

APPROVE UNIVERSITY OF ILLINOIS HOSPITAL & HEALTH SCIENCES
SYSTEM COMPLIANCE PLAN

Action: Approve University of Illinois Hospital & Health Sciences System Compliance Plan

Funding: No New Funding Required

The Vice President for Health Affairs recommends approval by the Board of Trustees of a Corporate Compliance Plan for the University of Illinois Hospital & Health Sciences System (UI Health).

Previous compliance plans considered and approved by the Board focused substantially on the College of Medicine Medical Service Plan. As described in the attached proposed Corporate Compliance Plan document, the healthcare regulatory environment has grown more complex. For example, forty-five federal agencies currently write laws and regulations that affect health care, including many related to finances and financial privacy. In addition, practice patterns have evolved; today, non-physician providers capable of independent practice are rising out of more Health Sciences Colleges.

In 2011, a committee was established to review compliance efforts for UI Health. Committee members included representatives from the College of Medicine, College of Nursing, Department of Hospital Finance, the Hospital Department of

Compliance, and the Office of University Counsel. The committee reviewed two score programs from other university medical centers to inform the content for the plan, then worked with the Office of University Counsel to retain outside legal counsel with expertise in healthcare compliance to review the proposed program.

The draft plan was then reviewed by the UI Health Compliance Operations Committee and approved unanimously. This Committee included compliance officers from all the health science colleges and UI Health. The proposed Compliance Plan was finally presented to and approved by the deans of the health sciences colleges in its original format early in 2012. It was also reviewed by an outside healthcare consulting firm, Pricewaterhouse Coopers LLP. In discussions with Dr. Chamberlin, the consulting firm suggested that the plan was sound.

More recently, the President asked that, in view of the delays with approval of the Compliance Plan, that the plan be updated and re-reviewed one final time by outside legal counsel. That review was undertaken and no substantive changes were suggested.

The plan creates the necessary structure to carry out effective compliance programs within the clinical programs of UI Health. The UI Health Compliance Office will have a full-time compliance officer, assisted by three analysts. Their primary charge will be to assure effective compliance efforts throughout the clinical programs by regularly reporting to the health science deans and Vice President for Health Affairs at their monthly meeting. The conclusions from these meetings will be presented regularly to the University Healthcare System Committee of the Board of Trustees. Extraordinary

issues will be dealt with through the University management structure, the President and taken to the Board as necessary. Specific projects will be driven by careful review of the process problems identified through the programs and by the published intents of federal agencies governing the health care community.

This Compliance Plan and program contemplated thereby require approval by the Board of Trustees.

The Board action recommended in this item complies in all material respects with applicable State and federal laws, University of Illinois *Statutes, The General Rules Concerning University Organization and Procedure*, and Board of Trustees policies and directives.

The President of the University concurs with this recommendation.