

CHILDREN'S HOSPITAL LOS ANGELES MEDICAL GROUP
COMPLIANCE POLICY MANUAL

POLICY	Responding to Requests for Information From External Agencies
SIGN OFF	Robert Adler, M.D., CHLAMG Compliance Officer
ISSUED	July 2009
REVISED	June 6, 2018
NUMBER	CHLAMG 15-0012

POLICY

It is the policy of CHLAMG to respond promptly and accurately to requests for information by state and federal agencies according to internal policy and external guidelines and in compliance with the HIPAA and the HITECH Act. In order to ensure that staff provide the minimum amount of information necessary in full compliance with CHLAMG policies and procedures pertaining to the business of the medical group and the Pediatric Management Group, L.L.C., staff should forward all requests to the CHLAMG Compliance Director & Privacy Officer.

PROCEDURE

Forward all requests for copies of patient billings or other financial records by state or federal regulatory agencies to the Compliance Director upon receipt. This includes letters, mailings, electronic mail, facsimiles, telephone calls, and personal appearances by auditors, reviewers, or surveyors. This includes but is not limited to:

- State of California Department of Health Care Services
- State of California Medi-Cal Program Integrity Audits
- State of California Office of Inspector General for Medicaid (Medi-Cal) Services
- Department of Health and Human Services Medical Expenditure Surveys
- Department of Health and Human Services Office of Inspector General
- Commercial Insurance Compliance Auditors or correspondence
- Any and all regulatory agencies requesting billing information.

This procedure **does not** pertain to requests for copies of billing records by insurance companies, patient/family/legal guardians, or in response to a subpoena duces tecum, all of which the law allows within the normal course of business. These standard and routine requests for professional bills should go to the PMG Revenue Cycle Director, who is the custodian of billing records. However, if the recipient of the request for records or billings is uncertain, forward the request to the Compliance, Risk Management and Legal Departments for guidance.

The appropriate Department will review the request and provide further instructions for the copying, reproduction, or printing of materials to service the request if warranted. If necessary, the Department will also give distribution instructions.

At no time should a physician, provider, or employee of CHLAMG or PMG release copies or originals of billing information to an external regulatory agency or commercial insurance compliance auditor without consent of the Compliance Department. Staff may reach the Department at (323) 361-2587 or CHLAMGCompliance@chla.usc.edu.