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Owner: Maura McGrath: CCPO
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Risk Assessment and Audit Work Plan

Policy

Amida Care employs a multi-faceted approach to identifying and addressing risk. At the beginning of each calendar year, the Compliance Department under the direction of the Chief Compliance and Privacy Officer (CCPO) conducts a risk assessment and creates an audit work plan. Both are presented to the Compliance Committee and the Board of Directors for review and approval.

Procedure

The Compliance Department under the direction of the CCPO will review at least the following documents on an annual basis to assist in the development of risk categories:

- Internal and external audit findings
- Statements of deficiency
- Statements of finding
- New York State Office of the Medicaid Inspector General (OMIG) annual work plan
- Health and Human Services Office of the Inspector General (OIG) annual work plan
- Internal policies and procedures

The Compliance Department will create a comprehensive list of all risk areas based on Amida Care experience, industry experience and DOH/OMIG/CMS focus areas.

Each item/category on the list shall be ranked by assigning a risk score based on the magnitude and likelihood of a potential issue occurring.

- Magnitude refers to the level of importance or impact to the members and regulatory requirements
- Likelihood means the possibility of a process or control weakness around this risk area, or the chance that an issue could occur in this area

1. Magnitude and likelihood will be rated based on the following scales:

Magnitude Ranking	Definition (1 or more)
1. Negligible	Minimal or no impact on members, and little or no impact on being able to meet regulatory requirements.
2. Minor	Minor impact on members and small impact on meeting regulatory requirements.
3. Moderate	Moderate impact on members and inability to meet regulatory requirements.

4. Serious	Serious impact on members and increased inability to meet regulatory requirements.
5. Critical	Serious impact on members and inability to meet regulatory requirements.

Likelihood Ranking	Definition
1. Improbable	Shocked if this risk happens
2. Possible	Not likely, surprised if it happens
3. 50/50	Toss-Up
4. Probably	Likely, but not surprised if it did happen
5. Near Certain	Shocked if it didn't happe

2. The Compliance Department will collaborate with business owners to identify risk areas and to rank each area.
3. The completed risk assessment will be utilized to create the audit work plan.
4. The risk assessment and audit work plan will be presented to the Compliance Committee. The Compliance Committee will discuss and recommend any changes in rank or focus.
5. Once finalized, the risk assessment and audit work plan will be presented to the Board of Directors.
6. The Compliance Department will work with staff to ensure the following elements are addressed through departmental monitoring, regardless of the overall ranking and potential for the Compliance Department to conduct a formal audit:
 - enrollment/disenrollment
 - credentialing and re-credentialing
 - network accuracy and adequacy
 - appeals and grievance handling
 - utilization management
 - accuracy of claims processing
 - detection of potentially fraudulent claims
 - vendor oversight and monitoring

References

- Medicaid Managed Care/Family Health Plus Contract, Section 23.1 (a), (b)
- 18 NYCRR Part 521
- Federal Deficit Reduction Act of 2005 ("DRA")

Attachments:

No Attachments

Approval Signatures

Approver	Date
Doug Wirth: CEO	5/2/2017

Approver	Date
Maura McGrath: CCPO	5/2/2017
Esperanza Gabriel: Director of Medicaid Compliance	5/2/2017

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