



# Pinellas County

## Staff Report

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**File #:** 18-1463A, **Version:** 1

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### **Subject:**

Pinellas County Safety and Emergency Services Compliance Program & Code of Conduct: A supplement to County policies associated with ambulance billing organizational functions for Ambulance Billing & Financial Services and EMS & Fire Administration Divisions.

### **Recommended Action:**

Acting as the Emergency Medical Services Authority, approve the 2018 update of the Pinellas County Safety and Emergency Services Compliance Program & Code of Conduct: A supplement to County policies associated with ambulance billing organization functions for Ambulance Billing & Financial Services and EMS & Fire Administration Divisions.

- Recommend approval of administrative updates to the Compliance Manual, a supplement to County Policy regarding ambulance billing operations as summarized below.
- Designates a Compliance Officer, and other appropriate bodies; Education and Training Programs; Internal Monitoring and Review.
- Delineate the roles and responsibilities of the County Compliance Officer, County Compliance Committee, Ambulance Billing & Financial Services, and Emergency Medical Services & Fire Administration staff.
- Strengthen components of potential risks.

### **Strategic Plan:**

Deliver First Class Services to the Public and Our Customers

5.2 Be responsible stewards of the public's resources

5.3 Ensure effective and efficient delivery of county services and support

5.4 Strive to exceed customer expectation

### **Summary:**

Pinellas County Safety and Emergency Services has an existing compliance manual supplementing County's Policies. This manual is updated periodically and this item is the 2018 update.

The 2018 Compliance Manual revisions include the following:

- Further enhance the strategic components that align with the Office of the Inspector General's (OIG) Seven Elements of a Compliance Program for Ambulance Suppliers, which include: Development of Compliance Policies and Procedures; Designation of a Compliance Officer, and other appropriate bodies; Education and Training Programs; Internal Monitoring and Reviews; Responding Appropriately to Detected Misconduct; Developing Open Lines of Communication; and Enforcing Disciplinary Standards Through Well-Publicized Guidelines;
- Specifically delineate the roles and responsibilities of the County Compliance Officer, County

Compliance Committee, Ambulance Billing & Financial Services, and Emergency Medical Services (EMS) and Fire Administration staff;

- Stipulate the manual's limitation to "billing" related functions; and
- Strengthen components that focus on area of potential risks identified through the findings of the OIG 2015 Audit: Inappropriate Payment and Questionable Billing for Medicare Part B Ambulance Transports.

**Background Information:**

Federal Register Notice Vol 68, No.56 dated March 24, 2003 set forth Compliance Program Guidelines (CPG) for Ambulance Suppliers developed by the OIG. Prior to that time, the OIG's CPG were broad-based and focused on several different areas of the healthcare industry comprehensively. Utilizing this broad-based guidance, County EMS developed a compliance program manual in 1999. This manual serves as a mechanism by which the County Compliance Officer and the County Compliance Committee monitors the billing operations of County EMS against the submission of erroneous claims and combat potential fraudulent or abusive conduct. The manual was subsequently revised in 2002 and 2006.

**Fiscal Impact:**

N/A

**Staff Member Responsible:**

James G. Fogarty, Bureau Director, Safety and Emergency Services

**Partners:**

Ambulance Billing Compliance Committee  
EMS Management & Consultants  
Paramedics Logistics

**Attachments:**

Summary of Pertinent Changes to Compliance Manual  
Safety and Emergency Services Compliance Program and Code of Conduct Manual (Revised August, 2018)