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Risk Assessment Survey and Potential Risk Areas

By Nina Youngstrom

Here's an example of a risk assessment survey, with a list of risk areas "inherent to health care organizations," said Shelly Denham, senior vice president of compliance, risk and audit services at UofLHealth in Louisville, Kentucky. Contact her at shelly.denham@uoflhealth.org.

Annual Risk Survey

Background

Please help us plan our audit and compliance activities by providing your input on our enterprise risk assessment. (See survey on page below.) We need to know, in your opinion, which clinical, regulatory and financial processes have the highest risk and should be considered for an audit or compliance project.

Below are some areas of potential risks to help you generate your own ideas.

General Compliance

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| <ul style="list-style-type: none">• 501r• Clinical research• Community benefit• Conflicts of interest• HIPAA privacy• Meaningful use | <ul style="list-style-type: none">• Medicare three-day payment window• Medication reconciliation• Social media• Joint commission readiness• Two-Midnight rule |
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General Compliance Risks

Pharmaceuticals

Physician Financial Transactions

<ul style="list-style-type: none"> • Drug diversion • 340B compliance assessment • Opioid prescribing analysis and monitoring assessment 	<ul style="list-style-type: none"> • Physician payments • Physician contract compliance • Stark Law / False Claims Act / Anti-Kickback Statute
Emergency Medical Treatment and Labor Act (EMTALA)	Advanced Practice Providers (APP)
<ul style="list-style-type: none"> • Compliance with EMTALA guidelines with the emergency department • Compliance with EMTALA guidelines for patients presenting outside the emergency department • EMTALA transfer and receiving processes (antidumping) 	<ul style="list-style-type: none"> • Scope-of-practice alignment with state-specific practice authority • Compliance with supervision requirements • APP services documentation and billing compliance

Legal and Regulatory Compliance Risks

Patient Safety	Behavioral Health
<ul style="list-style-type: none"> • Surgical safety and surgical suite disinfection • Device sterilization and disinfection • Hospital-acquired conditions, including infections, falls and pressure injuries 	<ul style="list-style-type: none"> • Environmental and ligature risk assessment • Mental health assessment and suicide risk screening • Access to mental health services
Case Management and Utilization Management	Physician Practice Clinical Operations
<ul style="list-style-type: none"> • Compliance with Medicare conditions of participation • Status assignment (inpatient versus observation) • Discharge planning and transition of care 	<ul style="list-style-type: none"> • Physician practice or ambulatory clinical assessment • Physician practice results management assessment

Clinical Risks

Telemedicine	Environmental, Social and Governance (ESG) and Diversity, Equity and Inclusion (DEI)
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<ul style="list-style-type: none"> • Compliance with documentation and billing requirements • IT assessment of telehealth platform and devices • Cybersecurity assessment of network and unified communications supporting telehealth 	<ul style="list-style-type: none"> • Assessment of current ESG and DEI programs • Executive and employee pay analysis
New Regulations	Robotic Process Automation (RPA)
<ul style="list-style-type: none"> • No Surprises Act process effectiveness • Hospital price transparency compliance and accuracy • CMS vaccine mandate process assessment and compliance • CARES Act reporting compliance 	<ul style="list-style-type: none"> • Review of overall RPA governance process • Assessment of RPA security, controls and disaster recovery • Assessment of RPA change management

Emerging Risks

Workforce/Executive Retirement and Succession Planning	Vendor Management
<ul style="list-style-type: none"> • Recruitment and retention effectiveness • Critical department staffing levels • Succession planning 	<ul style="list-style-type: none"> • Business continuity • Vendor selection, management and monitoring • Vendor IT security assessment
Staff Safety and Security	Revenue Cycle

<ul style="list-style-type: none"> • Staff protection—personal protective equipment safety and environmental safety • Workplace violence and management of aggressive behavior • Physical security 	<ul style="list-style-type: none"> • Revenue cycle process effectiveness • Clinical documentation improvement • Expected reimbursement • Denials management • Patient access • Billing and claims submission • Credit balances • Collections • Charge capture
Financial Reporting	Supply Chain
<ul style="list-style-type: none"> • Financial statement close process • Accounts payable—duplicate payments • Journal entry integrity • Fraud awareness • Payroll • Construction accounting 	<ul style="list-style-type: none"> • Purchasing agreements • Materials management/inventory • Medical device credits

Financial and Operational Risks

Cybersecurity and Ransomware Preparedness	Biomedical Devices
<ul style="list-style-type: none"> • Ransomware preparedness and response • Cybersecurity risk assessment • Business continuity management 	<ul style="list-style-type: none"> • Biomedical device governance and procurement • Biomedical device security • Biomedical device maintenance and third-party, service-level agreement compliance

Technology Risk

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