AUBURN COMMUNITY HOSPITAL & THE FINGER LAKES CENTER FOR LIVING 17 LANSING STREET AUBURN, NEW YORK 13021

Subject: Billing Services	Policy No.: CC: 18	
Department: Administration: Corporate Compliance	Page:	1 of 2
	Date Issued:	1/25/2012

SCOPE:

This Policy applies to all Board members, officers, managers, and other workforce members, including employees, trainees, volunteers, providers, consultants, independent contractors, students and temporary workers of Auburn Community Hospital and affiliates ("Affected Individuals"), as appropriate.

PURPOSE:

The purpose of this Policy is to ensure that Auburn Community Hospital at all times remains in compliance with applicable federal and state laws with respect to agreements for billing services to be provided by a third party, independent contractor or consultant.

POLICY:

It is the policy of Auburn Community Hospital that any agreement between the Hospital and any other entity for billing services or billing review services are compliant with all applicable state and federal laws.

PROCEDURE:

The Chief Financial Officer or designee will review any agreement between the Hospital and any other entity for the handling of the Hospital's billing or billing review services to ensure that the agreements(s) address the following:

1. Representations or warranties concerning the contracted company's experience in providing the specific services at issue in the contract.

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- 2. Allocation of responsibility for documentation and knowledge of standards which pertain to the service at issue in the contract, and the manner of updating such information.
- 3. Allocation of responsibility for third party billing and compliance requirements.
- 4. Obligations regarding periodic monitoring of documentation and reports submitted during the term of the agreement.
- 5. Responsibility for conveying any information received by the subcontractor from the Hospital pertaining to Medicare and Medicaid billing, including general policy documents as well as specific correspondence, profile information, audit requests, and overpayment notification.
- 6. Responsibilities regarding participation in cost payment audits, even after termination of the agreement, as well as availability of and access to data from prior periods.
- 7. Responsibilities regarding write-offs, appeals and the respective parties' obligations to assist with appeals.
- 8. Ability to terminate for incompetence, because the billing company is not performing appropriately.
- 9. Compliance by the contractor with requirements relating to federal health care programs and representations that the contractor is not excluded or debarred from the federal health care programs.
- 10. Compliance by the contractor with Auburn Community Hospital's Financial Assistance policies, including notification to potential beneficiaries of their rights with regard to charitable assistance.

The Chief Financial Officer or his/her designee will, after consultation with appropriate legal counsel, amend any agreement for billing services as necessary to ensure the above issues are addressed.

Approved:_	John W. Bagenski, M/(ASC)	Corporate Compliance Officer	10/29/2024
	Name	Title	Date
Revised:			
12	2/11/2018		
Reviewed:			
6/15	5/2014, <u>8/30/2016</u> , <u>12/1</u>	1/2018, 10/29/2024	

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