

UNIVERSITY OF ROCHESTER MEDICAL CENTER	UNIVERSITY OF ROCHESTER MEDICAL CENTER POLICY	Compliance Committee
	SECTION Compliance	March 2002
	Auditing and Monitoring	PAGE: 1 of 2

PURPOSE:

To establish a system of ongoing auditing and monitoring for compliance.

POLICY:

An important component of the Compliance Program is the use of audits and/or other evaluation techniques to monitor compliance and assist in the reduction of identified problem areas. The URMC Compliance Office will establish a process to ensure that our operations and programs are in compliance with applicable laws, regulations, policies, procedures, and the code of conduct.

PROCEDURE:

1. The Compliance Officer is charged with ensuring this policy is carried out, and will report the overall results of these reviews to URMC management on a regular basis and to the URMC Board of Trustees at least annually.
2. Ongoing auditing and monitoring efforts will focus on the following areas as appropriate:
 - All billing for services rendered to ensure accurate coding and sufficient chart documentation to substantiate the claims submitted for reimbursement.
 - Compliance with laws, regulations, policies, procedures, and the code of conduct relating to referral arrangements, coding, claim submission, reimbursement, supervising physicians in teaching settings.
 - Compliance with specific rules and policies that have been the focus of particular attention by third party payers, regulatory agencies, Special Fraud Alerts, audits and settlements at other institutions.
 - Areas of concern identified by any internal processes, including the hotline operation, external auditor, etc.
3. Errors or overpayments discovered as a result of the ongoing auditing and monitoring will be disclosed to URMC management and legal counsel; resulting in the prompt return of any overpayment as deemed appropriate, with appropriate documentation and a thorough explanation of the reason for the refund.
4. When monitoring discloses program deficiencies, appropriate immediate corrective action measures shall be implemented.
5. The Compliance Officer will work with management to develop an annual auditing and monitoring plan to address identified risk areas related to compliance with laws and regulations, as well as organizational policies, procedures, and the code of conduct.

6. Ongoing auditing and monitoring efforts shall include: interviews with management responsible for operations (e.g. coding, claim development and submission, patient care, and other related activities); reviews of medical and financial records and other source documents as deemed necessary that support claims for reimbursement in order to ensure accuracy of claims.