HEALTH CARE AUDITING & MONITORING TOOLS

TABLE OF CONTENTS

ABOUT THIS MANUAL

SUGGESTIONS

INTRODUCTION

LIST OF CONTRIBUTORS

MONITORING & AUDITING PRACTICES FOR EFFECTIVE COMPLIANCE

PLANNING AND CONDUCTING AUDITS

1. Facility Audit Process
2. Compliance Auditing and Monitoring Policy
3. Initial Audit Report Format
4. Internal Audit Standardized Audit Process Pre-Audit
5. Entrance Conference and Planning—Preliminary Meeting with Management Worksheet
6. Planning Memorandum for Internal Audit
7. Staff Assignment for Internal Audit
8. Corrective Action Policy and Procedure
9. Audit Software
10. Audit Scoring

General Compliance Program Audit Tools and Worksheets

1. “Risk Assessment Matrix” Example
2. Compliance Risk Analysis
3. Office of Compliance - Program Evaluation
4. Project Tool for Compliance Program
5. Checklist for Implementation of Policies and Procedures
6. Audit Effectiveness Checklist
7. Checklist for Performance and Documentation of Audits
8. Checklist for Training Program Development
9. Annual Compliance Survey for Administrators/Directors/Managers

**Effectiveness Tools**
1. Suggested Documents for Review of Compliance Program Effectiveness
2. Compliance Program Effectiveness Review Tool
3. Compliance Program Effectiveness Review - Survey Questions for Senior Leadership and Other Key Personnel
4. Compliance Monitoring Checklist

**OIG Workplan Response Policies and Tools**
1. Faculty Practice Plan – OIG Work Plan Policy
2. OIG – Risk Areas Worksheet

**BILLING & CODING**
1. Policy on Review of Compliance Concerns Related to Coding and Billing
3. Review Procedures - Adjustments and Write-offs

**HIPAA, PRIVACY, SECURITY**
1. Corporate Policy and Procedure—Auditing Information System Access and Activity
2. HIPAA Policy Compliance Checklist—Safeguarding Protected Health Information
3. HIPAA Policy Compliance Checklist—General
4. HIPAA Compliance Checklist—Patient Rights
5. Privacy Audit
6. Compliance Checklist for HIPAA Privacy – Walk Through
7. Discarding Printed or Written Protecting Health Information
8. Information Systems Security Review
9. Required Elements for any PHI Disclosure Authorization Form
10. System Administration Standards
11. System Administration Standards Assessment
EVALUATION/ MANAGEMENT

1. Auditing E/M Codes
2. Medicare Evaluation & Management E&M Coding – Compliance Audit Program
3. E/M Documentation Auditor’s Worksheet - Information
4. Documentation and E/M Review Checklist
5. Sample E/M Audit Worksheets
6. Review of Evaluation and Management Service

ADDITIONAL RESOURCES

Advanced Beneficiary Notice (ABN) Review Procedures and Tools

1. Medicare Advanced Beneficiary Notifications (ABN Rule) Compliance Review
2. Advance Beneficiary Notice Program Checklist for Monitoring Use of ABNs

EMTALA Review Procedures and Tools

1. EMTALA Compliance Review
2. Compliance Quarterly Monitor – EMTALA

Issue-specific Review Procedures and Protocols

1. DPA Prior Approval—Home Health
2. Annual Vendor, Employee and Physician Sanctioned Provider Check Audit Program
3. Independent Contractor Review - Audit Program
4. Voluntary Recalls Review – Audit Work Program
5. Review of Disposition/Discharge Codes – Audit Work Program
6. Corporate Compliance Monitoring and Review – Medicare Same Day, Same Provider Acute Care Readmissions
7. Medicare Secondary Payer (MSP) Screening Procedures Compliance Review
8. Medicare and Medicaid Credit Balances Reporting
9. Medicare DRG Window Rule (72 Hour Rule) Compliance Review
10. Medicare Bad Debt and Recoveries Program Guide
11. Medicare Outlier Payments Review
12. Medicare Excessive Payments for In and Outpatient Services Compliance Review
13. Medicare Diagnostic Testing Emergency Department Compliance Review
14. Medicare Consultations Billing
15. Medicare Services and Supplies Billed Incident-To Services Compliance Review
16. Medicare Inpatient Psychiatric Services Compliance Review Program
17. Medicare Deductible, Coinsurance Calculation and Waiver/Write-off Compliance Review
18. Board of Directors Conflict of Interest Disclosure – Compliance Review Work Program

**Issue-specific Tools and Templates**
- 1. Procedure for filling out Audit Worksheets
- 2. Skilled Nursing Facility—Compliance Self-Audit Tool
- 3. IPPE Audit Tool
- 4. Prepayment Audit Form
- 5. Surgery Audit Worksheet
- 6. Audit Worksheet—Radiology
- 7. Critical Care Audit Worksheet
- 8. ED & Observation Care
- 9. Pathology Audit Worksheet
- 10. Procedure for filling out Anesthesiology Audit Worksheets and Audit Worksheet
- 11. Chart Review Worksheet—Dental
- 12. Chart Review Worksheet—Surgical, Endoscopic/Laparoscopic, High Risk or Other Complex Procedures
- 13. Surgery Audit Tool
- 14. Psychiatric Partial Hospitalization Audit Program Worksheet
- 15. Compliance Monitor – Discharge Dispositions Worksheet

**Request for Information and Due Diligence Forms**
- 1. Request for Information TMF PEPPER Data and Other Coding Accuracy Information
- 2. Request for Information Copies of Documents Received from Regulatory or Governmental Agencies
- 3. Request for Monthly List of Denied Medicare & Medicaid Claims
- 4. Charge Description Master Due Diligence Statements
- 5. Employee Education Related to the Reimbursement Cycle, Claims Development, Billing & Coding Due Diligence Statement
- 6. Credit Balance/Refund Due Diligence Statement
- 7. Request for Medical Record Coding Internal Audits
8. Annual Employee Screening Due Diligence Statement
9. New-Hire Screening Due Diligence Statement
10. Vendor and Contractor Screening Due Diligence Statement

OUTCOMES
1. Follow up Audit Report Format
2. Error Correction Provider Notification Form
3. Policy on Correction of Errors Related to Government Reimbursement

JOB DESCRIPTIONS

APPENDIX

1. “Performing a compliance risk assessment for compliance risk assessment” for compliance auditing & monitoring in health care organizations – Glen C. Mueller
2. “Seven Component Framework” for compliance auditing & monitoring in health care organizations – Debi Weatherford
3. Developing a compliance workplan for compliance auditing and monitoring in health care organizations – Randall Brown and Britt Crewse
4. Using computer-assisted audit techniques for more effective compliance auditing and monitoring in health care organizations – Glen Mueller
5. Emphasizing a documented comprehensive approach to compliance auditing – Debi Weatherford
6. Implementing a core set of compliance policies and procedures – Randall Brown
7. Compliance education and awareness tools and techniques – Kathy Thomas
8. Auditing and Monitoring defined – Mark Ruppert