Section 6 Compliance Subject 6.1 General Compliance Policy 6.1.10 Self-Reporting of Overpayments	12/13/06 - Originated 02/02/12 - Reviewed w/ changes -Reviewed w/o changes 03/02/12 – Effective Office of Institutional Compliance - Author

Self-Reporting of Overpayments

Policy

Both federal and state governments pay UTMB for services rendered. These services may include the provision of health care to patients or through sponsored research through grants awarded from various governmental funding agencies.

If there is a report of incorrect billing, request for reimbursement, or use of governmental monies, UTMB will investigate the allegation and ensure the errors are corrected and any overpayments are reported and returned by the later of sixty (60) days after an overpayment is identified, or if applicable, the date any corresponding cost report was due. In certain situations, UTMB may determine it is necessary to communicate billing errors directly to the Department of Justice, the Department of Health and Human Services Office of Inspector General, or other appropriate agency.

The Office of Institutional Compliance (OIC) is responsible for managing any investigations and determining the amount of money to be refunded. Furthermore, the OIC, along with the responsible department head, is responsible for managing any communication of errors to the governmental sponsor. This may include, but is not limited to, making phone calls, writing letters, hiring outside counsel or otherwise investigating and communicating to the government sponsor.

References

IHOP Policy 6.3.1 Billing Compliance Plan

IHOP Policy 6.3.2, Correction of Errors Related to Federal Healthcare Program Reimbursement

Section 6402 (d), Patient Protection and Affordable Care Act (PPACA)