

Monitoring Tool Audits

Title:	Monitoring Tool Audits	Effective Date:	10/27/2003
Author:	Chief Compliance Officer	Last Review Date:	12/01/2021
Location:	All Locations	Last Revision Date:	12/01/2021
Functional Area:	ADMINISTRATION		

POLICY

One of the seven essential elements of an effective compliance program as dictated by the U.S. Office of Inspector General (OIG) is establishing a standard audit process that is applicable to its operations. Liberty staff, including the Corporate Compliance Officer (CCO), conducts periodic auditing and monitoring of identified risk areas related to compliance. It is the responsibility of the entire management team to ensure that ongoing auditing and monitoring are properly executed, documented and evidenced. When the audit or survey is conducted by a federal, state or private agency, the CCO will be responsible for monitoring the results of such audits. An important component of the Compliance Program (Program) is the use of audits and/or other evaluation techniques to monitor compliance and assist in the reduction of identified problem areas.

PROCEDURE

1. Responsibility of program management personnel for compliance monitoring:

It is the responsibility of individual Contract Managers, Directors of Operations and on-site Program Directors and Managers to remain vigilant to particular risk areas and lead initiatives to address potential, emergent and evident compliance issues. Clearly, the individual leaders who are closest to the details of day-to-day operations have greatest familiarity with their particular processes and exposure to compliance issues. The CCO cannot be an expert in all facets of Liberty's many diverse programs but will be available for consultative expertise.

2. Responsibility of CCO for compliance monitoring:

The CCO is responsible for ensuring that the element of the Program, such as the Employee Help Line, remains effective. The CCO also provides oversight to ensure that various areas of risk are monitored consistently and appropriately. One of the principal responsibilities of the CCO is to annually identify compliance issues, which require monitoring, with proposed timetables and personnel assignments. Progress reports of the ongoing monitoring activities, including identification of suspected noncompliance, will be maintained by the CCO and shared with corporate management. Monitoring techniques that will be used by the CCO include, but are not limited to, the following:

- a. Compliance audits that focus on those areas within Liberty that have potential exposure to government enforcement actions as identified in:
 1. Special Fraud Alerts issued by the OIG;
 2. OIG work plans, audits and evaluations; and
 3. Law enforcement initiatives.
- b. Benchmarking analyses, which provides operational trends from a compliance perspective, and identify the need for further assessment, study or investigation
- c. Periodic reviews in the areas of Program dissemination, communication of Liberty's compliance standards and Code of Conduct, availability of the Employee Help Line, and adequacy of compliance training and education to

ensure that the Program's compliance elements have been satisfied in terms of Liberty conformance. The review process will be conducted through on-site interviews and survey questionnaires completed by personnel in operations, medical records, coding, billing and patient care and other select areas.

- d. Follow-up reviews that ensure corrective action have been effectively and completely implemented.
- e. The CCO will recommend and facilitate auditing and monitoring of identified risk areas related to compliance with laws and regulations, as well as Liberty's policies, procedures and Code of Conduct.
- f. The CCO will guide and assist management personnel in conducting and/or overseeing annual compliance reviews.
- g. The CCO will verify completion of compliance reviews and any corrective action measures arising from them. The CCO will also be required to validate corrective compliance system measures that address any weaknesses identified by the process.
- h. The CCO is responsible for periodic reporting to corporate management on the general status and outcome of compliance auditing and monitoring.

NOTE: It is not necessary that the CCO perform all of the audits personally. However, the CCO should coordinate efforts to secure the resources and experts needed to accomplish this key element of compliance.

Approved By: _____

Revision History

Version	Date	Author	Summary of Changes
#1	10/27/2003	Judith Ann Shields	Initial ISF release – refactor and update of previous security policies into distinct documents
#2	08/20/2004	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#3	01/18/2005	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#4	12/22/2006	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#5	12/22/2007	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#6	12/22/2008	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#7	11/15/2009	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#8	8/20/2010	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#9	01/18/2011	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#10	12/22/2012	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement

#11	12/22/2013	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#12	12/22/2014	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#13	11/15/2015	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#14	08/20/2016	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#15	12/22/2017	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#16	12/22/2018	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#17	11/13/2019	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#18	11/03/2020	Judith Ann Shields	Annual review, Attorney reviewed © LHC, Author Title not name, Policy Title. Added inactivity lock requirement
#19	12/01/2021	John Beck	Annual review, minor changes. Added inactivity lock requirement