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When do we have an obligation?

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Once again, this column is entitled "Exhale," and this topic will not make you exhale. In fact, it might actually make you hold your breath.

I think it is still hard to communicate the "obligation" factor. When an error due to a documentation or coding issue is discoveredin a claim that has been submitted and paid, when does it rise to the level of creating an "obligation" that requires further inquiry or investigation? Errors are human. When Operations is alerted to errors in normal claims submission processes, they do their best to correct the claims so they go out accurately. You hear: "We corrected the claim and resubmitted it." "We paid it back." "We fixed our processes." "We followed the appropriate process for the overpayment issue in good faith and returned the overpayment." When do we have an "obligation" to do more? Doesn't this question become an important part of a compliance officer's job responsibilities to assist in detecting and preventing improper conduct and promoting adherence to legal and ethical obligations?

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