

Policies and Procedures: WVU Physicians of Charleston
Corporate Compliance Committee

Section: Compliance
Chapter: Billing
Policy: Corporate Compliance Committee Composition and Processes

I. Purpose

The purpose of this policy is to set forth the composition of the WVUPC Corporate Compliance Committee, and the processes to be followed by such Committee in addressing the issues which come before it.

II. Scope

This policy is applicable to the Corporate Compliance Committee of WVUPC, and all individuals who are members of and render services in conjunction with such Committee.

III. Statement of Policy/Procedure

WVUPC is committed to ensuring compliance with all regulatory requirements regarding billing and coding for services rendered by WVUPC practitioners. To this end, WVUPC shall have in place a Corporate Compliance Committee to provide assistance and support to the WVUPC Compliance Officer in fulfilling his/her responsibilities. Such assistance and support shall include, but not be limited to, assisting in the identification and analysis of any organizational compliance risk areas, and in the oversight of internal and external audits and investigations. The Committee shall also be empowered to address such other compliance related issues and concerns which are brought to it for consideration, and shall make recommendations regarding such issues and concerns as needed to the WVUPC governing board. The Corporate Compliance Committee shall also assist the Compliance Officer, upon request, in the formulation of policies and procedures on specific billing issues for consideration by the governing board of the WVUPC organization. This policy is intended to address the composition of the Corporate Compliance Committee, and to set forth the processes to be followed by that Committee and its members.

IV. Procedure

A. Composition of Committee

The WVUPC Corporate Compliance Committee shall be comprised of the following individuals:

- The Compliance Officer of the WVUPC Corporation
- Chief Operating Officer of the WVUPC corporation
- Four (4) members of the clinical faculty of the WVUPC corporation, to be appointed by the Chair of the Board of Directors, with the advice and input of the Compliance Officer and Chief Operating Officer
- Two (2) Practice Administrators, to be appointed by the WVUPC Chair of the Board of Directors, with the advice and input of the Compliance Officer and Chief Operating Officer
- Two (2) members of the departments of Revenue Cycle and/or internal auditing and monitoring staff to be appointed by the Chair of the Board of Directors, with advice and input of the Compliance Officer and Chief Operating Officer;
- One (1) representative from the Department of Human Resources, to be appointed by the Chair of the Board of Directors, with advice and input from the Compliance Officer and Chief Operating Officer
- One (1) representative from the Department of Informations Technology, to be appointed by the Chair of the Board of Directors, with advice and input from the Compliance Officer and Chief Operating Officer

B. Processes

1. The Corporate Compliance Committee of WVUPC shall meet at such a frequency as deemed necessary by the Compliance Officer or Chief Operating Officer of the organization.

2. Attendance at Corporate Compliance Committee meetings is mandatory, except with prior approval of the Chief Operating Officer and/or Compliance Officer. Appointed committee members may be discharged from the Committee for excessive absences, or for unexcused absences.

3. Matters discussed by the members of the Corporate Compliance Committee shall, by nature, be deemed sensitive and confidential and may not be discussed with other individuals within or outside the organization, except with the express permission of the Chief Operating Officer of the organization, or as otherwise required by law.

4. The Compliance Officer shall chair the Corporate Compliance Committee, and shall ensure that an agenda of each meeting is circulated to all members of the Committee, in advance of each scheduled meeting.

5. Issues which any individual who is not a member of the Committee wishes to be addressed by the WVUPC Corporate Compliance Committee shall be communicated to the Compliance Officer no less than seven (7) days prior to the meeting at which such issue is sought to be presented.

6. Minutes shall be prepared of each meeting of the Corporate Compliance Committee, and shall be circulated to Committee members within twenty-four (24) hours of each scheduled meeting.

7. The Chairperson of the Corporate Compliance Committee shall call all meetings to order, and shall ensure that all meetings are conducted in an orderly and efficient manner, consistent with recognized rules of order.

8. Any issue calling for a vote of the Committee shall be decided by majority rule.

9. Whenever matters brought to the attention of the Corporate Compliance Committee require the adoption of an organizational policy or procedure, such policy/procedure shall be submitted to the governing board of the WVUPC organization for formal approval.

VI. Implementation

All organizational communications, policies and/or procedures generated as the result of action by the Corporate Compliance Committee shall, along with all minutes of committee meetings, be maintained by the WVUPC compliance officer in the corporate compliance files of the organization.

VII. Administration and Interpretations

Questions regarding the provisions of this policy shall be directed to the Chief Operating Officer or the Corporate Compliance Officer of WVUPC organization.

VIII. Amendment or Termination of this Policy

This policy may be amended or terminated at any time.

POLICY/PROCEDURE NO. B-1

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