



## *Tell me About the Compliance Office*

The Compliance Office is a component part of the Office of Audit, Compliance and Ethics (OACE), a joint office of UConn and UConn Health. Our mission is to assist the University, including UConn Health in achieving their financial, operational and strategic goals while maintaining compliance with all associated laws and/or regulations. The Compliance Office accomplishes this goal by identifying institutional risks; reviews and investigations; augmenting institutional compliance through effective education and training programs; and fostering the values of knowledge, honesty, integrity, respect and professionalism as outlined in the University's [\*Code of Conduct\*](#).

Because a primary function of the University of Connecticut Board of Trustees and University of Connecticut Health Center Board of Directors is to ensure effective control of the administration and operations of our institution, the Joint Audit and Compliance Committee (JACC) of the Board of Trustees has mandated the establishment of a Compliance Program. In order to ensure its objectivity and independence, the Office reports functionally to the Chair of the JACC and for administrative purposes only, to the President.

The purpose of the Compliance Program is to promote a University-wide culture of compliance and ethics by assisting Senior Administration in the effective discharge of their responsibilities.

The Compliance Program is a valuable resource for compliance-related information and training. In addition, the department is responsible for developing compliance policies, overseeing and monitoring compliance activities, and identifying weaknesses in our compliance systems. Compliance Staff also serve as the centralized office for compliance with privacy laws as well as liaison to the State of Connecticut's Office of State Ethics.

We accomplish our goals by:

- Developing and implementing effective training programs to ensure that employees are aware of, adhere to and report potential violations of laws, regulations, policies, and procedures;
- Developing effective ways to mitigate compliance risk through collaboration with our institution's community and the implementation of appropriate monitoring plans.
- Investigating potential violations of laws, regulations, and policies;
- Providing a confidential reporting mechanism, REPORTLINE at 1 (888) 685-2637 to allow individuals to report or seek guidance regarding potential or actual criminal or other non-compliant conduct without fear of retaliation.

The success of the Compliance Program depends on individual and collective cooperation. As members of the UConn Health community, we all share a commitment to uphold the highest educational, business, and ethical standards. Contact the Compliance Office with any questions, suggestions or concerns. Iris Mauriello, Compliance Integrity & Privacy Officer, (860) 679-3501, [mauriello@uchc.edu](mailto:mauriello@uchc.edu)



**REPORTLINE 1-888-685-2637**



## ***Consultation Visits Must be Performed Independently***

National Government Services (NGS), the contractor for Medicare in Connecticut, has updated their E&M FAQs to include two important changes. NGS corrected prior posted information on the topic of Consultations by noting that Split/Shared billing is not appropriate for these services. CMS rules on consultative services have not changed, despite the use of standard E&M coding for inpatient and outpatient consultative services since 2010. When a provider requests the consultative opinion of another provider, the consulting provider must perform the service independently, and cannot split/share the required elements of the consultative E&M service.

Please see this FAQ as posted on NGS website:

**Question:** Can a consultative service in the hospital setting be performed on a split/shared basis?

**Answer:** CMS rules on consultative services have not changed, despite the use of standard E&M coding for inpatient and outpatient consultative services since 2010. When a provider requests the consultative opinion of another provider, the consulting provider must perform the service independently, and cannot split/share the required elements of the consultative E&M service.

For questions, please contact Margaret DeMeo, Associate Compliance Officer at 860-679-1226 or [demeo@uchc.edu](mailto:demeo@uchc.edu).

## ***Guidelines for Accepting Honoraria***

An important consideration in determining whether or not an employee may personally accept an honorarium or fee for doing a presentation, writing an article, participating as part of a panel or engaging in some other activity outside of UConn Health is whether the employee is doing so in his or her “official capacity.” As noted in the University Guide to the State Code of Ethics, *in general*, if an employee is invited to participate in an activity and his or her UConn Health role is the predominant reason for that invitation, it is likely the participation will be considered to be in the employee’s official capacity. If an invitation to participate in an activity is extended based primarily upon a particular expertise, even an expertise developed through the employee’s UConn Health role, the participation is usually considered to be outside of the employee’s official capacity.

Honoraria or fees may be *personally* accepted only for activities that are deemed outside of an employee’s official capacity. Honoraria or fees offered for activities performed in an employee’s official capacity may be directed to a UConn Health account for future UConn Health-related business. Because situations are often fact-specific, employees are encouraged to seek individual guidance as needed.

For questions, contact Ginny Pack, UConn Health Ethics Liaison at [pack@uchc.edu](mailto:pack@uchc.edu) or 860-679-1280 or the Office of State Ethics at 860-263-2400 or [ethics.code@ct.gov](mailto:ethics.code@ct.gov)

