Yale Medical Billing Compliance Program Manual

Overview.

The Yale University School of Medicine ("YSM") holds that the long-term success of its programs is intimately tied to its reputation for integrity. The School's Medical Billing Compliance Program is designed to safeguard and enhance that reputation by defining a comprehensive effort to attain the Program's goals: adequately documented and uniformly accurate medical bills issued by or through the School. Although the task of billing may seem largely technical and generally remote from public scrutiny, experience shows that carelessness in billing can too quickly lead to a reputation compromised by public suspicions of wrongdoing, no matter how ill-founded. For this reason, and despite the many competing demands on your time, we strongly urge all members of the School's clinical community to devote significant energy and resources to making the Medical Billing Compliance Program an effective one.

In accordance with its commitment to compliance with applicable laws and regulations and to ethical business practices, the Yale Corporation, through its Audit Committee, has approved the Yale University School of Medicine Medical Billing Compliance Plan (the "Plan"), attached as Appendix A. The Plan provides the blueprint for the School's Medical Billing Compliance Program (the "Program" or the "Billing Compliance Program"), which encompasses all of the School's efforts to achieve correct coding and adequate documentation and to ensure that all aspects of medical billing and collections are handled in accordance with applicable laws and regulations. This Medical Billing Compliance Manual has been prepared to explain the Program and to give detailed guidance about it to those who must comply.

As the Manual describes, the Program contains educational, oversight, auditing, disciplinary and other components. Promulgated under the aegis of the Dean of the Medical School in accordance with the Yale Corporation's approval of the Plan, the Program charges the Director of the Yale Medical Group ("YMG") with supervising its implementation. Primary responsibility for day-to-day medical billing operations rests with the Executive Director of the School's Patient Financial Services, who works closely with the School's Director of Compliance. Each health care provider and staff member involved in billing has an important role to play in the Program, however. The obligations of each person covered by the Program are described in detail in this manual below. Please read the Manual with care.

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# **Medical Billing Compliance Program Manual**

**Jessica J Manson** 

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