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GCPG makes recommendations for policies and procedures

by Betsy Wade

The U.S. Department of Health and Human Services Office of Inspector General (OIG) recently updated its *General Compliance Program Guidance* (GCPG), making several recommendations related to an organization's policies and procedures and code of conduct.^[1]

Among the recommendations:

- Identifying “relevant individuals”
- Ensuring accessibility of policies and procedures and the code of conduct for relevant individuals
- Including a signed statement from the board in the code of conduct

Identifying relevant individual

In its opening paragraph on policies and procedures, OIG emphasizes the importance of policies and procedures and the code of conduct by stating that they provide a “roadmap for relevant individuals” to conduct their jobs.

OIG defines a relevant individual as “a person whose responsibilities or activities are within the scope of the code, policy, or procedure.” OIG goes on to state that relevant individuals could include agency staff, agents, contractors, customers, employees, medical staff, patients, subcontractors, or others. Finally, OIG states that each organization needs to determine who their relevant individuals are.

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