I. POLICY

A component of every University of Miami Miller School of Medicine (UMMSOM) faculty’s variable compensation, as set forth in the Faculty Compensation Policy, Miller School of Medicine, University of Miami (Compensation Policy)\(^1\), is comprised of compliance metrics, in order to incentivize compliance with all governing laws, regulations, institutional policies, and training requirements. The following sets forth the methodology for implementation of such metrics for faculty compensation pursuant to the Compensation Policy.

II. GUIDELINES

A. In order to be eligible for the “Y” variable compensation component (paid quarterly), a faculty member must:

1. pass his/her professional billing compliance audit in accordance with UHealth Billing Compliance Review/Audit procedures. If the faculty member fails the review/audit, the faculty member will forfeit the “Y” variable compensation component for the period during which the failure occurred.

2. pass his/her assigned mandatory Compliance Training(s) by the stated deadline. If the faculty member fails the training or fails to complete and pass the training(s) in a timely manner, the faculty member will forfeit the “Y” variable compensation component for the period during which the failure occurred.

3. comply with the UMMG Interactions with Health Industry Entities, Disclosure/Reporting obligations\(^2\). If the faculty member fails to comply with this requirement in a timely manner or provides false or misleading information, the faculty member will forfeit the “Y” variable compensation component for the period during which the disclosure or failure to disclose occurred.

For any failure in categories A.1, A.2 or A.3 above within a given quarter, the faculty member will also have his/her annual “Z” incentive component of compensation reduced by 25%.

B. Enforcement

1. Any violation of the above, along with the above noted financial penalty, will trigger reporting to the faculty member’s respective Department Chair and may subject the faculty member to further enforcement under applicable enforcement policies.

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\(^1\) Terms not so defined within this policy are as defined in the Compensation Policy

\(^2\) See UMMG Interactions with Health Industry Entities, section 13.
2. If the faculty member loses two (2) or more quarters of variable compensation as set forth above, UHealth Compliance will further report the matter to the CEO of the Health System, Dean of the UMMSOM and their designee(s) for consideration.

III. REFERENCES

- Faculty Compensation Policy, Miller School of Medicine, University of Miami
- UMMG Guidelines for Determining Corrective / Disciplinary Action for Violations of the University of Miami Billing Compliance Plan
- UMMG Enforcement Policy
- UMMG Interactions with Health Industry Entities
- Research Conflict of Interest Policy