



University of Florida, Pediatric Integrated Care System

Compliance Program

Policy: Internal & External Monitoring & Auditing Standards **Number:** CD-0011

Programs: Title XIX and Title XXI

Effective Date: Title XIX January 24, 2008

Title XXI August 1, 2013

(Revisions are effective 45 days after AHCA approval for Title XIX and after CMS approval for Title XXI.)

Approved by:

Title	Name	Signature	Ped-I-Care Approved	CMS Approved	AHCA Approved
Compliance Officer	Mark Hudak, M.D.	<i>Mark J. Hudak M.D.</i>	1/30/2008, 9/2/2008, 8/30/2010, 9/24/2012, 9/6/2013, 3/17/2016	3/2/2011	3/2/2011
Revised	4/30/2008, 7/7/2010, 8/12/2011, 11/22/2012, 8/8/2013, 3/11/2016				

Responsible Party: Compliance Officer, Compliance Department, Ped-I-Care Organizational Administration, and all Ped-I-Care employees.

Purpose

Ped-I-Care in coordination with the Compliance Officer and Compliance Department is committed to ensuring that the organization adheres to all laws, statutes, and regulations as required by its governing agents and/or accrediting agencies. This policy has been developed to ensure compliance with these standards as set forth through the use of internal monitoring as well as participation with external audits conducted by governing agencies. Organizational compliance ultimately affects the accountability to governing and accrediting agents as well as the effectiveness of health care services provided to beneficiaries.

Policy

It is the policy of Ped-I-Care to fully comply with all laws, rules, and regulations as well as its own organizational policies regarding compliance, conduct, and ethical requirements which apply to the organization's daily operations. All employees are required and held responsible for their efforts to act in a legal and ethical manner as relevant to regulations pertaining to their employment with Ped-I-Care. Furthermore, it is the policy of Ped-I-Care to cooperate with appropriately authorized investigations, both internal through the utilization of the Compliance Department and external as conducted by governing and accrediting agencies. The Compliance Department has developed guidance which supports the general premises of this policy as listed below in the procedure.

Procedures

1. The Compliance Officer, Compliance Director, and Compliance Department:
 - a. Identify which areas within the organization need monitoring and determine a time schedule for such activities.
 - b. Give sufficient notification to applicable department managers/directors of when monitoring, whether internal or external, will occur unless notification is otherwise determined by the Compliance Director.
 - c. Assure full cooperation with investigators, internal and external, within the authorized scope of such an investigation.
 - d. Reduce the chaos and fear associated with investigations.
 - e. Ensure that required documents and data are disclosed timely upon request by auditor(s) within the scope of the authorized investigation.
 - f. Maintain a detailed summary for all events associated with the investigation.
 - g. Assist in a plan of action in the event any system(s) may be affected by the investigation.
 - h. Suspend the routine destruction of records during an investigation.
 - i. Assure full cooperation by all staff, managers, directors, and departments including administration; failure to effectively participate includes disciplinary action up to and including termination.

References

Agency for Health Care Administration, *Interpretive Guidelines*, (July 2004), 59A-12.004(1)(a), F.A.C., and 59A-12.0072, F.A.C.

Health Care Compliance Association, *Evaluating and Improving A Compliance Program*, (April 2003)

Office of Inspector General's *Model Compliance Program* (November 1999) Centers for Medicaid and Medicare Services Managed Care Manual, Chapter 11; 20.2 and 110.1, (December 2004, March 2002 respectively)

State of Florida Statute for Medicaid Program Integrity and Federal Laws 42 CFR 438.608, 42 CFR 455(a)(2), Chapters 358, 414, 641 and 932, F.S., and Section 409.912(21) and (22), F.S.(2006)