

DEPARTMENT OF VETERANS AFFAIRS MEDICAL CENTER
San Francisco, California

Appendix C to MCM No. 00C-01
April 10, 2007
00C/YNB/ynb

SUBJ: Compliance and Business Integrity Communication Policy

1. PURPOSE: This medical center memorandum establishes policies related to communication involving matters relating to Compliance and Business Integrity (CBI) initiatives within the SFVAMC.

2. POLICY. The following are policies of this Medical Center:

a. The following items will be communicated to the executive leadership and managers of each department identified for focused compliance activity:

- (1) The Risk Assessment
- (2) The Training and Education Plan
- (3) The Monitoring and Auditing Plan

(4) Any compliance risks identified throughout the year, as well as the plan to mitigate that risk.

b. The CBI Officer will be involved in entrance and exit interviews conducted by the VA OIG, System-wide Ongoing Assessment and Review Strategy (SOARS), The Joint Commission, any health benefit plan or third party payer, or other agency which evaluates business compliance or health information practices.

c. The facility (to include Human Resource Management Service as well as Research Service) will use exit interviews to ask business integrity related questions. In order to adhere to this requirement, the facility (to include HRMS and Research Service) is responsible for providing all departing employees the CBI Duty to Report memorandum (Attachment 1). The CBI Officer will be immediately notified of any alleged or actual compliance failures communicated during the exit interview process. A compliance failure is defined as an alleged or actual deviation from a law, regulation, policy, rule or standard that applies to but is not limited to the following business related areas:

- (1) Registration, documentation, coding or billing
- (2) Self-referrals of services which could result in a financial benefit for the referring employee
- (3) Protection and utilization of medical center resources

- (4) Application and appropriate government standards/code of conduct.
 - d. Clinical providers will be informed of changes to documentation standards which may affect coding or billing.
 - e. Managers of all business operations will immediately forward to the CBI Officer copies of any correspondence that suggests significant or systemic deficiencies in patient registration data, clinical documentation, coding, billing, refunds, or overpayments.
 - f. The CBI Officer will be promptly informed of issues of significant importance or compliance exceptions.
 - g. The CBI Officer will receive reports of monitoring by internal business units.
 - h. The CBI Officer will have ready access to assistance from Regional Counsel and will consult with Counsel when serious compliance exceptions are suspected or detected.
 - i. CBI Posters will be displayed in employee and other appropriate areas such as patient waiting areas, break rooms, revenue office, etc.
 - j. The CBI Officer will be a member of the following multidisciplinary committees:
 - (1) Administrative Service Chiefs
 - (2) All Chiefs
 - (3) Clinical Chiefs
 - (4) Data Validation
 - (5) Leadership Board
 - (6) Medical Records
 - (7) Revenue Cycle
 - (8) VISN Compliance
 - k. The VA Sierra Pacific Network CBI Officer will be promptly notified of any issues of significant importance or compliance exception.
- 3. RECESSION: This Medical Center Memorandum replaces Appendix C to MCM No. 00C-01 dated September 15, 2005. This MCM expired April 9, 2009.
- 4. REFERENCES:

- a. VHA Directive 2005-030, CBI Program Administration
- b. Appendix 02 to MCM No. 00-09, Medical Records Committee

Sheila M. Cullen
Medical Center Director

Attachment:
Memorandum, Subject: CBI Duty to Report, dated 10/14/05

Distribution: C

Department of Veterans Affairs

Memorandum

Date: October 14, 2005

From: Compliance Officer (00C)

Subj: Compliance and Business Integrity Duty to Report

To: Separating Employee

According to San Francisco Veterans Affairs Medical Center (SFVAMC) Medical Center Memorandum 00C-02, it is the obligation of employees who have knowledge of any suspected or actual compliance failures to report same without fear of retribution or retaliation. Requests for anonymity from persons reporting compliance failures will be honored whenever possible. A compliance failure is defined as an *alleged or actual deviation from a law, regulation, policy, rule or standard that applies to and includes the following business related areas:*

- registration, documentation, coding or billing
- self-referrals of services which could result in a financial benefit for the referring employee
- protection and utilizations of medical center resources
- application of appropriate government standards/code of conduct

On the occasion of your departure, we would like to remind you of the provisions of MCM No. 00C-02 as well as provide you with the opportunity to communicate any areas of alleged or actual compliance failures you suspected or had knowledge of while employed with the SFVAMC. If you have any questions and/or comments you have the option of:

- Notifying the undersigned (Yvonne Brooks), SFVAMC's Compliance and Business Integrity Officer (CBIO):
 - In person by going to Building 210, room 306,
 - Telephonically by calling (415) 221-4810 ext. 4398
 - In writing via e-mail (yvonne.brooks@med.va.gov) or by mailing your concerns to SFVAMC, ATTN: Compliance Officer (00C), 4150 Clement Street, SF, CA 94121
- Contacting the VISN 21 Compliance Specialist, Jane Dutton Morris at 707-562-8377
- Contacting Compliance and Business Integrity Helpline at 1-866-842-4357

Additionally, this memorandum serves as a reminder of your obligations under the following regulations and statutes:

- Standards of Ethical Conduct for Employees of the Executive Branch at 5 CFR Part 2635
- Employee Responsibilities and Conduct at 5 CFR Part 735
- Conflict of Interest Statutes, 18 USC §§ 203, 205, 207, 208, and 209

If you have questions regarding the above cited regulations and laws, you may contact the Regional Counsel's Office or Human Resources Management Services, as appropriate.

Thank you for your attention to this matter!

Sincerely,

Yvonne N. Brooks

TO: SFVAMC Compliance Officer (00C)

ATTESTATION STATEMENT

- I acknowledge receipt of the attached Memorandum, Subject: Compliance and Business Integrity Duty to Report, dated October 14, 2005
- I understand that according to MCM No. 00C-02, I am obligated to report any suspected or actual compliance failures without fear of retribution or retaliation.
- I understand, if requested, persons reporting compliance failures will remain anonymous whenever possible.

COMMENTS (*optional*)

Printed Name

Signature

Date