

## NORTHCARE NETWORK

<b>POLICY TITLE:</b> Compliance Monitoring & Auditing	<b>CATEGORY:</b> Compliance	
<b>EFFECTIVE DATE:</b> 3/21/13	<b>BOARD APPROVAL DATE:</b> 3/21/13	
<b>REVIEWED DATE:</b> 8/12/24	<b>REVISION(S) TO POLICY STATEMENT:</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>OTHER REVISION(S):</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>RESPONSIBLE PARTY:</b> Compliance and Privacy Officer	<b>CEO APPROVAL DATE:</b> 8/12/24 Megan Rooney, CEO	

### **APPLIES TO**

NorthCare Network Personnel  
Network Providers

### **POLICY**

NorthCare Network's compliance program will engage in ongoing evaluation and monitoring of its compliance program. This will occur as a component of the regional compliance program and reporting of effectiveness will be reported to NorthCare Leadership. The Compliance and Privacy Officer will maintain reports from ongoing monitoring and auditing activities as well as a summary of reports from suspected noncompliance will be reviewed with the NorthCare Network's Compliance Oversight and Risk Management Committee (CORMC) and the Board of Directors, as necessary.

### **PURPOSE**

The purpose of this policy is to identify and define NorthCare Network's approach to an ongoing process for the evaluation and monitoring of the compliance program to ensure regional commitment, implementation and effectiveness of the compliance program at a local and regional level.

### **REFERENCES**

- 42 CFR 438.608
- MDHHS Medicaid Services Verification Technical Requirement
- MDHHS/PIHP Contract
- NorthCare Network Compliance Plan and Policies

### **HISTORY**

REVISION DATE: 12/18/13, 11/5/14, 9/16/15, 5/16/17, 8/23/21, 5/3/23, 8/12/24

REVIEW DATE: 3/13/13, 12/18/13, 11/5/14, 9/16/15, 7/27/16, 5/16/17, 3/13/18, 1/22/19, 12/3/19, 10/21/20, 8/23/21, 6/10/22, 5/3/23, 8/12/24

CEO APPROVAL DATE: 3/13/13, 12/18/13, 11/5/14, 10/6/15, 8/2/16, 6/6/17, 3/27/18, 2/7/19, 1/7/20, 11/3/20, 9/7/21, 7/12/22, 6/5/23, 8/12/24

BOARD APPROVAL DATE: 3/21/13

## **PROCEDURES**

### **A. Audit and Monitoring Plan**

The compliance activities are defined as the activities specified and defined within the MDHHS-OIG as specified in the Quarterly Reporting Guidance Document. These activities described as compliance activities include (but are not limited to) audits (as scheduled and as needed), investigations, data mining activities, financial reconsiderations which may include, recoupments, manual prepayment reviews and provider disenrollments related to noncompliance.

1. NorthCare will create an Annual Audit and Monitoring Plan that will identify the scheduled audit and monitoring activities for that fiscal year. Activities included in the Audit and Monitoring Plan shall include but not be limited to:
  - i. Medicaid Service Verification as specified within the MDHHS Technical Requirements for that fiscal year.
  - ii. Data Mining
  - iii. Reviews of Block Grant Funded services.
  - iv. Planned activities generated from risk assessments, data-mining, MDHHS , MDHHS-OIG Workplans, investigative findings, audit findings, or other identified risk areas.
2. The Annual Audit and Monitoring Plan will include details specifying the frequency and the methodology utilized for each activity. The audit methodology may include but not be limited to:
  - i. Record reviews
  - ii. Provider self-audits
  - iii. Beneficiary interviews for confirmation of service provision.
3. Unplanned reviews and audits may occur during compliance investigations.

### **B. Auditors will be internal staff or external sources as needed and will:**

1. Meet the qualifications and experience necessary to identify issues with the subject matter of the audit:
2. Be independent.
3. Have access to resource materials and individuals necessary to audit.
4. Will identify specific corrective action as determined necessary.

### **C. The Compliance and Privacy Officer will provide a written report and review of reporting on compliance activities to the Chief Executive Officer, CORMC and Board of Directors as needed but at a minimum annually.**

### **D. NorthCare will ensure that all compliance activities are reporting to the MDHHS-OIG as necessary per policy,**