

Compliance Workplan Template

1st Quarter

Item	Detail	Audit or Monitor?	Responsible Party	Initiate	Complete	
1. Billing and Coding						
1.1	Coding Integrity	Verify Health Center coding is accurate, appropriate, and can be justified in medical record	Audit	Billing Manager	1/1/15	1/15/15
1.2	Claims	Claims are adjudicated and closed out quickly	Audit	Billing Manager	1/1/15	1/15/15
1.3	Approval Rate	Ensure the approval rate	Audit	Billing Manager	2/7/15	2/21/15
1.4	New Provider Claims	New provider claims are closely monitored for six weeks	Monitor	Billing Manager	Ongoing	Ongoing
1.5	Claims Audits	Review claims for over-billing of top ten most costly codes	Audits	Billing Manager	3/1/15	3/15/15
2. Contracts						
2.1	Renewals	Ensure all contracts (provider, IPA, ancillary services, management staff, etc.) are current	Monitor	CEO	2/21/15	2/30/2015
2.2	Relevancy	Have segments of the population been added to the service area that impact contracts?	Audit	CO	2/21/15	2/30/2015
2.3	Terms	Review terms of contracts	Audit	CO	3/30/15	3/7/15
2.4	Vendors	Assess contracts with vendors and their performance	Auditor	CO	3/15/15	3/7/15
3. Finance and Accounting						
3.1	Actual versus Projected	Are current finance reports at or close to budget projections?	Audit	CFO	Quarterly	Quarterly
3.2	Sliding Fee Discount Program	Appropriate documentation (proof of income)	Audit	CFO	3/21/15	3/30/15
3.3	Billing Rules and Standards for Clinical Visits	Review P&Ps to ensure up to date; audit annually	Audit	CFO		
4. Clinical Quality						
4.1	Infection Control	Review employee and patient logs	Audit	CMO	Quarterly	Quarterly
4.2	Patient Experience	Patient satisfaction survey	Monitor	Clinic Manager	Bi-Annually	Bi-Annually
4.3	Referral Tracking	Review reports for missed, failed, or incomplete referrals	Audit	Director of Quality Assurance	Quarterly	Quarterly
5. Privileging and Credentialing						
5.1	Privileging	Review documents provided to Privileging Committee; following meeting review approved privilege	Audit	HR Director	2/1/15	2/21/15

	5.2 Credentialing	Review documents presented to Privileging Committee	Audit	HR Director	2/1/15	2/21/15
	5.3 Professional CME Credits	Review recent	Monitor	HR Director	2/14/15	2/28/15
6. Reporting and Grants Management						
	6.1 Monitoring requirements	Monitoring grant requirements against reality	Monitor	CFO	3/1/15	3/21/15
	6.2 Grant Reporting	Calendar and submitting appropriate grant reports	Monitor	CFO	3/1/15	3/21/15
	6.3 Grant Requirements	Review if Health Center is recording numbers according to each of grant and HRSA requirements	Audit	CFO	3/14/15	3/28/15
7. UDS Reports						
	7.1 Quarterly UDS Reports	Run quarterly UDS reports to review accuracy and	Monitor	CO		
2nd Quarter						
	Item	Detail	Audit or Monitor?	Responsible Person	Initiate	Complete
1. Facility Review						
	1.1 Storage and disposal of hazardous materials	Review vendor performance	Audit	Clinic Manager	4/1/15	4/15/15
	1.2 ADA Access	Facilities walk through	Audit	CO	4/1/15	4/7/15
	1.3 Space Utilization	Clinic lead provider at each location	Monitor	CO	4/15/15	4/30/15
	1.4 Proper patient flow	Clinic lead provider at each location	Monitor	Clinic Manager		
2. Emergency Preparedness						
	2.1 Evacuation Plan	Review evacuation plan and parties responsible	Audit	CO	5/4/15	5/15/15
	2.2 Fire Safety	Check expiration date on fire extinguishers and review fire safety plan	Audit	CO	5/4/15	5/15/15
	2.3 Bomb or Gun Threat	Review plans and training	Audit	CO	5/7/15	5/21/15
	2.4 Disease Outbreak	Review plans, equipment, and training	Audit	CO	5/7/15	5/21/15
3. Patient Registration Materials						
	3.1 SFDP	Notice of SFDP	Audit	Clinic Manager	4/1/15	4/7/15
	3.2 LEP Materials	Are all patient materials available in other commonly spoken languages in the service area for those with Limited English Proficiency?	Audit	Clinic Manager	4/2/15	4/30/15
	3.3 Notice of Hours and Location	Are the notice of hours and locations consistent and visible?	Audit	Clinic Manager	4/3/15	4/1/15
	3.4 After-hours instructions	Are after-hours instructions available and clearly posted?	Audit	Clinic Manager	4/4/15	4/2/15

	3.5 Informed Consent	Are patients provided with appropriate informed consent forms? Are these being stored properly?	Audit	Clinic Manager	4/5/15	4/3/15
4. Governance						
	4.1 Board Packets	Does the board receive timely and effective information?	Audit	CEO/CO	5/4/15	5/30/15
	4.2 Board Composition	Does the board composition meet section 330 requirements?	Monitor	CEO/CO	Ongoing	Ongoing
	4.3 Board Orientation	Is there adequate board orientation materials and training?	Audit	CEO/CO	5/6/15	5/1/15
	4.4 Board Committees	Do the appropriate board committees exist and meet regularly?	Audit	CEO/CO	5/7/15	5/2/15
	4.5 Minutes	Are minutes being recorded and signed for every board meeting and board committee meeting?	Audit	CEO/CO	5/8/15	5/3/15
	4.6 Board Training	Is there adequate ongoing board training?	Audit	CEO/CO	5/9/15	5/4/15
	4.7 Conflict of Interest	Have all board members signed a conflict of interest statement?	Audit	CEO/CO	5/10/15	5/5/15
	4.8 Bylaws	Do the board bylaws address all section 330 requirements?	Audit	CEO/CO	5/11/15	5/6/15
5. Finance and Accounting						
	5.1 Actual versus Projected	Are current finance reports at or close to budget projections?	Audit	CFO	Quarterly	Quarterly
6. Clinical Quality						
	6.1 Infection Control		Audit	CMO	Quarterly	Quarterly
	6.2 Referral Tracking	Review reports for missed, failed, or incomplete referrals	Audit	Director of Quality Assurance	Quarterly	Quarterly
7. Contracts						
	7.1 Renewals	Ensure all contracts (provider, IPA, ancillary services, management staff, etc.) are current	Monitor	CEO	5/21/15	5/30/15
8. UDS Reports						
	8.1 Quarterly UDS Reports	Run quarterly UDS reports to review accuracy and	Monitor	CO		
3rd Quarter						
	Item	Detail	Audit or Monitor?	Responsible Person	Initiate	Complete
1. Billing and Coding						
	1.1 Coding Integrity	Verify Health Center coding is accurate, appropriate, and can be justified in medical record	Audit	Billing Manager	7/15/15	7/30/15
	1.5 Claims Audits	Review claims for over-billing of top ten most costly codes	Audits	Billing Manager	7/16/15	7/1/15
2. Finance and Accounting						
	2.1 Actual versus Projected	Are current finance reports at or close to budget projections?	Audit	CFO	Quarterly	Quarterly
3. Privileging and Credentialing						

	3.1 Priviledging	Review documents provided to Priviledging Committee. Review approved priviledges.	Audit	HR Director	7/1/15	7/21/15
	3.2 Credentialing	Review documents presented to Priviledging Committee	Audit	HR Director	7/1/15	7/21/15
4. Clinical Quality						
	4.1 Infection Control	Review vendor and employee performance	Audit	CMO	Quarterly	Quarterly
	4.2 Patient Experience	Patient satisfaction survey	Monitor	Clinic Manager	Bi-Annually	Bi-Annually
	4.3 Referral Tracking	Review reports for missed, failed, or incomplete referrals	Audit	Director of Quality Assurance	Quarterly	Quarterly
5. Contracts						
	5.1 Renewals	Ensure all contracts (provider, IPA, ancillary services, management staff, etc.) are current	Monitor	CEO	8/21/15	8/30/15
6. Privacy and Confidentiality						
	6.1 Logins and Passwords	Ensure all passwords have been changed in the last year and check for frequency of failed logins	Audit	CO/Director of IT	8/3/15	8/15/15
	6.2 Work station security	Check all workstations to ensure that they are not accessible by unauthorized individuals	Audit	CO/Director of IT	8/4/15	8/16/15
	6.3 HIPAA	Ensure HIPAA compliance	Audit	CO/Director of IT	9/5/15	9/17/15
7. 340B						
	7.1 Reporting	Ensuring that 340b program reports are completed on a timely and accurate basis	Monitor	Director of Pharmacy/Clinic Operations Director	8/3/15	8/15/15
	7.2 Monitoring Inventory	Monthly and quarterly inventory, and monitoring contracted vendor performance. Review vendor	Monitor	Director of Pharmacy/Clinic Operations Director	8/4/15	8/16/15
8. UDS Reports						
	8.1 Quarterly UDS Reports	Run quarterly UDS reports to review accuracy and	Monitor	CO		
4th Quarter						
	Item	Detail	Audit or Monitor?	Responsible Person	Initiate	Complete
1. Facility Review						
	1.1 Storage and disposal of hazardous materials	Review vendor performance	Audit	Clinic Manager	10/1/16	10/15/16
	1.2 ADA Access	Facilities walk through	Audit	CO	10/1/15	10/7/15
	1.3 Space Utilization	Clinic lead provider at each location	Monitor	CO	11/15/15	11/30/15
	1.4 Proper patient flow	Clinic lead provider at each location	Monitor	Clinic Manager	11/15/15	11/30/15
2. Clinical Quality						
	2.1 Infection Control	Review employee and patient logs	Monitor	CMO	Quarterly	Quarterly
	2.3 Referral Tracking	Review reports for missed, failed, or incomplete	Audit	Director of Quality Assurance	Quarterly	Quarterly
3. Contracts						

3.1 Renewals	Ensure all contracts (provider, IPA, ancillary services, management staff, etc.) are current	Monitor	CEO	10/21/15	10/30/15
4. Code of Conduct					
4.1 Conflict of Interest	Have all management signed Conflict of Interest Statements? Is the Conflict of Interest policy up to date?	Audit	CO	10/1/16	10/28/16
4.2 Payments and Gifts	Review P&Ps up to date	Monitor	CO	11/2/16	11/29/16
4.3 Purchasing and Competitive Bidding Policy	Review P&Ps to ensure up to date	Audit	CO	11/3/16	11/30/16
5. UDS Reports					
5.1 Quarterly UDS Reports	Run quarterly UDS reports to review accuracy and	Monitor	CO	12/1/15	12/15/15
5.2 Annual report due	45 days after calendar year (Feb. 15th)	Audit	CO	12/1/15	12/15/15
6. Lawsuits or Malpractice Claims					
6.1 FTCA or Malpractice Insurance	Is insurance up to date	Audit	COO/CO	12/1/16	12/11/16
6.2 Lawsuits/Malpractice Claims	Tracking lawsuits and frequency of malpractice claims	Monitor	COO/CO	12/1/16	12/11/16