

Billing Compliance Plan Attestation

Introduction

Columbia University Medical Center (The University) has an ongoing commitment to ensure that its affairs are conducted in accordance with applicable law. The University also has a strong interest in making certain that its faculty and employees are fully informed about applicable laws and regulations so that they do not inadvertently engage in conduct that may raise compliance issues. Of particular concern, given the fact that many faculty engage in clinical practice, are legal requirements related to professional fee billing. To further its commitment to compliance and to protect its faculty and employees, the University has adopted a formal compliance plan to address professional fee reimbursement.

The Compliance Steering Committee requires that each member of the clinical faculty be familiar with the Compliance Plan, the principles of which are summarized below, and sign an attestation at the time of appointment/reappointment. A complete copy of the Plan may be obtained from the Billing Compliance Office (305-3842 or Ext.5-3842), or from the office of your Chairman, or by accessing the Billing Compliance website at <http://cumc.columbia.edu/dept/compliance/plan/index.html>.

Policy Guidelines

The Policy of Columbia University is to bill only for professional services actually provided. The University recognizes that special billing requirements may apply to certain government sponsored programs or to other providers; any such requirements must be followed. In selecting codes to describe services rendered, University physicians, other health professionals, and billing personnel are to select codes that they believe, in good faith, correspond to services actually rendered, as documented in the medical record. University clinicians, other health professionals, and billing personnel have a collective responsibility to be knowledgeable about the meaning of the codes applicable to their area of practice, including relevant directives from billing authorities.

University physicians, other health professionals, and billing personnel should never submit a claim that is known to contain inaccurate information concerning the service provided, the charges, the identity of the provider, the date of service, the place of service, or the identity of the patient.

When in doubt about how to bill a particular service, including the proper code to use, no claim should be submitted until appropriate guidance is obtained from departmental compliance leaders or from the Compliance office. The resolution of any such billing questions should be documented in writing.

It is the responsibility of the billing physician or other health professional to ensure that appropriate documentation supports the bill being submitted.

I have read and agree to be bound by the principles of the Columbia University Billing Compliance Plan.

I attest that I have not been sanctioned by, nor am I the subject of a proceeding, which could result in my exclusion from the Medicare program or any other government program.

Please fax the completed form to the CUMC Faculty Affairs Office (212)304-5528.

Print Name_____Signature_____
Department _____ University Title_____ Date_____
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