Auditing and Monitoring for Compliance

POLICY: AC.ETH.01.16

Date: September 30, 1999

Responsible to: President/CEO

POLICY:

Established guidelines are provided for the auditing, monitoring and evaluation of compliance with the Ethics in Business Program.

PROCEDURE:

Shepherd Center and Affiliates will ensure compliance with the Ethics in Business Program through auditing and monitoring by:

1. Reporting from departments/program to the Chief Compliance Officer.

2. Audits and monitoring by internal auditor and Chief Compliance Officer. These reports will be submitted to President & CEO, Compliance Committee and summary to Governing Board. Audits/Reviews will include such topics as:
   
   a. Potential kickbacks arrangements.
   c. CPT/HCPSC-ICD-9 coding.
   d. Claim development and submission.
   e. Medical Record Documentation.
   f. Medical necessity review.
   g. Outpatient ABN review.
   h. Cost reporting.
   i. Inventory reviews.
   j. Payment reserves for federal healthcare programs.
   k. Contractual relationships.
   l. Marketing practices.

3. Any suspected violation or potential violation of the compliance program may trigger an audit and/or ongoing monitoring by Chief Compliance Officer.

4. Auditing and monitoring by the Chief Compliance Officer and auditor will include, but will not be limited to:

   a. On-site visits; scheduled and unscheduled.
   b. Interviews with staff and management.
   c. Questionnaires to solicit feedback or impression from a broad cross section or specific divisions of staff.
d. Review and evaluation of medical records, financial documents and any other source documents to support claims.
e. Reviews of any written material or documentation dealing with business compliance.
f. Trend analysis or studies that seek deviations in specific areas.

5. Auditors and Chief Compliance Officer;

a. Will be independent of direct line management or physicians.
b. Have access to any relevant resources.
c. Presents reports to President/CEO, compliance committee and/or general board.
d. Identify specific areas for improvement and assist in action plan.