



MIR PROGRAM **AUDIT** CHECKLIST

Identify risk. Validate compliance. Protect capital.

A structured review of your Section 111 reporting integrity before it becomes exposure.

DATA INTEGRITY

Foundation Layer - Green Zone

- Tax ID and EIN match CMS registration exactly
- ORM acceptance date aligns with the claim file
- ICD diagnosis codes match medical records
- Claim numbers are consistent across internal systems
- No duplicate submissions exist for the same claim

 Most MIR errors originate from internal system mismatches.



ORM ALIGNMENT

Yellow Zone - Escalating Risk

- ORM is triggered only when responsibility is clearly established
- ORM termination events are supported by settlement or resolution
- ORM is not left open unnecessarily

 Open ORM without documentation increases audit vulnerability.



TIMELINES & SUBMISSION CONTROL

Orange Zone - Financial Risk Building

- Quarterly submission occurs on schedule
- Rejected files are corrected and resubmitted
- Error reports are reviewed by a designated responsible party
- Internal MIR review occurs prior to submission

 Most MIR errors originate from internal system mismatches.



Low Risk
Structured Control

Moderate Risk
Limited Validation

Elevated Risk
Reactive Corrections

High Risk
No Independent Audit