

Faculty Practice Plan (FPP) CLINICAL COMPLIANCE COMMITTEE

CHARTER

3/09

The Faculty Practice Plan Clinical Compliance Committee (“Committee”) is an oversight group for clinical compliance issues related to OHSU professional services. The Committee is advisory to both the Clinical Compliance Officer for Professional Services and the OHSU Clinical Compliance Committee (CCC). The Committee also assists with the Clinical Compliance Program. The term “compliance” used in this charter refers to adhering to federal, state, and local laws and regulations; OHSU policies; and billing rules for third party payors that impact or relate to clinical professional services. The Committee membership represents the professional services of the Health Care System defined below.

The components of professional services associated with the Health Care System include those clinicians who are authorized to provide and bill for services as independent licensed practitioners. The Health Care System includes providers from the Schools of Medicine, Dentistry, and Nursing; the Child Development and Rehabilitation Center; the clinical research enterprise; the Faculty Practice Plan; the Hospitals; and all other sites or programs that are involved in the delivery of patient care. As used in this charter, the term “OHSU” is used to refer to all of these components.

The Committee shall meet at least quarterly. However, the Committee may be convened at the Chair’s discretion for urgent matters. The Committee may request that Legal Counsel attend the meetings from time to time to provide legal advice to the Committee or when matters are subject to attorney-client privilege. The Committee should provide periodic reports to the FPP Board of Directors. The Committee shall provide an annual report to the OHSU Chief Integrity Officer. Professional services compliance will be included in the annual OHSU Integrity Program report to the OHSU Board of Directors.

The Committee shall maintain minutes of all its meetings to document its activities and recommendations. The primary goals of the Committee are to:

1. Assist the OHSU Board of Directors in fulfilling its governance responsibilities relating to OHSU professional services compliance with applicable laws, regulatory requirements, industry guidelines, and policies.
2. Provide oversight to the development and implementation of an educational program for professional services that will provide for proper documentation,

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billing, and collection processes and accurately reflect the services performed and billed by OHSU clinicians.

3. Provide a vehicle for communication between the Committee and the OHSU Chief Integrity Officer, the CCC, and the OHSU Board of Directors.

A Chair of the Committee will be a provider appointed by the Dean of the School of Medicine or designee. The Chair may delegate co-chairing responsibilities to other members.

Members of the Committee are responsible to attend and actively participate in the meetings and represent the departments and staff of the FPP or other clinical areas that are within their purview. Members who cannot attend a meeting may not send a representative in their place.

The Committee will decide upon recommended actions by majority vote of members present. In some cases, the Chair may decide to conduct Committee business via electronic means and the majority vote of the members electronically responding will still apply.

Advisory responsibilities of the Committee include:

1. Recommending approval to the CCC and providing oversight of the implementation, monitoring, and enforcement of a written program for compliance with regulations and guidelines of federal and state authorities, applicable to clinical professional activities (the Clinical Compliance Program).
2. Working with appropriate areas within OHSU to assure development of policies and procedures to promote compliance with the Clinical Compliance Program as it relates to professional services.
3. Recommending approval to the CCC and providing oversight of a communication plan for personnel regarding the development, implementation, and monitoring of the Clinical Compliance Program related to professional services.
4. Recommending approval to the CCC and providing oversight of the compliance risk assessment of areas of clinical professional activities at OHSU, including prioritizing high-risk areas of concern. At the direction of Legal Counsel, this assessment may be implemented as a privileged document that guides clinical compliance activities.

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4. Recommending monitoring, overseeing reviews and the development and implementation of plans for acting on results of the reviews.
5. Overseeing internal systems, controls, and monitoring to carry out the policies and procedures related to the professional services standards of the Clinical Compliance Program.
6. Promoting and overseeing a system to solicit, evaluate, and respond to clinical compliance inquiries, complaints, and problems.
7. Assuring timely response to clinical compliance problems in a manner that resolves immediate issues and prevents future issues of the same type.
8. Overseeing a continuous education program that explains the compliance program, specific requirements, and relevant laws and regulations for all OHSU personnel involved in clinical professional services activities.
9. Overseeing the periodic evaluation of the effectiveness of the professional services portion of the Clinical Compliance Program

Members of the Professional Services Compliance Committee include:

1. Provider from Primary Care
2. Provider from the Department of Medicine
3. Provider from a Surgery Department
4. Provider from other departments not previously identified
5. Provider from School of Nursing
6. 2 Academic Department Administrators
7. OHSU Chief Integrity Officer or his/her designee (non-voting member)
8. OHSU Clinical Compliance Officer, Hospital Services (non-voting member)
9. OHSU Clinical Compliance Officer, Professional Services (staff)

Additional representatives as deemed appropriate by the Chair of the Committee.

In addition to the above membership, legal counsel will attend and participate in the Professional Services Compliance Committee meetings as necessary and appropriate for the rendering of legal advice to the Committee and OHSU. It is permissible for one representative to fill more than one of the identified roles for the Committee.