

Texas Tech University Health Sciences Center El Paso Institutional Compliance Policy

Policy: Policy Development and Implementation	Policy #: BCP EP 1.0
Effective Date: November 19, 2009	Last Revision Date: January 28, 2026
References: HSCEP OP 52.07	
TTUHSC El Paso Billing Compliance Website: https://ttuhscel.edu/compliance/BillingCompliance/default.aspx	

Policy Statement

This policy defines the process of development and implementation of policies and procedures that (1) support the Billing Compliance Plan (HSCEP OP 52.07) and (2) provide guidance related to identified billing compliance risk areas.

Scope

This policy applies to Texas Tech University Health Science Center El Paso (TTUHSC El Paso) for healthcare items and/or services billed under a TTUHSC El Paso tax identification number.

Policy

TTUHSC El Paso Billing Compliance Policies shall be developed and implemented in accordance with the procedures outlined below.

Procedure

1. **Policy Development.** The Institutional Compliance Officer (ICO) or their designee is responsible for the development of written billing compliance policies based on internally or externally identified billing risk areas. The Medical Coding Auditor Manager (MCAM) may assist in policy development by recommending policy topics and providing reviews and comments during the development stages, including updates or revisions to existing policies.
2. **Policy Approval.** The ICO or its designee shall provide a final Policy draft to the MCAM for review and comment before a new or revised Policy is submitted for approval. The MCAM may provide the draft Policy to the Billing Compliance Advisory Committee (BCAC) to address potential operational impact or other issues related to the implementation of the proposed Policy. The BCAC will review and approve as appropriate.
3. **Approved Policies:** Notice and Education
 - a. **Website.** The ICO or their designee shall maintain the Billing Compliance Policy and Procedure site on the TTUHSC El Paso intranet to publish new and revised Policies approved by the BCAC.
 - b. The ICO, MCAM, or designee shall distribute to appropriate individuals in the Institution. Whenever necessary, education will be provided on approved Policies, including, but not limited to, e-mails, memoranda, postings, newsletters, and/or in-person meetings.

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Frequency of Review

This policy will be reviewed every even-numbered year by the Medical Coding Auditor Manager, and the Billing Compliance Advisory Committee. This policy may be amended or terminated at any time to reflect the changes in the TTUHSC EP policies or applicable laws and regulations.

Questions regarding this policy may be addressed to the Medical Coding Auditor Manager, or the Institutional Compliance Officer.

Review Date: 3/1/2016, 1/13/2022, 1/24/2024, 1/28/2026

Revision Date: 6/1/2015, 3/1/2016, 4/2019, 1/13/2022, 1/24/2024, 1/28/2026