

Compliance, Inventory, and Surveys

Compliance

LSUHSC's Office of Compliance functions under the direction of the Vice Chancellor for Finance and Administration. It was established to ensure implementation of HIPAA requirements and to provide comprehensive conformity with other existing Federal and State laws and regulations, in addition to LSUHSC policies and procedures. Compliance with such requirements is vital to the organization's operations to avoid administrative sanctions ranging from stringent program oversight to the suspension of Federal program funding and criminal/civil prosecution.

All employees are required to participate in the compliance training for their respective position. The majority or all of the training is conducted online. The link to the department's website is: <http://www.lsuhs.edu/no/administration/ocp/>

Departments are required to respond to inquiries from the Office of Compliance. As a reminder, all overpayments of employees are to be coordinated through the Dean's Office, Human Resources, and the Office of Compliance.

Inventory

Tagged equipment is currently defined as having a purchase price of \$1,000.00 or greater; shipping costs do count toward reaching this threshold. For inventory purposes, LSUHSC is required by the state of Louisiana to not depreciate the purchase price of equipment. Regardless of the age or fair market value of an asset, it will remain on our books at its purchase price until properly disposed of or transferred from LSUHSC. For external reporting purposes the university does depreciate equipment; however this will not have an impact at a school or departmental level.

The LSUHSC Department of Asset Management will conduct an annual physical inspection of all tagged equipment. Departments should make every effort to assist in the first round of this inspection. Every inventoried item not specifically identified on the first round will be sent on a list to the Department who will then be responsible for finding the equipment. Departments and LSUHSC are required to keep losses of tagged equipment under a minimum dollar threshold (not depreciated) and minimum number of assets lost. Failure to keep losses under these levels will result in the Department failing the inventory audit for that year and repeated failures can result in sanctions against the Department.

With the decreasing size and increasing portability of electronic devices such as laptops, the ease of loss and temptation for theft is increased. Departments are responsible for remaining vigilant in tracking this equipment throughout the year. Sign-out sheets and logs should be utilized by the Department to track equipment. Additionally, while most of the written procedure and processes revolve around tagged equipment, all equipment purchased by LSUHSC and its affiliated entities falls under the policies and procedures

of the State of Louisiana. As such, all equipment must be properly disposed of in accordance with LSUHSC and State guidelines. Individual departments are responsible for coordinating with Asset Management and Facility Services for the physical removal of unneeded equipment. Asset Management will give the department permission to either surplus or scrap equipment. A department should NEVER attempt to make a determination as to whether an item should be scrapped or surplussed on their own. A work order should then be done and Facility Services will remove or dispose of the property in accordance with Asset Management's direction.

All Business Managers should read and be familiar with LSUHSC's Office of Asset Management's website which contains their policy and a list of definitions that should be particularly helpful to the new Business Manager. It can be found at:

<http://www.lsuhs.edu/no/administration/accounting/asset%20management/amdefault.aspx>

It is important to note that in accordance with the Cooperative Endeavor signed by the LSUHSC Foundation and LSUHSC, all equipment purchased through the Foundation is, immediately upon purchase, donated to LSUHSC. All such equipment is governed by all the rules and regulations of LSUHSC and the State of Louisiana and as such, will be tagged and monitored in accordance with the aforementioned policies.

Surveys

Business Managers will be asked to complete surveys throughout the year. They will largely be internal queries such as those from the Dean's Office asking about space utilization. The Departments need to respond timely to all such inquiries. Space surveys may seem like a trivial or mundane waste of time, but their accurate capturing of data is actually a critical component in determining our Federal Indirect Cost Rate. This is crucial because it determines how much extra money LSUHSC receives from the Federal government in addition to the actual award amount.

Business Managers should be cautious about what data is given in response to external queries. If a Department has questions about the appropriateness of releasing data, they should contact their Dean's Office before doing so. LSUHSC participates in surveys conducted by the primary professional organizations to which it belongs – AAMC (American Association of Medical Colleges), MGMA (Medical Group Management Association), and ACGME (Accreditation Council for Graduate Medical Education). Participation in surveys by these national organizations is critical because in most instances, non-participating institutions are ineligible to receive copies of survey results. The school relies on these surveys a great deal for benchmark information, primarily for guidance on physician compensation and pricing of our physician services to outside entities. Additionally, there are not that many medical schools in the country, much less in the Southern Region (which we frequently use), our participation or lack thereof can skew the results and or make some sub-specialties too small a population to even have survey data on.