

SAMPLE PROGRAM

Program Integrity Plan

Policies and Procedures

SAMPLE PROGRAM'S employees have access to policies and procedures via our intranet site. P&Ps are routinely reviewed during staff meetings.

- P&P # _____ Commitment to Corporate Compliance Policy
- P&P # _____ Billing and Coding Standards and Liability For False Claims
- P&P # _____ Duty to Report Misconduct and Whistleblower Protections; Deficit Reduction Act Compliance

Training and Access

Employees are trained annually on Corporate Compliance and Ethics

- Corporate Compliance and Ethics Training accessed via _____
- Corporate Compliance and Ethics reviewed during staff meeting annually.
- Employees sign acknowledgement of receipt of Corporate Compliance and Corporate Ethics Policies.
- Corporate Compliance Hotline poster available for view in common area.
- Corporate Compliance Hotline information available via intranet.

Client confirmation By Signature

- Program service verification shall occur on a Quarterly Schedule. One week per Quarter, as determined by the Program Manager, each provider will be required to obtain signatures for face to face individual or group counseling/case management/recovery services/and other DMC-ODS billable services (from clients age 11 and older and/or their parents) that occur during the week assigned.
- Each provider will be responsible for obtaining an equally assigned amount of signatures. (Signatures to be obtained for a minimum of 5% of clients opened to our program each quarter)
- The services are verified for accuracy by the Program Manager and QI specialist, once the billings are complete for that month in the Quarter. The Program Manager and QI specialist will verify that a minimum of 5% of clients open in each quarter have client signatures pages available and that the services were billed accurately for payment.
- On a routine basis, the Program Manager and QI specialist will review the findings in the verification activities and determine if there is suspected fraudulent activities. Suspected fraud

will be further investigated by QI specialist and Program Manager and may involve contacting the client directly, reviewing chart documentation, and interviewing staff.

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Program Integrity -Service Verification

Client # _____

Client Name (Printed): _____

DOB: _____ (11 yrs and up only)

Date of Appointment: _____

Which Type of Service was provided (Anasazi Service Code): _____

Length of Service (face to face contact): _____

Printed Staff Name: _____

Signature of Staff: _____

Client Signature: _____

Parent or Legal Guardian Signature: _____

Dated by client: _____

- Refused to sign**
- Appointment changed**
- No show**