

HERITAGE FARM, INC. POLICY AND PROCEDURES

Policy: Reimbursement Practices and Billing Errors;

Date: October 8, 2013

Rationale:

Heritage Farm is committed to preparing and presenting all its billing, and other reimbursement practices, in an accurate and conscience manner. The Compliance Officer will be responsible for the oversight of program billing and other reimbursement operations in accordance with this corporate philosophy.

Policy:

Heritage Farm's reimbursement billing practices will meet all Federal and State laws, codes, rules, regulations, guidelines, and policy standards. Heritage Farm will not sanction any willful reimbursement claim that is fraudulent misleading in nature. Heritage Farm further commits to the belief that no transaction of any reimbursement claim will be false or inaccurate even if by mistake.

This policy shall require the billing of claims only when the services actually rendered and documented as such in the participant's program notes. This policy and its procedures were written and approved as a guide for employees to achieve Heritage Farm's policy rationale.

Procedures:

- The Compliance Officer shall ensure that all billing procedures and subsequent reimbursement will be accomplished through the procedures outlined in this policy.
- All employees and associated personnel of Heritage Farm will be required to attend initial – New Employee Orientation - and at least annual training thereafter in an effort to continue to strengthen the understanding and compliance to the policy:
 - The Compliance Officer is responsible for making sure that the employee compliance training program regarding billing and reimbursement practices allows for employee interaction.
- Any employee or associated persons who has knowledge or suspects an erroneous filing of a claim or other reimbursement practice has a mandatory obligation to report that problem to a Supervisor, Compliance Officer or the Corporation Hotline.

- Failure to report a problem or suspected problem in this area may result in disciplinary actions against the employee for failure to report.
- Any filing of false claims, either intentionally or by mistake, may result in the involved employee(s) having disciplinary, civil or criminal actions against them.
- All reports of actual or suspected false claims, done so in good faith, will be protected by Heritage Farm's non-retaliation policy.
- The Compliance Officer will be responsible for ensuring that Heritage Farm's Code of Conduct will provide clear direction regarding Heritage Farm's billing and reimbursement expectations.
- The Compliance Officer will ensure that specialized training is provided to employees that are directly responsible for creating and submitting prepared billing and such training will allow for adequate employee interactive involvement.
- The billing for program services rendered to participants will be done only upon completion of the required documentation.
- The Compliance Officer will develop and maintain written procedures for the documentation of care services.
 - Procedures will include, at a minimum, the following:
 - Attendance records;
 - An ISP that is current by date with the billing time period
 - A Habilitation Plan that is current by date with billing time period
 - Service documentation requirements specific to the respective program;
 - Contemporaneous documentation;
 - Defined by OPWDD as immediately upon providing the service or as soon as possible after that.
 - Attestation and review prior to submission to billing personnel; and
 - The retention and physical security of all forms and documents that are supportive of the service rendered.
- The Compliance Officer will present all billing and relative documentation policy and procedures and/or any revisions to existing procedures or forms to the Board of Directors before implementation.
- The Finance Department will conduct an annual review of its documentation practices to verify that practices conform to the

written procedures. Results of the review will be posted in the internal audit files, and any areas in need of corrective actions taken will be presented to the Finance Committee for review.

- The Finance Administrator and billing staff will make all efforts to communicate with each other in a meaningful manner to assure compliance and avoid billing errors.
- The Compliance Officer is responsible resolving all problems, potential problems, or questions related to billing and reimbursement practices.
 - The Compliance Officer is also responsible for ensuring that appropriate remedial actions are taken for any irregularities uncovered.
- If a billing error that could lead to a false claim is discovered after the billing has been submitted (some examples include: knowingly making a false statement, falsifying records, submitting claims for services never performed, double-billing, or otherwise causing a false claim to be submitted), these findings should be immediately reported to the ED and the Compliance Officer.
- Documentation will be made that includes the following information:
 - Patient/Client's Name, payer and identification number;
 - Date(s) of services and units;
 - Description of service;
 - Change requested (void, add, adjust); and
 - Reason for the change.
 - The documentation will be forwarded to the Compliance Officer for review.
- The Finance Administrator will ensure that the adjustment is made and recorded in a timely manner.
- The Compliance Officer is responsible for the investigation any billing errors.
 - Action will be taken to prevent recurrence.
- Any overpayment received because of a billing error will be repaid to the appropriate entity in a timely manner.
- Any discovery billing and reimbursement irregularities, as a result of investigations will be recorded in the compliance log and reported to the Compliance Committee. Corrective actions taken will be also documented in the log. The Compliance Committee will be notified on a quarterly basis of any irregularities and corrective action, and at least annually the Board of Directors will be notified.