

EVMS MEDICAL GROUP		
POLICY: Corrective Action Plans	DATE: 01-08-1997	
CATEGORY: COMPLIANCE	REVIEWED/ REVISED: April-13	Page 1 of 1

PURPOSE: To establish a corrective action plan when a compliance issue is identified.

PROCEDURE: When a compliance issue is identified, through monitoring, reporting of possible issues, investigations or otherwise, the Compliance Officer will develop a plan to address the issue. In developing a corrective action plan, the Compliance Officer may obtain advice and guidance from EVMS Medical Group legal counsel. There will also be consultation with the EVMS Medical Group President and appropriate clinical and billing personnel, if necessary.

Corrective action plans will be designed to ensure not only that the specific issue is addressed but also that similar problems do not occur in other areas or departments. Corrective action plans may require that billing be handled in a designated way, that certain training takes place, that restrictions be imposed on billing by particular physicians or other health professionals, that repayment be made, or that the matter be disclosed externally. Sanctions or discipline, in accordance with EVMS Medical Group rules, may also be recommended. If it appears that certain individuals have exhibited a propensity to engage in practices that raise compliance concerns, the corrective action plan will identify actions to be taken to prevent such individuals from exercising substantial discretion with regard to billing.