

Amendments to
Compliance Plan for Health Sciences Billing and Patient Services

Approved: July 21, 2009

Page 4, The Billing Compliance Program, Billing Compliance Committee, second paragraph: Second sentence amended to change physician representation from Compliance Liaison Committee—School of Medicine to CMA Compliance Committee and thus to read:

The Billing Compliance Committee shall include, at a minimum, the Compliance Director, the Vice President for Health Sciences or his/her designee, the Dean of the School of Medicine or his/her designee, the Dean of the School of Dentistry or his/her designee, the Dean of the School of Pharmacy and Health Professions or his/her designee, the CMA President/Senior Associate Dean for Clinical and Academic Affairs from the School of Medicine, and at least one physician representative from the CMA Compliance Committee.

Page 5, The Billing Compliance Program, Compliance Director: Last sentence amended to remove reference to the Compliance Liaison Committee—School of Medicine and thus to read:

The Compliance Director or his/her designee chairs the Billing Compliance Committee.

Page 5, The Billing Compliance Program, Compliance Liaison Committee—School of Medicine: Amended to delete the section in its entirety and replace with:

CMA Compliance Committee

The CMA Compliance Committee will serve as a liaison between the Billing Compliance Office and the Board of Directors and physicians of Creighton Medical Associates. This Committee fosters a collaboration between the Billing Compliance Office and CMA to ensure 1) physician input into the development, implementation and enforcement of compliance policies and procedures and the Plan; 2) a dialogue between the Billing Compliance Office and physicians on matters of investigation and corrective action; and 3) a mechanism by which CMA leadership is informed of the compliance status, efforts and issues within CMA. The composition and schedule of meetings of the CMA Compliance Committee will be as set forth by the CMA Board of Directors from time to time; provided, however, that the Compliance Director will serve as an *ex officio* member without vote.