

OIG Project	The OIG Will:	Risk	Recommended Action Plan
Medicare Hospitals			
Adjustments for Graduate Medical Education Payments	Determine if audit adjustments for direct and indirect graduate medical education (GME) that fiscal intermediaries make while settling Medicare cost reports were properly reflected in the revised Medicare reimbursement.	<input type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low	
Payments for Observation Services versus Inpatient Admissions for Dialysis Services	Determine whether payments were made for inpatient admissions for dialysis services when the physicians' orders stated the level of care as admission to observation status.	<input type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low	
Medical Education Payments for Dental and Podiatry Residents	Determine the appropriateness of including dental and podiatry residents in hospitals' counts of full-time equivalent residents for purposes of direct and indirect GME payments.	<input type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low	
Nursing and Allied Health Education Payments	Determine the appropriateness of payments for provider-operated nursing and allied health (NAH) education programs.	<input type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low	
Inpatient Prospective Payment System Wage Indices	Determine whether hospital and Medicare controls are adequate to ensure the accuracy of the hospital wage data used for calculating wage indices for the inpatient prospective payment system.	<input type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low	

Inpatient Rehabilitation Facilities Payments	Review payments to inpatient rehabilitation facilities (IRF) under the prospective payment system to determine the extent to which they were made in accordance with Medicare laws and regulations.	<input type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low	
Inpatient Hospital Payments for New Technologies	Review payments made to hospitals for new services and technologies.	<input type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low	
Inpatient Psychiatric Hospitals	Review payments to psychiatric hospitals under the prospective payment system to determine the extent to which they were made in accordance with Medicare laws and regulations.	<input type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low	
Inpatient Rehabilitation Payments - Late Assessments	Determine the accuracy of Medicare payments for inpatient rehabilitation stays when patient assessments are entered late.	<input type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low	
Long Term Care Hospital Payments	Review payments to long term care hospitals under the prospective payment system to determine the extent to which these payments were made in accordance with Medicare laws and regulations.	<input type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low	

Compliance Program Elements	
Guideline	Action Plan
Policies and Procedures	
Has Children's implemented policies and procedures to address its principal business risks?	
Do Children's policies address issues identified by guidance documents (e.g., OIG Guidance, fraud alerts) or enforcement actions by the OIG and other government agencies whose legal requirements are applicable to the organization?	
Have Children's policies and procedures previously identified serious weaknesses in practices?	
Has Children's developed and distributed a Code of Conduct?	
Does Children's maintain documentation substantiating the distribution of the policies and procedures and the Code of Conduct to its employees?	
Has Children's communicated alternative complaint mechanisms to employees?	
Does Children's have a process in place to promptly address and rectify employee non-compliance?	
Has Children's developed policies and procedures that describe how the organization's compliance program operates and the consequences of non-compliance?	
Does Children's ensure that relevant employees and agents are properly oriented to applicable new and revised policies and procedures?	
Does Children's ensure prompt orientation to applicable policies for new employees?	
Does Children's ensure prompt distribution of revised policies to existing employees?	
Are Children's policies periodically reviewed and updated to reflect changes in laws, regulations or processes?	
Does Children's monitor adherence to policies?	

Are policies reviewed at regular intervals?	
Does Children's have a process in place to monitor significant changes in law and modify policies as appropriate?	
Does Children's appropriately discipline employees who do not adhere to the organization's policies and procedures?	
Ongoing Education and Training	
Is initial training provided to all employees upon date of hire regarding the Compliance Program and Code of Conduct?	
Is periodic training provided to all employees regarding the Compliance Program and Code of Conduct?	
Does Children's require employees in identified high-risk roles to receive specific job-related training?	
Has Children's reviewed the roles of agents, students, volunteers, and vendors and assessed the need to train those individuals regarding compliance and can Children's provide evidence of such evaluation?	
If Children's has identified agents, students, volunteers, and vendors that require compliance training, is there a plan in place to ensure training is provided?	
Does Children's test employees to evaluate comprehension of compliance training?	
Does Children's have a process in place to ensure that all employees complete required compliance training and are there mechanisms in place to appropriately discipline those employees who have not completed training?	
Does Children's keep accurate records of all training completed by employees?	
Is documentation maintained in Children's employee files showing discipline for those employees that do not complete the required training?	
Is Billing Compliance Training offered and given to all appropriate individuals?	

Outpatient Outlier & Other Charge-Related Issues
 Outpatient Pharmacy Services at Acute Care Hospitals
 Outpatient Psych Services
 Payments for Related Hospital & Skilled Nursing Stays
 PPS Transfers Between Chain Members
 PPS Transfers: Administrative Recovery
 Procedure Coding of Outpatient & Physician Services
 Same-Day Discharge & Readmission to Same Hospital
 Satellite Hospitals
 Update on DRG Coding
 Updating DRG Codes
 Billing Routine Services on a "Stat" Basis
 Capital Cost PPS
 Certification of Heart Transplant Centers
 Changes in the Inpatient Case Mix Index for Medicare
 Charges & Payments Under New PPS
 Costs at Non-PPS Providers
 DRG Payment Window
 DRG Payment Window - Hospitals
 Duplicate Billing of Outpatient Hospital Services
 External Oversight of Hospital Outpatient Departments
 Followup on Peer Review Organizations' Compliant Process
 Graduate Medical Education Payments
 Graduate Medical Education Voluntary Supervision in Nonhospital Settings
 Home Office Costs-Critical Access Hospitals
 Hospital Closure: 1997
 Hospital Closures: 1998
 Hospital Discharge Planning
 Hospital Ownership of Physician Practices
 Hospital-Owned Physician Practices: Financial Impact
 Hospital-Owned Physician Practices: Provider-Based Status
 Hospitals Exempt from the PPS
 Implementation of Critical Access Hospital Program

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