

Detailed Content Outline

	Cognitive Levels			TOTAL
	Recall	Application	Analysis	
1. Standards, Policies, and Procedures	2	10	4	16
<ul style="list-style-type: none"> A. Maintain compliance-related policies, procedures, and controls (e.g., regulatory requirements, billing and coding) B. Maintain process for the development of new policies for emerging compliance risks C. Consult with applicable resources to assure the policies are comprehensive (e.g., regulatory, legal, subject matter expert) D. Integrate mission, vision, values, and ethical principles with code of conduct E. Maintain compliance plan and program F. Assure that a non-retribution/non-retaliation policy exists G. Maintain policies and procedures for internal and external compliance audits H. Maintain a code of conduct <ul style="list-style-type: none"> I. Verify appropriate policies on interactions with other healthcare industry stakeholders (i.e., hospitals/physicians, pharm/device representatives, vendors, etc.) J. Assure policies and procedures address the compliance role in quality of care issues K. Promote accountability (e.g., incentives, sanctions, disciplinary policies) for employees at all levels L. Assure governance policies related to compliance are appropriately maintained 				
2. Compliance Program Administration	3	10	4	17
<ul style="list-style-type: none"> A. Advocate for compliance resources that are scalable for the organization's needs (e.g., financial resources and systems) B. Report compliance program activity to the governance board/committee C. Coordinate operational aspects of a compliance program with the oversight committee D. Collaborate with others to institute best compliance program E. Coordinate organizational efforts to maintain a compliance program F. Define scope of compliance program consistent with current industry standards G. Assure that the compliance oversight committee's goals and functions are defined H. Evaluate the effectiveness of the compliance program on a periodic basis <ul style="list-style-type: none"> I. Maintain knowledge of current regulatory changes and interpretation of laws J. Assure the credibility and integrity of the compliance program K. Recognize the need for outside expertise L. Verify the organization has defined the authority of the compliance officer at a high level M. Verify the governing board understands its responsibility as it relates to the compliance program and culture N. Assure that the role of risk partners in the compliance process has been defined (i.e., internal audit, risk management, legal, etc.) O. Define the responsibilities, purpose, and function for all compliance employees P. Participate in the development of internal controls and systems to mitigate risk Q. Incorporate relevant aspects of regulatory agencies' focus into compliance operations R. Oversee the integration of compliance program into operations S. Develop an annual compliance work plan T. Demonstrate independence and objectivity in all aspects of compliance program U. Maintain an independent reporting structure to the governing body (e.g., Board, Physician Practice Executive Committee) V. Assure that the role and scope of compliance officer are reflected in the job description and align with governing body expectations 				

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3. Screening and Evaluation of Employees, Physicians, Vendors and other Agents	1	5	1	7
<ul style="list-style-type: none"> A. Assure organization has processes in place to identify and disclose conflicts of interest B. Assure inclusion of compliance obligations in all job descriptions C. Assure inclusion of compliance accountabilities as an element of performance evaluation D. Verify the organization has an ongoing screening process for all employees and medical staff E. Assure exit interviews include compliance-related questions F. Assure government sanction lists for excluded individuals/entities (e.g., OIG, SAMS, SDN, SDGT) are monitored G. Verify due diligence is conducted periodically on third parties (e.g., consultants, vendors, acquisitions) H. Assure corrective action is taken based on background/sanction check findings 				
4. Communication, Education, and Training on Compliance Issues	2	12	4	18
<ul style="list-style-type: none"> A. Disseminate regulatory guidance material B. Communicate compliance information throughout the organization C. Distill complex laws and regulations into a format employees can understand D. Assure workforce staff are educated on compliance policies E. Assure a mechanism exists to evaluate employee understanding of compliance responsibilities F. Promote a culture of compliance throughout the organization G. Encourage employees to seek guidance and clarification when in doubt H. Participate in continuing education to maintain professional competence I. Verify participation in ongoing compliance training programs is tracked J. Assure general compliance training is conducted for all employees, governing body, physicians, vendors, and other agents K. Assure risk-specific training is conducted for targeted employees L. Provide HR and management with training to recognize compliance risk associated with employee misconduct M. Provide role-specific training for governing body on their oversight responsibilities 				
5. Monitoring, Auditing, and Internal Reporting Systems	2	8	10	20
<ul style="list-style-type: none"> A. Protect anonymity and confidentiality within legal and practical limits B. Publicize the reporting system to all workforce members, vendors, and agents C. Assure monitoring occurs to detect violations of laws and regulations D. Conduct organizational risk assessments E. Develop work plan based on risk assessment F. Maintain reporting system(s) to enable employees to report any noncompliance (e.g., hotline) G. Respond to compliance concerns expressed by employees through internal reporting H. Assure the existence of procedures for monitoring adherence to compliance policies and procedures I. Conduct compliance audits J. Analyze compliance audit results (e.g., track, trend, benchmark) K. Develop an annual compliance audit plan L. Evaluate results of audits conducted by external entities M. Monitor that retaliation has not occurred for reporting compliance concerns N. Employ auditing methodologies that are objective and independent O. Determine sampling methodology consistent with circumstances 				

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<ul style="list-style-type: none"> P. Assure a timely response is made to reported compliance concerns Q. Monitor management’s implementation of corrective action plans R. Provide timely feedback to management on compliance concerns based on audit results 				
6. Discipline for Non-Compliance	1	4	3	8
<ul style="list-style-type: none"> A. Recommend disciplinary action when noncompliance is substantiated B. Promote discipline proportionate to violation C. Verify that discipline is enforced consistently throughout all levels of the organization D. Monitor for consistent disciplinary action E. Recommend action for individuals and entities that have been excluded from government programs F. Verify that compliance-related violations are addressed in disciplinary policies G. Coordinate with management that timely disciplinary action is taken H. Verify that disciplinary action is reported to regulatory body when required 				
7. Investigations and Remedial Measures	2	4	8	14
<ul style="list-style-type: none"> A. Communicate suspected noncompliance through appropriate channels B. Assure development of corrective action plans in response to noncompliance C. Assure corrective action plans are in response to noncompliance D. Cooperate with government inquiries and investigations E. Investigate matters related to noncompliance in a fair, objective, and discrete manner F. Participate in negotiation with regulatory agencies G. Assure that overpayments to payors are refunded in a timely manner H. Assure timely fulfillment of obligations to external parties <ul style="list-style-type: none"> I. Collaborate with legal counsel regarding voluntary disclosures J. Coordinate investigations to preserve privileges, as applicable K. Facilitate independent investigations when necessary L. Recommend modification of corrective action plans M. Recognize the need for subject matter experts N. Assure compliance investigations are documented and records are maintained according to requirements O. Assure investigation personnel have the necessary skill sets P. Institute immediate measures as necessary to mitigate ongoing harm 				
Totals	13	53	34	100

Answer key for page 21				
1.B	2.C	3.D	4.C	5.C