

## Corporate Compliance

Internal Audits June 2023

## Standard:

AccessCNY will implement a system of internal audits to ensure that services are provided and billed in compliance with applicable laws and regulations.

## Procedure:

- 1. The Director of Quality Enhancement or designee will determine how often each program will be audited annually based on the results of the annual risk assessment.
- 2. The Quality Enhancement department will develop audit tools for each department audit to ensure that the audit team uses consistent protocols during each audit.
- 3. The Quality Enhancement team will select a random sample on the day of the scheduled audit. Before reviewing any participant record, the Quality Enhancement team will sign the record access log if it is required by the department.
- 4. The Quality Enhancement team will provide feedback to the department receiving the audit throughout the audit.
- 5. Upon completion of the audit, the Director of Quality Enhancement or designee will prepare an audit summary including positive and negative findings. Within one month of the completion of the audit, the audit summary will be forwarded to the Associate Executive Director, Program Director, Program Manager and Chief Financial Officer (if appropriate). The Program Director and Program Manager will also receive a copy of each individual audit tool completed during the audit.
- 6. The Program Director will document corrections to issues and any monitoring system on the response form. Corrections may include voiding claims that were billed with errors or do not have required supporting documentation. The response form will be forwarded to the Associate Executive Director of Quality and Performance within 30 days of receipt of the audit summary.
- 7. The written audit summary, completed audit tools and response form will be kept on file with the Associate Executive Director of Quality and Performance.

- 8. Each department will also develop an additional auditing process within the department which may include peer audits. Trends from these audits will be forwarded to the Associate Executive Director of Quality and Performance.
- 9. The Associate Executive Director of Quality and Performance will review audit trends with the Quality Assurance Committee on a quarterly basis.
- 10. The Associate Executive Director of Quality and Performance will submit an annual report to the Board of Directors on audit trends as well as department improvements.