

**HEALTH CARE COMPLIANCE  
FALL 2024**

5262 Health Care Compliance

Location: T.B.D.

Time: Tuesday 7:30p-9:30p

Credits: 2

Professor: Ryan Ingraham (Adjunct)

Email: ryan.ingraham55@gmail.com

Office Hours: Contact me and we can schedule a time to meet; I can arrive early before or stay late after class as needed.

**Course Materials:** Students will need to purchase the following book: AHLA Health Care Compliance Legal Issues Manual, 5<sup>th</sup> Edition, ISBN: 9781522173410

Additional materials, which will be provided in hard copy and/or emailed to you, will include, without limitation, the following:

- Compliance Program Guidance for Hospitals (63 Fed. Reg. 8987; February 23, 1998)
- Supplemental Compliance Program Guidance for Hospitals (70 Fed. Reg. 4858; January 31, 2005)
- Practical Guidance for Health Care Governing Boards on Compliance Oversight (Office of Inspector General, U.S. Department of Health and Human Services, Association of Healthcare Internal Auditors, American Health Lawyers Association, and the Health Care Compliance Association; April 20, 2015)
- Measuring Compliance Program Effectiveness: A Resource Guide (HCCA-OIG Compliance Effectiveness Roundtable; issue date March 27, 2017)

**Course Outline:** This course will examine health care compliance programs and the laws, regulations, and federal guidance attendant thereto, including OIG rules and federal agency enforcement actions. This course will explore ethical considerations of building effective compliance programs, including state law implications. This course will explore how to handle both internal and external investigations, including whistle-blower actions. This course will focus on the practical implications of laws that apply to health care organizations, and how organizations help ensure adherence to relevant rules through effective compliance programs.

**Syllabus:** Over our fourteen (14) weeks together, we intend to cover the following:

- The Federal Regulatory Enforcement Environment

- The Framework for Compliance Programs, focusing on the Federal Sentencing Commission's Federal Sentencing Guidelines for Organizations and the Health and Human Services Office of Inspector General's Guidance for Compliance Programs
- In-Depth Review of Each Element of an Effective Compliance Program:
  - Compliance Officer and Compliance Committees
  - Policies, Procedures, and Standards of Conduct
  - Open Lines of Communication
  - Appropriate Training and Education of Workforce Members
  - Risk Monitoring and Auditing
  - Response to Detected Deficiencies
  - Enforcement of Disciplinary Standards
- Hotline Complaints and the Anatomy of an Internal Investigation (Including Potential or Actual Whistleblower Complaints)
- Anatomy of an External Investigation
- Review of Federal Civil Monetary Penalties, Settlement Agreements, Corporate Integrity Agreements, and Corrective Action Plans
- Key Elements of Research Compliance Programs (may have guest speaker)
- Key Elements of Privacy Compliance Programs (may have guest speaker)
- Key Elements of Billing and Reimbursement Programs (may have guest speaker)
- How to Appropriately Manage Corrective Actions (including Refunds and Reimbursements)
- Key Elements of Conflicts of Interest and Ethics Programs, including Undue Foreign Influence
- The Importance of Ethics in an Effective Compliance Program

**Grading and Final Exam Schedule:** Your grade in this class will be based on a midterm paper and a final exam, which will be an in-class, open book, open notes test. The final exam is scheduled TBD.

**Learning Outcomes:**

During your time in this course, you will develop competence in the following: • Knowledge and understanding of substantive laws and regulations in a healthcare setting; • Legal analysis and reasoning, legal research, problem-solving, and written and oral communication related to healthcare regulatory compliance, in particular the ability to write a concise and thorough Compliance Memo; • Recognition of the trends that will influence the future healthcare compliance; and • Other professional skills needed for competent and ethical participation as a member of the legal profession in a healthcare environment.

**Attendance:**

You are expected to attend class every week, and I will track attendance at the beginning of each class. I will follow the UH Law Center's policy on class attendance. If you do not follow the attendance policy, you will be referred to the Office of Student Services.

**Class Participation:**

I expect to hear your ideas and analyses every week in class. I will call on you at random during the class period and expect you to be prepared for a robust classroom discussion.

**Class Etiquette:**

Your cell phone must remain in silent mode (or be turned off) and put away during the entirety of class. If classes are held virtually, I expect you to join using audio and video. For in-person classes, you may use a computer in class to take notes or refer to assigned materials.

**Honor Code:**

The UHLC Honor Code applies to all aspects of this course. You are responsible for knowing all Honor Code provisions and for complying with the Honor Code. Please inquire if you have any questions regarding how the Honor Code's provisions apply to specific activities or situations related to this course. Your continuing enrollment in this course is deemed to be a pledge by you under the Honor Code to comply with the Honor Code in relation to this course and to comply with the instructions in the course syllabus.

**Policy Regarding Use of AI:**

The use of AI generated text for class assignments (unless explicitly stated to be part of the assignment by the professor) is prohibited and is a violation of the Honor Code.

**Mental Health and Wellness Resources:**

The University of Houston has a number of resources to support students' mental health and overall wellness, including CoogsCARE and the UH Go App. UH Counseling and Psychological Services (CAPS) offers 24/7 mental health support for all students, addressing various concerns like stress, college adjustment and sadness. CAPS provides individual and couples counseling, group therapy, workshops and connections to other support services on and off-campus. For assistance visit [uh.edu/caps](http://uh.edu/caps), call 713-743-5454, or visit a Let's Talk location in-person or virtually. Let's Talk are daily, informal confidential consultations with CAPS therapists where no appointment or paperwork is needed.

The Student Health Center offers a Psychiatry Clinic for enrolled UH students. Call 713-743-5149 during clinic hours, Monday through Friday 8 a.m. - 4:30 p.m. to schedule an appointment.

The A.D. Bruce Religion Center offers spiritual support and a variety of programs centered on well-being.

Need Support Now? - If you or someone you know is struggling or in crisis, help is available. Call CAPS crisis support 24/7 at 713-743-5454, or the National Suicide and Crisis Lifeline: call or text 988, or chat [988lifeline.org](http://988lifeline.org)

**Title IX/Sexual Misconduct:**

Per the UHS Sexual Misconduct Policy, your instructor is a "responsible employee" for reporting purposes under Title IX regulations and state law and must report incidents of sexual misconduct (sexual harassment, non-consensual sexual contact, sexual assault, sexual exploitation, sexual intimidation, intimate partner violence, or stalking) about which they become aware to the Title

IX office. Please know there are places on campus where you can make a report in confidence. You can find more information about resources on the Title IX website at <https://uh.edu/equal-opportunity/title-ix-sexual-misconduct/resources/>

### **Reasonable Academic Adjustments/Auxiliary Aids:**

The University of Houston is committed to providing an academic environment and educational programs that are accessible for its students. Any student with a disability who is experiencing barriers to learning, assessment or participation is encouraged to contact the Justin Dart, Jr. Student Accessibility Center (Dart Center) to learn more about academic accommodations and support that may be available to them. Students seeking academic accommodations will need to register with the Dart Center as soon as possible to ensure timely implementation of approved accommodations. Please contact the Dart Center by visiting the website: <https://uh.edu/accessibility/> calling (713) 743-5400, or emailing [jdcenter@Central.UH.EDU](mailto:jdcenter@Central.UH.EDU).

### **Recording of Class:**

Students may not record all or part of class, livestream all or part of class, or make/distribute screen captures, without advanced written consent of the instructor. If you have or think you may have a disability such that you need to record class-related activities, please contact the Justin Dart, Jr. Student Accessibility Center. If you have an accommodation to record class-related activities, those recordings may not be shared with any other student, whether in this course or not, or with any other person or on any other platform. Classes may be recorded by the instructor. Students may use instructor's recordings for their own studying and notetaking. Instructor's recordings are not authorized to be shared with anyone without the prior written approval of the instructor. Failure to comply with requirements regarding recordings will result in a disciplinary referral to the Dean of Students Office and may result in disciplinary action.

### **Resources for Online Learning:**

The University of Houston is committed to student success, and provides information to optimize the online learning experience through our Power-On website (<https://uh.edu/power-on/learning/>). Please visit this website for a comprehensive set of resources, tools, and tips including: obtaining access to the internet, AccessUH, Blackboard, and Canvas; using your smartphone as a webcam; and downloading Microsoft Office 365 at no cost. For questions or assistance contact [UHOnline@uh.edu](mailto:UHOnline@uh.edu).

### **UH Email:**

Please check and use your CougarNet email for communications related to this course. Faculty use the CougarNet email to respond to course-related inquiries such as grade queries or progress reports for reasons of FERPA. To access your CougarNet email, login to your Microsoft 365 account with your CougarNet credentials. Visit University Information Technology (UIT) for instructions on how to connect your CougarNet e-mail on a mobile device.

### **Webcams:**

Access to a webcam is required for students participating remotely in this course. Webcams must be turned on (state when webcams are required to be on and the academic basis for requiring

them to be on). (Example: Webcams must be turned on during exams to ensure the academic integrity of exam administration.)

**Security Escorts and Cougar Ride:**

UHPD continually works with the University community to make the campus a safe place to learn, work, and live. The security escort service is designed for the community members who have safety concerns and would like to have a Security Officer walk with them, for their safety, as they make their way across campus. Based on availability either a UHPD Security Officer or Police Officer will escort students, faculty, and staff to locations beginning and ending on campus. If you feel that you need a Security Officer to walk with you for your safety, please call 713-743-3333. Arrangements may be made for special needs.

Parking and Transportation Services also offers a late-night, on-demand shuttle service called “Cougar Ride” that provides rides to and from all on-campus shuttle stops, as well as the MD Anderson Library, Cougar Village/Moody Towers and the UH Technology Bridge. Rides can be requested through the UH Go app. Days and hours of operation can be found at <https://uh.edu/af-university-services/parking/cougar-ride/>.

**Syllabus Changes:**

Please note that the instructor may need to make modifications to the course syllabus. Notice of such changes will be announced as quickly as possible through (specify how students will be notified of changes).