Clinical Compliance Operations Committee ("CCOC")

Purpose and Authority
The Clinical Compliance Operations Committee ("CCOC") is responsible for advising the Tulane University Medical Group ("TUMG") Governing Board (the "Board") and University Compliance Steering Committee (the "Steering Committee") on the development of compliance policies, education and training, the identification of internal audit priorities and risk areas based on the annual Department of Health and Human Services Office of Inspector General Work Plan. In this regard, the CCOC prepares an annual work plan for Steering Committee approval. The CCOC monitors responses to external billing audits and coordinates implementation of the annual work plan. The CCOC provides reports of its activities to the Steering Committee and to the Board, maintains and monitors the TUMG compliance hotline, proposes annual physician and staff education to the Board and implements the annual physician education plan adopted by the Board.

Subcommittees
Four (4) subcommittees of the CCOC address specific areas of compliance policy, the main focus of each is as follows:

- Billing & Audit Subcommittee - Physician billing and coding
- Education Subcommittee - Physician and staff training
- Health Insurance & Portability Accountability Act ("HIPAA") Subcommittee - HIPAA privacy and security
- Industry Subcommittee – Industry relationships

Chairman
The TUMG Governing Board appoints one of its physician members to act as chairman the CCOC.

Membership
The CCOC members include, in addition to the Chairman, the TUMG Compliance Officer, Director of the Center for Continuing Medical Education, HIPAA Privacy Officer, HIPAA Security Officer and an attorney from the Office of the General. The TUMG may from time to time hire full or part-time staff to assist in compliance related activities, and they are members and participate in the work and decisions of the CCOC.

Meetings
The full CCOC meets monthly, and each of the subcommittees (Billing & Audit, Education, HIPAA and Industry) meets monthly unless by consensus of the members there is no issue to be considered. The CCOC members may participate in a meeting of the CCOC or any of its subcommittees by means of conference telephone or similar communications equipment if all persons participating in the meeting can hear each other at the same time. Such participation shall constitute presence in person at the meeting for purposes of taking any action.