

Healthcare Compliance Forms and Tools Sample Compliance Program Audit Plan

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Audit Subject	Purpose	Scope	Lead Person Responsible	Department	Projected Timing
Medical Necessity of Diagnostic CT and MRI	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 st quarter
Exclusion Review of Employees, Contractors, Vendors	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 st quarter
Evaluation & Management (E/M) Documentation & Coding	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 nd quarter

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Physician Contract Review	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 rd quarter
HIPAA Privacy & Security Measures Implemented for Telehealth	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 th Quarter

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