

Eli's Hospice Insider

Compliance: 7 Elements CMS Wants In Your Compliance Plan

"While the specifics are still being ironed out through the regulatory process, we do know that compliance practices will be mandatory soon enough. [The **HHS Office of Inspector General**] has promoted voluntary compliance programs for years," said attorney **Amanda Walker**, senior counsel with the OIG, during the watchdog agency's HEAT Provider Compliance Training session on May 17 in Washington, D.C.

Following are the seven compliance elements that the **Centers for Medicare & Medicaid Services** has identified:

- Written policies and procedures for your compliance program, which you should share with all members of your organization.
- Identification of compliance professionals in your organization who are keeping up with federal and state requirements.
- Effective training to educate your employees on your compliance policies.
- Effective communication lines between the compliance officer and the other members of the organization.
- Internal monitoring systems, such as internal audits or other reviews. "A good compliance program will identify problems from time to time," Walker said. "If it doesn't, that's a sign that what you're doing is not working. If you detect something problematic, then you're in a position to do something about it."
- Enforcement of standards and action taken if an employee is not following the procedures.
- Prompt response to any issues that you identify.