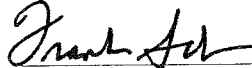
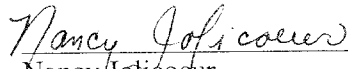
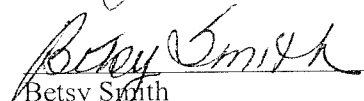



TRI-COUNTY MEDICAL ASSOCIATES, INC.

Effective Date: 5/1/09	Manual: Corporate Compliance
Distribution: All Departments	
Originating Dept./ Committee:	Corporate Compliance
Senior Management:	Corporate Compliance Officer
Signature:	 Frank Saba
	Corporate Compliance Liaison Officer
	 Nancy Jolicœur
	Director, Physician Billing Services
Signature:	 Betsy Smith
	President and CEO
Signature:	 Philip Ciaramicoli
<input type="checkbox"/> New	
<input checked="" type="checkbox"/> Supersedes:	<u>Duplicate Billing Prohibitions</u> (Policy Name)
	<u>5/1/09</u> (Effective Date)
	<u>9/28/06</u> (Origination Date)
Subject: Duplicate Billing Prohibitions	

Purpose: The submission of a claim for the same test or service twice to one payor or patient for the same date of service constitutes double billing. Such billing practices could result in billing and reimbursement errors and, depending upon the circumstances, subject Tri-County Medical Associates (“TCMA”) to liability under administrative, criminal and /or civil law. A policy is necessary to ensure TCMA only submits claims once to the applicable third party payor(s) for each test or service provided.

Policy: TCMA shall ensure that it does not submit claims for professional services or other related tests or services twice.

Procedure:

1. TCMA billing department personnel shall implement appropriate internal controls to prevent the submission of a claim for tests or services provided on a given date of service twice.
2. TCMA staff responsible for billing claims of TCMA providers shall implement appropriate procedure edits to: (a) identify any such Duplicate Claims; and (b) suppress the processing of such Duplicate Claims.

3. In the event that a credit balance is identified due to duplicate billing, and such overpayment is confirmed, TCMA staff shall follow the patient's applicable third party payor rules regarding overpayments and timelines for refunding such amounts to the payor, or patient.

4. TCMA's Corporate Compliance Officer and/or his/her assigned designee shall ensure that applicable TCMA staff are educated on this policy and shall periodically monitor and audit the effectiveness of the operational and/or internal controls that have been implemented to ensure compliance with this policy.

REFERENCES:

Office of Inspector General's ("OIG") Compliance Program Guidance for Hospitals, February 23, 1998, 63 Fed. Reg. 8987 at p. 8990.