

To be completed by: [Contractor]
Reporting Period: [Quarterly]

Goal: To have all program integrity related policies as required by contract with AHCCCS, updated and properly disseminated to all employees and subcontractors before the end of the 4 QTR.

Date	Elements:	Yes /No? If No Explain	Activities Qtr 1	% done Qtr 1	Activities Qtr 2	% done Qtr 2	Activities QTR 3	% done Qtr 3	Activities Qtr 4	% done Qtr 4	Outcomes
	Is there a policy that pertains to Ethics?	YES	Example: Policy under revision: Submit to Compliance committee and officer for review and approval	50%	Policy revisions complete, submit to board for review and approval	75%	Submit to AHCCCS for review and approval	80%	Policy has been disseminated to all employees and subcontractors as applicable	100%	
	Are enforcement of standards through well-publicized disciplinary guidelines established?										
	Is there a policy that pertains to fraud, waste, and abuse identification and reporting?	YES		50%		100%		100%		100%	
	include the provision for the prompt referral of any potential fraud, waste, or abuse to AHCCCS-OIG been established and implemented to include AHCCCS-OIG contact information?										
	Does the AHCCCS-OIG contact information include the website, email address, and phone										
	Have policies and procedures been established that address the Deficit Reduction Act of 2005 (DRA), where Contractors, as a condition for receiving payments shall establish written policies for any employees and of any contractor or agent, detailing of the Social Security Act?										
	Does the DRA policy address: The Federal False Claims Act provisions; The administrative remedies for false claims and statements; Any State laws relating to civil or criminal penalties for false claims and statements; and The whistleblower protections under such laws?										

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<p>is there a policy that explains the False Claims Act requirements and how is it disseminated?</p>	<p>YES</p>		<p>100%</p>		<p>100%</p>		<p>100%</p>		<p>100%</p>	
<p>Compliance Officer and designated Regularory Compliance Committee involving the Board of Directors and the Contractor's senior management? Functions? Is that effective?</p>	<p>YES</p>		<p>100%</p>		<p>100%</p>		<p>100%</p>		<p>100%</p>	
<p>Are there effective lines of communication between the Corporate Compliance Officer and the Contractor's employees?</p>										
<p>is the plan ensuring that all program integrity policies are up to date and reflect specific efforts to address FWA?</p>	<p>YES</p>		<p>100%</p>		<p>100%</p>		<p>100%</p>		<p>100%</p>	
<p>is the compliance plan updated regularly? Is the effectiveness of the program evaluated?</p>	<p>YES</p>		<p>100%</p>		<p>100%</p>		<p>100%</p>		<p>100%</p>	

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Goal 2: To ensure effective training and education for the Compliance Officer and all employees including leadership of the organization. (DRA, FCA, Qui Tam and Whistleblower Provisions.)

Date	Elements:	Yes/No? If No, What Steps?	Activities Qtr 1	% done Qtr 1	Activities Qtr 2	% done Qtr 2	Activities QTR 3	% done Qtr 3	Activities Qtr 4	% done Qtr 4	Outcomes
	Is there a policy(s) that pertains to training?	YES	Example: The policy is under revision to enforce FWA reporting mechanisms.	65%	Example: The policy has been approved and has been sent to AHCCCS/OIG prior to be disseminated.	100%	Example: AHCCCS/OIG has agreed to the policy content.	100%	Example: The policy has been disseminated accordingly.	100%	
	Is there a curriculum for the courses that will be addressed to meet this goal?	NO		50%		75%		85%		100%	
	Is the plan measuring the effectiveness of the training? How?	YES		50%		50%		50%		50%	
	Is there a schedule for training? If so, how is the training implemented?	YES		100%		100%		100%		100%	
	Is the Program Integrity information presented to new employees, current employees, interns, volunteers, and subcontractors?	YES		100%		100%		100%		100%	
	Are there multiple ways in which the training information is presented? PPT? CBT? Online? Lecture?	NO		100%		100%		100%		100%	

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Goal 3: Ensure compliance and proper monitoring in accordance with Federal and AHCCCS contractual requirements for internal and external audits related to Fraud, Waste and Abuse.

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	Is there a provision or system in policy for internal and external audits to include dedicated staff?	YES		100%		100%		100%		100%	
	Does the external audit policy require an audit plan, schedule and executive summary to be submitted to the AHCCCS-OIG?										
	Does the provision or system include monitoring and auditing of compliance risks, prompt response to compliance issues, investigation of potential compliance problems as identified in the course of self-evaluation and audits, correction of problems promptly and thoroughly to reduce the potential for recurrence, ongoing compliance with requirements under the Contract, and external monitoring and auditing of subcontractors.										
	Is there a methodology or protocol for provider audits? If so, is the Health plan conducting methodical inspections?	YES	Example: the Health plan is contracting with a vendor to conduct periodic audits to all programs.	100%		100%		100%		100%	
	Is the health plan measuring, correcting and preventing overpayments? How?	YES		100%		100%		100%		100%	
	What detection activities are conducted? Are those activities generating potential audit cases?	NO	Example: The audit unit is conducting an internal audit to identify potential gaps during the credentialing processes	0%		50%		85%		100%	

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Goal 4: The contractor must ensure proper *External* monitoring/auditing - usage of data and other detection systems

Date	Elements:	Yes /No? If No, What Steps?	Activities Qtr 1	% done Qtr 1	Activities Qtr 2	% done Qtr 2	Activities QTR 3	% done Qtr 3	Activities Qtr 4	% done Qtr 4	Outcomes
	Is there a policy that addresses provider audits based on data/algorithms?	YES	Example: the health plan is using a system based on predetermined algorithms that identify high utilization patterns.	100%		100%		100%		100%	
	Specific data mining activities performed?	YES		100%		100%		100%		100%	
	Audits are conducted on-site or desk? Explain in either case.	YES		100%		100%		100%		100%	
	Is the plan using trend analysis to prioritize auditing activities? If so, how?	NO		100%		100%		100%		100%	
	What are the actions taken by the plan according to audit results?	YES		100%		100%		100%		100%	

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Goal 5: The contractor must ensure Disclosure of Ownership and Control and Disclosure of Information persons convicted of Crime is implemented according to the federal regulation and the contractual provision.

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	Are employees screened against the federal databases when hired and monthly thereafter?	YES		100%		100%		100%		100%	
	Are subcontractors, administrative subcontractors, vendors and other entities required to check, identify and report excluded individuals?	NO	Example: No schedule set up for reporting.	30%	Corp Compliance officer and board meet throughout the qtr to develop a plan for reporting.	70%	Compliance Officer received information monthly and reports to OIG if an excluded individual is identified.	100%	Plan goes into effect. New policies and procedures implemented. Compliance Officer gathers results on ongoing basis.	100%	
	Is the credentialing process ensuring that these checks are conducted?	YES		100%		100%		100%		100%	
	What other background checks does the plan has incorporated?	YES		100%		100%		100%		100%	
	Does the Contractor report a description of transactions between the Contractor and a party in interest including the following transactions; Any sale or exchange, or leasing of any property between the organization and such a party; Any furnishing for consideration of goods, services , or facilities between the organization and such a party, but not including salaries paid to employees for services provided in the normal course of their employment; Any lending of money or other extension of credit between the organization and such a party?										