

**Practical Guidance and Strategies
for Skilled Nursing Facility
Compliance & Ethics Programs**



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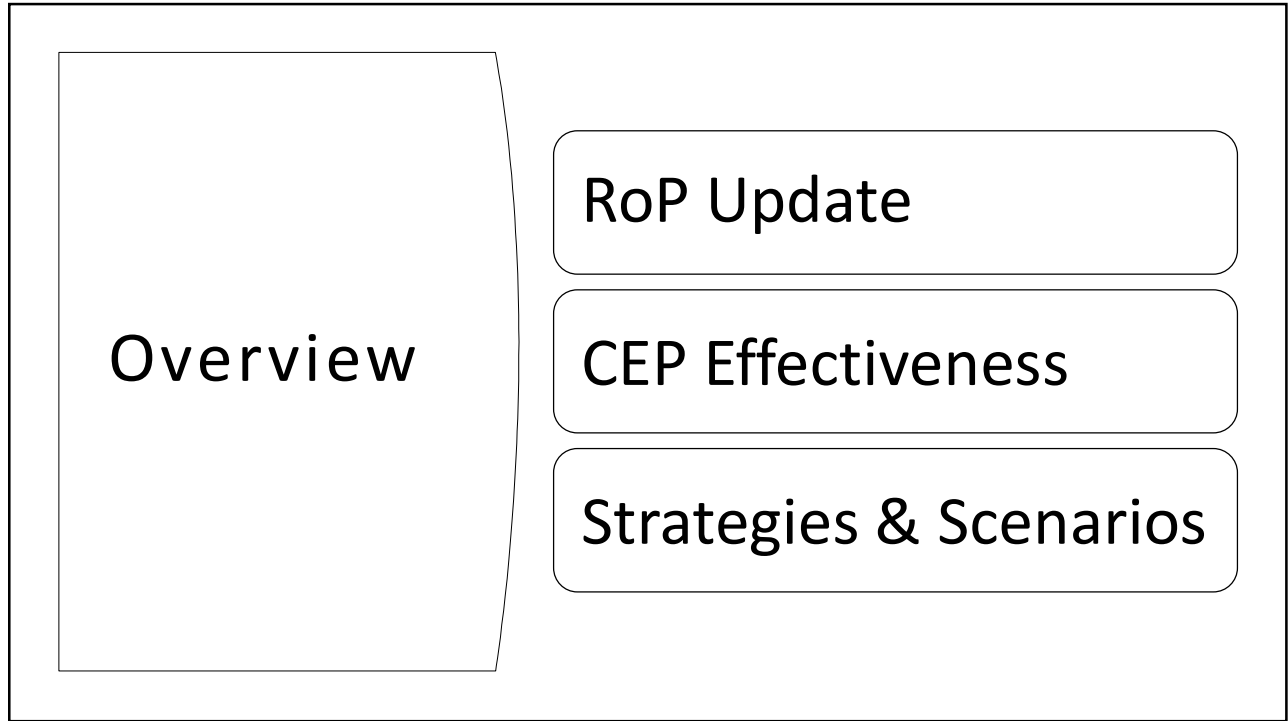
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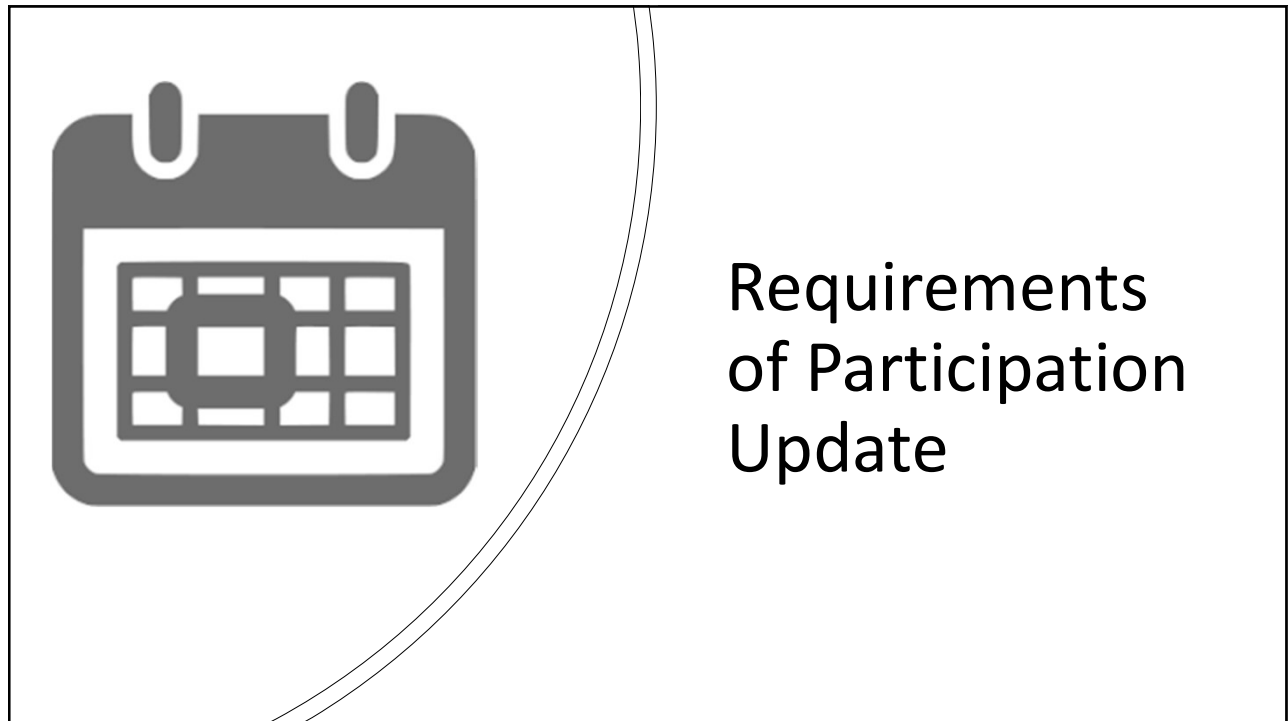
www.RolfLaw.com

www.Evolve-Compliance.com

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Surveyor Review

Is there a CEP?

Does the CEP have a reporting
mechanism?

Can reports be made
anonymously?

Do staff know how to make a
report?

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Surveyor Review

Are there policies?

Who is the Chief Compliance
Officer?

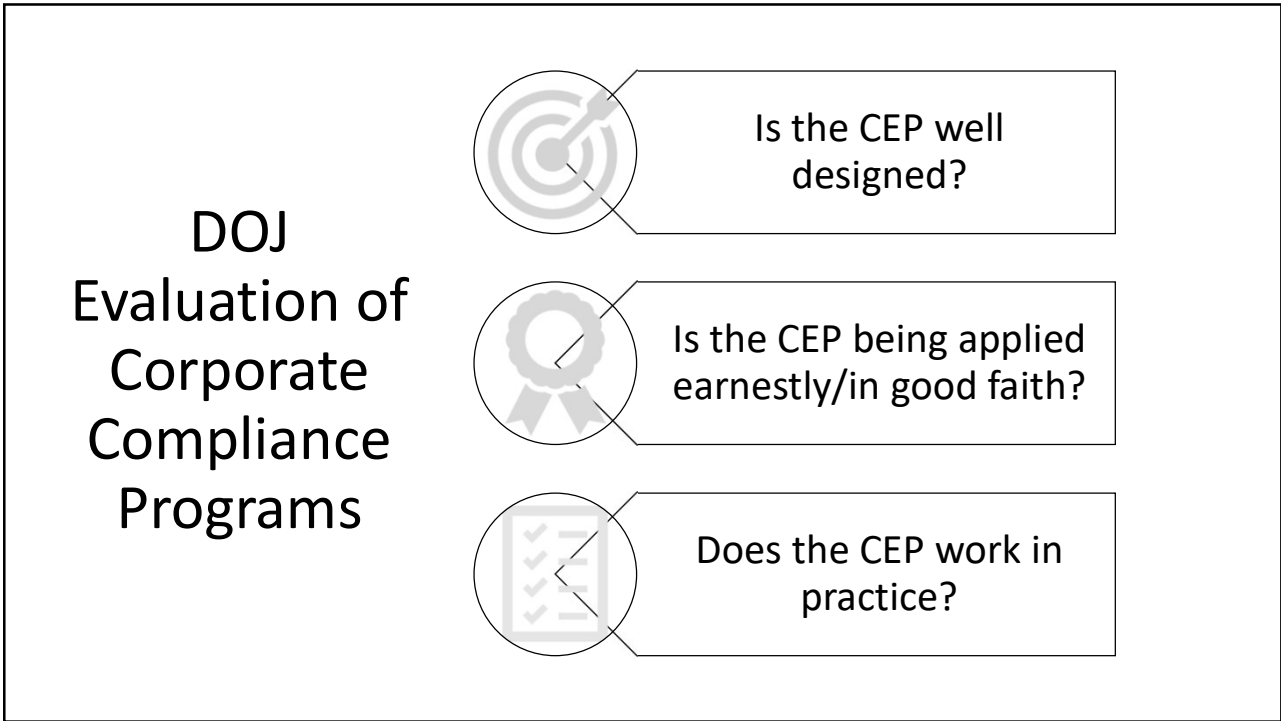
Education?

Background/Exclusion Checks?

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Risk Assessment

Risk Management Process

What methodology and information do you use to identify, analyze, and address particular risks and inform your compliance program?

Risk-Tailored Resource Allocation

Do you appropriately allocate scrutiny based upon the level of risk involved (*i.e.*, high-risk areas receive greater scrutiny than low-risk areas)?

Updates and Revisions

Do you update your risk assessment in response to lessons learned and problems discovered with the compliance program?

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Identification of Risks

Office of Inspector General

- Compliance Guidance for SNFs
- Work Plan
- Corporate Integrity Agreements
- Special Fraud Alerts, Bulletins and Other Guidance

Department of Justice

- News Releases

Internal

- Complaints and Reports
- Audit Results

Trade Publications

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Quality of Care	Resident Rights	Billing	Cost Reporting
Employee Screening	Kickbacks	Self-Referrals	Staffing
Therapy Services	Physician Relationships	Hospices	HIPAA Privacy & Security

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Strategies & Scenarios

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Government Investigations

Re: Go Team!

To:
Lol, I suppose I'll see you there!

But you got the RUX! 😊

From:
Sent:
To:
Subject: Re: Go Team!

That's awesome!!!!

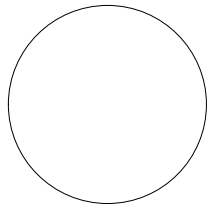
I still feel a little guilty... when I was there last week, I had to move someone's date up to get an ultra and catch the IV. So I made them double minutes for the lady that day - about 3 hours of therapy for the day. I found out yesterday that she just got put on hospice... am I going to hell in gasoline pants?

At least we got the RUX!

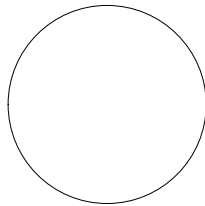
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Subject: Go Team!

We met all of our targets for January! This is great news and a major improvement over where we were last month. Keep up the good work!

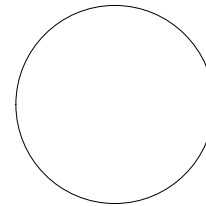
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UPPING THE STAKES



BEING READY



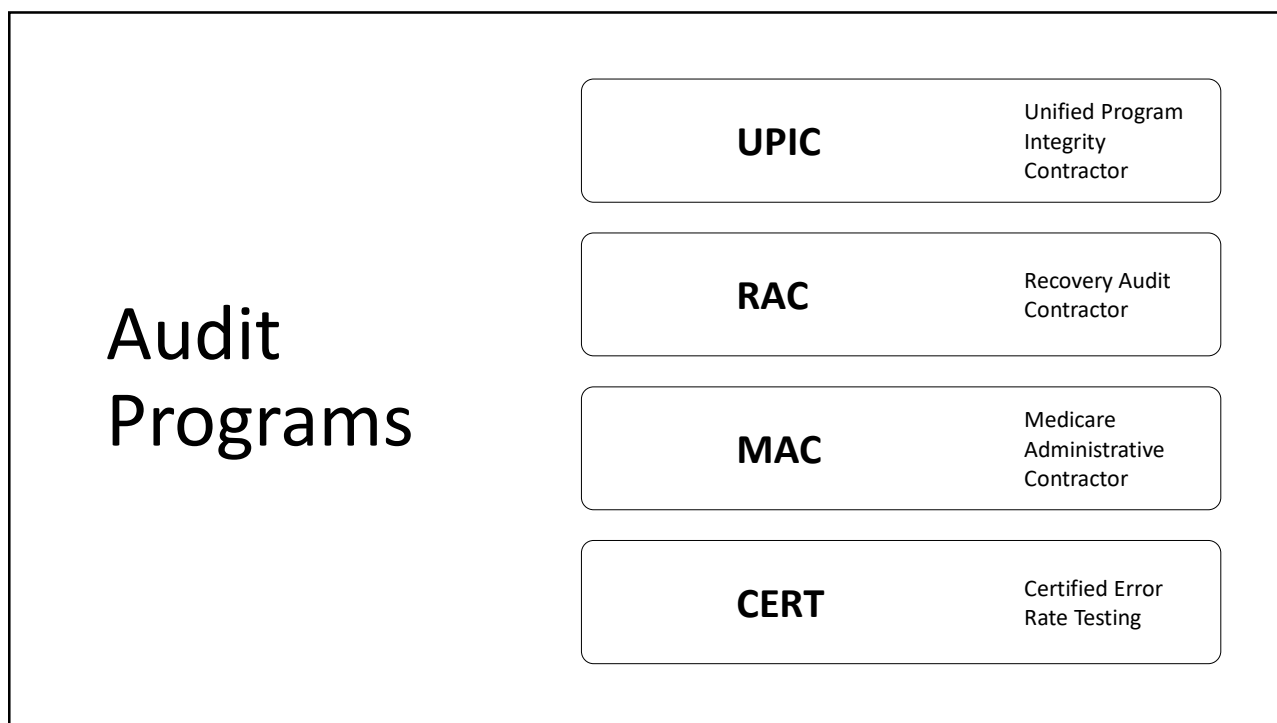
UNDERSTANDING THE
PROCESS

Government Investigations

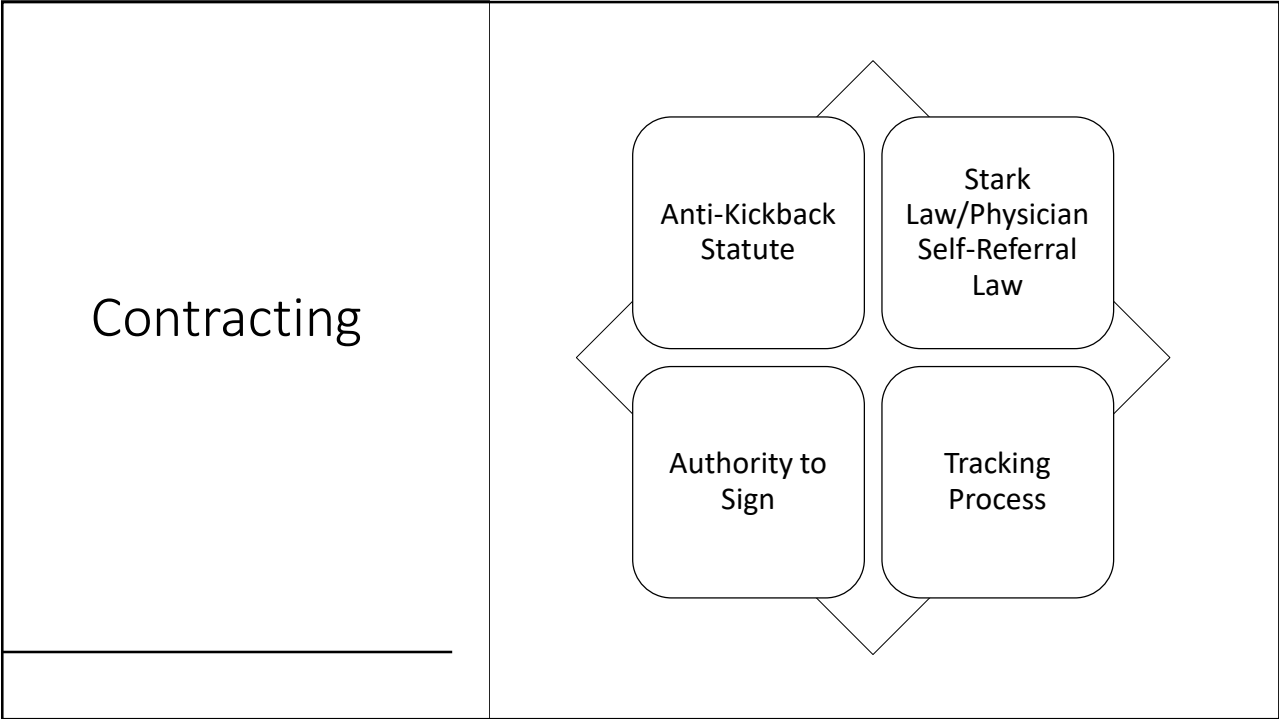
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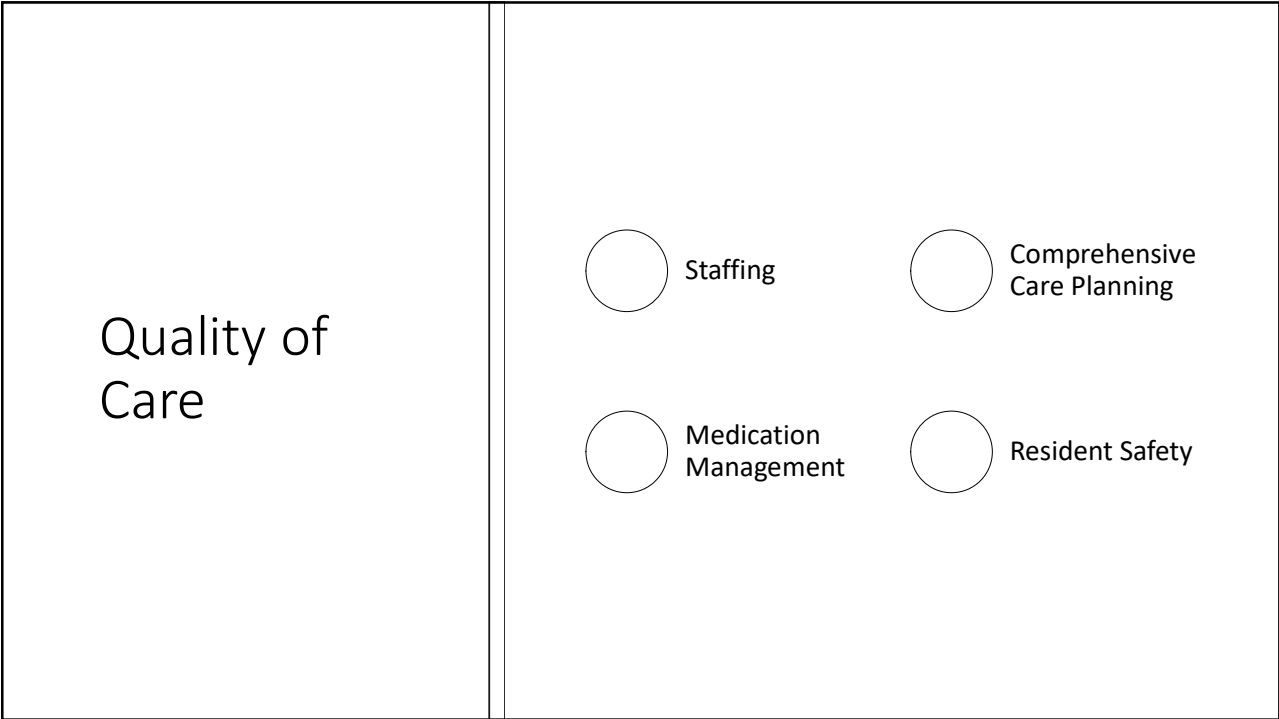
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Quality of Care	Resident Rights	Billing	Cost Reporting
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