STRATEGIC MANAGEMENT SERVICES

Standardizing Your Health Care Compliance Program Policies and Procedures Can Lead to a More Effective Compliance Program

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The Department of Health and Human Services Office of Inspector General (OIG) and the Department of Justice both have stressed the importance of readable and understandable health care compliance documents for program guidance. Implementing a standard form and format makes it easier for employees to understand and use compliance policies. This article offers tips for compliance officers for improving your compliance policies.

Health Care Compliance Policies and Procedures Best Practices

The foremost best practice that we recommend to our clients is to design and implement a standard form and format used for all company's policies. There are several benefits to standardizing the form and format.

First, use of a standard form helps employees immediately recognize the policy as an important company-issued document. Because it is important for employees to read compliance policies, you will want to make the policy easy to recognize.

Second, the standard format of health care compliance program policies and procedures documents and templates are best when limited to no more than three pages and focused on a single specific topic. If the policy document is likely to run significantly longer than the recommended three pages, consideration should be given to whether the topic could be better addressed in multiple policy documents. A successful policy is one that is easily readable and understood and uses short sentences and paragraphs.

Third, the policy should be written in a manner that is easy for employees to comprehend. As such, avoid using technical jargon and unfamiliar terms, without defining those terms first. This point is particularly important when the policy addresses compliance with applicable laws and regulations as it relates to the employees' responsibility. This includes use of standardized language, organization names and titles, fonts and other styling specifics. This will improve employees' reading comprehension of the health care compliance document. The more consistency, the easier it will be for them to navigate the content to find what they need to know. What this means is that the document elements should remain the same across all documents.

Standard Form and Format

Meeting these challenges can be simplified by standardizing the health care compliance document form and format in order to avoid gaps in the process. Using a template helps to standardize what information and sections are needed and standardized section titles allows for organization across all policy documents. A common method of health care compliance policy and procedure formatting includes the following:

- **Header and Footer Blocks** are used for administrative control that includes: policy title; responsible party for policy; policy approval date; effective date; policy number; approval authority; and whether it replaces or modifies an existing policy.
- **Background Section** establishes the document's context and relevance.
- **Purpose and Objective Sections** provide direct statements that define the policy's intent.
- **Definitions Section** defines the terms used in the policy.
- **Policy Section** includes general statements describing the goals of the policy.
- **Procedures Section** clearly defines step by step requirements or process to carry out each policy statement.
- **Related Policies Section** helps to eliminate confusion when policies touch on a same or similar topic.
- **Reference Section** includes legal, regulatory or internal and external references used to develop the policy.

Developing Health Care Compliance Documents and Templates for Your Organization

It's important to communicate health care compliance program policies and procedures to employees. Standardized policy documents and templates make it easy to distribute this information so that employees can better understand and use policies on an ongoing basis.