**Checklist for Due Diligence**

The due diligence process is complex and must be done thoroughly to anticipate problems and avoid unnecessary risk. When starting the process, organizations can use this checklist, organized by critical healthcare specific topics. Further information will be necessary, but this tool provides a starting point for the process.

**Licensure/Payer Certification**

* Copies of licenses
* Copies of certification
* 2-3 years of Medicare/Medicaid cost reports
* 2-3 years of audit reports
* Other information

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**Compliance Program**

* Copies of the organization's compliance plan
* Minutes of the compliance committee
* Evidence of plan integration into day-to-day operations; this may include interviews with the CEO, CFO, chief compliance officer, and staff regarding the role of compliance planning in the organization
* Other information

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**Fraud and Abuse and Stark Law**

* Copies of agreements between the healthcare entity and referral sources
* Assessment of fair market value of the amounts paid under those agreements
* Any analyses of fraud and abuse aspects of those agreements
* Other information

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**HIPAA**

* Copies of the organization's HIPAA policies
* Evidence of how the organization integrates those policies into day-to-day operations; this may involve interviews with organization leadership
* Other information

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*Source:* Developed by Alan E. Schabes, partner, Benesch Friedlander, Cleveland, Ohio ([aschabes@Beneschlaw.com](mailto:aschabes@Beneschlaw.com)).