

Uniform Business Office Newsletter

Helping frontline users perform their day-to-day jobs

IMPORTANT NOTICE: Due to Privacy concerns, all personal identifiers, e.g., names and personal e-mail addresses, were removed from this newsletter. We apologize for this inconvenience. If you have questions about an article, please contact the UBO Help Desk (UBO.helpdesk@altarum.org/703-575-5385).

Volume 7, Issue 3
Apr – Jun 2009

IN THIS ISSUE

1. CY 2009 OIB Rates on the Way
2. Pharmacy Rates on Hold
3. 2009 Conference Successfully Completed
4. 2010 Conferences Date Set
5. SIT/OHI Update
6. DoD Updates Privacy Guidance
7. Rates for Deployed Medical Facilities
8. Compliance Program Update – Education Is Key!
9. UBO Learning Center

Abbreviations and Acronyms in this Issue

1. CY 2009 OIB Rates on the Way

The Calendar Year (CY) 2009 Outpatient Itemized Billing (OIB) rates for outpatient care furnished in MTFs are expected to become effective 1 July 2009.

The OIB rates package includes: CHAMPUS Maximum Allowable Charge (CMAC), CMAC Component, Anesthesia, Ambulance, Dental, Durable Medical Equipment/Durable Medical Supplies (DME/DMS), Immunization, and elective Cosmetic Surgery rates. The package also updates the interagency rate (IAR) and international military education and training (IMET) rates, Ambulatory Procedure Visit (APV), Pharmacy Dispensing Fee (which is set at zero), TPOCS Mapping Table, Current Procedural Terminology (CPT) Revenue Mapping Table, Defense Medical Information System Identifier (DMIS ID) Table, and the Modifier Mapping Table.

Teleconferences in mid-June explained the overall changes in the new rate package and answered any questions about the rates. Slides are available on the TMA [UBO Web site](#).

2. Planned Update to UBO Pharmacy Rates on Hold

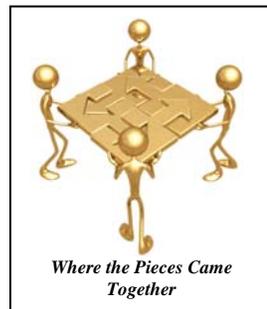
While UBO pharmacy rates are normally updated twice a year, the update planned for May 2009 was delayed. This will give TMA UBO time to address concerns with the UBO's current pricing methodology for pharmaceuticals.

The Issue: UBO billing rates are required to reflect “reasonable charges” for healthcare goods and services furnished. There is an ongoing review as to how “reasonable” should be defined. Key considerations in this review include: (1) What charge TRICARE will reimburse for a given pharmaceutical, (2) What charge will allow the MTF to recover its cost, and (3) What charge is comparable to an individual's cost at a typical retail pharmacy.

Limitations in the system historically used to price all pharmaceuticals with the same active ingredient(s), dosage form, and strength at the same rate are making it more difficult to define reasonable charges. While this review of pharmaceutical pricing is underway, billing offices will continue to use the current pharmacy rate file released in October 2008.

3. 2009 Educational Conference Brought Pieces Together

The 2009 UBO/UBU Educational Conference held 31 March to 2 April at the National Conference Center (NCC), in Lansdowne, Virginia, was another resounding success. This year's theme, “Bringing the Pieces Together,” was reflected in more than 90 conference sessions in seven tracks. Given this year



of budget constraints, the importance of this conference was signified by another record attendance of 531 participants representing their commands' Uniform Business Office (UBO) and Unified Biostatistical Utility (UBU) Programs. In addition to the sessions, 15 Department of Defense (DoD) exhibitors sponsored booths and social events.

Conference sessions are available via the TMA [UBO Web Site](#). UBO Training/Education sessions can be presented as teleconferences throughout this year if there is sufficient demand. Send requests to the UBO Helpdesk for assistance.

Special thanks to everyone who helped make this year's conference a success.

Observations from a First-Year Attendee

As relatively new to the UBO, I found the week's agenda was jam-packed with education/training and networking opportunities. I attended several presentations and gained a vast amount of knowledge—knowledge I knew was indispensable. By week's end I was pleased that I attended, and I'm already looking forward to next year's event!

A Note from the Field

I annually attempt unsuccessfully to convince my superiors that I don't need to spend several days in Leesburg. This year was the first time I ever returned and proclaimed that I was glad I attended. My contemporaries shared similar sentiments.

4. Mark Your Calendars for Next Year's Conference

NOW, mark your calendars for the 2010 UBO/UBU Educational Conference, scheduled for **22–26 March 2010**. As always, we need YOUR input on topics and recommended speakers. This is YOUR conference and we need to know what we can do to help make your daily work more productive and rewarding. Working together, we can continue to help make the coders' and billers' jobs easier and become more effective. Please send your recommendations/input to your Service UBO Manager.



*Mark your calendars **now** for the 2010 UBO/UBU Educational Conference
22–26 March 2010*

5. SIT/OHI Update

Clean-up. The re-pointing of Other Health Insurance (OHI) continues. Mailhandlers Health Insurance Carriers (HICs) will be the next HIC on the Standard Insurance Table (SIT) to be reduced. On 1 July 2009, Defense Manpower Data Center (DMDC) will deactivate designated Mailhandlers HICs from the master table except for the following.

Many thanks to all of the MTF staff who helped make the clean-up happen.

Approved MailHandlers HICs as of July 1 2009

MAIKY0001
MAIKY0002

MAIKY0003
MAIKY0005

MAIKY0012
MAIFL0001

Continue to review your business processes as we move forward with another payer. As requested by the Service UBO Managers, the next group of HICs to be reviewed for clean-up will be MEDCO.

SIT/OHI Teleconferences. Thanks to everyone who made the teleconferences a success. There were attendees from 60 MTFs, including several OCONUS sites. Everyone's willingness to share questions and experience was appreciated by all. For questions about the teleconferences, contact VPOChelpdesk@altarum.org.

6. DoD Updates Privacy Guidance

Privacy and security training and communication must be, “job specific and commensurate with an individual’s responsibilities,” according to the 5 June 2009 Memorandum from the DoD Privacy Office. Safeguarding Against and Responding to the Breach of Personally Identifiable Information (PII) is “intended to strengthen existing standards for the protection of personally identifiable information.”

The new policy also requires training to be a, “prerequisite before an employee, manager, or contractor is permitted to access DoD systems.” The training is to encompass a general orientation, specialized training, management training, and Privacy Act System of Records Training along with annual refresher training. The DoD Policy includes an Identity Theft Risk Analysis, containing five factors, “to consider when assessing the likelihood of risk and/or harm”: (1) Nature of the data elements breached; (2) Number of individuals affected; (3) Likelihood the information is accessible and usable; (4) Likelihood the breach may lead to harm; and (5) Ability of the agency to mitigate the risk of harm.

The DoD policy reflects requirements issued by the Office of Management and Budget (OMB) in a May 2007 memorandum detailing four general areas, all federal agencies were required to address: (1) Safeguarding Against the Breach of PII; (2) Incident Reporting and Handling Requirements; (3) External Breach Notification; and (4) Rules and Consequences (a new OMB requirement). OMB defines a breach as

loss of control, compromise, unauthorized disclosure, unauthorized acquitting, unauthorized access or any similar term referring to situations where persons other than authorized users for an other than authorized purposes have access or potential access to personally identifiable information, whether physical or electronic.

Bottom line: It is time to revisit your privacy policy and practices and make sure they comply with this new DoD policy. A copy of the policy is available from the TMA [UBO Web site](#).

7. Rates for Deployed/Non-Fixed Medical Facilities Under Review

The policy memoranda updating Medical Billing Rates for Department of Defense Deployed/Non-Fixed Medical Facilities are under review by the Under Secretary of Defense (Comptroller). The two separate memoranda list global inpatient and outpatient reimbursement rates for medical services furnished at DoD deployed/non-fixed medical facilities to foreign nationals covered by Acquisition and Cross Servicing Agreements (ACSAs) and to other individuals who are not covered by ACSAs, such as DoD contractors and embedded media.

The UBO is not responsible for billing in nonfixed deployed medical facilities. Chapter 3 of the UBO Manual clearly reaffirms this. However, for the past several years, at the direction of the Assistant Secretary of Defense (Health Affairs) (ASD(HA)), the UBO has developed global outpatient and inpatient rates so that care furnished in the nonfixed deployed medical facilities can be billed appropriately.

The memoranda establish rates and not eligibility for care. Once signed and effective, the new inpatient and outpatient rates for services furnished under ASCAs will be \$843 and \$60, respectively. Services furnished for care not covered by ACSAs will be \$2,286 for inpatient and \$207 for outpatient. Once signed into policy, the memoranda will be posted to the [UBO Web site](#).

The DoD Inspector General (DoDIG) and Congress have taken a special interest in billing for care furnished by nonfixed deployed medical facilities. On 4 May 2009, the DoDIG released a report summarizing a congressionally mandated audit of healthcare services furnished in Southwest Asia. In

Health Care Provided by Military Treatment Facilities to Contractors in Southwest Asia, the DoDIG sought to determine whether

- (1) contract terms for health care provided by military treatment facilities to contractors in Southwest Asia were adequately addressed, and
- (2) controls for billing and collecting payment from contractors for health care provided by military treatment facilities in Southwest Asia were adequate.

While TMA UBO asserted that these facilities were not under the UBO's authority, the DoDIG's report did not differentiate between fixed and nonfixed MTFs. The DoDIG found that MTFs "were not billing and collecting payment from contractors for health care provided." Furthermore, MTFs "in Southwest Asia may have provided health care billable in the millions without seeking reimbursement." The report concluded that a working group should continue reviewing these issues to ensure that bills are generated and that care is reimbursed. Health Affairs is included in this working group.

Congress is also reviewing this issue and held a hearing Thursday, 18 June 2009 to address care furnished by MTFs in Southwest Asia for workers' compensation cases. The hearing focused primarily on the insurers who were allegedly denying or delaying payment.

This information is presented so that MTF UBO staff can address any questions regarding who is responsible for deployed medical unit billing.

8. Compliance Program Update – Education Is Key!

Compliance education ensures that all staff fully understand their role in compliance. To that end, each billing office should have a UBO compliance program in place to protect against billing fraud, waste, and abuse. The plan should include, at a minimum, steps to mitigate common billing errors outlined in Chapter 2 of the UBO Manual (DoD 6010.15-M, November 9, 2006). The billing office compliance program should be integrated into the MTF's overall program. This is in accordance with DoDI 5505.12, "Anti-Fraud Program at Military Treatment Facilities (MTFs)," October 19, 2006, requiring MTFs to establish and implement "antifraud programs." The DoDI and other compliance-related resources can be found on the TMA UBO Web site at: http://www.tricare.mil/ocfo/mcfs/ubo/policy_guidance/letters.cfm.

To help billing offices with their anti-fraud/compliance programs, the TMA UBO will hold a teleconference in July featuring staff from TMA's Office of Program Integrity.

9. UBO Learning Center

Recent Teleconferences

The SIT OHI and Beyond teleconference was presented 11 and 12 May 2009. This teleconference reviewed the basics of SIT/OHI and discussed updates on current issues. The CY 2009 OIB Rate Package was presented on 15 and 17 June 2009. It reviewed the upcoming rate changes. The slides for both of these presentations can be obtained from the [UBO Web site](#).

Upcoming Teleconferences

Cosmetic Surgery Estimator Teleconference and Webinar

A live demo of the latest estimator and superbill will be provided.

23 June 2009 – 1500 Eastern Daylight Time (EDT)

24 June 2009 – 0900 EDT

Dial in number: 877-694-5777

Participant Pin: 6944507

Compliance Teleconference

Featuring staff from TMA's Office of Program Integrity.

21 July 2009 – 0800, 1400, 2000 EDT

23 July 2009 – 0800, 1400 EDT

Dial in number: 877-960-7130

Participant Pin: 8442672

Check the TMA [UBO Web site](#) for additional material and call-in information.

Abbreviations/Acronyms in This Issue

ACSA	Acquisition and Cross Servicing Agreement
APV	Ambulatory Procedure Visit
ASD(HA)	Assistant Secretary of Defense (Health Affairs)
CHAMPUS	Civilian Health and Medical Program of the Uniformed Services
CMAC	CHAMPUS Maximum Allowable Charge
CPT	Current Procedural Terminology
CY	Calendar year
DMDC	Defense Manpower Data Center
DMIS ID	Defense Medical Information System identifier
DoD	Department of Defense
DoDI	Department of Defense Instruction
EDT	Eastern Daylight Time
HIC	Health Insurance Carrier
IAR	Interagency Rate
IG	Inspector General
IMET	International Military Education and Training
MSA	Medical Services Account
MTF	Military Treatment Facility
NCC	National Conference Center (Lansdowne, Virginia)
OCONUS	Outside the Continental United States
OHI	Other Health Insurance
OIB	Outpatient Itemized billing
OMB	Office of Management and Budget
PHI	Protected Health Information
PII	Personally Identifiable Information
POC	Point of Contact
SIT	Standard Insurance Table
TMA	TRICARE Management Activity
TPOCS	Third Party Outpatient Collections System
UBO	Uniform Business Office
UBU	Unified Biostatistical Utility
VPOC	Verification Point of Contact