

# PROFESSIONAL BILLING COMPLIANCE TRAINING PROGRAM

## INTRODUCTION

# PROFESSIONAL BILLING COMPLIANCE TRAINING PROGRAM

UCLA Faculty Practice Group requires all Providers new to UCLA to successfully complete the “Training Program” and demonstrate an understanding of the principles, laws and regulations governing payment of governmental claims.

Providers for purposes of this Training Program include:

- All new UCLA clinical faculty, new volunteer clinical faculty & new allied health care professional;
- Who have been credentialed by any UCLA Hospital or the UCLA Medical Group; and
- Intend to bill through a UCLA affiliated Practice Plan.

# PROFESSIONAL BILLING COMPLIANCE TRAINING PROGRAM (CONTINUATION)

- Training is in accordance with the Faculty Practice Group” Standards and Guidelines” for Compliance and Billing: “New Faculty and Allied Health Care Professionals – Professional Billing Compliance and Audit Training Program.”
- Providers must complete the following steps:
  - Online training
  - Practical Coding Training
  - Coding Audit

# FIRST STEP

## Online Training:

- Successful completion of this Online Training Program prior to officially seeing patients and being assigned a professional billing number. Online Training include the following modules:
  - Principles of Medical Record Documentation
  - Evaluation and Management Services (Appendixes 1-3)
  - Requirements for Billing for Teaching Physician Services
  - Consultation Services
  - Observation Services

# FIRST STEP (CONTINUED)

## Other Online Training Requirements:

In addition, every new provider must complete:

- Online Privacy and Security Training  
(<http://hr.healthcare.ucla.edu/hipaa2/main.asp> )
- Online Code of Conduct, Compliance and Ethics Training\*  
(<http://www.mednet.ucla.edu/ComplianceQuiz/> )

\* If you trained at UCLA, the Privacy/Compliance modules should have been completed during your training.

# SECOND STEP

## Practical Coding Training (In-person):

- Attendance at an initial coding training program offered by the Professional Compliance Office pertaining to service and diagnosis code assignment in the provider's specialty.
- This step must be completed within 60 days of a new provider's first clinical assignment day.
- To schedule training contact Riham Leon, Administrative Specialist, at (310) 794-6763 or email at [rsleon@mednet.ucla.edu](mailto:rsleon@mednet.ucla.edu).

# THIRD STEP

## **Coding Audit:**

- Successful completion of a Professional Compliance Office audit.
- This audit is triggered upon the Provider's completion of 30 patient visits.
- A Provider is considered to have successfully completed the Training Program if written documentation supports the claims.
- Providers who fail to successfully complete must attend additional coding training and are subject to further auditing.

# CONSEQUENCES OF NOT SUCCESSFULLY COMPLETING TRAINING PROGRAM

## **Failure to Successfully Complete after Second Round of Training:**

- All charges submitted for billing to governmental programs placed on hold and not billed until:
  - Provider’s charges are supported by service and diagnosis codes as assigned by a departmentally funded, and Professional Compliance Office approved, Certified Professional Coder (“CPC”), or
  - Provider has subsequently successfully completed the coding audit as determined by a departmentally funded CPC.



# INTRODUCTION TO PROFESSIONAL COMPLIANCE DEPARTMENT

## **Role of the Professional Compliance Department:**

Assist Providers in complying with governmental regulations and policies pertaining to medical record documentation, coding and billing for services by:

- Proactively providing educational sessions.
- Proactively conducting audits based upon a workplan.
- Responding to audit requests by external oversight agencies.
- Researching compliance-related issues with Medicare, Medi-Cal and other third party payors.

# HIGH RISK AREAS

## High Risk Areas Frequently Targeted by Governmental Audits:

May include, but are not limited to:

- Billing for Services not rendered
- Lack of Medical Necessity
- Upcoding
- Duplicate billing
- Failure to meet Teaching Physician requirements
- Failure to meet Consultation requirements
- Unbundling
- High Volume and Level of Service

# REFERENCES

- See OIG Work Plan for list of other High Risk Areas at <http://oig.hhs.gov/publications/docs/workplan/2009/WorkPlanFY2009.pdf>
- UCLA Office of Compliance – Professional Compliance <http://compliance.uclahealth.org/body.cfm?id=25&oTopID=25>

# RESOURCES

**Marti Arvin, JD, CHC F, CCEP-F**  
Chief Compliance Officer  
924 Westwood Blvd. Suite 810  
P (310) 794-6763  
F (310) 794-6118  
[marvin@mednet.ucla.edu](mailto:marvin@mednet.ucla.edu)

**Julian Dakkak**  
Deputy Compliance Officer  
P (310) 794-3624  
F (310) 794-6118  
[jdakkak@mednet.ucla.edu](mailto:jdakkak@mednet.ucla.edu)

**Emma Cuenco, CPC**  
Professional Compliance Auditor and Trainer  
P (310) 794-8762  
F (310) 794-6118  
[ecuenco@mednet.ucla.edu](mailto:ecuenco@mednet.ucla.edu)

**Riham Leon**  
Administrative Specialist  
P (310) 794-6763  
F (310) 794-6188  
[rsleon@mednet.ucla.edu](mailto:rsleon@mednet.ucla.edu)