

PROGRAM INTEGRITY TIPS

Do we have in place and can we support with appropriate documentation all 7 elements of an effective compliance program (as adopted by CMS and OIG):

- | Yes | No | |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | Written policies and procedures; |
| <input type="checkbox"/> | <input type="checkbox"/> | Compliance officer and Compliance committee; |
| <input type="checkbox"/> | <input type="checkbox"/> | Effective training and education; |
| <input type="checkbox"/> | <input type="checkbox"/> | Effective lines of communication between the compliance officer, board, executive management and staff, including an anonymous reporting function; |
| <input type="checkbox"/> | <input type="checkbox"/> | Internal monitoring and auditing; |
| <input type="checkbox"/> | <input type="checkbox"/> | Disciplinary enforcement; |
| <input type="checkbox"/> | <input type="checkbox"/> | Mechanisms for responding to detected problems. |

Do we have in place and can we support with appropriate documentation the proposed 8th element of a compliance program:

- | Yes | No | |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | Is our program effective (i.e., can we show that we are preventing, detecting and resolving fraud, waste and abuse)? |

Does our program consist of the following:

- | Yes | No | |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | Documentation, consistently maintained, of all policies, procedures, program integrity activities, audits, investigations, etc.? |
| <input type="checkbox"/> | <input type="checkbox"/> | Procedures to ensure that our contractual and regulatory requirements are fully met? |
| <input type="checkbox"/> | <input type="checkbox"/> | Tool to assess the company's risk and compliance with contractual and regulatory requirements? |
| <input type="checkbox"/> | <input type="checkbox"/> | Work plan to prioritize the identified compliance risk assessment activities and resources? |
| <input type="checkbox"/> | <input type="checkbox"/> | Training and education of staff on how to recognize fraud waste and abuse as well as how to prevent, detect and report it? |
| <input type="checkbox"/> | <input type="checkbox"/> | Process to audit medical records to ensure documentation accurately supports claims submitted for payment and that the documentation meets standards? |
| <input type="checkbox"/> | <input type="checkbox"/> | System in place to identify when an employee has lost his/her credentials (due to expiration, revocation, disbarment, etc.) |
| <input type="checkbox"/> | <input type="checkbox"/> | Link between treatment provided and the billing function to ensure accurate billing of the funding source? |
| <input type="checkbox"/> | <input type="checkbox"/> | Process to return all erroneously paid claims to the appropriate funding programs and correct all identified errors? |
| <input type="checkbox"/> | <input type="checkbox"/> | Process to proactively seek evidence of fraud, waste and abuse, such as data-mining? |
| <input type="checkbox"/> | <input type="checkbox"/> | Process to report all fraud, waste and abuse issues to the appropriate contracted, state and/or federal agency? |