While relationships between UC San Francisco and the private sector are critical for supporting our highly entrepreneurial and innovative culture, it is equally important that these associations are transparent and promote the highest level of integrity.

In an effort to stimulate a conversation about Conflict of Interest (COI) issues, the UC Office of Ethics, Compliance and Audit recently launched a systemwide COI Awareness Campaign.

The COI Awareness Campaign includes messaging related to issues that may constitute real and/or perceived COI relevant to UC faculty, postdocs, visiting scholars, graduate students and staff. Whether publishing, speaking, consulting or engaging in start-up activities, the COI Awareness Campaign encourages all UC employees to contact their local resources to help them better understand the issues related to their specific situation and to assure the conflicts are managed appropriately.

Please visit http://ethics.ucsf.edu/ to view the COI Awareness Campaign materials covering some key COI concepts.
Multi-center protocols are often reviewed by many different Institutional Review Boards (IRBs), which can increase the time it takes to get these studies up and running. The Committee on Human Research (CHR) has agreements with other IRBs that allow UCSF Principal Investigators (PIs) to rely on another IRB to review their human research, or allow the other institution to rely on UCSF’s IRB review.

UCSF currently has IRB review reliances with several groups:
- IRBs at All University of California Campuses
- Children’s Hospital Oakland Research Institute (CHORI)
- Western IRB (for some industry authored clinical trials)
- WIRB-Copernicus (for some industry authored clinical trials)
- Community Medical Centers in Fresno
- National Cancer Institute Central IRB

The UCSF CHR continues to evaluate other private IRBs and different IRB models to streamline review and approval.

Important note: If a UCSF PI is relying on one of the IRBs listed above, an abbreviated application must be completed in the iRIS system, as the Human Research Protection Program (HRPP) is the record keeper of human research at UCSF and informs internal compliance units.

Detailed information on the reliances is available on the HRPP website or by calling the office at 415-476-1814.

NEW TO UCSF
MEDICAL GROUP PROVIDER REVIEWS

The Clinical Enterprise Compliance Program (CECP) has initiated a service for New Providers joining UCSF Medical Group. As part of the Regents-approved Clinical Enterprise Compliance Program, the CECP will be performing coding and billing compliance reviews of all new UCSF Medical Group Providers. Reviews will focus on the adequacy of documentation to support Evaluation and Management (E&M) and Procedure claims in adherence to Medicare and Medical billing guidelines, as well as University policies and standards.

We anticipate beginning our review within 90 days of the Provider’s employment and will compile a random selection of billed claims for review. Upon completion of the review, the CECP office will forward the review results to the Provider and answer any questions he or she may have.

If you would like additional information regarding the process of these reviews, please contact Juanita Villanueva, Clinical Operations Compliance Manager at: Juanita.Villanueva@ucsf.edu.

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As a provider or employee in the healthcare field, acronyms are a way of life. Many Government programs are commonly referred to by an acronym. There are an increasing number of entities associated with CMS/Medicare that audit and monitor healthcare providers’ documentation and billing practices. As part of our mission, we respond to audit inquiries on behalf of UCSF Medical Center and UCSF Medical Group on a frequent basis. Common entities, their acronyms and definitions are listed below:

**HHS OIG**
Department of Health and Human Services Office of Inspector General.
Arm of the U.S. Department of Health & Human Services that conducts audits, investigations, and evaluations to protect the integrity of HHS programs and the welfare of program beneficiaries.

**MAC**
Medicare Administrative Contractor.
CMS contractor that processes Medicare claims submitted by physicians, hospitals, and other health care providers/suppliers. This role includes identifying and correcting underpayments and overpayments.

**CERT**
Comprehensive Error Rate Testing. CMS contractor that reviews a statistically-valid random sample of Medicare fee for service claims to produce an annual improper payment rate.

**RAC**
Recovery Audit Contractor. Primary contractor to retrospectively and prospectively identify and correct underpayments and overpayments, as part of the Recovery Audit Program.

**SMRC**
Supplemental Medical Review Contractor. The newest Medicare contractor. The focus of SMRC reviews may include, but is not limited to, vulnerabilities identified by CMS internal data analysis, the Comprehensive Error Rate Testing (CERT) program, professional organizations and Federal oversight agencies.

For more information please refer to the Medical Learning Network or contact Carol Yarbrough at carol.yarbrough@ucsf.edu.

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**ETHICS & COMPLIANCE ORGANIZATION: NEW & UPDATED WEBSITES!**

The Office of Ethics & Compliance has embarked on a project to redesign and update its organizational websites.

Using the standardized UCSF Drupal templates, these sites will have a consistent look and feel, improved navigation and design, and a find-it-fast, user-centric focus. In 2013, the main Ethics & Compliance and the Conflict of Interest Advisory Committee websites were updated and a new Ethics Awareness website was launched.

In 2014 look for redesigned and updated sites dedicated to Export Control matters, Human Research Protection Program, and Institutional Animal Care and Use Program websites.

All suggestions and feedback is welcome! Let us know your thoughts at compliance@ucsf.edu.
There is a new Medicare Administrative Contractor (MAC) in Jurisdiction E which covers the state of California.

“The Centers for Medicare & Medicaid Services (CMS) uses a network of contractors called Medicare Administrative Contractors (MACs) to process Medicare claims, enroll health care providers in the Medicare program and educate providers on Medicare billing requirements. MACs also handle claims appeals and answer beneficiary and provider inquiries. Section 1861 of the Social Security Act (“the act”) defines the items and services for which Medicare may pay. It also defines the provider types recognized by the Medicare program.” (CMS.gov) Noridian Health Solutions’ contract became effective August 26, 2013 for Part A claims and September 16, 2013 for Part B claims. The transition from the former MAC, Palmetto, was virtually seamless.

The Noridian website provides resources including documentation, coding, and billing requirements for the services you are rendering. Please contact us at (415) 502-2790 if you need additional clarification on articles you have reviewed on the Noridian website.

Coordinated by John Naranjo, the UCSF CECP hosted Noridian in January for an on-site meeting that is part of the quarterly Open Door Coverage series. During the meeting, Noridian addressed issues related to Medicare coverage policies. This was also a great opportunity to meet and network with Noridian staff and to establish a relationship with Dr. Bernice Hecker, the Medical Director, and other Assistant Medical Directors who may attend. The meeting was held January 14, 2014.

Please contact John with any questions at: john.naranjo@ucsf.edu.

The site covers topics including important tips for planning international projects, guidance to researchers for planning and implementing an international research project, opportunities for funding. It also provides guidance on regulatory issues and tools to conduct projects safely and in compliance with institutional and federal policies.

These resources were modeled after the popular UCSF HUB. A web development team at the UCSF Center for HIV Information, led by Nicolé Mandel, built the websites.