

# Complete Healthcare Compliance Manual 2024

## Resource: Sample Board Report 1, Audit Status Update

---

By Greg Radinsky,<sup>[1]</sup> JD, MBA, CHC, CCEP

### Office of Corporate Compliance Audit Status Update May 2021

#### 2021 Compliance Audit Work Plan Items – Facilities

Compliance Audit	Facility	Auditors	Estimated Timing	Estimated Hours
Ambulatory Surgery Unit (ASU) Coding and Billing	XYZ	Internal	Q1	50
Inpatient Rehabilitation Facility (IRF)	GHI	Consultant	Q1	50
Facility Emergency Dept. Coding and Billing	XYZ	Internal	Q1	50
SNF RUG Coding	ABC	Consultant	Q2	100
Inpatient Psychiatric Coding	GHI	Consultant	Q2	50
Outpatient Psychiatric Coding	XYZ	Consultant	Q2	50
Facility Emergency Dept. Coding and Billing	ABC	Internal	Q2	50
Ancillary Services Lab	GHI	Consultant	Q2	50
Ancillary Services Pharmacy	XYZ	Consultant	Q2	50

Ancillary Services Respiratory Therapy	ABC	Consultant	Q2	50
Ancillary Services Radiology	GHI	Consultant	Q2	50
Radiology	XYZ	Internal	Q2	50
Inpatient Psychiatric Coding	ABC	Consultant	Q2	50

## 2021 Compliance Audit Work Plan Items

Compliance Audit	Facility	Auditors	Estimated Timing	Estimated Hours
Clinical Research Billing	ABC	Consultant	Q2	75
Outpatient Chemical Dependence Services	GHI	Internal	Q3	50
ESRD PPS	XYZ	Consultant	Q3	50
Early Intervention	ABC	Internal	Q3	50
Outpatient Mental Health Services	GHI	Internal	Q3	50
Partial Hospitalization	XYZ	Internal	Q3	50
Day Treatment	ABC	Internal	Q3	50
Day Habilitation	GHI	Internal	Q3	50

Follow-up Reviews Home Health	GHI	Internal	Q4	50
Follow-up Reviews Home Health	XYZ	Internal	Q4	50
Follow-up Reviews of Skilled Nursing Facilities	ABC	Internal	Q4	50
Follow-up Reviews of Skilled Nursing Facilities	GHI	Internal	Q4	50
Follow-up Reviews of Hospice	XYZ	Internal	Q4	50
Total Hours:				2,000

## 2021 Compliance Audit Work Plan Items – Professional Fee

Compliance Audit	Facility	Auditors	Estimated Timing	Estimated Hours
Professional Fee Re-Audits	Various	Internal	Q2	400
Independent Therapists – High Utilization of Outpatient Physical Therapy Services	Various	Consultant	Q2	50
High Volume Providers by Specialty	Various	Consultant	Q2	100
Ophthalmological Services	Various	Internal	Q2	50
Anesthesia Services – Payments for Personally Performed Services (Pain Management)	Various	Consultant	Q2	50
Electrodiagnostic Testing – Cardiology	Various	Internal	Q2	50

Physicians: Impact of Opting Out of Medicare	Various	Internal	Q2	50
E&M Services: Cut & Paste	Various	Internal	Q2	150
Medicaid Rate Part B Carve-Out	Various	Consultant	Q2	50
Total Hours:				950

## 2021 Compliance Work Plan Items – Data Mining Reviews

Compliance Audit	Facility	Auditor	Estimated Timing	Estimated Hours
Extensive OR Procedures Re-Audit	Various	Consultant	Q1	40
Diabetes MS-DRGs 637-639	Various	Internal	Q1	80
Transient Ischemia Attack (TIA) MS-DRG 069	Various	Consultant	Q1	40
Gastroenterology (GI) Bleed MS-DRGs 377-379	Various	Consultant	Q1	40
Syncope	Various	Internal	Q1	80
IV Hydration Units	Various	Internal	Q1	40
Pulmonary Edema and Respiratory Failure MS-DRGs 189/087	Various	Consultant	Q1	40
Excisional Debridement	Various	Consultant	Q1	40

Ultrasound	Various	Internal	Q1	40
Place of Service (POS) Errors in an ASU Setting	Various	Internal	Q1	40
Colonoscopy Units	Various	Internal	Q3	40
Present on Admission (POA) Indicators	Various	Internal	Q3	40
Total Hours:				560

## 2021 Compliance Audit Work Plan Items – Non-Coding Audits

Compliance Audit	Facility	Auditors	Estimated Timing	Estimated Hours
Review Termination Procedures	N/A	Internal	Q2	25
Benchmark Patient Satisfaction Scores Regarding Patient Privacy	N/A	Internal	Q2	30
Employee Conflicts of Interest Audit	N/A	Internal	Q2	25
Audit of the Physician Conflicts of Interest Disclosure Forms	N/A	Internal	Q2	50
Create Additional Conflicts of Interest Procurement Control	N/A	Internal	Q2	10
Review of Physician Practices Coding Procedures	N/A	Internal	Q2	10
Verify Medicare Inpatient Coding Education on New 2021 Codes	N/A	Internal	Q2	10

Electronic Health Record Compliance-Related Policies	N/A	Internal	Q2	50
Review Managed Care Denial Data	N/A	Internal	Q2	10
Professional Fee Data Mining Application	N/A	Internal	Q2	25
Review Professional Fee Denial Data	N/A	Internal	Q2	10
Compliance Integration	N/A	Internal	Q2	10
Review Documentation Related to Physician Administrative Function Contracts	N/A	Internal	Q2	20
Verify Compliance with the On-Call Coverage Payments	N/A	Internal	Q2	20
Verify Compliance with Stark and Anti-Kickback EMR Safe Harbors and Exceptions	N/A	Internal	Q2	10
New HIPAA Rule Implementation	All	Internal	Q1 – Q3	400
Revise Identity Theft Policy and Review Identity Theft Education	N/A	Internal	Q2	25
Implementation of HIPAA Monitoring and Detection Application	N/A	Internal	Q2	100
HIPAA Control for Posting Public and Internal Data on Websites	N/A	Internal	Q2	10
Enhance HIPAA Accounting of Disclosure Process	N/A	Internal	Q2	10
Revision of HIPAA Security Policies	N/A	Internal	Q2	25

Revision of HIPAA Privacy Policies	N/A	Internal	Q2	50
HIPAA Security Training Awareness	N/A	Internal	Q2	50
Verify Appropriate Use of Email with Mental Health Patients	N/A	Internal	Q2	20
Review Facility Directory Privacy Request Process	N/A	Internal	Q2	20
Disposal of Protected Health Information	N/A	Internal	Q2	10
Implement Privacy Control to Protect Texting of Patient Information	N/A	Internal	Q2	10
Implement Additional Training on Protecting Patient Information on Medical Shift Reports	N/A	Internal	Q2	10
Review Sensitive Patient Identifiers on Clinical and Business Forms	N/A	Internal	Q2	40
Identify Additional Training on Medical Identity Theft	N/A	Internal	Q2	20
New Conflicts of Interest Tracking System	N/A	Internal	Q2	30
Review the Gifts and Interactions with Industry Policy	N/A	Internal	Q2	10
Verify Physician Payments Sunshine Reporting Entities	N/A	Internal	Q2	10
Institutional Conflicts of Interest Policy	N/A	Internal	Q2	20
Review Inpatient Federal Health Care Program Denial Data	N/A	Internal	Q2	10
Compliance with New Requirements for Outpatient Physical Therapy Cases	N/A	Internal	Q2	10

Verify Compliance with CMS' Adverse Event Restraints Regulation	N/A	Internal	Q2	10
Compliance Survey	N/A	Internal	Q2	20
Verify the Implementation of the Revised Physician Education Program for New Physician Employees and Credentialed Physicians	N/A	Internal	Q2	10
Verify the Implementation of the Revised Conflicts of Interest Process for New Physician Employees and Credentialed Physicians	N/A	Internal	Q2	10
Marketing Analysis of Compliance Intranet and Internet Sites	N/A	Internal	Q2	10
Compliance HelpLine Utilization Review	N/A	Internal	Q2	10
Skilled Nursing Facility Compliance Plans	N/A	Internal	Q2	40
New Physician Location Education Roll Out Project	N/A	Internal	Q2	20
Office of Corporate Compliance Documentation	N/A	Internal	Q2	10
Implementation of Health System's Financial Assistance Program	N/A	Internal	Q2	10
Assist with the Development of a Compliance Managed Care Plan	N/A	Internal	Q2	100
Home Care Network Vendor Agency Exclusion Screening Process	N/A	Internal	Q2	20
Review OIG's New Exclusion Screening Guidance	N/A	Internal	Q2	20
Review Fair Market Valuation of Physician Compensation	N/A	Internal	Q2	10



Evaluate Compliance Joint Venture Controls	N/A	Internal	Q2	25
Revise Emergency Medical Treatment and Active Labor Act (EMTALA) Policy	N/A	Internal	Q2	10
TOTAL:				1,540

## 2021 Compliance Work Plan Items – HIPAA

Compliance Audit	Facility	Auditor	Estimated Timing	Estimated Hours
Electronic Medical Record Access Audit	ABC	Internal	Q1	40
Electronic Medical Record Access Audit	GHI	Internal	Q2	40
Electronic Medical Record Access Audit	XYZ	Internal	Q2	40
Electronic Medical Record Access Audit	ABC	Internal	Q2	40
Electronic Medical Record Access Audit	GHI	Internal	Q3	40
Electronic Medical Record Access Audit	XYZ	Internal	Q3	40
Electronic Medical Record Access Audit	ABC	Internal	Q3	40
Electronic Medical Record Access Audit	GHI	Internal	Q3	40
Electronic Medical Record Access Audit	XYZ	Internal	Q3	160

HIPAA Rounding Audit	ABC	Internal	Q1	15
HIPAA Rounding Audit	GHI	Internal	Q1	15
HIPAA Rounding Audit	XYZ	Internal	Q1	15
HIPAA Rounding Audit	ABC	Internal	Q1	15
HIPAA Rounding Audit	GHI	Internal	Q1	15
HIPAA Rounding Audit	XYZ	Internal	Q1	15
HIPAA Rounding Audit	ABC	Internal	Q1	15
HIPAA Rounding Audit	GHI	Internal	Q1	15
HIPAA Rounding Audit	XYZ	Internal	Q1	15
HIPAA Rounding Audit	ABC	Internal	Q1	15
HIPAA Rounding Audit	GHI	Internal	Q1	15
HIPAA Rounding Audit	XYZ	Internal	Q1	15
HIPAA Rounding Audit	ABC	Internal	Q2	15
HIPAA Rounding Audit	GHI	Internal	Q2	15
HIPAA Rounding Audit	XYZ	Internal	Q2	15

HIPAA Rounding Audit	ABC	Internal	Q2	15
HIPAA Rounding Audit	GHI	Internal	Q2	15
HIPAA Rounding Audit	XYZ	Internal	Q2	15
HIPAA Rounding Audit	ABC	Internal	Q2	15
HIPAA Rounding Audit	GHI	Internal	Q2	15
HIPAA Rounding Audit	XYZ	Internal	Q2	15
HIPAA Rounding Audit	ABC	Internal	Q2	15
HIPAA Rounding Audit	GHI	Internal	Q3	15
HIPAA Rounding Audit	XYZ	Internal	Q3	15
HIPAA Rounding Audit	ABC	Internal	Q3	15
HIPAA Rounding Audit	GHI	Internal	Q3	15
Business Associate Agreement Reviews	XYZ	Internal	Q2 – Q4	100
HIPAA Rounding Audit	ABC	Internal	Q1	15
HIPAA Rounding Audit	GHI	Internal	Q2	15
Total Hours:				1,015

## 2021 Special Requests and Investigations

Audit in Progress	Contact	Audit Status	Comments	Corrective Action
XXXXX	X. XYZ	Progressing	None.	N/A
XXXXXX	A. ABC	Closed	None.	Corporate Compliance to educate appropriate staff.

## 2021 Compliance Professional Fee Audits in Progress

Audit in Progress	Contact	Audit Stage	Audit Status	Comments	Corrective Action
XXXXXX	X. XYZ	Field Work	Progressing	None.	N/A
XXXXXX	A. ABC	Field Work	Progressing	None.	N/A

## 2021 Compliance Facility Audits in Progress

Audit in Progress	Contact	Audit Stage	Audit Status	Comments	Corrective Action
XXXXXX	X. XYZ	Field Work	Progressing	None.	N/A
XXXXXX	A. ABC	Field Work	Progressing	None.	N/A

## 2021 Compliance Data Mining Audits in Progress

Audit in Progress	Contact	Audit Stage	Audit Status	Comments	Corrective Action
XXXXXX	X. XYZ	Field Work	Progressing	None.	N/A
XXXXXX	A. ABC	Field Work	Progressing	None.	N/A

### 2021 Compliance Audit Non-Coding Reviews in Progress

Audit in Progress	Contact	Audit Stage	Audit Status	Comments	Corrective Action
XXXXXX	X. XYZ	Field Work	Progressing	None.	N/A
XXXXXX	A. ABC	Field Work	Progressing	None.	N/A

### OMIG Audits

Audit in Progress	Letter Date	Status	Audit Timeframe and Recoupment
XXXXXX	XX/XX/XX	Open	XX/XX/XX-XX/XX/XX
XXXXXXXXXX	XX/XX/XX	Closed	XX/XX/XX-XX/XX/XX \$

### OIG Audits

Audit in Progress	Letter Date	Status	Audit Timeframe and Recoupment
-------------------	-------------	--------	--------------------------------

XXXXXX	XX/XX/XX	Open	XX/XX/XX-XX/XX/XX
XXXXXXXXXX	XX/XX/XX	Closed	XX/XX/XX-XX/XX/XX

This document is only available to subscribers. Please log in or purchase access.

[Purchase Login](#)