

**SECTION:** 2.4.6.1.  
**SUBJECT:** Corporate Compliance  
**TOPIC:** Auditing and Monitoring

**POLICY**

Arc of Onondaga conducts internal audits and reviews all areas of the organization to ensure compliance with federal, state, local and organizational standards by which the agency is governed and with the agency policies and procedures.

Arc of Onondaga conducts on-going auditing and monitoring of identified risk areas related to compliance including but not limited to billing, fiscal management, program/clinical operations and service provision. Additional potential areas of inclusion include employment policies, third-party billing practices, contractual relationships, reporting and record-keeping practices, employee and independent contractor training and education, proper documentation and individual record accuracy, and other areas as identified by the agency.

The audits and reviews will examine the agency's compliance with specific rules and policies through on site visits, personnel interviews, general questionnaires, medical and clinical record reviews to support claims for reimbursement, and documentation reviews.

Audits and reviews are conducted by QA staff as well as divisional staff. Copies of any file reviews completed by program or divisional staff are forwarded on a monthly basis to the Compliance Officer. Regular audits conducted by QA staff consist of billing/claim audits as well as file reviews as part of self surveys.

Division Directors will immediately notify the Compliance Officer of any visits, audits, investigations, or surveys by any regulatory agency or authority. Additionally, information related to overpayments from any payors should be sent to the Compliance Officer. Results, oral or written, of any visits, audits, investigations, or surveys will be forwarded to the Compliance Officer promptly upon receipt by agency personnel.

Results of internal and external audits are shared on a monthly basis with the Corporate Compliance Committee. Corrective action plans are developed for any issues identified by any audit, including both deficient practices and areas for improvement. The Corporate Compliance Committee receives monthly updates on the implementation of corrective action plans until all items are completed. The Corporate Compliance Officer is responsible for verification of development and implementation of corrective measures.

**PROCEDURE**

**Person(s)**  
Corporate Compliance Committee

**Responsibility**  
During December, develops annual work

plan for upcoming year, identifying audit schedule, including sample sizes, etc.

As part of work plan, identifies responsible parties for completing assigned numbers of audits.

Approves tools used to conduct audits.

Corporate Compliance Officer and/or designated individuals

During site visit, utilizes checklist to conduct audit.

Prepares written report within two weeks following completion of audit, identifying issues of concern, deficient practices, areas of improvement, and best practices. If necessary, identifies potential disallowances.

Distributes report to Division Director, Assistant Executive Director, Chief Financial Officer, and Executive Director.

Division Director

Prepares written response to report, identifying corrective action, within two weeks of receipt of report.

Ensures billing correction notices are completed and forwarded to Finance Department, as necessary.

Forwards copies of divisional audits and/or file reviews to Compliance Officer on a monthly basis.

Corporate Compliance Officer

Ensures audit results and responses are reviewed at Corporate Compliance Committee meetings.

Ensures Corporate Compliance Committee receives monthly updates on implementation of corrective action.

Maintains data from audits and reviews, reviewing on at least a quarterly basis to identify trends and needed corrective

actions. Shares data with Compliance Workgroup, Compliance Committee and Board of Directors.

DATE: 5/2002  
REVISED: 6/2007, 7/2009, 12/2011, 12/2016

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Executive Director

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Date

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President, Board of Directors

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Date