

Institutional Compliance Program

Texas Tech University Health Sciences Center School of Medicine

Policy on Investigating Compliance Issues

5.3

Date: March 14, 2001

Revised: September 2002

Purpose:

The Institutional Compliance Officer is the primary TTUHSC official entrusted with initiating or conducting investigation into compliance-related issues. In most cases, the actual process of investigation will likely involve other TTUHSC offices or officials. This policy explains the appropriate procedure for the Institutional Compliance Officer to take under certain specific circumstances.

Policy:

Whenever a Quality Improvement activity is identified as having to do with a compliance issue, or reports are received of instances of possible noncompliance, either through the usual chain-of-command or through the compliance Helpline, the Institutional Compliance Officer shall act on the matter expeditiously and in accordance with applicable law. TTUHSC employees shall cooperate fully with any investigation initiated by the Institutional Compliance officer.

Procedures:

1. The Institutional Compliance Officer receives information that warrants a special investigation.
 - Information may be received via numerous sources: Helpline, monitoring process, legal counsel, individuals.
2. The Institutional Compliance Officer reviews information and if necessary, discusses the matter with legal counsel, and may initiate investigation with the consent of the legal counsel.
3. The Institutional Compliance Officer notifies the appropriate Regional dean and Chairperson of the Department.
4. Specific monitoring instrument is developed if necessary for investigation.
5. The Institutional Compliance Officer, the Deputy Compliance Officer and specific designated compliance personnel conduct the investigation.
6. A report of the investigation is written and then discussed with legal counsel. If applicable, the report is presented to the Regional Dean and Chairperson of the Department.
7. The Institutional Compliance Officer submits the report to the TTUHSC President as necessary.
8. A file on the investigation is maintained in the Compliance Office.