

Complete Healthcare Compliance Manual

Resource: Sample Compliance Program Audit Plan

By Mary M. Menard, RN, MPH, CHC, CHPC

Audit Subject	Purpose	Scope	Lead Person Responsible	Department	Projected Timing
Medical Necessity of Diagnostic CT and MRI	To determine compliance with CMS 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, 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 Documentation & Coding	To determine compliance with E/M coding guidelines.	Retrospective review of medical records with DOS January 1–March 31, 20xx Statistically valid random sample	[name]	Compliance	2 nd Quarter

Physician Contract Review	To assess compliance with Stark and/or Anti-Kickback Statute; to assess compliance with terms of contract; to 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 if provider is using approved telehealth platform; to determine whether a BAA exists; to determine if informed consent for telemedicine was obtained from the patient; to determine whether a system for monitoring communications containing ePHI have been implemented; to determine whether only authorized users have access to ePHI	Statistically valid random sample	[name]	Privacy and Compliance	4 th Quarter

This document is only available to subscribers. Please [log in](#) or [purchase access](#).

[Purchase Login](#)