

Aurora Health Care, Inc.

Research Billing Compliance Policy

April, 2004

POLICY:

It is the policy of Aurora Health Care Inc. Hospitals and Clinics (Aurora) to consistently and fully comply with all laws and regulations pertaining to the billing of research-related charges for patients insured through Medicare, Medicaid and other third party payers. Applicable laws and regulations include, but are not limited to, Medicare and Medicaid billing regulations and Aurora Hospitals and Clinics contracts with third party payers.

GOAL:

The goal of the Research Billing Compliance Policy is to ensure appropriate billing of research-related charges by all Aurora business units.

SCOPE:

This policy applies to all research-related charges generated from medical, behavioral, social science, outcomes and health services research involving human subjects conducted within Aurora.

OVERVIEW:

Accountability for compliance with laws and regulations pertaining to the billing of research-related charges is primarily vested with the investigator conducting the research activity and with each Aurora business unit where the research will be conducted. Aurora shall ensure that services it provides are billed in compliance with applicable laws, regulations, and Aurora policies. (Appropriate billing of professional fees remains the responsibility of the investigator. Unless the investigator is an employed physician of Aurora Health Care, in which case Aurora will bill the physician investigator's professional fees.)

Individuals assigned primary accountability for billing compliance at each Aurora business unit will necessarily obtain and rely upon the cooperation of investigators conducting research studies within Aurora. Investigators are responsible for identifying all patients receiving services at an Aurora Hospital or clinic and communicating this information to Aurora Central Business Office billing staff.

MANAGEMENT:

This policy will be managed by Aurora’s Central Business Office and implemented by Central Business Office management.

Central Business Office management shall be accountable for ensuring its department’s compliance with Aurora Research Billing Compliance Policies and Procedures.

DOCUMENTATION:

In all cases, published Medicare and Medicaid regulations and contract language with third party payers will serve as Aurora documentation of billing and other claim submission expectations as they apply to research-related charges.

In cases of multiple interpretations, vague expectations or contradictory regulatory language, Aurora will supplement published regulations with Aurora Billing Compliance Policies and Procedures that clearly set forth Aurora’s expectations.

EDUCATION:

Research Billing Compliance Policy and Procedure information and education will be provided to both Aurora employees and other individuals involved in the conduct of research within Aurora. The education will be appropriate to each individual’s role in the process of identifying and billing research-related charges. The focus of such education will be to inform those individuals of their accountability and the expectations for their performance.

MONITORING AND AUDITING:

Aurora will conduct ongoing monitoring and periodic audits to evaluate compliance with this policy and related procedures. Follow-up audits will be conducted as necessary to measure the success of any remedial actions implemented following monitoring activities or previous audits.

EMPLOYEE REPORTING:

All Aurora employees are expected to report any good faith belief of any violation of law or regulation, or any non-adherence to third party payer contracts, related to the billing of research-related charges by Aurora business units. Employees are assured that they shall not be subject to any form of retaliation in the terms and conditions of their employment based on such reporting.

Employees shall make required reports to their supervisors, unless for some reason the employee is uncomfortable making a report to his/her supervisor or has concerns that the supervisor will not take appropriate action in response to a report. In such situations, the employee should contact the individuals identified below to report his/her concerns.

Supervisors who receive such reports shall contact the Research Compliance Officer in the event they need assistance in investigating the report or implementing any remedial actions necessary, and in the event the report identifies a matter that exposes Aurora to significant risk.

Additionally, employees may make a report to the Aurora Compliance Hotline 1-888-847-6331.

ENFORCEMENT:

This policy and related procedure will be consistently enforced through appropriate sanctions and disciplinary measures when violations are identified following existing Aurora employee disciplinary policy.