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# FEHB Program Carrier Letter

Fee-for-Service

U.S. Office of Personnel Management  
Office of Insurance Programs

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**Letter No. 1999- 040**

**Date:** August 27, 1999

Fee-for-service [ 34 ] Experience-rated HMO [ -- ] Community-rated [ -- ]

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**SUBJECT: Greenbrier Clinic, Inc., Compliance Plan**

Enclosed is a copy of a Compliance Plan for Appropriate Billing Practices adopted by the Greenbrier Clinic, Inc., (the Clinic). The Clinic provides services to individuals insured through the Federal Employees Health Benefits Program (FEHBP), and submits claims or causes claims to be submitted to the various insurance carriers for payment by the FEHBP.

The Clinic developed this Compliance Plan as a result of Civil and Administrative Claims against the Clinic under the False Claims Act, 31 §§ U.S.C. 3729-3733, other federal statutes and/or common law doctrines and under the provisions for permissive exclusion from the FEHBP, as provided in 5 U.S.C. § 8902a or 5 C.F.R. Part 890.

As part of the settlement agreement, the Clinic agrees to adopt and implement the Compliance Plan. The terms of the Compliance Plan may be modified by the Clinic as may be reasonably required to ensure its continued effectiveness in maintaining compliance with Federal and State regulations and guidance.

We hope you find this document useful during your Plan's review of claims submitted by the Clinic. Should you have any further questions about this Compliance Plan, please contact Mary Saunders at (202) 606-0745.

Sincerely,

(signed)  
Frank D. Titus  
Assistant Director  
for Insurance Programs

Enclosure

## ENCLOSURE (Compliance Plan)

This document is not available electronically. It will be sent in hard copy with the original carrier letter mailing. At other times, contact Mary Saunders -- 202/606-0745 -- for this enclosure.