

## ECU Physicians Group Practice Policy and Procedure Manual

Topic: Comprehensive Error Rate Testing (CERT)	
Section No.	Section Name:
Approval Date: March 8, 2006	Interim Medical Director Approval: Todd M. Beste, MD

### I. Purpose:

The purpose of this policy is to define the appropriate steps taken by all healthcare providers and administrative staff of the Brody School of Medicine to comply with the Comprehensive Error Rate Testing (CERT) Program as developed by the Centers for Medicare and Medicaid Services (CMS).

### II. Definitions:

**AdvanceMed:** An independent external medical review organization that currently has been awarded a government contract to conduct Comprehensive Error Rate Testing (CERT) for the purpose of monitoring the accuracy and appropriateness of Medicare payments made by the Medicare Carrier to providers. In the event CMS contracts with another organization to provide this service, this policy will apply to requests received from that organization.

**Comprehensive Error Rate Testing (CERT):** The CERT program measures the error rate for claims submitted to a providers' local Medicare Carrier. The intent of this testing is to calculate the providers' compliance error rate by evaluating claim submission compared against documentation review. In addition, Carrier error rates are also established by evaluating claim processing and claim payment.

### III. Policy:

It is the policy of ECU Physicians to comply with all requests for medical record documentation received from AdvanceMed in a timely and efficient manner. Responses to CERT requests will be coordinated and managed by the Office of Billing Compliance. All ECU healthcare providers who receive a request made by AdvanceMed will immediately forward all correspondence received from AdvanceMed to the Billing Compliance Office

### IV. Procedure:

A. **Individual Provider:** Individual providers that are in receipt of any request for medical record information from AdvanceMed must forward the request to the Office of Billing Compliance as soon as possible, but not more than five business days. This will allow processing of the request as specified in the procedure below designated as **Billing Compliance Office**.

Effective Date: March 8, 2006	Contact Person/Reference Source: Charlotte Price, Billing Compliance Manager	Extension: 744-3388
Revision/Review Date: October 13, 2010	Revision/Review Person/ Source:	Page 1 of 2

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**B. Billing Compliance Office:**

1. The Billing Compliance Office has been designated by ECU Physicians as the contact to handle all CERT requests.
2. The Billing Compliance Office will verify that the CERT request for release of medical documentation is pertaining to a patient of the Brody School of Medicine.
3. Copies of all requested medical record information will be obtained by the Billing Compliance Office.
4. Medical documentation for the CERT requested encounter will be reviewed and compared with data available within the ECU Physician's billing system to verify the services billed are supported by the medical documentation for that encounter.
5. Comparisons between billing and record information that reveal gross errors in billing, i.e., missing and/or incomplete documentation will be refunded to the Medicare Carrier immediately upon identification.
6. The Billing Compliance Office will maintain a record of review on each CERT claim requested which will identify either agreement with the service(s) as billed or disagreement with the service(s) billed, citing a rationale for disagreement.
7. After completion of the Billing Compliance review of the documentation and billing information, the requested documentation will be sent via fax or US mail to AdvanceMed within 8 business hours.
8. The Billing Compliance Office will, via confidential email or flag as applicable, communicate information regarding the CERT request and response to the Departmental Chair, the attending provider, and any billing staff as applicable involved in the claim submission.
9. Aggregate data reporting/analysis will be done and reported to the Risk Management and Compliance Committee at least on a quarterly basis.
10. The Departmental Chairs will receive department specific reporting of CERT requests on a quarterly basis.
11. The Billing Compliance Office will provide educational instruction to the provider and/or provider group and coding /billing staff as applicable addressing any provided opportunities identified during the internal documentation review.

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