

Healthcare Compliance Forms and Tools

Sample Compliance Monitoring Plan

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Sample Compliance Monitoring Plan for FY [2022]

Description of Monitoring Activity	Risk	Frequency	Sample Size	Locations	Assigned To	Date Completed	Results
Corporate							
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%, with 25% of medical directors each quarter	All			
Nonmonetary compensation	Stark and Anti-Kickback compliance	Monthly	100%	All			
Repayments within 60 days	CMS 60-day payment rule, False Claims Act	Monthly	100%	All			

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Excluded providers (i.e., employees, vendors, physicians)	Federal Sentencing Guidelines	Monthly	100%	All			
Licensure (i.e., CNAs, LPNs, RNs, PT, OT, speech, and other)	State law	Monthly	100%	All			
Payroll based journal (PBJ) medical director timesheets	CMS PBJ compliance	Monthly	100%	All			
Management certifications	Ineffective compliance program	Annually	100%	All			
Conduct gap analysis of compliance program with the Office of Inspector General's <i>Measuring Compliance Program Effectiveness: A Resource Guide</i> and the Department of Justice's <i>Evaluation of Corporate Compliance Programs</i> and develop an action plan	Ineffective compliance program	Annually	N/A	Home office			
Compliance/privacy self-assessment	Ineffective compliance program	Annually	100%	All			
Open Payments database	Conflicts of interest	Annually	100% of 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							
Home health Program for Evaluating Payment Patterns Electronic Report (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 (institutional review board, individual consent and authorization)	Human subjects protection laws, Health Insurance Portability and Accountability Act (HIPAA)	Annually	TBD based on the number of open studies	All			
Physician Enterprise							
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							
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							
Telehealth consents	HIPAA	Annually	25 residents	Random selection from buildings with telehealth			
Assisted Living Facilities							
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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