



DEFENSE HEALTH AGENCY
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DHA-Policy Memorandum 24-029
November 14, 2024

MEMORANDUM FOR: SEE DISTRIBUTION

SUBJECT: Defense Health Agency Uniform Business Office Enterprise Compliance Plan
Implementation Policy for Military Medical Treatment Facilities

- References:
- (a) DoD Directive 5136.01, "Assistant Secretary of Defense for Health Affairs (ASD(HA))," September 30, 2013, as amended
 - (b) DoD Directive 5136.13, "Defense Health Agency," September 30, 2013, as amended
 - (c) DHA-Procedural Instruction 5025.01, "Publication System," April 1, 2022
 - (d) DHA-Procedures Manual 6015.01, "Military Medical Treatment Facility (MTF) Uniform Business Office (UBO) Operations," October 24, 2017
 - (e) United States Code, Title 10, Section 1073c
 - (f) DHA Uniform Business Office Website,
<https://info.health.mil/bus/brm/ubo/Pages/ubon.aspx>

This Defense Health Agency (DHA) Policy Memorandum, based on the authorities of References (a) and (b) and in accordance with the guidance of References (c) through (e), addresses the adoption and implementation of a standardized, enterprise-wide compliance program for DHA Uniform Business Office (UBO) military medical treatment facilities (MTF).

Independent public accountants conducted financial audits of the Defense Health Program and found inconsistencies in the execution of internal controls across the Military Health System components. In accordance with Assistant Secretary of Defense for Health Affairs memorandum, "Compliance Plan Implementation Policy," February 28, 2002, MTF UBOs implemented individual compliance plans focused on coding and billing ethical conduct. These compliance plans lack DHA-wide standardization and consistency. To remediate these findings, this memorandum implements a restructured and standardized DHA UBO Enterprise Compliance Plan and a DHA UBO Compliance Audit Matrix/Checklist. This Enterprise plan supports standardization efforts to promote consistent UBO-owned billing and accounting-related activities reporting from the MTF UBOs to DHA UBO.

Changes to the enterprise-wide compliance program include:

- Restructuring and standardizing the UBO Compliance Plan template
- Creation of a DHA UBO Compliance matrix/checklist for the purpose of developing a future official DHA Compliance Audit checklist form
- Removal of Claims Submission Worksheets
- Reconfiguring the Compliance Committee Charter requirement
- Development of a centralized website featuring LaunchPad for compliance resources and reporting

- Establishing a help desk for MTF UBOs via the compliance management mailbox

By achieving the goal of a standardized, enterprise-wide compliance program, the DHA UBO will ensure MTF UBOs adhere to guidelines outlined in the revised compliance plan. Enterprise-wide documents will replace Military Service-specific documents currently in use. Effective October 1, 2024, each MTF will perform the following:

- Review and adhere to the DHA UBO Compliance Plan focused on uniform guidance for UBO-owned billing and accounting activities. The plan outlines collection compliance guidance for the Medical Services Account (MSA), Third Party Collection (TPC) Program, and Medical Affirmative Claims (MAC).
- Discontinue use of previous versions of the UBO Compliance Audit checklist; all previous checklists are obsolete.
- Perform quarterly compliance audits using the DHA UBO Compliance Audit Matrix/Checklist according to the phased implementation schedule detailed as follows:

PHASES	Implementation Date	Submission Date
Phase I: MSA (includes MSA Public and Federal, Armed Forces Billing and Collection Utilization Solution, general questions).	October 1, 2024	November 15, 2024
Phase II: TPC (includes MSA iteration).	January 2, 2025	February 14, 2025
Phase III: MAC (includes MSA and TPC iterations).	April 1, 2025	May 15, 2025
Phase IV: Concludes phased implementation. Execution of official DHA Form capturing all financial class and general questions from each version of the compliance audit matrix/checklist.	July 1, 2025	August 15, 2025

The DHA UBO Compliance Plan and DHA UBO Compliance Audit Matrix/Checklist is available on DHA SharePoint (LaunchPad) for Compliance Management at <https://info.health.mil/bus/brm/ubo/Pages/ComplianceManagement.aspx>. MTF UBOs must complete the internal control matrix/checklist on a quarterly basis with endorsement from the MTF Director. MTF UBOs must submit the quarterly audit matrix/checklist to DHA UBO through the Compliance Management LaunchPad site no later than day 15 of the second month in the respective quarter.

The implementation of these guidelines will support MTFs in their mission to provide quality health care while ensuring established internal controls for UBO billing, collection processing, analysis, and reporting of accounting-related activities are consistent.

This DHA-Policy Memo is cleared for public release and available on the internet from the Health.mil site at <https://health.mil/Reference-Center/Policies> and is also available to authorized users from the DHA SharePoint site at <https://info.health.mil/cos/admin/pubs/>.

Please address questions regarding this DHA-Policy Memorandum to the UBO Compliance Management Team at dha.ncr.financial-ops-j-8.mbx.dha-ubo-compliance@health.mil.

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Attachments:
As stated

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