

Amendments to
Compliance Plan for Health Sciences Billing and Patient Services

Approved: December 15, 2009

Page 4, The Billing Compliance Program, Billing Compliance Committee, second paragraph: Second sentence amended to change physician representation from CMA Compliance Committee to CMA Board of Directors 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 Affairs from the School of Medicine, and at least one physician representative from the CMA Board of Directors.

Page 5, The Billing Compliance Program, CMA Compliance Committee: Amended to delete the section in its entirety and replace with:

CMA—Compliance Collaboration

The Compliance Director will facilitate collaboration between the Billing Compliance Office and Creighton Medical Associates 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. Mechanisms of collaboration will be determined by the Compliance Director and approved by the Billing Compliance Committee and CMA, as applicable.