



# CMS Audit Readiness For Healthcare Leadership

“Understanding the Systemic Failures Behind the 80% Audit Failure Rate.”



# Common CMS Audit Readiness Gaps

## Patterns Observed in Audit Reviews

- **Audit standards have increased faster than operational support models.**  
CMS, OIG, and UPIC reviews now expect precise, claim-level documentation and traceable evidence.
- **Many compliance programs are documented but not operationalized.**  
Policies exist, but are not always embedded into workflows, documentation habits, and daily practice.
- **Templates and tools often require customization for audit defensibility.**  
Generic EHR templates and policy libraries frequently need strengthening to meet evidence expectations.
- **Leadership bandwidth is heavily constrained.**  
Executives and clinical leaders manage multiple priorities that compete with sustained readiness oversight.
- **Oversight expectations evolved — operational models must evolve with them.**  
Audit standards and enforcement practices have advanced over time.



# How CMS Audits Work — Part 1

## How Audit Determinations Are Made

- **CMS audits are evidence-based.**

Determinations are made from documentation and recorded support — not operational intent.

- **Each claim is evaluated on its own supporting record.**

Missing or incomplete elements can affect claim determination outcomes.

- **Audit reviews follow defined federal evaluation criteria.**

Review teams apply standardized rules covering eligibility, timing, coverage guidance, and clinical support.

“CMS audits are federal payment determinations based on documented evidence..”



# How CMS Audits Work — Part 2

## Common Operational Readiness Gaps

- **Many organizations prepare for surveys more than payment audits.**  
Operational reviews and payment audits evaluate different forms of evidence and documentation support.
- **Audit response timelines are often compressed.**  
Record requests may surface issues tied to earlier documentation periods.
- **EHR templates require clinical specificity for audit support.**  
Standard templates and dropdown text often need individualized clinical rationale and supporting detail.

“Documentation should reflect individualized clinical reality and supporting detail.”



# Why Traditional Support Models Fall Short

## Common Gaps in Traditional Compliance Support

- **Template-based tools alone rarely achieve audit defensibility.**  
Generic forms and standard templates typically require customization and governance oversight.
- **Staff are often trained to operational standards — not audit standards.**  
Clinical and administrative teams may not receive audit-level documentation guidance.
- **Efficiency practices can conflict with documentation precision.** Copy-forward text, generalized language, and checkbox entries often require strengthening for audit support.

“Audit defensibility depends on documentation precision and governance discipline.”



# SRP Readiness Framework

## Closing Structural Readiness Gaps

- Audit complexity has increased — readiness models must keep pace
- Evidence standards now require documentation precision
- Templates need governance and customization
- Compliance must operate in daily workflows
- Leadership oversight drives readiness outcomes
- Documentation processes must support defensibility
- Readiness models require periodic recalibration

“Operational systems drive audit defensibility.”



# Why the SRP Operating Doctrine Exists

- Many organizations lack a unified, audit-defensible framework
- Oversight expectations evolved faster than readiness models
- Policies often exist without workflow alignment
- Leaders need a practical readiness structure
- SRP provides governance, structure, and defensible practices



# How the SRP Readiness Framework Works

- Establishes a unified readiness structure across departments
- Aligns documentation and compliance controls to audit expectations
- Defines roles, oversight, and accountability
- Strengthens documentation and evidence practices
- Creates a repeatable readiness cycle

“SRP transforms compliance from reactive to operationalized.”



# What the SRP Readiness Framework Delivers

- Strengthened compliance and audit defensibility
- Reduced audit and documentation risk exposure
- More consistent, supportable documentation practices
- Clearer governance and leadership visibility
- A structured, repeatable readiness model

“Structured readiness supports defensible operations.”



# How the SRP Readiness Framework Is Applied

- Deployed as a unified readiness model across departments
- Governance roles and oversight structures defined
- Compliance and documentation workflows aligned
- Evidence and tracking practices strengthened
- Ongoing readiness monitoring supported

“Implementation is structured, repeatable, and built for results.”



# Leadership Responsibilities Within the SRP

- **Compliance success begins with executive ownership.**  
SRP centers responsibility at the leadership level—not on frontline staff.
- **Clear governance structures define who is accountable for what.**  
Executives, managers, and teams operate with aligned expectations and oversight.
- **Leaders gain visibility into risk, documentation integrity, and CMS readiness.**  
No blind spots. No surprises. No assumptions.
- **SRP reinforces a culture of accountability and operational discipline.**  
Roles, workflows, and decisions become consistent, intentional, and defensible.
- **Leadership engagement is the strongest predictor of CMS audit outcomes.**  
When leaders lead, audit readiness becomes achievable and sustainable.

“Structured implementation supports sustained readiness.”

# Leadership Responsibilities in the SRP Framework



- Readiness starts with executive ownership
- Governance roles and accountability are defined
- Leaders gain clearer visibility into risk and documentation quality
- Accountability and operational discipline are reinforced
- Leadership engagement strengthens readiness posture

“Readiness is a leadership function.”



# Closing Perspective

- CMS audit expectations continue to evolve
- Readiness requires aligned governance, documentation, and oversight
- SRP provides a structured readiness framework for leaders
- Clarity and accountability strengthen readiness posture

“Readiness is leadership-driven.”



# Next Steps

- Audit and oversight expectations continue to evolve
- Structured readiness supports defensible operations
- The SRP Readiness Framework provides a practical model
- Early readiness planning improves response capability
- HCCP provides independent advisory support.

“Build readiness with structure and leadership focus.”



**“Audit Readiness Is a Leadership Responsibility.”**  
Focused. Defensible. Audit-Ready.

### Executive Advisory Inquiries

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