



Policy No.: 304

Created: 6/2015

Reviewed: 7/2019

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CORRESPONDENCE WITH MEDICARE AND MEDICAID CARRIERS

ETHICS & COMPLIANCE DEPARTMENT

SCOPE:

All Evolution Health colleagues who may be involved in correspondence with Medicare and Medicaid carriers. For purposes of this policy, all references to “colleague” or “colleagues” include temporary, part-time and full-time associates, independent contractors, clinicians, officers and directors.

PURPOSE:

To provide documented guidelines for Evolution Health (the “Company”) colleagues to consult when corresponding with Medicare, Medicaid, Medicaid Carrier, Center for Medicare/Medicaid Services (CMS), Department of Health and Human Services (“DHHS”), Department of Justice (“DOJ”), and any other government agency.

POLICY:

Company colleagues must consult the guidelines listed below prior to corresponding with government payors.

PROCEDURE:

Non-Routine Correspondence

The Company Chief Compliance Officer must approve all non-routine correspondence with Medicare, Medicaid, Tricare, and other government payor programs. Non-routine correspondence refers to letters discussing the Company’s position, question, or opinion on a particular government rule, regulation, policy, position, or interpretation. Due to the importance of these programs to the Company, we want to maintain a consistent position when working with government agencies that administer, govern, and enforce these programs.

The documents/letters should be forwarded to the Chief Compliance Officer prior to distribution. The Chief Compliance Officer will consult with senior management and internal/external counsel prior to approving any documents. The documents will be reviewed within two weeks of receipt or sooner to meet government deadlines for response. The Chief Compliance Officer will maintain a record of all documents.



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Routine Correspondence

Routine correspondence refers to routine calls or meetings, typically with Medicare and Medicaid carriers, addressing or clarifying the billing and coding procedure for a specific item. These calls are made by a representative of the billing entity during the normal course of conducting daily business. An example of this correspondence is “What is the HCPCS code utilized by the Texas Medicaid program when billing for rhythm strips?” Each colleague that conducts routine correspondence, clarifying the billing and coding procedures with government payors and agencies, should maintain an annual log. This log should include the following:

- Date and time of the call/meeting.
- All persons participating in the call/meeting.
- Nature or question(s) of the call/meeting.
- Answer or response from the government representative.
- Result or next step by the billing entity.

The colleague’s manager should maintain these annual logs for a period of seven (7) years. These logs are necessary to support billing and coding practices recommended by government agencies to our billing entities.

POLICY REVIEW

The Ethics & Compliance Department will review and update this Policy and all HIPAA policies when necessary in the normal course of its review of the Ethics & Compliance Program.