

Compliance Program Requirements Checklist

Subject Matter	Detailed Content	Policy In Place		Action Required
		Yes	No	Please Score in this Column
Fraud, Waste, & Abuse				
	Compliance Program Requirements			
	1. Appoint a Compliance Official			
	2. Develop/update & enforce policies & procedures			
	3. Conduct workforce education			
	4. Carry-out communication & reporting requirements			
	5. Monitor the Compliance Program's processes			
	6. Investigate & intervene complaints/issues			
	7. Assure that discipline & remediation procedures are known and enforced			
OIG & State List of Excluded Individuals & Entities (LEIE)				
	LEIE Monitored for the following:			
	1. Current Staff			
	2. New Staff			
	3. Recent graduates with HC loans			
	4. Referrers			
	5. Vendors receiving federal funds			
Billing, Coding (B & C) & Documentation				
	1. Audit documentation			
	2. Audit business office procedures:			
	3. Audit billing & coding			

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Human Resources Matter				
	Employees/Agents (Contractors)			
	1. Assure EEO compliant advertising & hiring			
	2. Perform background check post offer			
	3. Verify credentials			
	4. Orient to State & Federal regulations			
	5. Complete I-9 for workforce (excluding contractors)			
	6. Verify application completion/signature			
	7. Obtain position description or contractual agreement signatures			
	8. Determine salary & wage classification (per IRS)			
	9. Perform competency testing, as applicable			
	10. Carry out position specific orientation			
	11. Monitor compliance			
	12. Carry out disciplinary and corrective measures, as applicable			
	13. Conduct comprehensive exit interviews			
	14. Conduct workforce separation security procedures			
HIPAA, HITECH & Code Sets				
	1. Appoint HIPAA Official			
	2. Develop/update & enforce policies & procedures			
	Privacy Notice (PN)			
	1. Provide to each patient			
	2. Post in prominent place			

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	3. Post on web			
	4. Assure HITECH & ACA Criteria			
	5. Comply with State laws, if more stringent			
	Minimum Necessary (MN)			
	1. Identify MN level per staff &/or BA			
	2. Note MN on position description			
	3. Address MN level per PHI & EPHI			
	4. Audit MN compliance			
	5. Establish access controls & audits			
	Authorization to PHI/ePHI			
	1. Utilize compliant Authorization Forms			
	2. Designate person to provide form			
	3. Comply with authorization criteria			
	4. Monitor & Report Disclosures			
	Business Associate (BA) Agreement (BAA)			
	1. Use compliant BA Agreement			
	2. Determine BA role and access level			
	3. Confirm BAA in place prior to use/disclosure of PHI/ePHI			
	4. Maintain current list of BA			
	5. Monitor BA compliance & take corrective action as needed			
	Data Storage & Transmission			
	1. Establish access control of PHI/ePHI during business & non-business hours			
	2. Establish measures to protect data at rest, in transit & stored			

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	3. Utilize encryption measures &/or secure portal			
	4. Establish and enforce portable media privacy & security measures			
Cont. Data Storage	5. Establish and enforce record retention, storage, and destruction processes			
	Breach Notification			
	1. Monitor/identify PHI/ePHI breaches			
	2. Perform breach risk assessments			
	3. Report breaches per HIPAA rules			
	4. Employ state breach requirements if more stringent than HIPAA			
	Patient Rights-The patient has the			
	1. Right to copy and inspect PHI/EPHI			
	2. Right to request confidential communication			
	3. Right to have accounting of disclosures			
	4. Right to limit the use/disclosure of PHI & ePHI			
	5. Right to be notified of a breach of PHI			
	6. Right to amend records			
	7. Right to revoke authorization			
	8. Right to complain			
	9. Right to restrict PHI to payer if self-pay			
	10. Right to limit marketing & sale of PHI			
	11. Right to receive PN			
	Disaster Continuity & Recovery Plan (Plan)			
	1. Develop and maintain a Plan			
	2. Carry out workforce education			
	3. Perform Plan drills			

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	Security Audits			
	1. Perform Security Risk Analysis (es)			
	2. Perform security audits			
	3. Monitor & enforce security compliance			
	Electronic Data Security- Safeguards			
	1. Administrative-Policies, Procedures, Enforcement Administrative Safeguards [DOCX - 269 KB]			
	2. Technical- Policies, Procedures, Enforcement Technical Safeguards [DOCX - 240 KB]			
	3. Physical- Policies, Procedures, Enforcement Physical Safeguards [DOCX - 225 KB]			
OSHA				
	Bloodborne Pathogens Standard			
	1. Appoint OSHA Officer			
	2. Develop & enforce policies & procedures			
	3. Develop, monitor, and evaluate Exposure Control Plan			
	4. Make exposure determination for workforce			
	5. Educate & train workforce			
	6. Provide HBV series & titers at no EE cost			
	7. Comply with exposure procedures			
	8. Take corrective action as needed			
	9. Complete required reports			
	10. Comply & provide PPE per PPE Standard			
	Hazard Communication (HC) Standard			

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	1. Appoint OSHA Officer			
	2. Develop & enforce policies & procedures			
	3. Develop, monitor and evaluate HC Plan			
	4. Perform HC & PPE risk assessment			
Cont. HC	5. Comply & provide PPE per PPE Standard			
	6. Educate & train the workforce			
	7. Provide exposure barriers & equipment			
	8. Label products per requirements			
	9. Post hazardous substance list			
	10. Maintain current and accurate MSDs			
	General Duty Clause			
	1. Maintain a safe and healthy work environment			
	2. Employ workforce health & safety measures			
	3. Develop & enforce internal & external disaster procedures			
	4. Report incidents & exposures per OSHA			
BCMS Provides EPPAP	Emergency Preparation, Protection & Action Plan			
	1. Develop & maintain a current EPPAP			
	2. Educate workforce			
	3. Perform drills per regulatory requirements &/or HC guidelines			
ADA/EEOC/ACA				
	1. Ensure public physical access			
	2. Ensure EEO Non-discrimination			
	3. Ensure ACA Section 1557 Non-Discrimination compliance (i.e., linguistic & auditory access)			

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Professional & Practice Act/Rules/Regulations				
	1. Verify & monitor licensure status			
	2. Monitor and/or investigate licensure sanctions			
Cont. Practice Act/Rules	3. Educate & enforce regulatory compliance			
	4. Enforce professional and ethical compliance			
Labor Laws				
	Federal- Workforce			
	1. Adhere to Fair Labor Standards Act (FLSA)			
	2. Adhere to Family Medical Leave Act (FMLA)			
	3. Adhere to EEO laws-discrimination, pay, & ADA			
	4. Adhere to Affordable Care Act (ACA)			
	5. Adhere to Fair Credit Reporting Act (FCRA)			
	6. Post Federal Regulatory Posters			
	Office of Civil Rights (Patients/Public)			
	1. Post Non-Discriminatory poster			
	State Labor Laws-Workforce (as applicable)			
	1. Adhere to rest & meal breaks rules			
	2. Comply with payday rules			
	3. Comply with child labor laws			
	4. Comply with prevailing wage & salary rules			
	5. Comply with State specific workforce educational requirements			
Local Regulations/Guidances				
	1. Post Business & or Occupancy Licenses			

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	2. Post State & Local Ordinance Posters			
	3. Document Fire Marshall Inspections			
	4. Comply with Emergency Executive Orders			