

**COMPLIANCE AND BUSINESS INTEGRITY (CBI) PROGRAM**

**1. REASON FOR ISSUE.** This Veterans Health Administration (VHA) Directive provides policy for the Compliance and Business Integrity (CBI) Program.

**2. SUMMARY OF MAJOR CHANGES.** This is a new VHA Directive outlining the processes for the compliance program.

**3. RELATED ISSUES.** VHA Handbook 1030.01.

**4. RESPONSIBLE OFFICE.** The Compliance and Business Integrity Office is responsible for the contents of this Directive. Questions may be referred to (202) 501-1831.

**5. RESCISSIONS.** VHA Directive 2003-028 is rescinded.

**6. RECERTIFICATION.** This VHA Directive is scheduled for recertification on or before the last working day of July 2011.

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## COMPLIANCE AND BUSINESS INTEGRITY PROGRAM

**1. PURPOSE:** This Veterans Health Administration (VHA) Directive provides policy for the Compliance and Business Integrity (CBI) Program.

**2. POLICY:** It is VHA policy that the Office of CBI serves as the principal VHA function advising the Office of the Under Secretary for Health in all matters relating to compliance and organizational integrity in the business arena.

### 3. RESPONSIBILITIES

a. **Under Secretary for Health.** The Under Secretary for Health is responsible for:

(1) Promoting an organizational culture which encourages compliance with the laws, regulations and standards which govern VHA's business and health information operations, the reasonable expectations of VHA's business partners, and the highest standards of business integrity.

(2) Appointing a Chief Officer for CBI, to provide oversight and direction to VHA's system-wide CBI Program.

(3) Establishing a national Compliance Advisory Board (CAB).

b. **VHA Chief CBI Officer.** The VHA Chief CBI Officer is responsible for:

(1) Receiving operational advice from VHA's CAB.

(2) Reporting to the VHA Chief of Staff and providing periodic reports to the National Leadership Board.

(3) Providing oversight and direction to VHA's system-wide CBI program and for describing the CBI mission, objectives and scope.

(4) Appointing and supervising CBI Officers accountable for CBI activities at any Consolidated Patient Account Center (CPAC).

(5) Evaluating and assessing policies, procedures, systems and control environments established by the VHA CBO, the Health Informatics and Data Program, and Veterans Integrated Service Network (VISN) and facility business and health information operational units, to determine whether effective operational control environments have been established and maintained.

**NOTE:** Further responsibilities are outlined in the VHA Handbook 1030 series.

#### 4. DEFINITIONS

- a. **Program Administration.** The CBI Program issues policies and procedures which identify and mitigate specific areas of risk to the organization.
- b. **Compliance Officer and Committee.** Compliance Officers and Committees will be maintained at all levels of the organization.
- c. **Compliance Training and Education.** The proper education and training of senior executives, managers, employees, physicians and other health care professionals, and the continual retraining of current personnel at all levels are required. Education, training and retraining are significant elements of an effective compliance program.
- d. **Open Lines of Communication.** An open line of communication between the compliance officer and hospital personnel is equally important to the successful implementation of a compliance program and the reduction of any potential for any compliance exceptions.
- e. **Enforcement and Discipline.** The CBI Program engages the responsible offices and personnel regarding the enforcement of compliance standards of practice and regarding disciplinary action where an intentional exception occurs.
- f. **Monitoring and Auditing.** An ongoing evaluation process is critical to a successful compliance program. An effective CBI Program incorporates a thorough monitoring of its implementation and provides regular reporting to senior managers.
- g. **Investigation, Response, and Prevention.** The CBI Program is responsible for promoting effective investigation of potential compliance exceptions, and identifying remedial action to mitigate or prevent future occurrences.

#### 5. REFERENCES

- a. Office of Management and Budget: Circular A-123, Management's Responsibility for Internal Control.
- b. Office of Management and Budget: Memorandum M-03-13, Improper Payments Information Act of 2002, Public Law 107-300.
- c. United States Sentencing Commission, Federal Sentencing Guidelines, Chapter 8, Part B, Section 2: "Effective Compliance and Ethics Program."  
[http://www.ussc.gov/2004guid/8b2\\_1.htm](http://www.ussc.gov/2004guid/8b2_1.htm).
- d. Title 18 U.S.C. Section 1035: False Statements Relating to Health Care Matters.
- e. Title 18 U.S.C. Section 1347: Health Care Fraud.

**July 31, 2006**

**VHA DIRECTIVE 1030**

- f. VA Directive 0700 and VA Handbook 0700.
- g. VHA Handbook 1400.1
- h. VHA Handbook 1907.1.