

HHUNY Compliance Program Plan - OMIG Part 521 Updates

Compliance Program Element	New Requirement	Status	Document	Priority 1-5
Element 1	Must review the written policies, procedures & standards of conduct annually	Completed, Review in progress	Compliance policies and procedures	3
Element 2	Compliance Officer develops an annual compliance workplan that outlines strategy for meeting compliance program requirements and addresses all elements	Completed, Review in progress	Compliance policies and procedures	2
Element 2	Designation of compliance committee. Compliance committee charter outlines the duties, responsibilities, membership, designation of a chair and frequency of meetings	Completed, Review in progress	Compliance policies and procedures	1
Element 3	Develop and maintain a training plan that: outlines the required subjects or topics, timing and frequency, which individuals are required to attend, how attendance is tracked, how effectiveness of training is evaluated	Completed, Review in progress	Compliance policies and procedures	2
Element 4	Lines of communication: anonymous reporting needs to be available to all Medicaid recipients of service	Completed, Review in progress	Compliance policies and procedures	4
Element 6	Routine auditing and monitoring: annual compliance program review for effectiveness	Completed, Review in progress	Compliance policies and procedures	5
Effective Compliance Program	effective compliance means: well-integrated into the company's operations, promotes adherence to legal and ethical obligations, reasonably designed and implemented to prevent, detect and correct non-compliance with Medicaid requirements	Completed, Review in progress	Compliance policies and procedures	5
Risk Areas	Compliance program must apply to the providers risk areas that include: contractor, subcontractor, agent, or independent contract oversight	Completed, Review in progress	Compliance policies and procedures	1
Self-Disclosure Program	Providers must comply with the requirements of SubPart 521-3 to report, return, and explain overpayments	Completed, Review in progress	HHUNY Mandatory Compliance Program policy	3