

Introduction

Eastern Virginia Medical School (“EVMS”) Medical Group has a strong and abiding commitment to ensuring that its affairs are conducted in accordance with applicable law. A critical focus of any compliance plan for an academic health center relates to professional fee reimbursement. Compliance in this area is challenging because the regulatory requirements governing such reimbursement are complex and changing. To underscore and enhance its commitment and to better assist all employees, including faculty physicians, in this area, EVMS Medical Group is implementing an expanded compliance program for professional fee reimbursement. The compliance plan applies to all EVMS Medical Group employees and has the following key features:

- Designation of an EVMS Medical Group official responsible for directing the effort to enhance compliance, including implementation of the Plan;
- Incorporation of standards and policies that guide EVMS Medical Group personnel with regard to professional fee billing;
- Development of compliance initiatives at the Department level;
- Coordinated training of clinical staff and billing personnel concerning applicable billing requirements and EVMS Medical Group policies;
- A uniform mechanism for employees to raise questions and receive appropriate guidance concerning professional fee billing;
- Regular chart and billing reviews by EVMS Medical Group employees to assess compliance and to identify potential issues;
- A process for employees to report instances of possible non-compliance and for such reports to be fully and independently reviewed;
- Regular reviews of the overall compliance effort, including Department-specific plans, to ensure that billing practices reflect current requirements and that other adjustments are made to improve the program;
- Formulation of corrective action plans to address any instances of non-compliance with EVMS Medical Group policies or billing requirements.

The compliance program described in this document is intended to establish a framework for legal compliance by EVMS Medical Group. It is not intended to set forth all of the substantive programs and practices of EVMS Medical Group that are designed to achieve compliance. EVMS Medical Group already maintains various compliance practices and those practices continue to be a part of its overall legal compliance efforts.