



HAWAII HEALTH SYSTEMS
C O R P O R A T I O N

"Touching Lives Every Day"

COMPLIANCE ALERT 12-04

Medical Director Timesheet Requirements

HHSC requires that timesheets be utilized for all medical directors involved in administrative duties in addition to their clinical service. These timesheets should document that the Medical Directors are performing their required specific administrative duties for which they are receiving compensation in addition to their compensation for clinical duties. This practice applies to both employed and contracted medical directors meeting this criteria.

Employed Medical Directors that are 100% administrative (like our Regional Medical Directors) do not need specific timesheets. These Medical Directors follow the procedures used by other Exempt Excluded employees. Contracted 100% administrative medical directors should complete timesheets and/or other requirements as part of the contract monitoring process.

The use of Medical Director Timesheets is based on the high level of scrutiny by the OIG during physician financial arrangement audits and the level or risk for these types of undocumented physician financial arrangements. The practice is also based on advice from outside legal counsel and Stark expert, Robert Wade, Esq.

EXAMPLE TIMESHEET: The attached is an example of a monthly timesheet (in Excel format that makes it easier to add up the hours spent). The model comes from Bob Wade and has been adapted by MMMC. On the left side of the sheet, individual duties as stated in the physician financial arrangement agreement and/or the employment agreement should be listed. (Example: [..\..\Forms\Med Dir Time Sheet \(sample\).xls](..\..\Forms\Med Dir Time Sheet (sample).xls))

ACTION NEEDED: All HHSC facilities with Medical Directors meeting the criteria above (clinical and administrative duties) should ensure that timesheets are developed for each applicable Medical Director, distributed, collected, and monitored regularly for compliance.

If have any questions, please contact your Regional Compliance Officer, your physician practice manager or medical group practice administrator, and/or the Chief Compliance and Privacy Officer.