**DOD UBO ANNUAL REVIEW OF COMPLIANCE PROGRAM EFFECTIVENESS CHECKLIST**

[NAME OF MTF]

The UBO Compliance Officer will regularly review the implementation and execution of the compliance program elements. This review will be conducted as least annually and will include an assessment of each of the basic elements individually, as well as the overall success of the program. It will help identify any weaknesses in your compliance program and implement appropriate changes. A copy of this review should be provided to the Base Commander and UBO Service Manager.

References:

OIG Compliance Guidance for Hospitals, February 1998

OIG Supplemental Compliance Program Guidance for Hospitals, January 2005

| **No.** | **Element 1 – Development of UBO Compliance Policies and Procedures, Including Standards of Conduct** | **Yes** | **No** | **Other Assessment/Comments** |
| --- | --- | --- | --- | --- |
|  | Are policies, procedures, and reference materials relevant to day-to-day responsibilities readily available to those who need them?  |  |  |  |
|  | Does the UBO monitor staff compliance with internal policies and procedures? |  |  |  |
|  | Have the standards of conduct been distributed to all UBO staff members? |  |  |  |
|  | Has the UBO developed a risk assessment or audit tool to assess and identify weaknesses and risks in their operations? |  |  |  |

| **No.** | **Element 2 - Designation of a UBO Compliance Officer & Compliance Committee**  | **Yes** | **No** | **Other Assessment/Comments** |
| --- | --- | --- | --- | --- |
|  | Is the designated UBO Compliance Officer a high-level official in the MTF? |  |  |  |
|  | Does the UBO compliance officer have direct access to all senior management and the Legal Office? |  |  |  |
|  | Does the UBO compliance officer closely coordinate compliance functions with the coding compliance officer, MTF compliance officer, and internal review auditors? |  |  |  |
|  | Is there an active UBO compliance committee, comprised of trained representatives of each of the relevant functional departments, as well as senior management? |  |  |  |
|  | Does the UBO compliance officer have full authority to stop the processing of claims that he or she believes are problematic until the issue in question has been resolved? |  |  |  |
|  | Does the UBO compliance officer make regular reports to senior MTF management concerning different aspects of the UBO’s compliance program? |  |  |  |

| **No.** | **Element 3 – Appropriate Training and Education** | **Yes** | **No** | **Other Assessment/Comments** |
| --- | --- | --- | --- | --- |
|  | Does the UBO provide qualified trainers to conduct annual compliance training for its staff, including both general and specific training pertinent to the staff’s responsibilities? |  |  |  |
|  | Has the UBO evaluated the content of its training and education program on an annual basis and determined that the subject content is appropriate and sufficient to cover the range of issues confronting its employees? |  |  |  |
|  | Has the UBO kept up-to-date with industry standards and adapted its education and training program accordingly? |  |  |  |
|  | Has the UBO formulated the content of its education and training program to consider results from its audits and investigations; results from previous training and education programs; trends in hotline reports; and OIG, CMS, or other agency guidance or advisories? |  |  |  |
|  | Has the UBO evaluated the appropriateness of its training format by reviewing the length of the training sessions; whether training is delivered via live instructors or via computer based training programs; the frequency of training sessions; and the need for general and specific training sessions? |  |  |  |
|  | Does the UBO seek feedback after each session to identify shortcomings in the training program and does it administer post-training testing to ensure attendees understand and retain the subject matter delivered? |  |  |  |
|  | Has the UBO documented who has completed the required annual training? |  |  |  |
|  | Is UBO staff attendance and participation in compliance training a condition of continued employment and that failure to comply with training requirements could result in disciplinary action? |  |  |  |

| **No.** | **Element 4 – Developing Open Lines of Communication** | **Yes** | **No** | **Other Assessment/Comments** |
| --- | --- | --- | --- | --- |
|  | Has the UBO fostered an organizational culture that encourages open communication, without fear of retaliation? |  |  |  |
|  | Has the UBO established an anonymous hotline or other similar mechanism so that staff, contractors, patients, visitors, and medical and clinical staff members can report potential billing compliance issues? |  |  |  |
| How well is the hotline or complaint box publicized? |  |  |  |
| How many and what types of calls/complaints are received? |  |  |  |
| Are calls/complaints logged and tracked (to establish possible patterns)? |  |  |  |
| Is the caller/complainant informed of the UBO’s/Billing Office’s actions? |  |  |  |
|  | Are all instances of potential fraud and abuse investigated?  |  |  |  |
|  | Are the results of internal investigations shared with the MTF senior management and relevant departments on a regular basis?  |  |  |  |
|  | Is the MTF senior management actively engaged in pursuing appropriate remedies to institutional problems?  |  |  |  |
|  | Does the UBO utilize alternative communication methods, such as a periodic newsletter or compliance intranet website?  |  |  |  |

| **No.** | **Element 5 – Response to Detected Deficiencies** | **Yes** | **No** | **Other Assessment/Comments** |
| --- | --- | --- | --- | --- |
|  | Has the UBO created a response team, consisting of representatives from the compliance, audit, and any other relevant functional areas, which may be able to evaluate any detected deficiencies quickly?  |  |  |  |
|  | Are all matters thoroughly and promptly investigated?  |  |  |  |
|  | Are corrective action plans developed that take into account the root causes of each potential violation?  |  |  |  |
|  | Are periodic reviews of problem areas conducted to verify that thecorrective action that was implemented successfully eliminated existing deficiencies?  |  |  |  |
|  | When a detected deficiency results in an identified overpayment, are the overpayments promptly reported and refunded?  |  |  |  |

| **No.** | **Element 6 - Internal Monitoring and Auditing** | **Yes** | **No** | **Other Assessment/Comments** |
| --- | --- | --- | --- | --- |
|  | Is the UBO audit plan evaluated annually, and does it address the proper areas of concern, considering, for example, findings from previous years’ audits, risk areas identified as part of the annual risk assessment, and high volume services?  |  |  |  |
|  | Does the audit plan include an assessment of billing systems, inaddition to claims accuracy, in an effort to identify the root cause of billing errors?  |  |  |  |
|  | Are internal review auditors available to conduct unscheduled reviews and does a mechanism exist that allows the compliance officer to request additional audits or monitoring should the need arise?  |  |  |  |
|  | Is the role of the internal and external auditors clearly established and is coding and audit personnel independent and qualified, with the requisite certifications?  |  |  |  |
|  | Have errors or deficiencies identified in prior audits been evaluated and resolved?  |  |  |  |
|  | If errors or deficiencies are not decreasing, has the UBO conducted a further investigation into other aspects of the MTF’s operations in an effort to determine hidden weaknesses and deficiencies?  |  |  |  |
|  | Does the audit include a review of all billing documentation, including clinical documentation, in support of the claim?  |  |  |  |

| **No.** | **Element 7 – Enforcement of Disciplinary Standards** | **Yes** | **No** | **Other Assessment/Comments** |
| --- | --- | --- | --- | --- |
|  | Are disciplinary standards well publicized and readily available to allUBO personnel?  |  |  |  |
|  | Are disciplinary standards enforced consistently across the organization?  |  |  |  |
|  | Is each instance involving the enforcement of disciplinary standards thoroughly documented?  |  |  |  |
|  | Are appropriate UBO employees checked routinely (*e.g.*, at least annually) against government sanctions lists, including the OIG’s List of Excluded Individuals/Entities and the General Services Administration’s Excluded Parties Listing System?  |  |  |  |

**Annual Review Of Compliance Program Effectiveness Checklist**

**Additional Comments**

| No. | **Issue/Item** | **Comments** |
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