

**Institutional Handbook of Operating Procedures  
Policy 06.01.10**

Section: Compliance	Responsible Vice President: Senior Vice President & General Counsel
Subject: General Compliance	Responsible Entity: Office of Institutional Compliance

**I. Title**

*Self-Reporting of Overpayments*

**II. Policy**

- A. Both federal and state governments reimburse UTMB for services rendered. These services may include the provision of health care to patients or through sponsored research grants awarded from various governmental funding agencies.
- B. If there is a report of incorrect billing, a request for reimbursement, or misuse of governmental monies, UTMB will investigate the allegation, ensure the error(s) are corrected, and any overpayments are reported and returned by the later of a) the date which is sixty (60) days after the date on which the overpayment was identified, or b) the date any corresponding cost report is due, if applicable. 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.
- C. 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.

**III. Relevant Federal and State Statutes**

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

**IV. Related UTMB Policies and Procedures**

[IHOP - 06.00.02 - Billing Compliance Plan](#)

[IHOP - 06.03.02 - Correction of Errors Related to Federal Healthcare Program Reimbursement](#)

**V. Dates Approved or Amended**

<i>Originated: 12/13/2006</i>	
<i>Reviewed with Changes</i>	<i>Reviewed without Changes</i>
02/02/2012	05/07/2015
	08/21/2018

**VI. Contact Information**

Office of Institutional Compliance  
(409) 747-8700