



NEHIA/HFMA

2025 Compliance & Internal Audit Conference

Compliance Panel Discussion 2.0

Privacy, Billing, and COI Investigation

Wednesday, December 3 - Friday, December 5, 2025
Mystic Marriott Hotel, Groton, CT

NEHIA/HFMA Compliance & Internal Audit Conference

December 3, 4, & 5, 2025

Compliance Panel Discussion 2.0

Privacy, Billing, and COI Investigation

Presented by:

Valerie Campbell, Regional Vice President, Compliance, WMC Healthcare

Garrett Gillespie, Chief Compliance Officer, Tufts Medicine

Beth Gutoff, Elliot Health System Compliance & Privacy Officer

Anthony Mio, Chief Compliance Officer, Hartford Healthcare

Donna Schneider, Vice President, Corporate Compliance and Internal Audit, Chief Compliance & Chief Privacy Officer, Brown University Health



Privacy Questions

- How does your team evaluate a potential Privacy Violation?
- Who on your team does that?
- When and how do you partner with Legal for a confirmed breach?
- Who notifies the patient and Office for Civil Rights (OCR)?
- And when does the Notification to the Patient and OCR happen?
- What is your organization's plans for 42 CFR Part 2?
- How often do you update your Notice of Privacy Practices?
- How do you do that?
- How do you work with your Chief Information Security Officer/Office?

Billing Questions

What is the structure of your Billing Compliance at your organization?

Do you have a Revenue Integrity group at your organization and what is their role?

How do you formulate your Billing/Revenue Compliance Audit Plan?

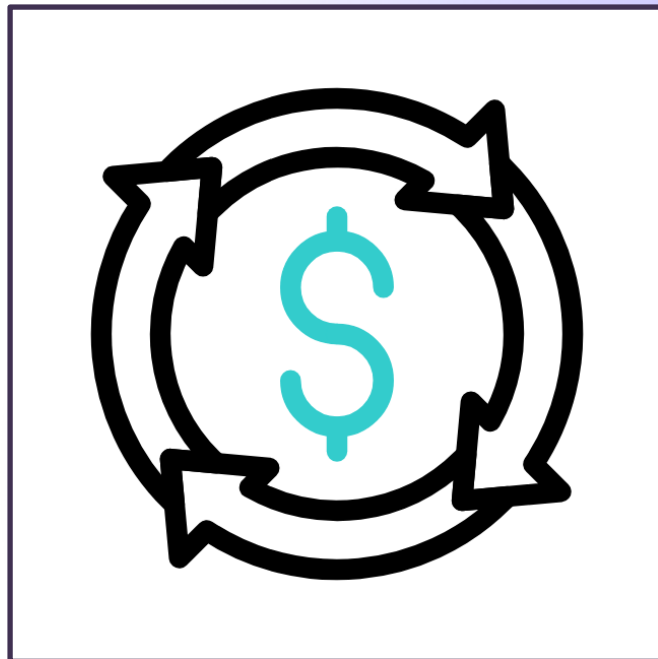
Do you meet routinely with members of the Revenue Cycle? If so, how often? Who do you meet with? What are the agenda items?

How do you handle differences of opinion with Compliance and the Revenue Cycle regarding differences of opinions specific to refunds for Compliance Audits?

What are your biggest concerns with billing questions?

Who drives Physician education related to billing?

What is the role of new technologies (for example: AI)?



CONFLICTS OF INTEREST QUESTIONS

Who handles the COI review in your organization? How often do you do a COI survey?

Who is surveyed? Is it electronic?

Do you survey non employed individuals? If so, how?

Who do the COI survey results go to? Is it a formal report? Who presents the report?

Who handles the routine COI concerns throughout the year?

Is there a COI Committee?

QUESTIONS



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