

# Compliance Program Standards (All service lines)

## KPA – Compliance Program

Standard	Evidence
<p>The organization has a compliance program with a designated officer and committee who are responsible for its operation.</p>	<p><b>Document review:</b> Review the organization’s written compliance program.</p>
<p>The designated compliance officer and compliance committee are responsible for the following key compliance program duties:</p> <ul style="list-style-type: none"> <li>• Maintaining regulatory knowledge and regulatory requirement monitoring</li> <li>• Staff education</li> <li>• Identifying organizational compliance gaps</li> <li>• Facilitation of regular compliance meetings</li> <li>• Participating in organizational policy review and update with designated quality staff with regulatory updates as applicable</li> <li>• Preparation of compliance information for the governing board</li> <li>• Ensuring ethical marketing practice</li> </ul>	<p><b>Document review:</b> Review the job duties of the compliance officer to validate duties outlined in the standard are included.</p> <p>Review job duties and evidence of education of designated compliance officer and compliance committee are completed.</p> <p><b>Interview:</b> Interview designated compliance staff to determine their role and understanding of compliance program duties.</p> <p><b>Tips:</b> Compliance officers may also have another position title and duties in addition to compliance management.</p> <p>In smaller organizations, this may be the QAPI committee, IDG, or other group. Compliance policy should outline who serves on the organization’s compliance committee.</p>
<p>The organization has written compliance policies and procedures and standards of conduct that are:</p> <ul style="list-style-type: none"> <li>• relevant to day-to-day responsibilities</li> <li>• available to those who need them</li> <li>• re-evaluated on a regular basis</li> </ul>	<p><b>Document review:</b> Review the organization’s written compliance program policies and procedures and standards of conduct to determine they are relevant to day-to-day responsibilities, available to those who need them, re-evaluated on a regular basis.</p> <p><b>Interview:</b> Interview staff members with various positions in the organization to determine if they know about the compliance policies and procedures and standards of conduct and where to find them.</p>
<p>The organization has a mechanism for reporting instances of potential compliance issues and</p>	<p><b>Document review:</b></p>

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<p>makes the information available to staff members.</p>	<p>Review the organization’s written compliance program to determine the reporting mechanism established so that staff members can report potential compliance issues.</p> <p><b>Interview:</b> Interview staff members with various positions in the organization to determine if they know about the mechanism to report potential compliance issues.</p>
<p>The organization has an effective auditing and monitoring plan in place to detect compliance issues that are re-evaluated at least annually.</p>	<p><b>Document review:</b> Review the organization’s auditing and monitoring plan to ensure it is active and re-evaluated at least annually.</p> <p><b>Interview:</b> Interview designated compliance staff to assess their awareness of the organization’s auditing and monitoring activities.</p>
<p>The organization documents investigation of compliance issues, implementation of corrective action, and periodic review of the problem to ensure compliance.</p>	<p><b>Document review:</b> Review the organization’s investigative process and corrective compliance action plans to determine if they were implemented and reviewed to verify the corrective action that was implemented was successful.</p> <p>Review documentation of investigation of compliance issues, implementation of corrective action, and periodic review of the problem to ensure compliance.</p> <p><b>Interview:</b> Interview the compliance officer (or equivalent position) to assess investigation process, corrective action implementation, and follow up to determine success.</p>
<p>The organization emphasizes ethical behavior by enforcing standards of conduct, consistently applying staff disciplinary guidelines, and checking employees, contractors and medical and clinical staff members checked routinely against</p>	<p><b>Document review:</b> Review the organization’s documentation for:</p> <ol style="list-style-type: none"> <li>1. enforcing standards of conduct;</li> <li>2. publicizing and applying disciplinary guidelines; and</li> </ol>

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<p>government sanctions lists, including the OIG's List of Excluded Individuals/Entities.</p>	<p>3. checking employees, contractors and medical and clinical staff members monthly against government sanctions lists, including the OIG's List of Excluded Individuals/Entities.</p> <p><b>Interview:</b> Interview staff members to determine their understanding of the organization's expectations for ethical conduct and their awareness of disciplinary guidelines.</p>
<p>The organization educates new staff and contractors at orientation and annually about their compliance program and validates their understanding.</p> <p>The organization provides educates existing staff about actual and potential compliance issues and regulatory updates as applicable.</p>	<p><b>Document review:</b> Review the organization's orientation and continuing education to confirm education about the written compliance program was provided and staff understanding was validated.</p> <p>Review the organization's continuing staff training program to validate training about actual and potential compliance issues and regulatory updates as applicable.</p>