



**DOCUMENT #6**

New York State Office of Medicaid Inspector General  
Bureau of Compliance



Effectiveness Review Tool-Documentation Review Checklist

Taken from Compliance Alert 2011-06

Sample	Documentation requested for each sample and/or Area	Comments
Employee Records	<ol style="list-style-type: none"> <li>1. Copy of <b>xx</b> employee records confirming the employee received the code of conduct.</li> <li>2. Copy of <b>xx</b> employee records confirming the employee received initial compliance training.</li> <li>3. Copy of <b>xx</b> employee records confirming the employee received annual compliance training.</li> </ol>	
Educational Training	<ol style="list-style-type: none"> <li>1. Copy of Education Training material utilized for compliance training upon hire and annually.</li> <li>2. Copy of any additional compliance related training that has occurred outside of the training done upon hire and annually.</li> <li>3. Copy of the participant's sign in sheet.</li> <li>4. Copy of the pre-test and post-test results.</li> </ol>	
Compliance Logs and Investigations	<p>Copy of <b>xx</b> compliance hotline calls/logs including, but not limited to how the complaint was:</p> <ul style="list-style-type: none"> <li>• Received</li> <li>• Recorded</li> <li>• Investigated</li> </ul>	

	<ul style="list-style-type: none"> <li>• Resolved</li> <li>• Further action taken</li> </ul>	
Employee Disciplinary Records	<p>Copy of <b>xx</b> employee disciplinary or termination records to include, but not limited to:</p> <ul style="list-style-type: none"> <li>• Date of incident</li> <li>• Nature of the allegation</li> <li>• Steps taken</li> <li>• Information revealed during investigation</li> <li>• Findings</li> <li>• Outcome and resolution</li> <li>• Corrective action plan, if warranted</li> </ul>	
Compliance Risk Areas/ Internal Audits	<p>Copy of <b>xx</b> internal audits documentation to include, but not limited to:</p> <ul style="list-style-type: none"> <li>• Who Initiated audit (organization vs. outside agency)</li> <li>• Scope and Method</li> <li>• Findings</li> <li>• Recommendations</li> <li>• Corrective action plan</li> <li>• Continued follow up plan, if warranted</li> <li>• If the issue involved an overpayment, when was it reported, explained and repaid to OMIG</li> </ul>	
External Audits	<p>Copy of <b>xx</b> external audits documentation to include, but not limited to:</p> <ul style="list-style-type: none"> <li>• Who Initiated audit (organization vs. outside agency)</li> <li>• Scope and Method</li> <li>• Findings</li> <li>• Recommendations</li> <li>• Corrective action plan</li> <li>• Continued follow up plan, if warranted</li> <li>• If the issue involved an overpayment, when was it reported, explained and repaid to OMIG</li> </ul>	

Reports of Intimidation and Retaliation	Copy of <b>xx</b> reports of intimidation and retaliation to include, but not limited to: <ul style="list-style-type: none"> <li>• Date of incident</li> <li>• Nature of the allegation</li> <li>• Steps taken</li> <li>• Information revealed during investigation</li> <li>• Findings</li> <li>• Outcome and resolution</li> </ul>	
Quality of Care Complaints / Mandatory Reporting	Copy of <b>xx</b> quality of care investigations/ reports to include, but not limited to: <ul style="list-style-type: none"> <li>• Date of incident</li> <li>• Nature of the allegation</li> <li>• Steps taken</li> <li>• Information revealed during investigation</li> <li>• Findings</li> <li>• Outcome and resolution</li> <li>• If the issue involved an overpayment, when was it reported, explained and repaid to OMIG</li> </ul>	

Based on review of the above, additional documentation may be requested. Please provide any additional documentation which would assist the reviewers in evaluating your compliance program. The requested sample numbers will vary depending on Provider type and size.

Acknowledgement: The NYS Office of the Medicaid Inspector General acknowledges the assistance of the Centers for Medicare & Medicaid Services (CMS) in making available a similar tool that CMS uses when it conducts compliance assessments of private entities it contracts with to offer health and drug plans in the Medicare program.