August 26, 2021

**Request to Certify Compliance with MU Health Compliance Obligations**

MU Health is proposing that the Health Affairs Committee of the Board of Curators adopt a resolution confirming that MU Health has implemented an effective compliance program under the Corporate Integrity Agreement (CIA).

Background

Effective as of June 30, 2016, the University entered a five-year CIA with the Office of Inspector General for the United States Department of Health and Human Services (OIG-HHS). The CIA was entered to resolve administrative claims of the OIG-HHS related to the federal investigation of radiology claims at MU Health.

The CIA requires Board review and oversight of matters related to compliance with Federal health care program requirements and the obligations in the CIA. The Board must receive periodic reports on compliance matters, describe the materials it has reviewed as part of MU Health’s annual report to the OIG, and adopt an annual resolution confirming that MU Health has an effective compliance program.

Under the CIA, the obligations of the Board can be performed by the full Board or a designated committee of the Board. At its September 15, 2016, meeting, the Board designated the Health Affairs Committee to provide oversight as required by the CIA. The Health Affairs Committee previously adopted resolutions for the first, second, third, and fourth annual reporting periods.

Reasons for the Recommendation

The fifth annual reporting period for the CIA ended June 30, 2021. As part of its fifth year obligations, the Health Affairs Committee must adopt a resolution regarding its review and oversight of the MU Health compliance program. The resolution must be signed by each member of the Health Affairs Committee. The resolution and a summary of materials reviewed by the Health Affairs Committee must be included in the annual report to the OIG which is due October 1, 2021.

The proposed resolution would confirm that the Health Affairs Committee has (1) inquired into the operations of MU Health’s Compliance Program including the performance of the Chief Compliance Officer and the Executive Compliance Committee[[1]](#footnote-1) and (2) concluded, to the best of its knowledge, that MU Health has an effective compliance program that meets Federal health care program requirements and the obligations of the CIA. The resolution would further provide for the Secretary of the Board of Curators to prepare a form of the resolution that could be signed by each member of the Health Affairs Committee.

1. The current roster of members of the Executive Compliance Committee is attached hereto. [↑](#footnote-ref-1)