

Report on Medicare Compliance Volume 32, Number 6. February 13, 2023

Sample Checklist for Compliance Policy Management

By Nina Youngstrom

This tool appears in the *Complete Compliance and Ethics Manual 2023*.^[1]

Topic	Task	Function Responsible	Next Steps	Completion Date
Policy approval process	Create “policy on policies” that defines approval process for policies, including any intermediary approval requirements and who has final approval authority			
	Outline policy approval process steps and approval “gates,” including approval by policy owner, Legal, and final approver (e.g., senior management and/or compliance governance committee)			
	Communicate policy approval policy and process to relevant stakeholders			
Policy drafting	Create standard policy format			
	Identify risk(s) for which a policy is needed (i.e., which risk will this policy help mitigate?)			
	Determine scope of persons affected by the risk (e.g., size of audience, geographical locations, job functions, departments) to determine policy audience			
	Identify relevant subject matter expert(s) to assist in drafting of new policy			
	Create initial draft of policy using standard policy format and identified policy audience			

	Assign policy owner (may be the subject matter expert)			
	Circulate initial draft for comment from relevant stakeholders			
	Create final policy draft and submit through policy approval process			
	Following approval, determine whether translations will be needed and if so, obtain them			
Policy implementation	Determine appropriate communication method based on urgency and audience, including consideration of any translations needed for communication pieces			
	Create communication plan with rollout dates and effectiveness measures			
	Draft communication pieces and submit for approval through corporate communications approval process			
	Once approved, obtain any needed translations			
	Launch policy communication campaign and assess effectiveness			
	Ensure new policy is posted to policy library and easily accessible to all affected persons			
Policy maintenance	Create versioning protocol to track revision dates and versions of policies			
	Assign an owner for each policy			
	Choose a review cadence for review of each policy based on comparative risk			

Policy review	Review policies based on a set review cadence for each (e.g., annually)			
	Ensure subject matter expert/policy owner conducts content review for each policy to ensure adequate risk mitigation			
	Conduct legal review for each policy to ensure policy language is adequate and current			
	Document all revisions, including reasoning/basis for each change			
	Implement versioning protocol to track and communicate current version and replace/archive outdated versions			

Sample Compliance Policy Management Checklist

This document is only available to subscribers. Please log in or purchase access.

[Purchase](#) [Login](#)