

A Practical Approach to Risk Assessment and How it Ties to Compliance Effectiveness

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Betsy Wade, MPH, CHC, CNA
Chief Compliance & Ethics Officer
Signature HealthCARE

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"There are risks and costs to a program of action, but they are far less than the long-range risks and costs of comfortable inaction."

~ John F. Kennedy

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Objectives

- Understand how Risk Assessment, Monitoring and Auditing, Compliance Work Plans and Reporting drive Compliance Effectiveness
- Learn how to quantify and track results to demonstrate Compliance Effectiveness to your Compliance Committee and Board
- Tools and Resources to help you assess your organization's Compliance Effectiveness and measure results
- References

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1. HOW MANY OF YOU REPRESENT?

- ACADEMIC HEALTH CARE
- NON-PROFITS
- FOR-PROFITS
- PUBLICLY TRADED FOR-PROFITS

2. HOW MANY OF YOU CONDUCT A RISK ASSESSMENT?

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What is Risk?

What is Risk?

- **Originates from:**
 - the Italian *risko*, which means danger, and *rischiare*, which means runs into danger
- **Noun that means:**
 - a situation involving exposure to danger
 - a possibility of harm or damage against which something that is insured
 - the possibility of financial loss or injury
- **Verb that means:**
 - exposing someone or something valued to danger, harm or loss
 - to incur the risk or danger of
 - acting or failing to act in such a way as to bring about the possibility of an unpleasant or unwelcome event



What affects Risk?

- Cash flow and liquidity
- Competition
- Evolving Technology
- Financial demands
- Joint Ventures
- Laws/Rules/Regulations
- Mergers/Acquisitions/Alliances
- Organizational Ethics
- Politics
- Type of industry
- Unknown

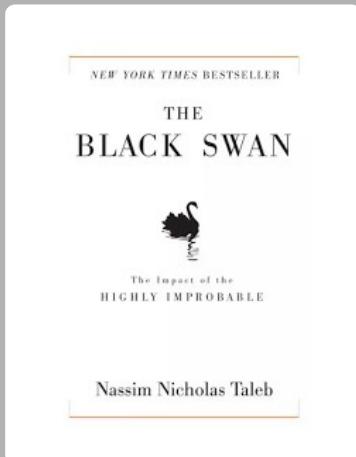
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What are common business risks?

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- Cybersecurity
 - Government investigations
 - Litigation and other legal action
 - Reductions in payment rates, unrealized or lost revenue
 - Loss or destruction of assets
 - Customer dissatisfaction
 - Fraud and abuse
 - Conflict of interest
 - Unacceptable accounting prin

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What are uncommon business risks?

- **Black Swan Events:**

- an event or occurrence that deviates beyond what is normally expected of a situation that would be extremely difficult to predict
- an outlier that carries an extreme impact, usually catastrophic
- the event is a surprise to the observer

- **Examples:**

- 9/11
- Black Monday (1987) (2015)
- dot com bubble (2001)
- Brexit

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**WHAT WOULD BE A BLACK SWAN EVENT IN
HEALTH CARE?**

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Risk Assessment and Compliance

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A graphic element on the left side of the slide features a magnifying glass with a black frame and a silver handle. The lens is focused on the word "RISK", which is written in large, bold, black capital letters on a yellow background. To the right of the magnifying glass is a white rectangular text area containing the following content:

Risk Assessment and Compliance

Risk Assessments are foundational to a Compliance Program:

- U.S. Sentencing Guidelines
- Corporate Integrity Agreements

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UNITED STATES SENTENCING COMMISSION
GUIDELINES MANUAL



[Incorporating guidelines amendments effective November 1, 2016, and earlier]

Risk Assessment and Compliance

U.S. Sentencing Guidelines mandate the Organization shall:

(A) ***Assess periodically the risk that criminal conduct will occur***, including assessing the following:

- i. The nature and seriousness of such criminal conduct...
- ii. The likelihood that certain criminal conduct may occur because of the nature of the organization's business...
- iii. The prior history of the organization...

(USSG § 8B2.1(b)(7) and (c); USAM 9-28.800 Comment; OECD Handbook, B, p. 10 *et seq.*)

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Risk Assessment and Compliance

Corporate Integrity Agreements include the following Risk Assessment requirement:

- The **risk assessment** and internal review process shall require compliance, legal, and department leaders, at least annually, to:
 - (1) identify and prioritize risks,
 - (2) develop internal audit work plans related to the identified risk areas,
 - (3) implement the internal audit work plans,
 - (4) develop corrective action plans in response to the results of any internal audits performed, and
 - (5) track the implementation of the corrective action plan in order to assess the effectiveness of such plans.

The Covered Entity shall maintain the risk assessment and internal review process for the term of the CIA.

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Risk Assessment and Compliance

- Address areas of government scrutiny
- Be proactive vs. reactive
- Improve Compliance Effectiveness
- Design controls to protect the organization
- Allocate resources
- Prevent and reduce compliance issues
- Decrease or prevent potential fines

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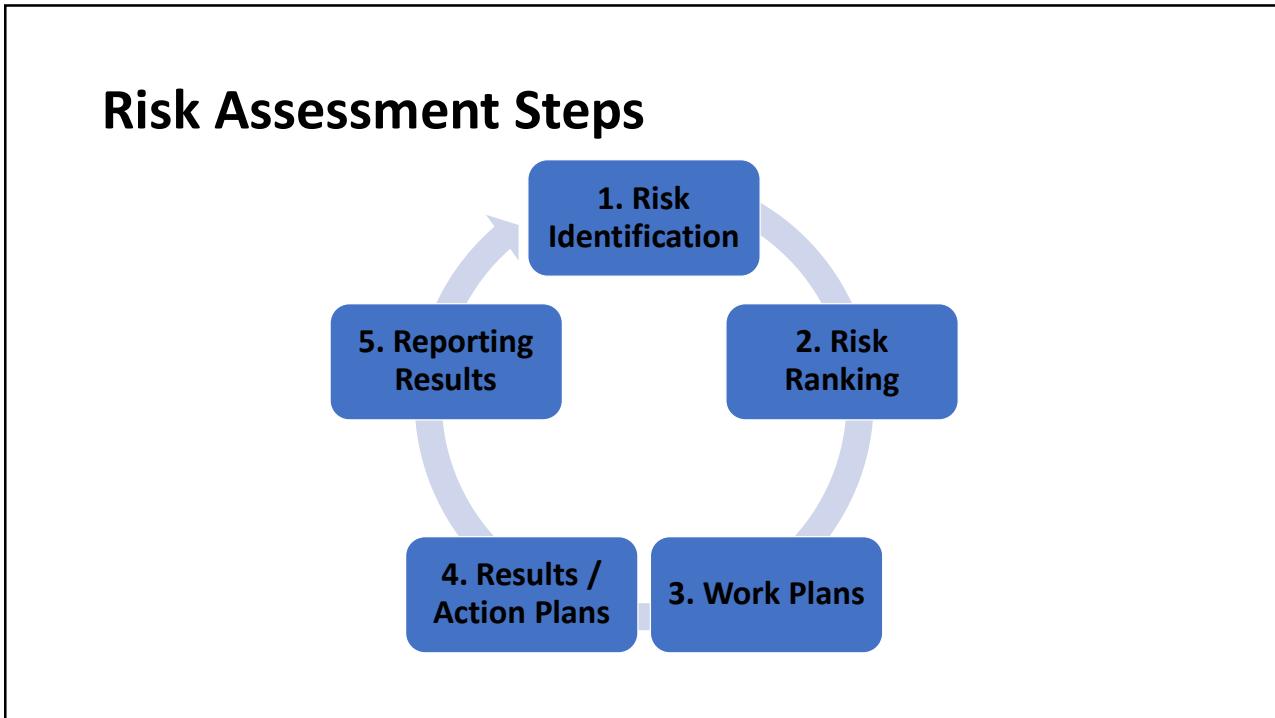


Effective ways to conduct a Compliance Risk Assessment

A Risk Assessment:

- Is a five-stage systematic process of evaluating those things, situations and processes that may cause harm to the organization resulting in non-compliance with regulatory requirements.
- Is conducted by a group of individuals representing different functions in an organization to identify, assess and prioritize compliance risk to reduce the probability of occurrence and/or impact unfortunate events.
- Analyzes what can go wrong, how likely it is to happen, what the potential consequences are, and help an organization determine risk mitigation steps and establish controls.
- Helps the organization judge “the tolerability of the risk on the basis of a risk analysis” while considering influencing factors.

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Effective ways to conduct a Compliance Risk Assessment

- All healthcare providers that participate in federal healthcare programs, including but not limited to:
 - Durable Medical Equipment companies
 - Emergency transport services
 - Hospitals and health systems
 - Home health agencies
 - Hospice
 - Pharmaceutical manufacturers
 - Physician practices
 - Skilled Nursing Facilities
 - Etc.

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Effective ways to conduct a Compliance Risk Assessment

- Risk Assessments are a team effort:
 - Compliance
 - Internal Audit
 - Legal
 - Risk Management
 - Operations

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WHO ELSE WOULD YOU INCLUDE IN THE PROCESS?

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Effective ways to conduct a Compliance Risk Assessment

- Risk Assessments can be performed anytime:
 - Usually about the same time annually
 - Usually started during budget planning cycle
 - Typically done during the third and fourth quarters of the organization's fiscal year
 - Continuous process year after year



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Sample steps and timeline for Risk Assessment process

- Q2 – Planning and Risk Identification
- Q3 – Risk Ranking / Prioritization and Develop Work Plans
- Q4 – Compliance Committee and Board approval of Work Plans
- Q1 – Q4 Begin Monitoring and Auditing, analyze outcomes and develop action plans, and report results
- Repeat Cycle



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Effective ways to conduct a Compliance Risk Assessment

- There is not one way to do a Risk Assessment.
- Develop the best method for your organization.
- Scale it to the organization's size and complexity.
- Points to decide:
 - Compliance risks only vs. Enterprise Risk Management
 - Internal vs. external third-party
 - Manually vs. risk assessment software

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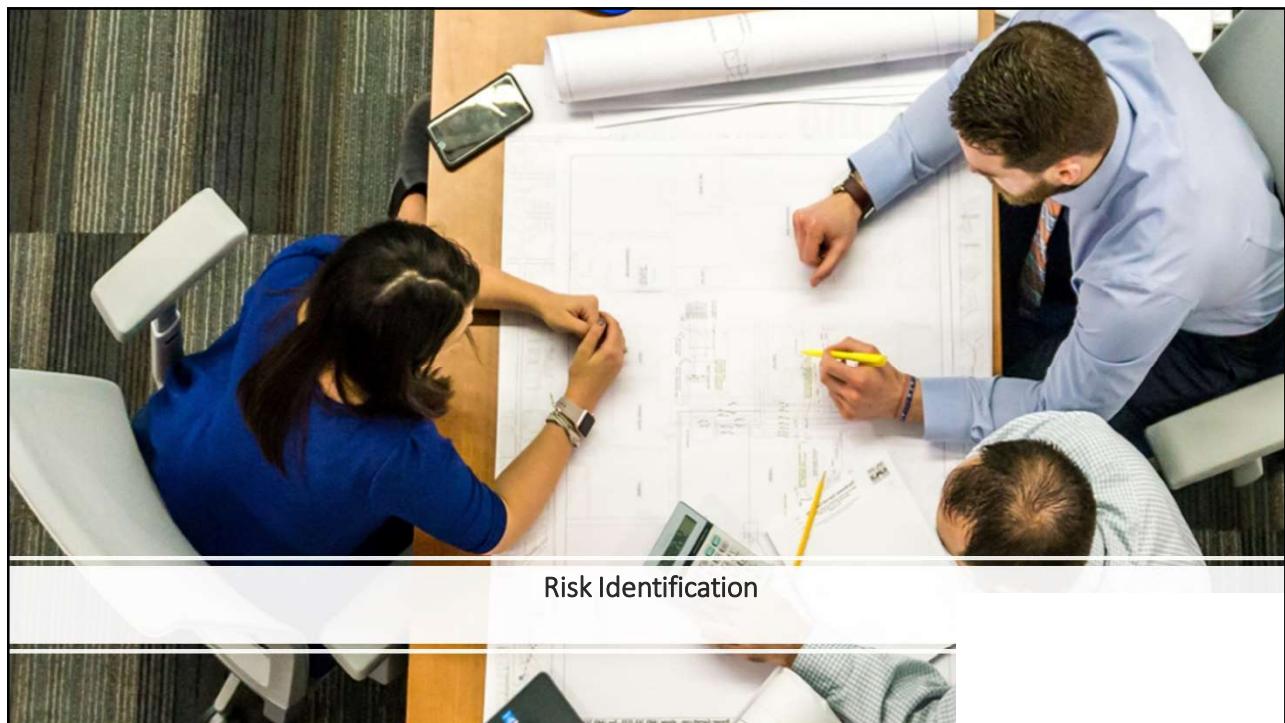


Risk Assessment Process

• Adopt Risk Assessment Policy that details:

- Who is responsible for the Risk Assessment process
- What process or framework is used to conduct the assessment (ie – compliance only, Enterprise Risk Assessment, COSO, RIMS)
- When the annual assessment is conducted
- The scope of the assessment (what entities or departments will be included)
- How the results will be ranked and prioritized
- How the results will be used to create the Internal Audit Plan and Compliance Monitoring Plan
- How the Risk Assessment results, Internal Audit Plan and Compliance Monitoring Plan will be approved by the Compliance Committee and the Board

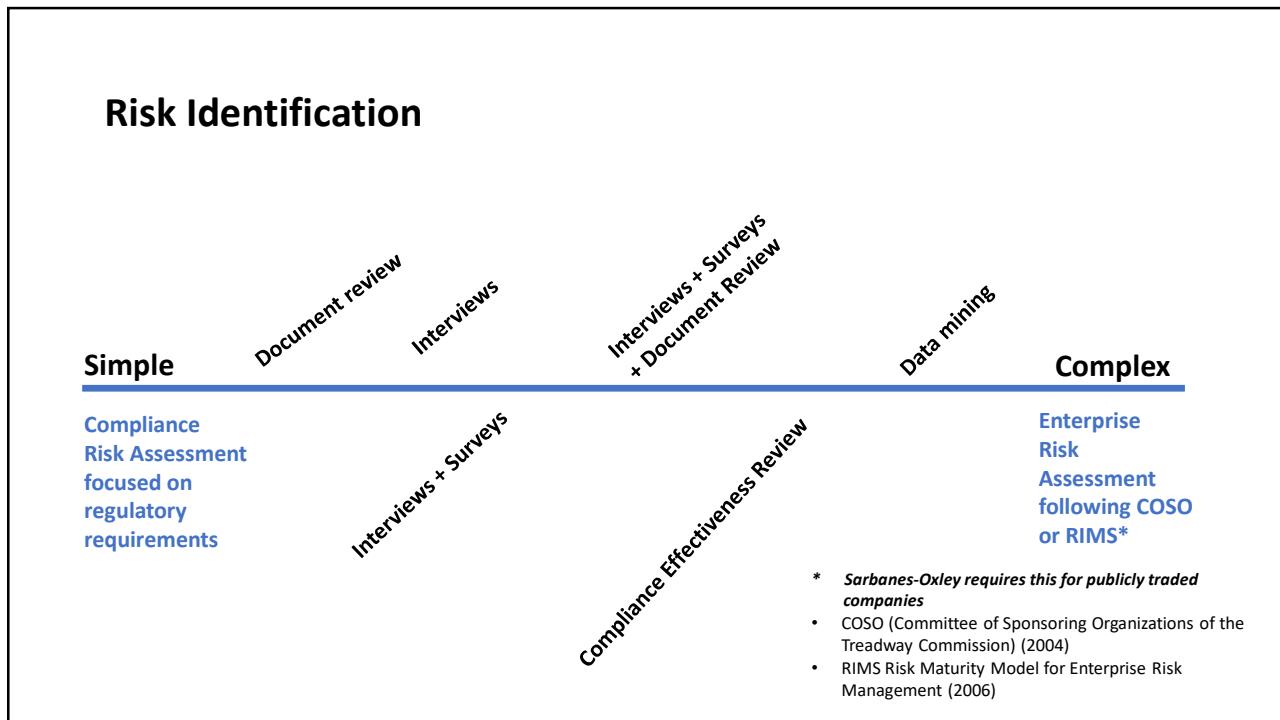
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Risk Identification

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Risk Identification



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Risk Identification

- **Review Documents**
 - Compliance Program Guidance
 - Corporate Integrity Agreements
 - Court documents
 - Government Agency Priorities
 - Industry Newsletters
 - Interviews
 - Laws
 - NCDs/LCDs
 - New Payment Models
- OIG Audits
- OIG Work Plan and updates
- OIG Fraud Alerts
- PEPPER Reports
- Previous Audits and Reviews
- Regulations
- Special Advisory Bulletins
- State and federal survey results
- Third Party Litigation

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Risk Identification



- **Conduct Interviews**

- Board members
- Senior management
- CEOs
- VPs
- Department leaders

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**WHAT OTHER AREAS
WOULD YOU INCLUDE?**

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Risk Identification

- **Conduct Data Mining**

- PEPPER Reports
- Denials data
- CMS Open Payments Database
- Excluded providers
- Licensure
- Star ratings
- Survey data
- Litigation data
- Etc.



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Risk Identification

The types of risk varies based on type of entity and the departments within the entity. Here are some examples:

- Bad debt
- Billing and coding
- Clinical quality
- Clinical research
- Cost reports
- Credentialing
- Credit balances
- Documentation
- Emergency Preparedness
- Environmental
- Excluded providers
- Finance
- HIPAA Privacy and Security

- Information Technology
- Licensure
- Marketing
- Medical Necessity
- Mergers, Acquisitions and Divestitures
- Physician Transactions (Stark)
- Policies and Procedures
- Record retention
- Regulatory
- Reimbursement
- Staffing and Payroll Based Journal
- State and federal surveys

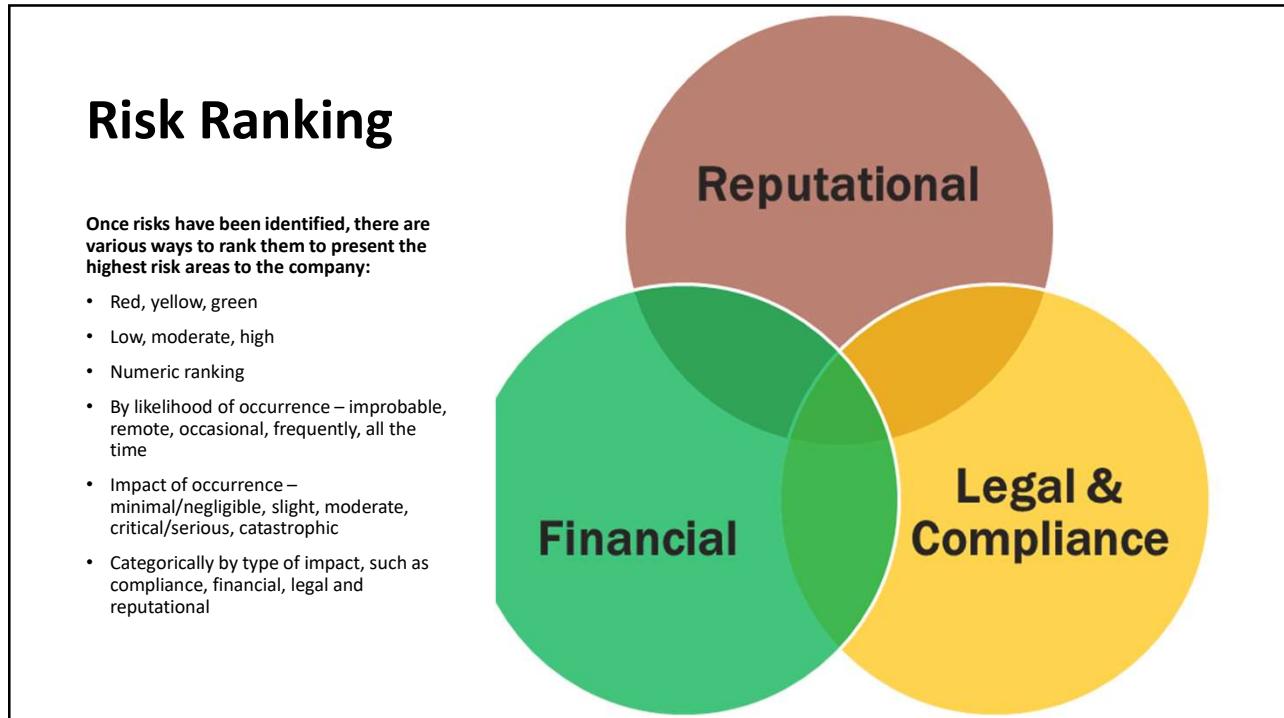
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Risk Ranking

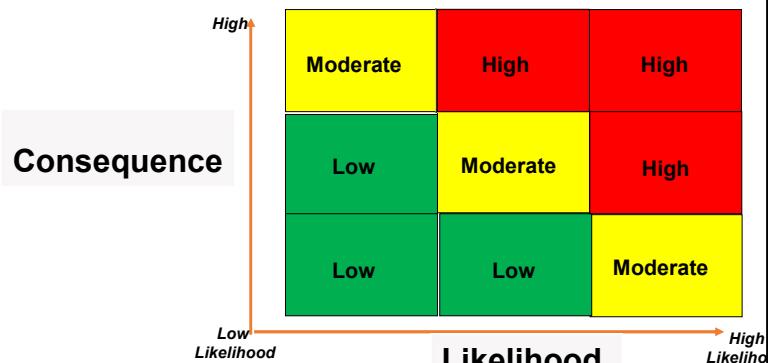
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Risk Ranking

RISK ASSESSMENT SCORECARD		
Risk Rating Scale		
#	Threat Category	RISK PRIORITY
1	Stark Laws & Kickback Statutes	125
2	Privacy and Security	100
3	Disaster Recovery	80
4	Antitrust/Competition Laws	60
5	Corporate Culture	50



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How Risk Assessment relates to Monitoring and Auditing

- Use prioritized results from the Risk Assessment to develop work plans:
 - Compliance Monitoring Plan
 - Internal Audit Plan
- Have Compliance Committee and Board approve all plans



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How Risk Assessment relates to Monitoring and Auditing

- What should you include in monitoring and auditing?
 - Education completion
 - Hotline call analysis (types of calls, number of calls, by entity/region/state)
 - Whether hotline calls were logged within 2 business days
 - Repayments within 60 days (government audits, internal audits, compliance monitoring, investigations)
 - Excluded providers
 - ETC....



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**How Risk Assessment
relates to
Monitoring and Auditing**

- Conduct auditing and monitoring and report out findings to management, the Compliance Committee and the Board
- Develop Corrective Action Plans with owner
- Conduct follow up to test effectiveness of Action Plans
- Document, document, document

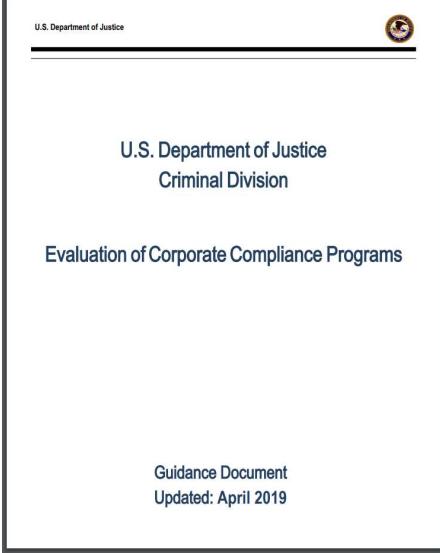
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How Risk Assessment and Compliance Effectiveness Tie Together

1. Risk Assessment
2. Monitoring and Auditing
3. Compliance Work Plans
4. Measuring and Reporting



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How Risk Assessment and Compliance Effectiveness Tie Together

Risk Assessment is a key component of measuring Compliance Program effectiveness:

- *Evaluation of Corporate Compliance Programs* (U.S. Department of Justice Criminal Division, April 2019)
- *Measuring Compliance Program Effectiveness: A Resource Guide* (Health Care Compliance Association-Office of Inspector General Compliance Effectiveness Roundtable, March 2017)
- *Evaluation of Corporate Compliance Programs* (U.S. Department of Justice, February 2017)

Measuring Compliance Program Effectiveness: A Resource Guide

PUBLICATION DATE: MARCH 27, 2017

HCA-OIG Compliance Effectiveness Roundtable
Roundtable Meeting: January 17, 2017 | Washington, DC

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How Risk Assessment and Compliance Effectiveness Tie Together

Measuring Compliance Program Effectiveness: A Resource Guide

2.56	Compliance Resource knowledge and competence	Survey, focus groups and interviews
2.57	Compliance staff knowledge of current regulatory changes and laws	Document review and interviews. Review certificates of attendance at conferences/other educational events, tools used to keep compliance staff current, compliance budget (to support access to current regulatory changes and laws).
2.58	Monitoring of regulations that impact the organization	Document and process interviews (Refer to Guide for list of questions)
2.59	Risk Assessment Cycle	Audit adherence to risk assessment cycle and annual documented risk assessment has been communicated to oversight committee
2.6	Risk based work plan that covers compliance plan elements with board approval and regular reporting on those projects to board	Compliance Committee and board minutes review
2.61	Work plan development based on risk assessment	Process and document review
2.62	Prioritization of risk and consultation with applicable risk partners (legal, HR, IT, risk management)	Documentation and process review. Is there a risk based plan? How was it developed?
2.63	Exit interview	Compliance concerns that come up in exit interviews are addressed

p. 15, 2.56-2.63

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How Risk Assessment and Compliance Effectiveness Tie Together

- **Evaluation of Corporate Compliance Programs** (U.S. Department of Justice Criminal Division, April 2019, p. 2-3)
 - **Risk Management Process** – What methodology has the company used to identify, analyze and address the particular risks it faced? What information or metrics has the company collected and used to help detect the type of misconduct in question? How have the information or metrics informed the company's compliance program?
 - **Risk-tailored Resource Allocation** – Does the company devote a disproportionate amount of time to policing low-risk areas instead of high-risk areas...? Does the company give greater scrutiny as warranted to high-risk transactions ... than more modest and routine hospitality and entertainment?
 - **Updates and Revisions** – Is the risk assessment current and subject to periodic review? Have there been any updates to policies and procedures in light of lessons learned? Do these updates account for risks discovered through misconduct or other problems with the compliance program?

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How Risk Assessment and Compliance Effectiveness Tie Together

"We recognize that each company's risk profile and solutions to reduce its risks warrant particularized evaluation. ... The starting point for a prosecutor's evaluation of whether a company has a well designed compliance program is to understand the company's business from a commercial perspective, how the company has identified, assessed, and defined its risk profile, and the degree to which the program devotes appropriate scrutiny and resources to the spectrum of risks."

*~ Evaluation of Corporate Compliance Programs
(U.S. DOJ Criminal Division, Updated April 2019)*

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IF YOU WEREN'T DOING RISK ASSESSMENT BEFORE WILL YOU NOW?

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Tools and Resources

Sample Tools and Resources

- Risk Assessment policy
- Risk Assessment questions
- Internal Audit Plan
- Compliance Monitoring Plan
- Compliance Program Effectiveness Gap Analysis Tool
- Compliance Committee and Board Reporting Scorecard

**ALL OF LIFE IS THE
MANAGEMENT OF RISK,
NOT ITS ELIMINATION**

WALTER WRISTON

Policy and Gap Analysis Tool

Draft Risk Assessment Policy and Process

In accordance with Office of Inspector General (OIG) Compliance Program Guidance, in U.S. Sentencing Guidelines and in support of the development of an effective compliance program, Signature HealthCARE has developed and implemented a centralized risk assessment and internal review process to identify and address risks not limited to the risks associated with the submission of claims for items and services furnished to Medicare and Medicaid program beneficiaries. Annually, Compliance, Risk Management and Internal Audit and Compliance Monitoring operations conducts a risk assessment and internal review process that:

- Identifies and prioritizes risks.
- Develops internal audit and compliance monitoring work plans related to the identified risk areas.
- Implements the Internal Audit and Compliance Monitoring work plans.
- Develops corrective action plans related to the results of any internal audits or compliance monitoring performed, and
- Tracks the implementation of the corrective action plans in order to assess the effectiveness of such plans.

The risk assessment process is conducted during the fourth quarter of the fiscal year and includes:

- Reviewing the OIG Workplan and Workplan updates for audit areas that are applicable to Signature HealthCARE.
- Reviewing OIG Audit Results, Corporate Integrity Agreements, Department of Justice Settlement Agreements, advisory opinions, fraud alerts and other government publications for risk areas that may be applicable to Signature HealthCARE.
- Reviewing PEPER Reports, internal risk scorecards, prior audit results, government audit results, exit interviews, hotline call trends, investigation trends, risk management cases, QAPI, for potential areas to review or follow up.
- Reviewing regulatory changes and environmental factors, such as changes in government payment models or implementation of new regulations, that could impact the organization.
- Identifying areas of focus for annual audit focus areas to Senior Leadership and Operations for consideration during development of the annual Internal Audit Plan and Compliance Monitoring Plan.
- Conducting a survey of Signature entities to identify gaps in compliance.

Produced in accordance with Section 1102(b)(2) and Annex A to the revised rule.

Sample Compliance Effectiveness Gap Analysis - Protected View - Excel

This document contains sensitive information and is protected by law. It is intended for internal use only. It is prohibited to copy, distribute, or otherwise use this document without the express written permission of the company.

Element	Description	Risk	Frequency	Sample Size	Location
1.a	Root Cause Analysis	What is the company's root cause analysis of misconduct at issue? What systemic issues were identified? Who is involved in the process?			
1.b	Prior Indications	Were there prior opportunities to detect the misconduct in question, such as audit reports identifying relevant control failures or allegations, compliance, & investigations involving similar issue? What is the company's analysis of the prior opportunities?			
1.c	Remediation	What specific changes has the company made to reduce the risk that the same or similar conduct will occur again? What specific steps has the company taken to address the issues identified in the root cause and missed opportunity analysis?			
2.a	Conduct at the Top	How have senior leaders, Board members, auditors, encouraged or discouraged the type of misconduct in question? What concrete actions have they taken to demonstrate leadership in the company's compliance and remediation efforts? How do the company's top leaders model the behavior that is expected of all employees and modeled proper behavior to subordinates?			
2.b	Shared Commitment	What steps has the company taken to demonstrate its commitment to compliance, including how it communicates its commitment to employees and other stakeholders (e.g., business and operational managers, Finance, Procurement, Legal, Human Resources) values to demonstrate their commitment to compliance, including their compensation levels, rank/title, reporting line, resources, and access to key decision makers? What has been the company's approach to addressing compliance issues with its board of directors and/or external auditors?			
2.c	Oversight	What compliance expertise has been available on the board of directors? Has the board of directors and/or external auditors held executive or private sessions with the compliance and control functions? What types of information have the board of directors and/or external auditors been provided in their exercise of oversight in the area in which the misconduct occurred?			
3.a	Compliance Role	Was compliance involved in training and decisions related to the misconduct? Did the compliance or relevant compliance committee, legal counsel, or ethics and compliance officer have a role in the investigation and resolution of the misconduct?			
3.b	Status	Has the company taken steps to improve its compliance function? How has the company's compliance function changed since the misconduct occurred? What role has compliance played in the company's strategic and operational decisions?			
3.c	Experience and Qualifications	Has the compliance and control personnel had the appropriate experience and qualifications for their roles and responsibilities?			

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Auditing and Monitoring Plans

Distribution of Notice of Privacy Practices

Entity	Date	Frequency	Sample Size	Location	Assigned To	Date	Results
1. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
2. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
3. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
4. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
5. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
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107. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
108. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
109. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
110. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
111. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
112. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
113. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
114. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
115. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
116. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
117. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
118. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
119. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
120. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
121. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
122. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
123. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
124. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
125. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
126. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
127. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
128. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
129. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
130. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
131. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
132. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
133. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
134. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
135. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
136. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
137. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
138. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
139. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
140. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
141. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
142. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
143. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
144. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
145. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
146. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
147. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
148. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
149. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
150. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
151. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
152. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
153. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
154. Distribution of Notice of Privacy Practices	10/2023	Annually	100%	All			
155. Distribution of Notice of Privacy Practices	10/2023						

Compliance Scorecard

CORPORATE COMPLIANCE REPORT – NAME OF ENTITY						
DATE:		FOR [QUARTER]				
Type	Completion	Q1	Q2	Q3	Q4	YTD Average
Annual Compliance Education	100%					
Non-Title Compliance (Months)	120%					

REIMBURSEMENTS		Number	Reimbursement	Paid Within 60 Days	YTD Number	YTD Reimbursement	YTD Paid Within 60 Days
Compliance Monitoring							
Internal Investigation							
External Investigation							
Total							

DISCLOSED PROVIDERS		Number	Reimbursement	YTD Number	YTD Reimbursement
Disclosed/Prohibited					
Other					
Total					

EXPIRED LICENSES		Quarter	Expired	Cost Report	YTD Expired	YTD Cost Report Adjustment
		Q1	Number	Amount	Number	Amount
		Q2				
		Q3				
		Q4				

INVESTIGATIONS BY PRIORITY		Q1	Q2	Q3	Q4	YTD Number
Priority 1						
Priority 2						
Priority 3						
Total						

INVESTIGATIONS UNTERED WITHIN TWO DAYS		Target	Q1	Q2	Q3	Q4	YTD Average
Priority 1							
Priority 2							
Priority 3							

NETTING CALLS AND INVESTIGATIONS BY TYPE	
Name	Phone
Anti-corruption	Phone Call
Anti-lobbying	Phone
Case of OIG	Other
Conflict of interest	Other
Documentation	Other
Other Justice	Other
Billing	Other
Other	Other
Government investigation	Other
HIPAA Privacy and security	Other
Licensing	Other
Government investigations	Other
Other	Other
Other rights	Other
Resident charges	Other
Resident trust fund	Other
New Monetary	Other
DOJ/USA Exclusions	Other
OFAC	Other
Other	Other
Total	Other

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Compliance Risk Assessment and Effectiveness Resources

- *Evaluation of Corporate Compliance Programs Guidance* (U.S. Department of Justice Criminal Division, April 2019)
<https://www.justice.gov/criminal-fraud/page/file/937501/download>
- *Measuring Compliance Effectiveness: A Resource Guide* (HCCA-OIG, March 27, 2017)
<https://www.oig.hhs.gov/compliance/compliance-resource-portal/files/HCCA-OIG-Resource-Guide.pdf>
- *Evaluation of Corporate Compliance Programs* (U.S. Department of Justice, February 2017)
<https://www.justice.gov/criminal-fraud/page/file/937501/download>
- *U.S. Sentencing Commission Guidelines* (November 2013)
http://www.ussc.gov/sites/default/files/pdf/guidelines-manual/2013/manual-pdf/2013_Guidelines_Manual_Full.pdf

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Compliance Risk Assessment Take Aways

Compliance Risk Assessment Take Aways

- Risk Assessment isn't a whether or not to do it, it's a must
- Risk Assessments are scalable to the complexity and size of the organization
- There is not one way to do a risk assessment and organizations should determine what works best for them
- Risk Assessment requires a collaborative team
- Risk Assessment is a continuous cycle that is completed annually
- Risk Assessment can help an organization identify potential risks and implement measures to prevent them from occurring
- Risk Assessment is an indication of an effective Compliance Program



Betsy Wade, MPH, CHC, CNA
Corporate Compliance Officer
bwade@shccs.com
(502) 568-7748