

Complete Healthcare Compliance Manual

Sample Compliance Monitoring Plan

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Sample Compliance Monitoring Plan for [YEAR]

Corporate							
Description of Monitoring Activity	Risk	Frequency	Sample Size	Locations	Assigned To	Date Completed	Results
Annual Compliance Education	Failure to meet Federal Sentencing Guidelines	Annually	100%	All			
Hotline Compliance Calls and Compliance Investigations	Ineffective Compliance Program	Monthly	100%	All			
Medical Director Payments	Stark and Anti-Kickback compliance	Quarterly	100%, 25% of medical directors each quarter	All			
Non-Monetary Compensation	Stark and Anti-Kickback compliance	Monthly	100%	All			
Repayments within 60 Days	CMS 60-day Payment Rule, False Claims Act	Monthly	100%	All			

Excluded Providers – Employees, Vendors, Physicians	Federal Sentencing Guidelines	Monthly	100%	All			
Licensure – CNAs, LPNs, RNs, PT, OT, Speech and other	State law	Monthly	100%	All			
PBJ Medical Director Timesheets	CMS Payroll Based Journal compliance	Monthly	100%	All			
Management Certifications	Ineffective Compliance Program	Annually	100%	All			
Conduct gap analysis of Compliance Program with the OIG's "Measuring Compliance Program Effectiveness: A Resource Guide" and the DOJ's "Evaluation of Corporate Compliance Programs" and develop action plan	Ineffective Compliance Program	Annually	NA	Home Office			
Compliance/Privacy Self-Assessment	Ineffective Compliance Program	Annually	100%	All			
Open Payments Database	Conflicts of Interest	Annually	100% contracted physicians	All			

Skilled Nursing Facilities

Description of Monitoring Activity	Risk	Frequency	Sample Size	Locations	Assigned To	Date Completed	Results
Staffing Tags and CMPs	CMS Regulations	Monthly	100%	All			
Staffing Ratios Compliance	CMS Regulations	Monthly	100%	All			
Staffing Hotline Calls and Complaints	CMS Regulations	Monthly	100%	All			
Regulatory – Survey Tags and CMPs	CMS Regulations	Monthly	100%	All			
Regulatory – New Life Safety Requirements	CMS Regulations	Monthly	100%	All			
New Advanced Beneficiary Notices	CMS Regulations	Annually	2 buildings each segment	Sample			
Involuntary Discharges	CMS Regulations	Annually	100%	All			
Home Health							
Description of Monitoring Activity	Risk	Frequency	Sample Size	Locations	Assigned To	Date Completed	Results
Home Health PEPPER Data	CMS Regulations	Annually	5 residents	Random selection from locations that are outliers			

Research							
Description of Monitoring Activity	Risk	Frequency	Sample Size	Locations	Assigned To	Date Completed	Results
Research – Appropriate approvals of research studies (IRB, individual consent and authorization)	Human Subjects Protections laws, HIPAA	Annually	TBD based on number of open studies	All			
Physician Enterprise							
Description of Monitoring Activity	Risk	Frequency	Sample Size	Locations	Assigned To	Date Completed	Results
NP Bell Curves	Inappropriate coding, billing, False Claims	Quarterly	25% of NPs each quarter so 100% are reviewed	All			
NP Resident Volumes	High volumes combined with coding at high levels could lead to False Claims	Quarterly	25% of NPs each quarter so 100% are reviewed	All			
Rehabilitation							
Description of Monitoring Activity	Risk	Frequency	Sample Size	Locations	Assigned To	Date Completed	Results

Rehabilitation PEPPER Data	False Claims	Monthly	5 residents	Random selection from buildings that are outliers			
Behavioral Health							
Description of Monitoring Activity	Risk	Frequency	Sample Size	Locations	Assigned To	Date Completed	Results
Psychotropic Medication Use and rates of Terrets, Schizophrenia and Huntington's	CMS Regulations	Quarterly	5 residents	Random selection from buildings that have highest use of psychotropic medications			
Telemedicine							
Description of Monitoring Activity	Risk	Frequency	Sample Size	Locations	Assigned To	Date Completed	Results
Telehealth Consents	HIPAA	Annually	25 residents	Random selection from buildings with Telehealth	Bryant Flynn		

Assisted Living Facilities							
Description of Monitoring Activity	Risk	Frequency	Sample Size	Locations	Assigned To	Date Completed	Results
Distribution of Notice of Privacy Practices	HIPAA	Annually	25 residents, split equally among locations	All			
Personal Care							
Description of Monitoring Activity	Risk	Frequency	Sample Size	Locations	Assigned To	Date Completed	Results
Distribution of Notice of Privacy Practices	HIPAA	Annually	25 residents, split equally among locations	All			

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