medical coding, claim composition, billing and accounts receivable management.

When questions arise regarding billing and coding practices, staff should seek clarification from appropriate knowledgeable parties. In the event that a department cannot address a particular billing or coding question, outside resources (i.e.: Compliance, legal counsel, or the Medicare intermediary) should be contacted for assistance. The inquiry and the answer obtained should be properly documented in writing and made available to the Corporate Compliance Officer

RI must disclose and return any overpayments that result from mistaken or erroneous claims. RI makes all reasonable efforts to promptly recognize and correct billing errors, including those that cause overpayments. Appropriate steps will be taken to investigate the cause of any error and to prevent its reoccurrence, including corrective actions and/or monitoring as applicable. In accordance with the Patient Protection and Affordable Care Act of 2010 and 18 NYCRR Part 521-3, overpayments will be reported and returned either within 60 days after being identified for governmental payors or within the contractually obligated timeframe set under commercial payors agreements

RI will review staff training on current billing policies and procedures for compliance with all billing requirements and revise as appropriate and necessary.

The Rogosin Institute

Sites: All locations

Policies and Procedures Manual Number: RI C142

Page 2 of 2

REFERENCES:

Patient Protection and Affordable Care Act of 2010 and 18 NYCRR Part 521-3

Related Policies:

RI Policy F140 Antifraud Program: Incident, Identification, Reporting and Investigation

RESPONSIBILITY:

Office of Corporate Compliance; Patient Financial Services

POLICY DATES:

(Prior to September 2005, this policy was part of the Corporate Compliance Manual)

Revised: December 2004; October 2006;

Reviewed: February 2009, February 2011; February 2013; September 2024;
September 2025

Revised: February 2015; February 2017; February 2019; April 2021;
April 2023; September 2023