

# THE CENTER FOR DISCOVERY

SUBJECT: Internal Auditing and Monitoring	MANUAL: Corporate Compliance
	SECTION: Section 6

## Purpose:

The Center for Discovery developed and implemented a compliance program in an effort to establish, in part, effective internal controls that promote adherence to applicable federal and state laws and requirements. 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 Center for Discovery recognizes the need for internal controls, but also realizes that resources are limited. Therefore, this policy focuses on the Center's resources to effectively and efficiently audit and monitor risk areas.

## Policy:

1. The Center for Discovery will conduct ongoing auditing and monitoring of identified risk areas related to compliance including but not limited to billing, fiscal management, clinical operations, and service provision.
2. The Quality Improvement Department and the Compliance Office will ensure that ongoing auditing and monitoring is properly conducted, documented and reported.

## Procedures:

1. Each Center for Discovery program is expected to conduct regular self-audits of their respective programs to ensure compliance with all appropriate rules and regulations, as well as Center for Discovery's policies, procedures and standards of conduct.
2. In order to assist in identification of potential risk areas, the Corporate Compliance Officer will request that each program complete an annual risk assessment as related to each specific program. This assessment will assist both the management of each program as well as the Corporate Compliance Officer in identifying areas that require additional attention, changes in policies, additional training, or regular monitoring.
3. Following receipt of the risk assessments, a schedule of audits to be completed by the Compliance Department will be generated for the upcoming year with additional audits completed throughout the year as needed.
4. Specific programs are also regularly audited by the Quality Improvement Department. Certain programs are consistently audited on an annual basis with additional audits if a specific risk is identified or a deficiency or violation occurs. All programs are audited by QI and or Compliance Departments on a periodic basis prioritized by factors to include results of the risk assessments, results from prior audits, reports of concerns or violations, changes in regulations, or changes in program organization.

ORIGINAL DATE: 2/2012	SUPERSEDES: N/A	
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5. The Corporate Compliance Officer will facilitate auditing and monitoring of the identified risk areas related to compliance with laws and regulations, as well as Center for Discovery policies, procedures, and standards of conduct.
6. The audits and reviews conducted by the Quality Improvement Department and Compliance Office will examine the Center for Discovery's compliance with specific rules and policies through on-site visits, personnel interviews, clinical record reviews to support claims for reimbursement, and documentation reviews. The Quality Improvement Department will conduct and/or oversee compliance reviews with guidance and assistance from the Corporate Compliance Officer. Each Center for Discovery program will be reviewed on its compliance with applicable regulations and quality measures. The Corporate Compliance Officer will determine the sample size and sample criteria prior to each audit. All review tools used will be standardized and approved by the Corporate Compliance Officer.
7. The Corporate Compliance Officer will verify completion of compliance reviews and any corrective measures arising from them. Program Administrators and the Corporate Compliance Office will address any weaknesses identified by the process. The Corporate Compliance Officer will validate any corrective measures through review and signature.
8. The Corporate Compliance Officer will be responsible to periodically, but not less than semi-annually, report to the Corporate Compliance Committee on the general status of compliance reviews, the outcome of compliance auditing and monitoring, and the corrective actions taken.

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