

# Reporting of Medicare Compliance Issues Policy

December 1998 \*

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## **Background**

The SUNY at Buffalo School of Medicine and Biomedical Sciences and the University at Buffalo (UB) have a strong commitment to ensure that professional business affairs are conducted in accordance with all applicable laws. A critical form of billing compliance for an academic health center relates to professional fee reimbursement. Compliance in this area is challenging because the regulatory requirements are complex and changing. Therefore, a compliance program has been instituted to understand and enhance the commitment to the fee billing procedures, and to assist all faculty, residents, students and staff in this area.

## **Purpose**

The purpose of this policy is to enhance the educational process concerning compliance for teaching physicians, residents and staff concerning applicable billing requirements, and to set forth a process to report instances of possible non-compliance.

## **Policy**

The training materials concerning compliance issues will direct residents to report to the Office of Graduate Medical Education and Continuing Medical Education and/or the Office of the Assistant Vice President and General Counsel for Health Affairs any activity that they believe to be inconsistent with the University and the School of Medicine and Biomedical Science policies or legal requirements and will explain how they can be contacted. The training materials will also provide the residents with information about programs and practices that are designed to achieve compliance with legal requirements. Residents who, in good faith, report possible compliance issues should not be subjected to retaliation or harassment as a result of the report. Concerns about possible retaliation or harassment should be reported to the Office of Graduate Medical Education and Continuing Medical Education and/or the Assistant Vice President and General Counsel for Health Affairs, who will take action to rectify the situation if necessary.

## **Reporting**

1. Report the incident to the Associate Dean for Graduate Medical Education and Resident Services, 117 Cary Hall, Buffalo, New York 14214 (829-2012); or
2. Report the incident to the Assistant Vice President and General Counsel for Health Affairs, 148 BEB, Buffalo, New York 14214 (829-3176);
3. Reports shall be kept confidential to the fullest extent permitted by law.

## **Investigation**

1. The Associate Dean or General Counsel receiving initial complaints should obtain information and prepare a memorandum containing, at a minimum:
  - The name and department of the individual(s) engaging in alleged prohibited conduct;
  - A description of the prohibited conduct or comments, including a list of possible witnesses and details of the alleged misconduct;
  - The date of the report and dates of the alleged prohibited conduct;
2. Individuals receiving complaints must promptly notify the Office of the Assistant Vice President and General Counsel for Health Affairs, 148 BEB, Buffalo, New York 14214, and turn over to the Office the recipient's memorandum regarding the complaint.
3. The Office of Graduate Medicine Education will refer the complaint and accompanying documentation for investigation to the Assistant Vice President and General Counsel for Health Affairs of the appropriate affiliated Hospital where the alleged prohibited conduct occurred.

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\*Sponsoring Institution: University at Buffalo (UB) December 19, 2004