



## PM Form 10.13.1 RA Corporate Compliance Plan Evaluation Form

Annually RAs evaluate and report the effectiveness of their previous year's compliance plans in writing to the NARBHA Corporate Compliance Officer. Responsible Agencies (RAs) write an annual Corporate Compliance Plan utilizing the above-mentioned evaluation of the previous year's plan. The plan details how the RA will detect and report fraud and abuse and is due to NARBHA's Corporate Compliance Officer in final form by January 31 each year. Ample time for a review and corrections should be built into the submission of the evaluation and plan. NARBHA's Corporate Compliance Officer, reviews each evaluation of last year's plan and the current plan and expresses approval/disapproval/conditional approval within 10 working days of receipt. The plan of any RA includes information on fraud and abuse aversion, detection, investigation, prevention and reporting activities, including time frames, which the RA and NARBHA believe provide reasonable assurance and guidance directed to minimize instances of member, contractor, and staff fraud and abuse at the RA.

### Calendar Year

Year:

### RA Information

RA Name:

Corporate Compliance Officer Name:

### Plan Information

**Corporate Compliance Plan Submitted?**

- Yes:        /        /  
 No

**Corporate Compliance Program Evaluation (for prior year) Submitted?**

- Yes:        /        /  
 No

**Approved?**

- Yes  
 No  
 Conditional Approval:

### Required Elements

**Required Elements of Plan (per Provider Manual Section 10.13):**

- Purpose/Introduction/Overview
- Definitions
- OIG 7 Elements of an Effective Compliance Program:
  - Implementation of written policies, procedures and standards of conduct;
  - Designation of a Compliance Officer and Compliance Committee;
  - Conducting effective training and education;
  - Developing effective lines of communication;
  - Enforcing standards through well-publicized disciplinary guidelines;
  - Conducting internal monitoring and auditing;
  - Responding promptly to detected offenses and developing corrective actions.



- Program Goals
- Plan Addresses/References:
  - False Claims, Correct Coding/Claiming
  - Overpayments (60 day repayments)
  - Excluded Providers
  - Internal Controls
  - Fraud & Abuse Aversion
  - Fraud & Abuse Detection
  - Fraud & Abuse Investigation
  - Fraud & Abuse Prevention
  - Fraud & Abuse Reporting
  - Reasonable timeframes
  - Signatures (Corporate Compliance Officer, CEO, Board)

**Comments:**

**Action Items**

Suggested or Required?	Action Items	Follow-up Completed
<input type="checkbox"/> Suggested <input type="checkbox"/> Required		
<input type="checkbox"/> Suggested <input type="checkbox"/> Required		
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**NARBHA Signature**

*Agency Compliance Representative:*

\_\_\_\_\_  
 Name:  
 Title:

/ /  
 \_\_\_\_\_  
 Date

*NARBHA Representative:*

\_\_\_\_\_  
 Jennifer McAleer  
 Corporate Compliance Officer

/ /  
 \_\_\_\_\_  
 Date