

	Department: Corporate Compliance	Policy No.: 302
	TITLE: MONITORING AND AUDITING	
Effective Date: 1/1/15	Revised: 11/12/15	

MONITORING AND AUDITING

SCOPE:

All Ascension At Home, LLC colleagues associated with the billing and coding process in anyway, including all internal and external billing companies utilized by Ascension At Home, LLC. For purposes of this policy, all references to “colleague” or “colleagues” include temporary, part-time and full-time associates, independent contractors, clinicians, officers and directors.

PURPOSE:

To outline the monitoring and auditing procedures of government payor claims to be followed by the Ascension At Home, LLC and its subsidiaries’ (“the Company”) Ethics & Compliance Department and each of the Company’s billing entities, as applicable.

POLICY AND PROCEDURE:

Compliance Monitoring

Monitoring systems enable the Company to monitor the Compliance Program's effectiveness and target additional training efforts.

All Billed Services

- The Ethics & Compliance Department directs billing reviews of government payor claims conducted by an outside third party consultant.
- Medical records of government beneficiary payors are randomly selected for a prospective review on a routine basis (*See the statistical sampling method in Attachment A*).
- Independent auditors review the sample according to current CMS coding documentation guidelines, CPT, and the current ICD coding book.
- Independent auditors review the sample for the appropriate assignment of visits and provide the Ethics & Compliance Department with the report of findings and compliance exceptions, if any.

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- The Ethics & Compliance Department reviews the findings and provides reports to the Company's Compliance Committee.
- Corrective action is initiated for material exceptions of a 5% variance or greater.
- Noted exceptions are reviewed to verify implementation of corrective action processes.

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ATTACHMENT A

Statistical Sampling

The sampling approach recommended for ongoing compliance is intended to address typical areas of risk associated with billing compliance. The ongoing sampling will be conducted quarterly and will be performed on a prospective basis, that is, after the files are processed but before the claims are actually billed.

The sample will be selected from a total "population" of government payor claims that are processed during the quarter being reviewed. The "population" is defined as all government payor claims that have been coded but not billed by the billing department. Each quarter a new group of claims will be selected to assist in monitoring ongoing compliance, but all claims selected will be limited to government payor claims.

Each quarter, in order to determine which specific claims are to be selected, the following steps need to be performed:

- Determine the population (government claims only).
- Select the specific population segments that are going to be audited.
- Select a random sample from the population that has been selected.
- Review the claims that have been selected from the random sample.

The following procedures outline the sampling approach as part of the Company's ongoing Compliance Program. The ongoing sample approach is divided into three sections:

- Selecting the population segment to be sampled.
- Selecting the sample.
- Analyzing the sample.

Selecting the Population

The population segment from which the sample will be randomly determined will consist of the total number of claims processed but not billed during a pre-determined time frame. The segment will have the following characteristics:

- The population segment is selected in a random manner.
- The statistical characteristics associated with the samples that are taken from these population segments will have a confidence level of 90% with an initial guess of 10% and 3.5% margin of error.
- The sample sizes will depend on the size of the population segment.

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Selecting the Sample of Claims with the Selected Population

As stated above, the random samples selected are at the 90% confidence level. This is accomplished by:

- Assigning each claim or encounter a number from 1 through n.
- Determining the appropriate number of claims to review for each sample based on internal statistical sampling methodology.
- Selecting the specific claims by using a random number program (RAT-STATS) that will generate x+5 numbers between 1 and n where x is the sample size and n is the number of files in the population segment. The +5 allows for selection of an additional 5 records in case there are duplicates, errors, etc. with selected claims. For a population size less than 100, all of the records in the population segment may be selected.

Analysis of the Sample

An outside auditing company retained by the Company performs the analysis of the claims. A report of findings is submitted to the Ethics & Compliance Department who will analyze and review with the Compliance Committee. If an issue is discovered, appropriate action will be taken which may include an expanded sample review.