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Owner: Kelly Thomas: Chief Compliance & Ethics Officer
Area: Corp CCE - Corporate Compliance & Ethics
References:

Billing and Documentation

American Health Companies, Inc. d/b/a American Health Partners ("AHP") is committed to prompt, complete and accurate billing and supporting documentation for all services provided to patients for payment by patients, government agencies or other third-party payors. Billing shall be made only for services actually provided, directly or under contract, pursuant to all terms and conditions specified by the government or third-party payor and consistent with industry practice and for which appropriate medical record documentation exists

POLICY

1. AHP and its employees shall not make or submit any false or misleading entries on any bill claim forms, or medical record documentation and no employee shall engage in any arrangement or participate in such an arrangement at the direction of another employee (including any officer or supervisor), that results in such prohibited acts. Accurate documentation is the responsibility of each staff member providing patient care. The clinician is required to document in their own words on each visit their assessment findings, skills performed and teaching. The clinician will provide documentation that is original and will not copy and paste notes from previous documentation. Any false statement on any bill or claim form or in any medical record used to support any bill or claim shall subject the employee to disciplinary action up to and including possible termination of employment.
2. It is the policy of AHP that all documentation shall be timely, accurate, and consistent with applicable professional, legal and provider guidelines and standards. This includes all aspects of the Provider's documentation, including, but not limited to, patient assessments and care plans, clinical records, minimum data set ("MDS") for nursing facilities, OASIS data set for home health, physician certifications, physician recertification ("Recert"), pre-admission evaluation ("PAE"), pre-admission screening and resident review ("PASRR") and all billing and payment documentation.

PROCEDURE

1. False claims and billing fraud may take a variety of different forms, including, but not limited to, false statements supporting claims for payment, misrepresentation of material facts, concealment of material facts or theft of benefits or payments from the party entitled to receive them.

AHP and employees shall specifically refrain from engaging in the following billing practices:

- A. Making claims for items or services not rendered or not provided as claimed;
- B. Submitting claims to Medicare Part A for patients who are not eligible for Part A coverage;
- C. Submitting claims to any payor for services or supplies that are not medically necessary or that were

- not ordered by the patient's physician or other authorized caregiver;
 - D. Submitting claims for items or services that are not provided as claimed;
 - E. Submitting claims to any payor for individual items or services when such items or services either are included in the health Provider's per diem for a patient or are of the type that may be billed only as a unit and not unbundled;
 - F. Double billings;
 - G. Upcoding;
 - H. False documentation to support a claim; and
 - I. Forging a MD signature by any method.
2. Falsification of records is strictly prohibited, including backdating of records, except for appropriate late entries noted and under applicable professional and legal standards.
 3. If an employee has any reason to believe that anyone (including the employee himself or herself) is engaging in false billing practices or documentation, that employee shall immediately report the practice to his or her supervisor or department head, any supervisor or department head, the Facility Compliance Officer, the Regional Compliance Directors, Chief Compliance and Ethics Officer, or via the Confidential Disclosure Program.
 4. Failure to act when an employee has knowledge that someone is engaged in false billing practices shall be considered a breach of that employee's responsibilities and shall subject the employee to disciplinary action up to and including possible termination of employment.

Attachments:

No Attachments

Approval Signatures

Approver	Date
Ben Sparks: AGC [LC]	04/2019
Kelly Thomas: Chief Compliance & Ethics Officer [LC]	04/2019
Kelly Thomas: Chief Compliance & Ethics Officer [LC]	04/2019
Laura Carrico: Director of Compliance	04/2019