

Title of Manual: Mid-South Substance Abuse Commission Policy and Procedures			Page 1 of 3	
			REVIEWED	
Section: Finance/Billing	Subsection: Quality Review	Subject: Financial Verification of Services Site Review		
Issued By: Assistant Director	Approved By: Executive Director	Scope: MSSAC Treatment & Prevention Provider Panel	Effective: June 2006	Revised:

I. Policy

It is the policy of the Mid-South Substance Abuse Commission to conduct annual financial provider site reviews to verify services were rendered.

II. Purpose

To ensure that the standards and requirements for billing and documentation for services rendered by the treatment provider to the client have been met. Community Grant, Medicaid, Adult Benefit Waiver, and MiChild client files are reviewed to determine if proper billing and reimbursement procedures have been followed according to the Mid South Substance Abuse Commission contract standards.

III. Authority

The authority to carry out this policy derives from the Mid-South Substance Abuse Commission's Board of Directors to the Executive Director. Oversight and interpretation of this policy rests with the Executive Director and the Manager of the Finance/Billing Department.

IV. General Expectations

It is the expectation of the Mid-South Finance/Billing Department, that billing for client services rendered will be accurate, timely, complete and have appropriate required documentation in the client's file.

The general expectations/requirements are:

- 1) Complete documentation of income/non-income is present in the client's file for those receiving Community Grant funding timely signed by both the client and the program director and/or his/her designee.
- 2) All fee agreements for Community Grant funded clients are reviewed and updated every ninety (90) days.
- 3) On a monthly basis, all clients must be verified via a Medicaid eligibility system in order to accurately bill the appropriate funding source.

The review of client files to determine if the billing and reimbursement process was correct and accurate will happen during the annual financial site review and at any other time deemed appropriate and necessary by the Mid-South Finance/Billing Department and the Executive Director and/or his/her designee.

V. Procedure

- 1) **Approximately 60 days before the site review**, programs will receive an initial letter of confirmation with a worksheet.
 - a) **The business day before the site visit**, the program will receive a letter via facsimile of client social security numbers for those clients whose files are to be reviewed.
 - b) **Additional client files may be requested** at the time of the site review.
- 2) The procedure shall include on-site examination of selected client files for verification of complete documentation of income/non-income. All fee agreements for Community Grant funded clients are

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reviewed and updated every ninety (90) days. All clients are verified on a monthly basis in order to correctly bill the appropriate funding source.

- a) The rating scale for compliance with the Finance/Billing site review is as follows:
 - i) 100% is **Excellent**
 - ii) 99-90% is **Great**
 - iii) 89-80% is **Good**
 - iv) 79-70% is **Fair**
 - v) 69% and Below is **Poor**

 - b) Compliance is determined by the following process:
 - i) **Community Grant:** Required file documentation is assigned two (2) points each with 8 total possible points;
 - (1) All progress notes present with appropriate signatures (without inappropriate corrections; such as whiteout or correction tape) and appropriately billed – 2 points,
 - (a) Electronic Progress notes need the electronic signature on the progress note at time of review,
 - (b) Electronic Progress notes can be reviewed either in paper format or electronically
 - (2) The fee agreement is present and 90 day review (if applicable) is timely – 2 points
 - (3) Proof of Income is present – 2 points;
 - (4) Necessary information is accessible in the client’s file – 2 points;
 - (5) Fee Agreement is present, but not updated within required timeframe (if applicable) – 1 point
 - ii) **Medicaid/ABW:** Required file documentation is assigned two (2) points each with 6 total possible points;
 - (1) All progress notes present with appropriate signatures (without inappropriate corrections; such as whiteout or correction tape) and appropriately billed – 2 points;
 - (a) Electronic Progress notes need the electronic signature on the progress note at time of review,
 - (b) Electronic Progress notes can be reviewed either in paper format or electronically
 - (2) Medicaid/ABW verification is present and processed timely – 2 points;
 - (3) Necessary information is accessible in the client’s file – 2 points;
 - (4) Medicaid/ABW verification present, but ran the day before the site visit – 1 point.

 - c) Such examination shall be conducted at least annually or on an as needed basis.
- 3) Reimbursement “payback” is determined during the financial client file review for the following reasons:
- a) If it is determined that the provider billed for a different level of care than what is stated in the client record for the date of service; and,
 - b) If there is no supporting documentation, a written and signed progress note in the client file at the time of the financial site review for the date of service billed and reimbursed.
 - c) If a progress note indicates a different length of time than billed.
 - d) Files with inappropriate corrections on a progress note.

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- e) Billed wrong funding source.
- 4) A copy of the completed financial site review worksheet is left with the provider at the end of the review and an exit interview is conducted to verbally inform the provider of the site review results. At this time, if there is to be any adjustments, corrections and/or paybacks, the reviewer informs the provider.
 - 5) A written report is submitted to the provider within 45 days by the financial site reviewer with detail findings per client file per funding source. If it is determined a need for corrective action, it is requested in this report and a deadline is given. If it is also determined to return for a follow-up financial site review, the date and time is confirmed in the submitted report.