

Simply Compliance – A Conversation about the Process of Enhancing Compliance

Waiting Your Turn: Overlapping Time Reporting

By Bernard K. Hooper, Corporate Compliance Officer

Many of the individuals we service receive therapies and supports from multiple providers or multiple therapies from a single provider. This arrangement can give rise to the common problem of overlapping time reporting. For example, when an individual resides in a facility where community living supports is provided by facility staff and another provider comes in to provide skill building services, facility staff may inadvertently bill for attending the skill building session. Of course, facility staff can bill their community living supports activities when it is their “turn” with the individual but when it is presumed that the individual is under the care of another provider, facility staff billing must stop. Another common example of overlapping time reporting is provider billing for consulting with an individual who is admitted for care in a hospital facility. Although some therapeutics modalities like Assertive Community Treatment may incorporate in-person interaction with an individual during a hospital stay, billing is not permitted. For CLS and Respite care workers, providing services to more than one individual during the same time period may constitute group services which may not be authorized by the IPOS. Therefore, the claim arising from the overlapping time reported may be invalid. There are numerous examples of overlapping time reporting but none of them should be a practice within our network.

Of course, overlapping time reporting is often inadvertent. Detroit Wayne Mental Health Authority has incorporated a text edit in MH-WIN to identify the situation. Our practice is to inform the overlapping biller of the circumstance, recoup inappropriate payment, if any, and direct payments to the appropriate biller for the time in question. How can you avoid overlapping time reporting? Simple, conduct an in-service progress note and billing session. In the recent issues of Simply Compliance, we have identified several key issues involving the IPOS, progress notes and overlapping time reporting. It is time for your quarterly project, share this information with your staff and monitor their performance. Quality Improvement at Detroit Wayne Mental Health Authority has provided your organization with self-review tools. Now is the time to see if we can be a better network.

Why is overlapping time reporting important to the individuals we serve? In short, time (amount), along with scope and duration, is a critical aspect of how service is measured by the IPOS. If we measure time correctly, we insure that the individuals we serve receive every minute of the therapies and supports that are medically necessary. Isn't that the point of what we do? Compliance made simple.