

OIG's Suggested Order of Compliance Steps

<u>Compliance Component</u>	<u>Description</u>
Step One: Auditing and Monitoring	Standards and procedures review; baseline claims submission audit
Step Two: Establish Practice Standards and Procedures	Written standards and procedures manual; updated clinical forms; clinical protocols; record retention policies
Step Three: Designation of a Compliance Officer/Contact(s)	Person(s) with compliance monitoring responsibility (may be outsourced); list of duties
Step Four: Conducting Appropriate Training and Education	Assessing who needs training, types and frequency of training
Step Five: Responding to Detected Offenses and Developing Corrective Action Initiatives	Investigate allegations, design corrective action, return overpayments, report to the Government, refer to law enforcement
Step Six: Developing Open Lines of Communication	"Open door" policies, written requirement to report, maintain anonymity, no retribution
Step Seven: Enforcing Disciplinary Standards Through Well-Publicized Guidelines	Consistent and appropriate sanctions, oral warnings, written reprimands, termination

Reference: <http://www.dhhs.gov/progorg/oig/modcomp/webcpg.txt>

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NOTE: This site includes a summary of certain compliance issues facing healthcare providers today. This site does not, and is not intended to, give legal advice. Reference should be made to full text of the statutes and regulations for complete analysis. Consultation with competent counsel is strongly recommended.