

EVMS MEDICAL GROUP		
POLICY: Compliance Officer	DATE: 01-08-1997	
CATEGORY: COMPLIANCE	REVIEWED/ REVISED: April-13	Page 1 of 1

PURPOSE: A Compliance Officer will be appointed to develop, oversee, plan, implement, and monitor the EVMS Medical Group Compliance Program.

Responsibility for implementing and managing the Compliance Plan shall be assigned to the Compliance Officer. The Compliance Officer will, with assistance of counsel where appropriate, perform the following activities:

- The review, revision, and formulation of appropriate policies to guide billing of professional fees by the practice plan;
- The review, revision, and approval of Department compliance plans, including Department policies relating to billing and documentation;
- The review and approval of training materials and programs;
- The oversight of chart and billing reviews conducted by internal auditors;
- The review of any inquiries concerning billing or reports of non-compliance by determining whether a compliance issue exists and if so, developing an appropriate response;
- The development of appropriate corrective action plans to address any compliance issues; and
- Prepare an annual report which summarizes the compliance effort, both for EVMS Medical Group as a whole and for individual Departments, and identifies changes that will be made to enhance compliance.

The Compliance Officer shall work closely with representatives of EVMS Medical Group, the Departments, and billing personnel to foster and enhance compliance with all applicable billing requirements. The Compliance Officer shall have the authority to supervise specific billing practices, including, but not limited to: 1) the use of particular codes for designated services, 2) the procedures and practices used to handle billing, and 3) the imposition of restrictions on billing by particular physicians, or groups of physicians, or other health professionals. Before directing specific billing practices, the Compliance Officer should consult with other EVMS Medical Group personnel, including, for example, the Chair of the affected Department, in an effort to resolve issues through consensus. The authority of the Compliance Officer shall extend to all billing for clinical services, whether on a fee for service basis or otherwise, provided by EVMS Medical Group employees.