

**COMPLIANCE PLAN
FISCAL YEAR 2007**

**The University of Texas Health Science Center at Houston
Institutional Compliance Program**



THE UNIVERSITY *of* TEXAS

HEALTH SCIENCE CENTER AT HOUSTON

INTRODUCTION

This Fiscal Year 2007 Compliance Plan represents the goals of The University of Texas Health Science Center at Houston's (UTHSCH) Institutional Compliance Program and the action items that will be undertaken to accomplish the goals. These action items were based upon review of the Federal Sentencing Guidelines, The University of Texas System Business Procedures Memorandum 63, the Office of Inspector General's Compliance Program Guidance for Hospitals, and the training *Compliance Essentials*, developed by The University of Texas System-wide Compliance Office.

The principal goal of the Institutional Compliance Program is to pro-actively promote compliance with all applicable legal and regulatory requirements and to foster and help ensure ethical conduct while providing education, training, and guidance to all faculty and staff members. The specific objectives of the Institutional Compliance Program in Fiscal Year 2007 which support this goal can be generalized into three primary categories, described as follows:

- Prevention:** Identifying and eliminating or minimizing compliance violations and compliance risks
- Detection:** Monitoring compliance risks and recognizing the signs of compliance violations and misconduct
- Correction:** Promptly reporting and investigating compliance violations and misconduct

This Compliance Plan also contains a fourth category, "Administration," which describes the activities necessary to effectively organize and coordinate Institutional Compliance Program activities. It is anticipated that the goals and action items contained in this Compliance Plan will assist UTHSCH in maintaining an efficient and effective Institutional Compliance Program.

OBJECTIVE #1

Prevention: Identifying and eliminating or minimizing compliance violations and compliance risks

#	ACTION ITEM	TARGET COMPLETION DATE	RESPONSIBLE PARTY
1.a	<p>Employee Training: Facilitate annual Standards of Conduct training for all university employees.</p> <p><i>Implementation Guidance:</i></p> <ul style="list-style-type: none"> ▪ Review Standards of Conduct training from the previous year to determine necessary modifications and revise training, as needed, to include “hot topics” in compliance ▪ Consider appropriate means of publicizing training requirements ▪ Track employee completion rates 	April 16, 2007	Chief Legal and Compliance Officer and Director, Institutional Compliance
1.b	<p>Hotline Advertising: Initiate a Compliance Hotline Awareness campaign.</p> <p><i>Implementation Guidance:</i></p> <ul style="list-style-type: none"> ▪ Facilitate communication with Human Resources to ensure compliance postings are placed in all appropriate locations ▪ Facilitate communication with Public Affairs to increase employee awareness of the Compliance Hotline and other available reporting mechanisms 	February 28, 2007	Chief Legal and Compliance Officer and Director, Institutional Compliance
1.c	<p>Risk Assessment: Facilitate the compliance risk assessments of designated operating units across the university and help identify and prioritize the “A List” Compliance Risks.</p> <p><i>Implementation Guidance:</i></p> <ul style="list-style-type: none"> ▪ Ensure that monitoring plans, training plans and reporting plans exist for each “A List” risk identified in the FY06-07 risk assessment process ▪ Develop and communicate quarterly reporting expectations from each “A List” risk Designated Responsible Party ▪ Ensure that the ECC designates Risk Areas, Designated Responsible Parties and “A List” risks for FY07-08 ▪ Communicate with all Designated Responsible Parties for risk assessment status updates and, as needed, ensure that Risk Area Working Groups are convened to identify and measure compliance risks for FY07-08 	<p>November 31, 2006</p> <p>November 31, 2006</p> <p>August 31, 2007</p> <p>August 31, 2007</p>	Chief Legal and Compliance Officer and Director, Institutional Compliance
1.d	<p>Educational Articles: Publish educational compliance articles in university publications at least semi-annually</p> <p><i>Implementation Guidance:</i></p> <ul style="list-style-type: none"> ▪ Receive input from ECC, ICC and Triage Team to determine topics for compliance educational articles ▪ Communicate with Public Affairs to publish information in university publications 	February 28, 2007 and August 31, 2007	Chief Legal and Compliance Officer and Director, Institutional Compliance

OBJECTIVE #2

Detection: Monitoring compliance risks and recognizing the signs of compliance violations and misconduct

#	ACTION ITEM	TARGET COMPLETION DATE	RESPONSIBLE PARTY
2.a	<p>Compliance Verification: Assuring that monitoring, reporting and training are taking place for all "A List" risks</p> <p><i>Implementation Guidance:</i></p> <ul style="list-style-type: none"> ▪ Develop a Compliance Verification schedule for "A List" risks for fiscal year ▪ Complete Compliance Verification process for "A List" risks ▪ Report Compliance Verification to ECC and UT System 	<p>November 31, 2006</p> <p>August 31, 2007</p> <p>On-going</p>	<p>Chief Legal and Compliance Officer and Director, Institutional Compliance</p>
2.b	<p>Policies/Procedures: Review and revise existing policies and procedures related to Institutional Compliance, including specifically the Conflict of Interest/Commitment Policy, and others as needed</p> <p><i>Implementation Guidance:</i></p> <ul style="list-style-type: none"> ▪ Facilitate the development of process to monitor conflicts of commitment and conflicts of interest of university employees ▪ Oversee the distribution and collection of Annual Financial Disclosures ▪ Assist with revision of HOOP, as needed 	<p>November 31, 2006</p> <p>May 31, 2006</p> <p>On-going</p>	<p>Chief Legal and Compliance Officer and Director, Institutional Compliance</p>

OBJECTIVE #3

Correction: Promptly reporting and investigating compliance violations and misconduct

#	ACTION ITEM	TARGET COMPLETION DATE	RESPONSIBLE PARTY
3.a	<p>Hotline and other Reporting Mechanisms maintenance: Maintain the Compliance Hotline, e-mail, web-site and other reporting mechanisms are maintained to ensure reports may be made promptly and confidentially.</p>	<p>On-going</p>	<p>Chief Legal and Compliance Officer and Director, Institutional Compliance</p>
3.b	<p>Investigations: Respond to compliance reports by ensuring appropriate inquiry and response is made to each report.</p>	<p>On-going</p>	<p>Chief Legal and Compliance Officer and Director, Institutional Compliance</p>
3.c	<p>Triage Team: Coordinate Triage Team meetings to ensure the review of hotline calls and compliance reports.</p>	<p>On-going</p>	<p>Chief Legal and Compliance Officer and Director, Institutional Compliance</p>

OBJECTIVE #4**Administration: Coordinate Institutional Compliance Program activities**

#	ACTION ITEM	TARGET COMPLETION DATE	RESPONSIBLE PARTY
4.a	Conduct monthly meetings with the Executive Compliance Committee and quarterly meetings with the Institutional Compliance Committee.	On-going	Chief Legal and Compliance Officer and Director, Institutional Compliance
4.b	Provide monthly/quarterly/annual reports to the UT System-wide Institutional Compliance office.	On-going	Chief Legal and Compliance Officer and Director, Institutional Compliance
4.c	Conduct Self Assessment of Compliance program.	11/31/06	Chief Legal and Compliance Officer and Director, Institutional Compliance
4.d	Participate in The UT System Institutional Compliance Advisory Council (ICAC) activities.	On-going	Chief Legal and Compliance Officer and Director, Institutional Compliance