AUDITING & COMPLIANCE TIP

Is your compliance plan up to date?

Your policies should be evaluated annually, and if you don't have compliance policies, then you need to create them. To assess your policies and decide if updates are needed, use the following guide.

Subject of Policy	Policy Origination Date	Last Revision Date	Noted Concerns in Last 12 months?	Was the Policy Guidance Met During Last 12 Months?	If no, Comments
Chart Audits	1/12/2010	4/12/2013	Audits are behind	Not Completely	We were unable to meet the expectations of the auditing policy due to an increased number of providers within the group.
Incident-to Services	1/12/2010	--	No	Yes	

Begin by pulling out your compliance plan and listing the individual specific policies so you can review each one.

Subject of Policy: The purpose of this is to identify the policy being reviewed. If your policies are numbered or have some other type of identifier this could be also be used, but it would be best to identify the policy by its topic.

Origination Date: Knowing how long this policy has been in effect at your practice is important so you can assess its effectiveness (i.e. did its creation stop the problem it addresses?).

Revision Date: By the origination date to the last known revision, you can identify policies that should be reviewed. Our industry is always changing and so is your practice (staffing changes, growth, procedural changes, etc.). Knowing the time between revisions allows you to prompt a review when needed.

Noted Concerns in Past 12 Months: This column could contain a simple "yes" or "no," but if you can provide a little information on the specific concern regarding the policy, you can make much better revisions. In our example, it is noted that the audits are late, which will prompt useful questions on why the practice has fallen behind on audits. Is the practice understaffed? Is its auditing policy too intensive? Has the number of providers gone up, leaving the administrative team potentially understaffed to cope with their needs?

Was the Policy Guidance Met in the Past 12 Months: Even if a policy has been revised recently and has no concerns or notes, it may still require review if it isn't followed consistently. This column is important because you need to know if policies are effective.

If No, Comments: Using this comments section to explain why a policy has not been met. This will help guide next steps such as the need to schedule a review or perhaps tweak the policy to make it easier to follow.

Using a spreadsheet like this may seem simple, or even a waste of time by creating more "paperwork." However, a tool like this will force you to focus your thought process on compliance and allow for meaningful evaluations of each policy. Note that there is no column showing the last review date of each policy. This has been omitted deliberately because each policy should receive a minimal review each year.

Remember, no matter how busy our jobs are, compliance is not something we can simply place on the back burner. Not only is compliance more important than ever due to regulatory changes, but spending a few days each year to review your compliance policies will often prevent larger headaches in the future.