



TEXAS TECH UNIVERSITY HEALTH SCIENCES CENTER

Operating Policy and Procedure

HSC OP: 52.01, **Institutional Compliance Plan**

PURPOSE: The purpose of this Health Sciences Center Operating Policy and Procedure (HSC OP) is to provide a framework for implementation of an effective institutional compliance plan for Texas Tech University Health Sciences Center (TTUHSC) in accordance with the Federal Sentencing Guidelines and Texas Executive Order RP 36, dated July 12, 2004.

REVIEW: This HSC OP will be reviewed June 1 of each year (EY) by the Institutional Compliance Working Committee, with recommendations for revisions forwarded to the President by July 15.

POLICY/PROCEDURE:

1. Compliance with federal and state laws.

TTUHSC, through its President, adopts the Texas Tech University Health Sciences Center (TTUHSC) Institutional Compliance Plan ("Compliance Plan"), accessible at http://www.ttuhscc.edu/compliance/documents/ico_plan_6-9-08.pdf, in support of its commitment that activities conducted by or on behalf of TTUHSC be in accordance with applicable federal and state laws and regulations, as well as Texas Tech University System (TTUS) *Regents' Rules* and TTUHSC policies.

2. Compliance policy.

In furtherance of the above-mentioned Compliance Plan, TTUHSC establishes the following directives:

- a. *Institutional Compliance Committee ("ICC")*. The TTUHSC President's Executive Council shall serve as the TTUHSC Institutional Compliance Committee as set forth in the Compliance Plan.
- b. *Institutional Compliance Working Committee ("ICWC")*. The TTUHSC ICC shall appoint members of the ICWC as set forth in the Compliance Plan. The duties and responsibilities of the ICWC are set forth in the Compliance Plan.
- c. *Appointment of Institutional Compliance Officer ("ICO")*. The President of TTUHSC shall appoint an Institutional Compliance Officer to oversee institutional compliance activities at TTUHSC.
- d. *Responsibilities of the Institutional Compliance Officer*. The ICO shall be responsible for monitoring and reporting on institutional compliance with applicable federal and state laws and regulations; TTUS Regents' Rules and TTUHSC operating policies as outlined in the Compliance Plan. In addition, the ICO has primary responsibility for implementing and overseeing clinical billing and HIPAA Privacy compliance activities for TTUHSC.