

EVMS MEDICAL GROUP		
POLICY: Investigating Compliance Issues	DATE: 01-08-1997	
CATEGORY: COMPLIANCE	REVIEWED/ REVISED: April-13	Page 1 of 1

PURPOSE: To establish a process by which conduct inconsistent with billing and privacy policies or requirements is investigated.

PROCEDURE: Whenever conduct that may be inconsistent with a billing or privacy policy or requirement is reported to the EVMS Medical Group Compliance Office and/or Privacy Office, an investigation will be undertaken with the assistance of the EVMS Medical Group President. After review and investigation, the EVMS Medical Group Compliance Office and/or Privacy Office will prepare a written report of findings. If the EVMS Medical Group Compliance Office and/or Privacy Office and the EVMS Medical Group President determine that the report may constitute a violation under current statutes, they will direct the matter to legal counsel for handling pursuant to that statute.

EVMS Medical Group employees must cooperate fully with any investigations undertaken by the EVMS Medical Group Compliance Officer, EVMS Medical Group Privacy Officer or the EVMS Medical Group President.