

HEALTH CARE AUDITING & MONITORING TOOLS

Second Edition

December 2015 Update

TABLE OF CONTENTS

(Note: The dating of updates has been replaced by a system of sub-chapters to allow new documents to be filed topically. New materials are to be placed at the end of each corresponding section.)

I. INTRODUCTION	I.1
II. WHAT'S NEW.....	II.1
III. COMPLIANCE PROGRAM DOCUMENTS.....	III.1
A. Job Descriptions.....	III.A.1
Vice President Positions	III.A.3
Director Positions	III.A.60
Senior Auditor Positions	III.A.19
Compliance Auditor Positions	III.A.27
Internal Auditor Positions	III.A.41
Job Descriptions – University Compliance Positions.....	III.A.57
Job Description – Vice President of Audit & Compliance.....	III.A.79
Job Description – Audit and Compliance Analyst	III.A.81
Job Description – Administrator of Audit and Compliance	III.A.83
B. Due Diligence	III.B.1
Request for Information TMF PEPPER Data and Other Coding Accuracy Information	III.B.3
Request for Information: Copies of Documents Received from Regulatory or Governmental Agencies.....	III.B.5
Request for Monthly List of Denied Medicare & Medicaid Claims	III.B.7
Charge Description Master Due Diligence Statement.....	III.B.9
Employee Education Related to the Reimbursement Cycle: Claims Development, Billing & Coding Due Diligence Statement	III.B.11
Credit Balance/Refund Due Diligence Statement	III.B.13
Request for Medical Record Coding Internal Audits	III.B.15
Annual Employee Screening	III.B.17
New-Hire Screening Due Diligence Statement	III.B.19
Vendor and Contractor Screening Due Diligence Statement	III.B.21
Physician Due Diligence Checklist	III.B.23
Due Diligence Checklist.....	III.B.25
IV. RISK ASSESSMENT AND PLAN DEVELOPMENT.....	IV.1
A. General.....	IV.A.1
Suggested Documents for Review of Compliance Program Effectiveness	IV.A.3
Compliance Program Effectiveness Review Tool.....	IV.A.5
Compliance Risk Analysis	IV.A.11
Office of Compliance Program Evaluation	IV.A.13
Risk Assessment Worksheet	IV.A.27
HIPAA Audit Risk Assessment	IV.A.31
Effectiveness of Medicaid Provider's Compliance Program: Self-Assessment Tool	IV.A.39
Compliance Program Assessment Tool for General Health Care	IV.A.51
Fraud, Waste and Abuse Work Plan	IV.A.57
HIPAA Risk Analysis	IV.A.61
HIT Security Risk Assessment.....	IV.A.93
Compliance Program Risk Assessment: Employee Questionnaire	IV.A.153

Compliance Program Risk Assessment: Human Resources Review	IV.A.155
B. Hospitals/Health Systems.....	IV.B.1
Compliance Program Effectiveness Review Survey Questions for Senior Leadership and Other Key Personnel.....	IV.B.3
Risk Assessment Matrix.....	IV.B.5
Annual Survey for Administrators/Directors/Managers.....	IV.B.25
Compliance Program Objectives Scoring Sheet.....	IV.B.27
Compliance Effectiveness Self-Evaluation – All Elements	IV.B.31
Compliance Program Guidance for Hospitals – Checklist.....	IV.B.43
Sample NYOMIG Compliance Program Assessment Status – Overview	IV.B.69
Sample NYOMIG Compliance Program Assessment – Detailed Review	IV.B.72
Risk Area Review Chart.....	IV.B.92
Proposed Corporate Compliance Annual Workplan	IV.B.98
Compliance Effectiveness Assessment and Evaluation	IV.B.115
C. Physician Practices	IV.C.1
Evaluating Conflict-of-Interest Issues in Physician Practice Settings.....	IV.C.3
D. Behavioral Health.....	IV.D.1
Behavioral Health Evaluation Tool.....	IV.D.3
E. Long-Term Care	IV.E.1
Long Term Care Compliance Risk Assessment	IV.E.3
Skilled Nursing Facility – Major Causes of Overpayments Chart	IV.E.7
Compliance Program Risk Assessment: Long-Term Care Facilities	IV.E.9
Compliance Program Risk Assessment: Long-Term Care Safety Review.....	IV.E.25
F. Pharmacies	IV.F.1
Compliance Program Assessment Tool for Pharmacies.....	IV.F.3
G. Other	IV.G.1
Compliance Program Assessment Tool for Health Care Transportation	IV.G.3
V. LAWS AND REGULATIONS REFERENCES	V.1
U.S. Laws and Regulations References for Health Care Organizations.....	V.3
VI. POLICIES AND PROCEDURES.....	VI.1
A. Compliance Program/Process.....	VI.A.1
Checklist for Implementation of Policies and Procedures.....	VI.A.3
Policy on Review of Compliance Concerns	VI.A.5
Corrective Action Policy and Procedure	VI.A.7
Complaint and Appeal Auditing Policy and Procedures	VI.A.15
Ethics and Compliance Committee Charter and Procedures.....	VI.A.21
Policy & Procedure Sample: Risk Assessment and Work Plan Development	VI.A.23
B. Auditing and Monitoring Issues	VI.B.1
Compliance Auditing and Monitoring Procedure Outline	VI.B.3
Internal Audit – Audit Sampling Discussion.....	VI.B.9
Utilization Review Plan Policy and Procedures	VI.B.13
C. Billing/Coding.....	VI.C.1
Compliance Policy: Billing For Services Provided by Non-Physician Practitioners	VI.C.3
Billing Audit Policy	VI.C.11

Policy and Process Flow Chart for Bill Waiver/Claims Management Related to Never Events and Adverse Events	VI.C.17
D. Clinical Research	VI.D.1
Time and Effort Reporting Policy and Procedures.....	VI.D.3
Clinical Trial Billing Compliance Policy	VI.D.8
E. Conflicts of Interest.....	VI.E.1
Resolution of the Board of Directors Regarding Conflicts of Interest	VI.E.3
Policy for Conflict of Interest.....	VI.E.11
Annual Staff Conflict of Interest Disclosure Statement	VI.E.21
Annual Conflict of Interest Disclosure Statement – Trustees	VI.E.25
Annual Conflict of Interest Disclosure Statement – Board	VI.E.29
F. Contracts.....	VI.F.1
Policy and Procedure for Physician and Clinical Services Contract Management	VI.F.3
Policy and Procedure for Non-Clinical Contracts	VI.F.9
G. Fraud and Abuse.....	VI.G.1
Deficit Reduction Act Anti-Fraud Policy.....	VI.G.3
Screening of Federal and State Exclusion Lists	VI.G.11
H. Patient Records	VI.H.1
Physician Signature Guidelines.....	VI.H.3
I. Privacy and Security.....	VI.I.1
Patient Identity Theft (Red Flag) Policy & Procedure	VI.I.3
Policy and Procedure for HIPAA and NY State Privacy Breach Notifications	VI.I.9
Mobile Device Security Policy	VI.I.21
Sample Notice of Privacy Practices	VI.I.23
Sample Social Media Policy	VI.I.31
Breach Notification Policy Template	VI.I.31
Copy & Paste Policy Template	VI.I.41
J. Quality of Care.....	VI.J.1
Quality Management and Improvement Reporting – Policies and Procedures	VI.J.3
K. Stark Law	VI.K.1
Potential Referral Source Compensation Methodology, Evaluation and Approval	VI.K.3
L. Other Regulatory Issues.....	VI.L.1
Sample 340b Policy.....	VI.L.3
Insider Trading Policy Template	VI.L.11
VII. EDUCATION AND RE-EDUCATION.....	VII.1
Education and Training Process for Hospital Following Voluntary Disclosure Of Serious Compliance Issue	VII.3
Coding Compliance Provider Education and Review Program	VII.5
Compliance Education Tracking Plans	VII.9
Pre/Post Testing Report for Ongoing/Annual Compliance Training.....	VII.11
Compliance Awareness Survey.....	VII.13
Hospital System Compliance Training Curricula Assignments	VII.19

VIII. AUDITING AND MONITORING TOOLSVIII.1

AUDIT PROCESS

A. Audit Prep	VIII.A.1
Audit Budget	VIII.A.3
Internal Audit -- Planning Memorandum	VIII.A.5
Internal Audit -- Staff Assignment.....	VIII.A.7
Internal Audit -- Standardized Audit Process Pre-Audit	VIII.A.9
Internal Audit: Entrance Conference and Planning—Preliminary Meeting with Management.....	VIII.A.11
Checklist for Performance and Documentation of Audits.....	VIII.A.13
Compliance Program Project Tool	VIII.A.15
Auditing & Monitoring Guidelines for Area Office and Service Unit Compliance Committees Maintaining OIG Compliance.....	VIII.A.17
Compliance and Audit Dashboard	VIII.A.27
Audit Prep Questionnaire – CFO and Controller	VIII.A.31
Audit Prep Questionnaire – Clinical	VIII.A.35
B. Audit Reporting	VIII.B.1
Initial Audit Report Format.....	VIII.B.3
Follow Up Audit Report Format	VIII.B.5
Audit Report: PA Prior Approval – Home Health	VIII.B.7
Correction of Errors Related to Government Reimbursement	VIII.B.9
Medicare and Medicaid Credit Balances Reporting.....	VIII.B.11
Error Correction Provider Notification Form.....	VIII.B.13
Self-Audit Report Cover Template	VIII.B.15
CMS Part C Reporting Requirements Calendar	VIII.B.17
CMS Part D Reporting Requirements	VIII.B.19
Audit Committee Dashboard for Compliance	VIII.B.23
Sample Compliance Committee Meeting Agenda	VIII.B.25
Multi-System Compliance and Audit Dashboard.....	VIII.B.27
Audit Committee Compliance Program Summary.....	VIII.B.33
Compliance Committee Report – Annual Summary of Compliance Activities	VIII.B.35
Facility Annual Compliance Report Template	VIII.B.37
C. Audit Effectiveness.....	VIII.C.1
Audit Effectiveness Checklist	VIII.C.3
Independent Auditor Effectiveness Evaluation	VIII.C.7

AUDIT TOPICS

D. Advanced Beneficiary Notice Issues.....	VIII.D.1
Medicare Advanced Beneficiary Notifications Compliance Review	VIII.D.3
Auditing and Monitoring for Advanced Beneficiary Notices	VIII.D.7
Advanced Beneficiary Notice Program Checklist for Monitoring Use of ABNs.....	VIII.D.9
ABN Process Compliance Task List	VIII.D.11
E. Behavioral Health	VIII.E.1
Partial Hospitalization Audit for Payer Requirements	VIII.E.3
F. Billing and Coding	VIII.F.1
Evaluation/Management Service Reporting	VIII.F.3
E/M Documentation Auditors' Worksheet	VIII.F.9
Internal Audit -- Medicare Services And Supplies Billed Incident To Services Compliance Review	VIII.F.19
Internal Audit -- Medicare Diagnostic Testing In Emergency Department	VIII.F.23

Internal Audit -- Medicare Outlier Payments Review	VIII.F.25
Internal Audit -- Medicare Excessive Payments For In And Outpatient Services	
Compliance Review	VIII.F.27
Procedure for Filling out Audit Worksheets	VIII.F.29
Audit Worksheet -- Radiology	VIII.F.31
Audit Worksheet -- Critical Care	VIII.F.33
Audit Worksheet -- ED & Observation Care	VIII.F.35
Audit Worksheet -- Pathology.....	VIII.F.37
Procedure for Filling Out Anesthesiology Audit Worksheets.....	VIII.F.39
Audit Worksheet -- Anesthesiology	VIII.F.41
Audit Worksheet -- Surgery	VIII.F.43
Procedure Coding of Outpatient and Physician Services	VIII.F.45
Internal Audit -- Medicare DRG Window Rule (72 Hour Rule) Compliance Review	VIII.F.47
Internal Audit -- Medicare Same-day, Same-Provider Acute Care Readmissions	VIII.F.51
Internal Audit -- Medicare Secondary Payer Screening Procedures Compliance Review ..	VIII.F.53
Review of Disposition/Discharge Codes.....	VIII.F.55
IPPE Audit Tool.....	VIII.F.59
Surgery Audit Tool	VIII.F.61
Dental Chart Review Worksheet.....	VIII.F.63
Surgical, Endoscopic/Laproscopic, High Risk or Other Complex Procedures	VIII.F.65
Psychiatric Partial Hospitalization Audit Program.....	VIII.F.67
Internal Audit -- Medicare Inpatient Psychiatric Services	VIII.F.69
Compliance Monitor -- Discharge Dispositions.....	VIII.F.73
Worksheet for E/M Documentation Audit	VIII.F.75
E&M Audit Tool.....	VIII.F.79
Billing for Non-Physician Practitioner Services -- FAQs	VIII.F.81
Non-Physician Practitioner Decision-Making Flowcharts	VIII.F.85
Public Provider Reimbursement Internal Control Questionnaire.....	VIII.F.89
Shared/Split Visit Audit Checklist	VIII.F.97
Incident-To Audit Checklist.....	VIII.F.98
Patient Services Billing Chart Audit	VIII.F.99
Audit Worksheet for Teaching Physician Guidelines	VIII.F.101
System Review Analysis.....	VIII.F.103
Detailed Baseline Coding Review.....	VIII.F.107
Coding and Documentation Compliance Review	VIII.F.113
Condition Code 44 Checklist	VIII.F.117
E M Coding Audit – Orthopedics	VIII.F.119
G. Clinical Research	VIII.G.1
Clinical Trials Planning Memo	VIII.G.3
Research Cycle Risks.....	VIII.G.11
Clinical Research Study Sample Budget.....	VIII.G.13
Informed Consent Audit Planning Memo	VIII.G.19
Informed Consent Audit Program	VIII.G.25
On-Site Audit of Approved Research on Human Subjects	VIII.G.29
Research Compliance QA Review	VIII.G.33
Research-IND Compliance QA Review.....	VIII.G.36
Research-IDE Compliance QA Review	VIII.G.41
Research-IDS Pharmacy QA Review.....	VIII.G.47
H. Conflicts of Interest.....	VIII.H.1
Board of Directors Conflict of Interest Disclosure.....	VIII.H.3
Questionnaire Regarding Policy on Conflict of Interest and Disclosure of Certain Interests	VIII.H.7

I. Contracts and Business Relationships	VIII.I.1
Independent Contractor Review Audit Program	VIII.I.3
Timeshare Initiation Checklist	VIII.I.9
Joint Venture Compliance Monitoring Checklist.....	VIII.I.11
Joint Venture Internal Control Checklist.....	VIII.I.17
Physician Contracts Database Audit	VIII.I.21
Provider Agreements Checklists	VIII.I.23
Physician Agreement Compliance – Loan Arrangement Audit	VIII.I.25
Provider Based Services Audit: Audit Program and Work Plan	VIII.I.27
Provider Based Services – Internal Control Questionnaire	VIII.I.31
Stark – Physician Transaction Review	VIII.I.33
Stark – Physician Lease Review	VIII.I.35
Medical Director Contract Review Checklist.....	VIII.I.37
J. EMTALA	VIII.J.1
Internal Audit Program -- EMTALA Compliance Review	VIII.J.3
EMTALA Compliance Assessment Questionnaire and Checklist	VIII.J.9
K. HIPAA/HITECH Privacy and Security.....	VIII.K.1
Compliance Checklist for HIPAA Omnibus Rule Requirements.....	VIII.K.3
HIM Checklist for HIPAA Omnibus Rule Preparation.....	VIII.K.5
Compliance Checklist for Business Associates.....	VIII.K.9
Safeguarding and Proper Handling of Patient Information	VIII.K.11
HIPAA Privacy Standards Assessment Questionnaire.....	VIII.K.13
HIPAA Security Monitoring Requirements	VIII.K.62
Privacy and Security Audit Tool	VIII.K.65
HIPAA Security Rule Evaluation Standard Checklist	VIII.K.67
Physician Office Location Compliance Survey Tool.....	VIII.K.71
HIPAA Privacy and Security Walk-Through Issues Checklist	VIII.K.73
HIPAA Privacy Assessment.....	VIII.K.77
Privacy/Security Monitoring Tool.....	VIII.K.79
HIPAA Incident Documentation Checklist	VIII.K.81
Breach Notification Risk Assessment Log.....	VIII.K.83
Breach Assessment and Decision Tool	VIII.K.85
Non-Breach Notification Memo Template	VIII.K.87
HIPAA_Breach Log	VIII.K.91
HIPAA_Non-Breach Log	VIII.K.93
Security - Corporate Office Walk-Through Checklist	VIII.K.95
HIPAA/HITECH Patient Privacy Monitoring Form	VIII.K.97
Privacy/Security Evaluation Remediation Form for Team Leaders.....	VIII.K.103
L. Home Health/Hospice	VIII.L.1
Official Physician Time Record: Hospice Medical Director.....	VIII.L.3
Home Care Outlier Audit Proposal and Audit Forms	VIII.L.5
M. Long-Term Care/Skilled Nursing.....	VIII.M.1
Rehabilitation Services Chart Review.....	VIII.M.3
Long-Term Care Mock Compliance Survey	VIII.M.5
Long-Term Care Inspection Checklist: Physical Security of Medical/Dental Records Storage Areas	VIII.M.29
N. Managed Care	VIII.N.1
Health Plan Vendor Audit Letter Template.....	VIII.N.3

O. Meaningful Use.....	VIII.O.1
EHR-Meaningful Use Review	VIII.O.3
Meaningful Use Audit Program	VIII.O.7
Meaningful Use Attestation Approval	VIII.O.10
P. Other Tools	VIII.P.1
Voluntary Recalls Review	VIII.P.3
Internal Audit -- Medicare Bad Debt And Recoveries Program Guide.....	VIII.P.5
Internal Audit -- Adjustments And Write-Offs	VIII.P.9
Internal Audit -- Medicare Deductible, Coinsurance Calculation and Waiver/Write-Off Compliance Review	VIII.P.11
Formal Complaint Audit Tool.....	VIII.P.17
Chemoform Clinical Audit Tool	VIII.P.19
RAC Readiness Assessment Tool	VIII.P.23
Internal Audit: Fraud Opportunities Checklist	VIII.P.29
Metric 17 – Pepper Outlier Summary	VIII.P.33
Metric Pepper Templates	VIII.P.34
IPPS Two-Midnight Rule Orders Audit Tool	VIII.P.38
340B Sample Audit Program	VIII.P.40
340B Retail Self Audit Report for Contract Pharmacy	VIII.P.42
Medicare Shared Savings Program ACO Eligibility Requirement Checklist	VIII.P.43
Medicare Shared Savings Program ACO Compliance Plan.....	VIII.P.49
OSHA Hot Topics: Monitoring Form for SNFs and PCHs.....	VIII.P.51

IX. APPENDICESIX.1

Appendix A. Compliance Auditing and Monitoring Articles – HCCA/AHIA	IX.A.1
1. Seven Component Framework for Compliance Auditing and Monitoring in Health Care Organizations	IX.A.3
2. Auditing and Monitoring Defined.....	IX.A.7
3. Performing a Compliance Risk Assessment For Compliance Auditing and Monitoring in Health Care Organizations	IX.A.10
4. Developing a Compliance Workplan for Compliance Auditing and Monitoring in Health Care Organizations	IX.A.17
5. Implementing a Core Set of Compliance Policies and Procedures	IX.A.21
6. Compliance Education and Awareness Tools and Techniques	IX.A.25
7. Using Computer-Assisted Audit Techniques for More Effective Compliance Auditing and Monitoring in Health Care Organizations	IX.A.29
8. Emphasizing a Documented Comprehensive Approach to Compliance Auditing.....	IX.A.34

Appendix B: Monitoring & Auditing Practices for Effective Compliance, Second Edition – HCCA

IX.B.1	
1. Developing an Effective Compliance Team, by Alan Peterson & Catherine Sreckovich..IX.B.14	
2. Keeping the Health Care Sampling Gains Going, by Catherine Sreckovich, Alan Peterson and B. Bo Martin	IX.B.20
3. Retrospective Versus Contemporaneous Reviews, by Thomas E. Boyle and Robert B. Ramsey, III.....	IX.B.46
4. The Attorney-Client Privilege in the Context of Health Care Compliance Investigations, by Jan Murray, Dorothy Regas Richards, and David Rowan.....	IX.B.54
5. Financial Relationships With Physicians: Auditing and Monitoring Anti-Kickback Statute and Stark Law Compliance, by Katherine Lauer	IX.B.66
6. Creating Databases of Financial Relationships, by Edwin D. Rauzi.....	IX.B.79
7. Developing a Voluntary Disclosure and Refund, by A. Peterson & C. Sreckovich.....	IX.B.89
8. Medicaid Program Provider Self-Audits, by Gregory A. Brodek & Emmy S. Monahan ..IX.B.98	
9. Corporate Integrity Agreement Negotiations, by Ronald L. Wisor, Jr.....	IX.B.107
10. Preparing for an Independent Review Organization Engagement, by Susan Lemanski.....	IX.B.115

