

Data and Billing Discrepancy Procedures

Policy

It is the policy of Central Florida Behavioral Health Network, Inc. (CFBHN) to address discrepancies identified between payments made to Network Service Providers (NSP), and their service documentation, and billing data.

Purpose

The purpose of this policy is to establish guidelines to address discrepancies observed between NSP service documentation, billing data and payments made by CFBHN to the organization.

Procedure

1. As a component of compliance monitoring, NSP service documentation and/or billing data is reviewed by Finance, Continuous Quality Improvement or other CFBHN departments, and reconciled with payments made to that organization. This process involves the review of a sample of service data to verify compliance with delivery and documentation requirements established by statute, Department of Children and Families (DCF) Guidance Documents, or other contract documents.
2. Discrepancies identified by CFBHN between service documentation, billing data and payments made to the NSP are examined in detail.
 - A. Additional data may be requested from the NSP to allow CFBHN staff to identify the extent and parameters of the observed discrepancy.
 - B. Identified discrepancies, including required data/documentation edits, and the net impact on the NSP's billing, are documented in writing.
3. If it is determined that unallowable services have been billed to CFBHN, and/or that billed services cannot be substantiated by data or service documentation, NSPs must correct billing data entered into the Carisk system. This may involve the addition or removal of, or edits to, billing data.
4. CFBHN will work with the NSP and Carisk to determine the:
 - A. Method by which the edits will be made. Options include:
 - 1) Direct data entry into Carisk by the NSP;
 - 2) Data upload into Carisk completed by the NSP
 - 3) With the permission of Carisk, submission of a summary spreadsheet to Carisk for upload.
 - B. Deadline by which the edits must be completed.
 - 1) The NSP is required to complete the edits as soon as possible.
 - 2) If required edits are discovered at the end of the fiscal year, cannot be made by the year-end data entry deadline and will result in a pay back, payment must be made to CFBHN within 15 business days of edit completion.
5. At the conclusion of the specified time frame, the CFBHN department that identified the discrepancy verifies that the billing data, and/or the service documentation has been corrected.
6. If the NSP fails to make required corrections by the established deadline, CFBHN will alert them to the continued discrepancy and determine next steps. Repeated failure to correct required edits may result in sanctions or financial penalties to the NSP, in accordance with CFBHN policy.

Data and Billing Discrepancy Procedures Approval:  Alan Davidson, President/Chief Executive Officer	Date Issued: <u>05/20/2005</u> Last Revision: <u>07/25/2023</u> Review Date: <u>04/23/2025</u>
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