

Compliance & Ethics Program Development Action Plan

Task	Individual(s) Responsible	Due Date			
		Q1 2019	Q2 2019	Q3 2019	Q4 2019
<p>Review current contracts, written policies, procedures and operational practices, including, but not limited to:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Code of Conduct <input type="checkbox"/> Employee Handbook <input type="checkbox"/> HIPAA <input type="checkbox"/> Business Associates <input type="checkbox"/> Physician & Vendor Contracts <input type="checkbox"/> Policies related to: <ul style="list-style-type: none"> <input type="checkbox"/> Documentation & Coding <input type="checkbox"/> Billing <input type="checkbox"/> Medical record maintenance <input type="checkbox"/> New hire processes <input type="checkbox"/> Employee orientation and training procedures <input type="checkbox"/> Marketing including marketing materials 					
<p>Develop Compliance Program written policies and procedures with consideration of:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Federal health care program requirements <input type="checkbox"/> Federal Sentencing Guidelines https://www.uscourts.gov/guidelines/2018-guidelines-manual <input type="checkbox"/> OIG Compliance Guidance for Nursing Facilities published in 2000 and 2008 https://oig.hhs.gov/compliance/compliance-guidance/docs/complianceguidance/nhg_fr.pdf <input type="checkbox"/> Section 6102 of the Affordable Care Act regarding mandatory compliance programs for nursing facilities and the October 4, 2016 Final Rule (\$483.85) https://www.hhs.gov/sites/default/files/ppacacon.pdf 					
<p>Assign Compliance Program oversight responsibilities.</p> <ul style="list-style-type: none"> <input type="checkbox"/> If applicable, develop/update the Chief Compliance Officer (CCO) job description to include essential functions, minimum qualifications, and outline a chain of command which allows reporting directly to the board of directors 					
<p>Provide orientation to the CCO and or Compliance Program designee regarding the Compliance Program and established work plan activities as needed</p>					
<p>Develop a formal Compliance Program violation reporting and disclosure process that includes:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Disclosure log & record keeping procedure 					

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<input type="checkbox"/> Investigative protocols <input type="checkbox"/> Response plan procedures <input type="checkbox"/> Disciplinary procedures					
Develop employee compliance training and a formal company-wide training plan					
Publicize the Compliance Program internally with emphasis on reporting obligations and the non-retaliation policy (e.g. through staff memorandum, company newsletter, departmental posting, website, etc.)					
Develop Governing Board education and a Compliance Program oversight plan including periodic reporting by the CO					
Establish a Compliance Committee to oversee the Compliance Program <input type="checkbox"/> Formal meetings scheduled at least quarterly <input type="checkbox"/> Procedure for developing the meeting agenda <input type="checkbox"/> Meeting process format <input type="checkbox"/> Documentation procedures, to include written meeting minutes					
Establish a formal risk assessment process to identify and address risks associated with facility service provision to Medicare, Medicaid, and Managed Care program beneficiaries					
Develop a compliance work plan based on identified risk areas					
Develop compliance auditing and monitoring systems and a formal audit plan. Consider areas that would benefit from 3rd party auditing.					
Establish procedures for monitoring Compliance Program implementation					
Develop a formal overpayment disclosure procedure based on the 60 day overpayment reporting rule					
Establish Compliance Program accountability and enforcement plans					
Develop processes for responding to violations and misconduct and implementing remedial actions					
Develop/update procedures for facility integrated billing compliance processes <input type="checkbox"/> Payor verification <input type="checkbox"/> Beneficiary notices <input type="checkbox"/> MDS accuracy <input type="checkbox"/> OMRA communication <input type="checkbox"/> Medicare Meeting					

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<input type="checkbox"/> Triple Check pre-billing record validation <input type="checkbox"/> Medical Review response and management					
Assign responsibility to access, analyze & report on SNF PEPPER & other billing reports/data.					
Review/Update procedures related to quality care compliance <ul style="list-style-type: none"> <input type="checkbox"/> Incident prevention, reporting and management <input type="checkbox"/> Admissions <input type="checkbox"/> Physician orders <input type="checkbox"/> QAPI and Outcomes reporting <input type="checkbox"/> Clinical assessment standards <input type="checkbox"/> Therapy provision (intensity, duration and quantity) <input type="checkbox"/> Medical necessity <input type="checkbox"/> Care planning <input type="checkbox"/> Safe discharge transitions <input type="checkbox"/> Interdisciplinary communication <input type="checkbox"/> Clinical meetings 					
Review/update HR hiring processes <ul style="list-style-type: none"> <input type="checkbox"/> Compliance language in job descriptions <input type="checkbox"/> Screening measures including exclusion checks & licensure verification <input type="checkbox"/> Enforcement and disciplinary procedures <input type="checkbox"/> Compliance related exit interview questions <input type="checkbox"/> Performance appraisal standards to include evaluation of performance related to the code of conduct <input type="checkbox"/> New employee orientation 					
Confirm process for acknowledgement of code of conduct and maintaining training records					
Conduct formal risk assessment to assess compliance and potential risk in areas such as fraud and abuse, referral relationships and arrangements, billing problems, privacy breaches, and quality related events.					
Develop internal controls to monitor adherence to applicable laws and regulations and to promote quality care					
Perform medical necessity and documentation audits					
Implement corrective action plans in response to audit findings as needed					