

UC Ethics Compliance & Audit Services - Attachment D: Scope of Work (Audit Areas) RFP #6225							
#	Risk Level	Audit Risk Category	Example Risk	Indicators	Objective	Likely Audit Type	Supplier Response
1	High	Teaching Physician Services	Lack of attestation, duplicate billing	CMS reviews, OIG work plan, recent settlements	Ensure CMS teaching physician rules are followed	Prospective or Retrospective	
2	High	Modifier 22, 25, 59 Use	Bypass of NCCI edits	High usage rate, improper documentation	Validate separate and distinct services are documented	Retrospective	
3	High	Critical Care Services	Unsupported time/complexity, split/shared	Time-based errors, overlapping claims	Confirm critical care time and criteria are supported	Retrospective	
4	Moderate	Clinical Trials	Billing for non-covered services	Double billing, billing payor for non-research costs, inaccurate coverage analysis, inappropriate Dx codes or modifiers	Confirm billing aligns with study and routine care coverage rules, billing supports accurate coverage analysis, consents and other supporting documentation are present	Targeted Review	
5	Moderate	High-Cost Imaging	Unjustified repeat testing, documentation of findings	Inadequate medical necessity, duplicate claims	Evaluate justification and documentation for CT/MRI/PET/US	Retrospective	
6	Moderate	Infusion Services	Time inconsistencies, hierarchy errors	High denial rate, inconsistent documentation	Review documentation and order consistency	Concurrent/Retrospective	
7	Moderate	Surgical Global Billing	Unbundling, overuse of assistants	Modifier misuse, excessive frequency	Assess adherence to global billing rules	Retrospective	
8	Moderate	E/M Coding	Upcoding, unsupported time billing	Outlier billing patterns, insufficient MDM documentation	Verify E/M levels are supported by documentation	Retrospective	
9	Moderate	Observation vs. Inpatient Status	Incorrect admission status	Audit denials, short stays, improper physician orders	Confirm status decisions are medically justified	Retrospective	
10	Moderate	Concurrent/overlapping surgeries	Presence key/critical portion lacking; immediately available throughout			Retrospective	
11	Low	TCM/CCM	Inadequate documentation	Missing communication notes, insufficient time logs	Ensure TCM/CCM services meet CMS and CPT requirements	Retrospective	
12	Low	Telehealth	Wrong POS or coverage	Service not on CMS list, out-of-scope use of telehealth codes	Evaluate correct coding and service modality	Retrospective	
13	Low	340B Billing	Ineligible patient/site, duplicate discount	Drug purchasing vs. billing crosswalk discrepancies	Confirm compliance with 340B eligibility and billing rules	Targeted Review	
14		Inpatient short stays					

Attach.D - Scope of Work

15		Inpatient DRG acute care					
16		Medicare Speech Language Pathology					
17		Psych E/M level accuracy, therapy add-on codes					
18		ESRD facility and physician MCP; MCP 90970 (partial month) accuracy					

UC Ethics Compliance & Audit Services - Questionnaires RFP #6225 (Attachment E)					
	Evaluation Question/Criteria	Supplier Response			
General Question #1	What can the firm offer to the University that competing firms cannot?				
General Question #2	Describe the firm's capability and experience in conducting healthcare revenue cycle compliance audit services for public academic medical center clients including applicable regulatory requirements.				
General Question #3	Describe your firm's capabilities in performing the audit services described in Attachment D - Scope of Work: Audit Risk Area Table.				
General Question #4	<p>Demonstrate expertise and capacity to perform the following audit types:</p> <p>a) Prospective (Pre-bill) Audits: Review claims and documentation prior to submission to ensure accuracy and compliance.</p> <p>b) Retrospective (Post-bill) Audits: Review billed and paid claims to identify errors, overpayments, underpayments, and documentation gaps.</p> <p>c) Focused Audits: Conduct targeted reviews of specific services, providers, departments, or risk areas.</p> <p>d) Random Audits: Perform random sampling audits to assess general compliance.</p> <p>e) Risk-Based Audits: Prioritize audit activities based on data-driven risk indicators, including outlier billing patterns, high-dollar services, or new regulatory requirements.</p> <p>f) Baseline or Readiness Audits: Establish compliance benchmarks for new service lines, regulatory changes, or clinical programs.</p> <p>g) Follow-up or Validation Audits: Confirm implementation and effectiveness of corrective actions.</p> <p>h) External Audits: Provide independent, objective third-party assessments.</p> <p>i) Investigation-Response or Shadow Audits: Conduct internal audits in preparation for or response to external regulatory or payer investigations to assess potential exposure and guide remediation.</p>				
General Question #5	Describe resources for providing specialized education and training.				
General Question #6	Describe your firm's familiarity with Epic electronic health record.				
General Question #7	Describe your firm's use of technology, including AI tools, in its internal audit process and the impact on the scope of work performed and/or audit efficiency.				
General Question #8	Describe your firm's plan for internal coordination and communications to assure consistency, quality, and timeliness of services.				
General Question #9	Describe your firm's process to familiarize your staff with UC's business, values, and internal audit objectives?				
General Question #10	How will you prioritize UC projects among other projects you are working on?				
General Question #11	Describe any litigation or disciplinary action of which your firm is the subject, and any litigation or professional disciplinary action that might adversely affect your ability to perform audit services.				
General Question #12	Discuss any impending changes to your organization that could affect the delivery of Internal Audit Services.				

Attach.E - Questionnaires

General Question #13	Describe the knowledge sharing tools your firm utilizes to share information with clients.				
General Question #14	How does your firm support the transfer of knowledge and development of your staff that may also be assigned on engagements in the future?				
General Question #15	If you plan to use sub-contractors, how do you oversee the quality of their work?				
General Question #16	Describe your firm's audit methodology, including sampling techniques, error rate thresholds, and how findings are validated.				
General Question #17	What types of reports and dashboards will your firm provide? Include examples of how findings, trends, and recommendations are communicated to clients.				
General Question #18	How does your firm support clients in developing and implementing corrective action plans based on audit findings?				
General Question #19	Describe your firm's approach to data security, HIPAA compliance, and safeguarding sensitive institutional and patient information				
General Question #20	How does your firm handle increased audit volume or urgent requests? Describe your surge capacity and resource allocation strategy.				
Sustainability Question #1	Is your company certified in the State of California or other U.S. State as a SBE, DBE, WBE, MBE, VBE, or DVBE? If yes, expand.				
Sustainability Question #2	Do you have a Corporate Social Responsibility (CSR) statement/policy/code of conduct or equivalent? If yes, provide an information link. If not publicly available, provide a copy with your response.				
Sustainability Question #3	Describe in general terms how your company supports your local community.				
Sustainability Question #4	Does your company incorporate any e-waste practices to ensure responsible recycling of electronics?				
Sustainability Question #5	Do you own or lease any facilities or office space certified to the LEED Green Building Rating System?				
Sustainability Question #6	Can you describe ways you support employee welfare in the workplace? (i.e., work life balance, parental leave, employee wellness programs)				

UC Ethics Compliance & Audit Services - Pricing Template RFP #6225 (Attachment F)

#	Evaluation Question/Criteria	Supplier Response			
1	Fixed hourly rate				
2	Fixed encounter rate				
3	Per provider rate for professional fee audits (optional)				
4	Best discount off hourly rate				
5	Best discount off fixed encounter rate				
6	Best discount off per provider rate for professional fee audits (optional)				