

## SAMPLE

Dear Lab Administrative Director:

A potential laboratory miscoding error has been identified in your laboratory charge description master (CDM) that may potentially end in governmental plan repayment. In order to be able to assure that we performed a thorough analysis, there are some steps to be followed to ensure good communication, data analysis accuracy/integrity and timely reporting. You need to make certain that your entity Corporate Responsibility Officer (CRO) XXXXX is aware of the situation. I also advise letting your entity VP and other senior leaders as required know of the situation and keep them updated as we progress. Please see attached typical data request for repayment analysis when appropriate.

The normal chain of events that occurs when a billing /coding error is discovered:

1. Notify Vice President or senior executive responsible for the laboratory department
2. Notify entity (CRO)
3. Notify national laboratory compliance director
4. Complete Laboratory Repayment Project Request Form (included)
5. A meeting with CHI legal you and the Director of Laboratory Compliance will be set up by the Entity CRO after items 1 and 2 below are accomplished. The purpose of this meeting will be direct analysis, develop an action plan and assign responsibilities on a go forward basis.

Simultaneously you should:

1. Identify the date that the correction of the error was completed, implemented and confirmed.
2. Determine when the error first occurred if possible for example there was a software change, new test initiated and assigned an incorrect code or old code discovered to be incorrect.
3. Legal will hear the presented information and determine a repayment corrective action if necessary.
4. If repayment is determined, legal will direct that the identification of all non-bundled (Post 1/2014) and all (Pre 1/2014) out and non-patients from PPS or sole community hospitals having the following payer types Medicare, Medicaid and their managed care plans are to be identified and repayment amounts will be determined. Providing the data in the format as required by the legal department's repayment template. This can be accomplished at the entity level or assigned by the entity to the Catholic Health Auditing Network (CHAN) to complete.[Recommended]
5. Once legal accepts the repayment data, repayment will be made by the entity as directed by the assigned attorney within 60- days of their acceptance date.
6. At the entity level, the repayment process will be directed and completed by the local (CRO).

Please feel free to refer to me any questions you or your leadership may have.

**Tim Murray, MS, MT (ASCP), CHC**

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