

# Healthcare Compliance Forms and Tools

## Sample Compliance Program Audit Plan

By Mary M. Menard, RN, MPH, CHC, CHPC

Audit Subject	Purpose	Scope	Lead Person Responsible	Department	Projected Timing
<b>Medical Necessity of Diagnostic CT and MRI</b>	To determine compliance with the Centers for Medicare & Medicaid Services guidelines, including physician order, place of service, prior authorization, documentation requirements, specificity of exam, etc.	Small physician practice may be 100% prospective review, with large organizations at 10% prospective review	[name]	Compliance	1 <sup>st</sup> quarter
<b>Exclusion Review of Employees, Contractors, Vendors</b>	To validate that exclusion review is being performed at hire and every 30 days on physicians, employees, contractors, and vendors	100% review of exclusion monitoring reports for past 12 months; validate a random sample of exclusion reviews reported	[name]	Compliance	1 <sup>st</sup> quarter
<b>Evaluation &amp; Management (E/M) Documentation &amp; Coding</b>	To determine compliance with E/M coding guidelines.	Retrospective review of medical records with date of service January 1–March 31, 20xx  Statistically valid random sample	[name]	Compliance	2 <sup>nd</sup> quarter

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<b>Physician Contract Review</b>	To assess compliance with Stark and/or Anti-Kickback Statute, assess compliance with terms of contract, and review physician compensation	Small physician practice—all contracts. Large organization—random sample	[name]	Compliance and legal	3 <sup>rd</sup> quarter
<b>HIPAA Privacy &amp; Security Measures Implemented for Telehealth</b>	To determine whether provider is using approved telehealth platform, whether a business associate agreement exists, whether informed consent for telemedicine was obtained from the patient, whether a system for monitoring communications containing electronic protected health information (ePHI) has been implemented, and whether only authorized users have access to ePHI	Statistically valid random sample	[name]	Privacy and Compliance	4 <sup>th</sup> Quarter

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