

"Medicare Audit Readiness"

# Medicare Certification & Compliance Packages

Tailored for Hospice Providers — Scalable Across All Medicare-Certified Entities

# Introduction & Purpose

Healthcare Compliance Certification Professionals (HCCP) is a trusted compliance and certification integrator dedicated to helping hospice providers across the nation protect their Medicare certification status, achieve full compliance, and maintain continuous audit readiness.

Our mission is to equip post-acute care organizations with actionable compliance intelligence, measurable certification support, and expert-led remediation services that defend their licenses, secure Medicare reimbursements, and fortify their operational future.

We offer a suite of rigorously structured Certification & Compliance Packages—each designed to meet providers where they are in their regulatory journey. Whether you are preparing for initial certification, remediating findings, or defending against audit escalation, our packages deliver a transparent, repeatable framework tailored for hospice operations.

- The Assessment Package helps providers identify regulatory gaps and establish a certification-grade baseline.
- The Remediation Package delivers structured fixes and defensible documentation aligned to CMS and HIPAA.
- The Audit Defender Package offers our most advanced services—full-spectrum audit defense, executive oversight, and year-round compliance assurance.

All packages are built with scalability, documentation rigor, and federal alignment in mind.

In addition, HCCP offers Senior Consulting (Concierge Oversight) services to support executive leadership, boards, IT teams, and managed service providers (MSPs) in navigating complex or high-stakes compliance scenarios. Our consultants are available for strategic engagements, ad hoc support, and special projects that require legal-grade remediation and certification expertise.

This document outlines each package in detail so you can make informed decisions that protect your patients, your staff, and your Medicare funding.



#### **Concierge Oversight Package**

"Ongoing embedded leadership for audit defense, certification continuity, and strategic compliance execution."



# Gold Package: Certification Readiness Assessment

## Purpose:

The Gold Package is a comprehensive, first-stage compliance engagement designed to evaluate your organization's readiness for Medicare certification and survey activity. It delivers a structured, evidence-based review of your current compliance posture, identifies deficiencies across HIPAA, CMS, and OCR domains, and provides an actionable snapshot of your risk exposure. This package includes a baseline Security Risk Assessment (SRA), CMS Conditions of Participation alignment review (42 CFR §418), HIPAA safeguards evaluation, internal vulnerability scan, and a focused audit readiness diagnostic—all tailored to hospice operations.

The goal is not only to uncover what's missing, but to establish a solid compliance baseline from which remediation and certification efforts can proceed with confidence.

### **Designed For:**

Hospice providers—especially small to mid-sized agencies—preparing for:

- Initial Medicare Certification
- CMS Survey or Re-survey
- Pre-audit preparation
- · Leadership transitions or ownership change
- Compliance restructuring after a failed survey or OCR warning

This package is ideal for executive teams that need a discovery-driven roadmap of regulatory health across technical, operational, and documentation domains. It's designed for leadership who recognize that compliance isn't just about passing an inspection—it's about proactively controlling risk before it turns into a violation or funding freeze.

#### Why It Matters:

Certification is not automatic. Medicare payments, state licensure, and long-term viability depend on defensible compliance. The Gold Package protects your organization by helping you:

- Identify regulatory blind spots before CMS or OCR finds them
- Quantify HIPAA vulnerabilities and documentation gaps that could trigger penalties
- Establish an audit-ready compliance baseline aligned with current federal expectations
- Lay the groundwork for Medicare certification, survey success, and payment continuity

For many hospices, this is the most critical investment they can make before regulators show up. Without this baseline, remediation lacks direction—and leadership operates in the dark.

Service Area	Description
HIPAA Compliance Snapshot	Evaluation of foundational administrative, technical, and physical safeguards. Focus on identifying gaps that may trigger CMS survey findings or HIPAA violations. [HIPAA 164.308, 310]
CMS CoPs Overview	Introductory review of Medicare Conditions of Participation including §418.54–418.116. Prioritizes emergency preparedness, personnel credentials, documentation protocols, and patient rights.
Security Risk Assessment (SRA)	Baseline HIPAA-required SRA with high-level risk scoring. Identifies immediate vulnerabilities relevant to Medicare compliance and OCR expectations.  Generates an initial Findings Report.
Vulnerability Discovery Scan	Internal, non-intrusive system scan to locate legacy software, outdated protocols, or exploitable misconfigurations. Mapped to NIST 800-115.
Policy & Training Readiness	Analysis of up to 3 key documents (e.g., Privacy Policy, AUP, IR Plan) and staff training posture. Flags compliance gaps against HIPAA 164.308(a)(5) and Medicare personnel training standards.
Reporting & Roadmap	Includes Compliance Snapshot Summary, Certification Readiness Index, Findings Report with priority flags, and a Step-by- Step Medicare Certification Action Plan.
Support Access	Email-based support, compliance Q&A, and one virtual review session with your assigned HCCP advisor. Secure SharePoint access to all deliverables.



# Platinum Package: Compliance Remediation & Certification Readiness

## Purpose:

The Platinum Package delivers full-cycle compliance remediation and Medicare certification preparation. It addresses known regulatory gaps, fortifies documentation, and establishes a defensible compliance posture ready for CMS surveyors and HIPAA enforcement.

Building on the Gold Package foundation, this engagement remediates all baseline diagnostics—SRA, CMS CoP mapping (42 CFR §418), HIPAA safeguards, and audit readiness gaps—elevating your posture to certification-grade standards. It includes technical and procedural corrections, advanced risk modeling, and a complete policy overhaul to make your organization audit-ready and certifiable.

#### **Designed For:**

Hospice providers that have completed a baseline assessment and now require structured, measurable remediation to:

- Respond to survey findings or OCR action plans
- Resolve documented HIPAA or CoP violations
- Protect Medicare reimbursement from compliance-related risks
- Navigate enforcement, CAPs, or multi-site operational expansion

This package is tailored for leadership teams who need execution—not just evaluation.

#### Why It Matters:

Medicare funding can be delayed, denied, or revoked due to unresolved compliance risks. The Platinum Package ensures your agency:

- Corrects gaps with certifiable documentation and audit tracking
- Aligns policies, IT controls, and CoPs for full compliance
- Upgrades HIPAA safeguards, training, and technical defenses
- Gains a remediation roadmap and defensible audit-ready records

This is the required next step for any hospice serious about certification, payment continuity, and long-term compliance integrity.

Service Area	Description
Full HIPAA Compliance Assessment	Deep-dive assessment of all HIPAA safeguards. Includes implementation scoring, OCR audit alignment, and gap identification against Medicare-required privacy/security standards.
CMS CoPs Remediation Mapping	Control mapping and documentation alignment with CoPs §418.52–418.100+. Survey readiness enhancements delivered via tracked corrections and a CMS attestation checklist.
Enhanced SRA	Advanced SRA with risk modeling, internal/external risk mapping, likelihood/impact matrices, and threat prioritization. Includes Risk Report with Certification Impact Scoring.
Vulnerability Management Review	In-depth scan and review of patching posture, antivirus status, EOL systems, and endpoint hardening. Tied to CMS IT risk posture for clinical systems and data safeguards.
Policy Overhaul & Update	Remediation of core documentation (IR Plan, Privacy Policy, Encryption Policy, Access Control). Customized for Medicare attestation and survey review. Includes legal alignment for OCR enforcement.
Awareness Training Support	Review and upgrade of workforce training. Includes phishing simulation templates and a recommended LMS framework for Medicare survey documentation.
Reporting & Roadmap	Final SRA Report, Vulnerability Report, CoPs Remediation Matrix, Certification Readiness Scorecard, and a 90-Day Compliance Remediation Roadmap.
Support Access	Regular virtual meetings, SharePoint documentation hub, and ongoing access to HCCP compliance experts for remediation validation.



# Diamond Package: Audit Defender Package

### Purpose:

The Audit Defender Package is HCCP's most advanced and comprehensive offering—designed for hospice providers that require full-spectrum Medicare certification, audit defense, and regulatory resilience. This package includes all services from the Gold and Platinum Packages and extends support into executive compliance strategy, operational readiness, red/purple team testing, and real-time audit intervention. It is built for providers operating in high-risk environments or under immediate CMS, OCR, or payer scrutiny. From technical safeguards to policy defense, HCCP ensures that your entire compliance program can withstand regulatory review, recover from incidents, and maintain Medicare funding continuity.

## **Designed For:**

Hospice leadership teams, compliance officers, audit committees, and legal counsel preparing for:

- CMS or state survey escalations
- OCR investigation or HIPAA enforcement
- Medicare payment holds or CAP settlements
- Complex multi-location or enterprise audits
- Executive or board-level briefings on compliance posture

This package includes 24/7 direct access to HCCP compliance advisors, unrestricted remediation support, and hands-on collaboration with your internal IT staff, Managed Service Provider (MSP), legal teams, and vendor ecosystem.

#### Why It Matters:

Compliance failures aren't theoretical—they result in denied Medicare payments, failed audits, reputational damage, and, in serious cases, license revocation. Certification is not guaranteed. The Audit Defender Package protects your organization through a repeatable, proven process that ensures regulatory alignment, survey readiness, and defensible audit posture.

This 12-month engagement includes full-spectrum support from senior HCCP compliance experts, continuous virtual collaboration with your IT, MSP, and leadership teams, and a tailored remediation roadmap designed to withstand scrutiny from CMS, OCR, and commercial payers. All work is performed remotely, but on-site support may be arranged as needed and billed separately.

This is HCCP's highest-value offering—built for organizations that cannot afford failure. With 24/7 support, red/purple team simulations, board-ready reporting, executive leadership integration, and direct audit representation, HCCP ensures your compliance program is not only certified—but fortified.

Additional senior consulting hours may be purchased to support specialized certifications, board presentations, targeted remediation, expanded audits, regulatory appeals, or enterprise compliance modernization projects. You gain a long-term partner—not just for your next audit, but for every challenge that follows.

Service Area	Description
Includes Gold Package	Baseline assessment covering HIPAA safeguards, CMS CoPs review, Security Risk Assessment (SRA), internal vulnerability scan, and audit readiness diagnostic.
Includes Platinum Package	Full-cycle remediation, documentation correction, enhanced SRA, vulnerability management, HIPAA training, and CMS/OCR alignment.
Executive Strategy & Oversight	Strategic advisory support including board briefings, certification planning, CAP preparation, and executive compliance alignment.
Red & Purple Team Audit Simulations	Simulated audit readiness exercises, breach response drills, and adversarial testing aligned with MITRE ATT&CK and OCR audit scenarios.
Real-Time Audit Response	On-call support during live audits, CMS surveys, OCR investigations, and CAP enforcement actions.
Policy & Incident Management Frameworks	Development and validation of advanced policies and breach response procedures.
IT/MSP Coordination	Collaboration with your internal/external IT providers for compliance-driven risk remediation.
Continuous Monitoring & Documentation	Ongoing access to SharePoint documentation hub, monitoring of controls, and quarterly compliance status reports.
24/7 Support Access	Unrestricted, round-the-clock support from senior HCCP compliance experts.
Optional Add-On Consulting Hours	Additional hours may be purchased to support custom projects, extended remediation, or board-level initiatives.

# **Concierge Oversight Package**



The Concierge Oversight is fully embedded within the Hospice Provider Medicare Compliance Certification Team—providing hands-on leadership across every phase of the Medicare assessment and audit process to ensure the organization meets all regulatory requirements, passes certification, and protects its Medicare funding. This strategic role is essential for driving audit readiness, closing compliance gaps, and securing long-term certification with precision, speed, and confidence

## **Technical & Administrative Scope**

Service	Expanded Scope
Strategic, Tactical &	Provides expert-level support in Medicare certification,
Operations Advisory	HIPAA compliance, and cybersecurity governance.
Support	Operates as an extension of your leadership team to
Сарроп	guide strategy, drive operational execution, and align
	compliance objectives with business outcomes.
Medicare Audit &	Direct participation in certification and audit operations
Certification Operations	including CMS/OCR survey coordination, deficiency
Certification Operations	response, audit interviews, and document validation.
Monthly, Quarterly &	Structured support for ongoing compliance activities,
Annual Certification	including attestation management, training validation,
Oversight	policy updates, and performance audits aligned with
Oversignt	' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '
Compliance & Risk	Medicare and CMS requirements.  Delivers executive-level guidance on HIPAA safeguards,
Program Oversight	CMS CoPs, internal control gaps, and risk mitigation
Program Oversignt	
	strategies. Tracks remediation progress and supports
DDO 9 Breach Operations	alignment with enforcement protocols.
DPO & Breach Operations	Manages breach response planning, risk register
Management	updates, PHI lifecycle controls, and reporting obligations.
	Coordinates with legal and compliance teams for proper
F (: 0.5 II I	incident handling.
Executive & Board-Level	Advises C-suite, board members, and compliance
Briefings	committees through briefings, roadmap presentations,
	and risk translation aligned with governance strategy.
Audit & Documentation	Reviews all certification-related documentation, including
Review	policy sets, audit tools, interview preparation, and
	compliance evidence binders. Supports internal mock
	audits.
Security & Certification	Develops strategic and technical roadmaps to elevate
Maturity Planning	compliance posture, address vulnerabilities, and maintain
	readiness for certification renewal and audit defense.
Program Management	Provides full-spectrum program management support—
	overseeing certification timelines, managing
	documentation cycles, coordinating with internal
	stakeholders, and ensuring consistency across all HIPAA
	and CMS compliance functions.

## **Concierge Package**

"The Concierge Oversight Package provides continuous leadership integration and full-spectrum compliance governance—ensuring your organization remains Medicarecertified, audit-ready, and board-aligned year-round."

## **Support Access**

✓ Full access to your HCCP Strategic, Tactical & Operations Advisor. Includes virtual consultations, strategic roadmap reviews, audit meetings, email-based coordination, and compliance oversight.

# Consulting Hours: Included Support with Scalable Flexibility

Each HCCP Compliance & Certification Package includes a defined number of consulting hours. These hours are built in to support core services such as strategic planning, certification guidance, policy development, risk assessments, and audit preparedness.

If your organization requires additional or extended support beyond the scope of the selected package, supplemental consulting hours are available in blocks of twenty (20). These optional hours may be used for:

- Executive or board-level briefings
- Live audit defense or simulation
- Advanced remediation or appeals
- · Custom compliance strategy or documentation

No additional consulting is required unless your needs exceed what is included. This structure ensures both transparency and flexibility—giving you clear deliverables upfront, with the option to scale support if needed.

#### References:

HIPAA Security Rule (45 CFR §164), CMS Conditions of Participation (42 CFR §418), NIST SP 800-30, SP 800-115, SP 800-53, SP 800-137, ISO/IEC 27001, MITRE ATT&CK, Zero Trust Architecture.

#### Notes, Disclaimers, and Assumptions:

- **Pricing Disclosure:** Final pricing will be provided following a collaborative discussion and a comprehensive review of your organization's size, operational scope, compliance maturity, and the level of effort required to meet regulatory objectives. All pricing is subject to change based on actual conditions and client-specific requirements.
- Scope & Customization: This service package is intended as a flexible framework. Customizations may be necessary based on the nature of your organization (e.g., hospice, home health, SNF), technology infrastructure, staffing model, and current compliance posture.

- Add-On Services: Optional enhancements—such as cloud security reviews, third-party risk assessments, penetration testing, or red team engagements—can be integrated into any package tier for an additional fee.
- **Assumptions:** This proposal assumes reasonable access to internal stakeholders, IT systems, policies, and documentation needed to perform assessments and deliver solutions in a timely and secure manner. Delays or limitations in access may affect the timeline and scope of deliverables.
- Engagement Requirements: Formal engagement will require a signed service agreement, mutual confidentiality terms, and an agreed-upon scope of work (SOW) prior to initiation of services.