

Effective: 7/1/2023; Revised: 7/1/2024; 7/1/2025
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COMPLIANCE PROGRAM

The Office of Compliance & Corporate Integrity's (OCCI) mission is to ensure and promote the highest standards of business ethics. We are committed to complying with all federal and state laws, rules, and regulations. Specifically, OCCI is tasked with helping to reduce any accidental or intentional violations of law; detecting and immediately taking corrective measures if violations occur; and collaboratively advising and educating on compliance topics.

OCCI ensures that VUMC implements and maintains an effective compliance program that includes the following seven key elements: 1) Compliance officer and oversight committee; 2) Written code of conduct and policy; 3) Regular training and education (for House Staff, this includes a requirement to complete compliance training via the [Learning Exchange](#) prior to entering training and annually thereafter); 4) Process to receive complaints; 5) Audits to monitor compliance; 6) Process to respond to allegations and remedy problems; and 7) Enforcing standards through well-publicized guidelines. For more details, the see the [VUMC Compliance Program Plan](#).

While OCCI manages the day-to-day aspects of VUMC's compliance operations, **you** are compliance in action. It is **everyone's** responsibility to ensure successful compliance organization-wide. This includes understanding and following VUMC policies and procedures. House Staff must review the following VUMC policies and guidance to help gain familiarity with what is expected of you:

[VUMC Code of Conduct](#)

[VUMC Conflict of Interest and Commitment Policy](#)

[VUMC False Claims Act and Whistleblower Protection](#)

[VUMC Documentation Standards in the Medical Record](#)

[VUMC Documentation Standards for Providers](#)

[VUMC Documentation Standard Timeframes](#)

[Charge Capture for Resident/Fellow Work and Teaching Physician Guidelines](#)

[CMS Guidelines for Teaching Physicians, Interns, and Residents](#)

House Staff should also be aware of federal, state, and payer regulations related to billing for physician services in a teaching hospital, and these may vary according to a House Staff member's credentialing and/or program. If you have questions concerning compliance issues or would like more information, contact the Office of Compliance & Corporate Integrity at 615-343-7266 or visit their [website](#). To report compliance concerns, you may also use the [VUMC Compliance Integrity Line](#). It is available 24/7 at 866-783-2287.