Oversight of Health Sciences Compensation Plan

Committees

OPARA
Outside Professional Activities Review and Advisory Committee - Elected & appointed faculty members charged with assisting VCHS in resolving issues on outside professional activity

CEC
HS Compliance Executive Committee - Dean for Clinical Affairs; Associate Dean for Academic Affairs; Associate Dean for Faculty Affairs; Chief HS Counsel; Chief Compliance and Privacy Officer; Director, Compliance and Privacy Program; Director, Conflict of Interest Office; Director, Research Compliance Office; Risk and Safety Officer

Issues

Department Good Standing Criteria

1. Plan participants - must comply with Department good standing criteria in order to engage in outside activity

2. Any faculty member not in good standing is notified by Department Chair in writing (including the reasons for determination and recommended remedy)

3. Not in Good Standing: Faculty member must obtain prior approval from Chair before engaging in outside professional activity and all income derived from such activity shall accrue to the Plan - not the Participant

4. Faculty member who believes the good standing criteria have been applied unfairly should first try to resolve at the Department level; if that is unsuccessful, an appeal may be filed with OPARA

Outside Professional Activity

1. Plan Participants must abide by the outside professional activity provisions of the HSCP (e.g., disclosure requirement and both time and income limitations - including turning in excess income to HSCP)

2. Failure to do so - issue/complaint submitted to CEC. CEC evaluates or refers for investigation

3. Findings sent to Department/Faculty Member for resolution. If resolved CEC notified and no further action required.

4. If not resolved - CEC recommends that VCHS also notify faculty member in writing of issue (including recommended remedy); faculty member given 30 days to comply or submit a plan for compliance

5. Department responsible for follow-up. If situation is not corrected, the VCHS sends a second letter giving 30 days notice of the action that will be taken - which may include possible termination of Y & Z salary components

6. Faculty Member notified of option to file a grievance with OPARA

7. If faculty member remains non-compliant and does not file a grievance with OPARA, corrective action will be implemented

8. Petition must be filed with the Department and the VCHS's Office to restore prior compensation

OPARA holds a hearing and issues a recommendation to the VCHS for final decision