

BOARD OF REGENTS  
BRIEFING PAPER

1. AGENDA ITEM TITLE:

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% Other: \_\_\_\_\_

% Fiscal Impact: Yes \_\_\_\_\_ No \_\_\_\_\_  
Explain: N/A

**Chapter 9**

**NEVADA SYSTEM OF HIGHER EDUCATION  
INTERNAL AUDIT, FINANCE AND ADMINISTRATION POLICIES**

**E. Compliance Department Charter**

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**Section 3. NSHE Compliance Department**

**Section 5. Annual NSHE Compliance Plan**

1. The [~~Director of~~] Compliance **Coordinator** shall, prior to the beginning of each fiscal year, prepare a plan detailing System and institution activities and areas that will be the focus of the NSHE Compliance Program for the upcoming year (each an “Annual Compliance Plan”). The Annual Compliance Plan will identify areas of potential or emerging compliance risk and identify priorities and goals for the NSHE Compliance Program in the upcoming year. The Annual Compliance Plan will be developed in consultation with the institutions.
2. The Annual Compliance Plan is subject to review and approval by the Audit, Compliance and Title IX Committee. Amendments and significant deviations to the Annual Compliance Plan must be approved by the Audit, Compliance and Title IX Committee. However, the [NSHE] Compliance **Coordinator** [~~Officer~~] may conduct unscheduled compliance reviews of System and institution activities outside of the Annual Compliance Plan based on specific compliance concerns that he or she learns about or are otherwise brought to his or her attention.

(B/R 12/18)

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**Section 7. Medical and Healthcare Compliance**

1. The healthcare industry is highly regulated and is subject to an increasing complex array of regulatory and industrial compliance obligations. Penalties for non-compliance can be severe and include exclusion of reimbursement from Medicare/Medicaid and private insurers. A robust compliance program is critically important in clinical practice activities in order to avoid erroneous billing and conflicts between patient care and business operations. Therefore, NSHE institutions, units and programs (including affiliated entities, programs, and practice plans) engaged in the clinical practice of medicine or allied healthcare must develop and maintain a written compliance plan for such activities (a “Healthcare Activity Compliance Plan”).
2. Each Healthcare Activity Compliance Plan shall address each of the elements described in