**Compliance Program Policy & Procedure Template**

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| **SUBJECT**:  Monitoring & Auditing | **EFFECTIVE DATE**: | **REVISION DATE**: |
| **APPROVAL**: | **DATE**: |  |

**PURPOSE:** To ensure that risks related to the Government Programs are regularly evaluated, appropriate mitigation strategies are developed and implemented and that processes exist to identify and resolve any instances of non-compliance as early as possible.

**POLICY:**  (“the Company”) shall implement procedures for internal monitoring and auditing in order to test and confirm compliance with applicable Medicare regulations, sub-regulatory guidance, contractual agreements, and all applicable state and federal laws, as well as internal policies and procedures to protect against potential fraud, waste or abuse (“FWA”).

The Company’s Compliance Officer will ensure that the compliance risks, both internal and external, related to the Government Programs are assessed on a regular basis and direct the implementation of internal systems and controls to reinforce compliance and to ensure the Compliance Program and the Monitoring and Auditing Work Plan are responsive to those risks.

The Company will cooperate fully with CMS on any audits.