

# Writing a P&P Using the ACO Policy Guidance Template

Effective Date: 7/28/2014

Draft/Review Date: 4/28/2014

## Policy

- A. It is the policy of the ACO to have written Policies & Procedures (P&Ps). P&Ps are created to record, define, and explain the processes and functions within the ACO. P&Ps function as an aid to Participants, Providers/Suppliers and other individuals or entities performing functions or services related to the ACO's activities to ensure consistency and reliability for the ACO and the activities it performs.

## Applicability

This policy applies to the Policy Guidance Manual for ACO P&Ps.

## Procedure

- A. P&Ps will be reviewed, revised, and updated by each responsible Committee or Subcommittee (herein referred to as "Committee") on an annual basis or as guidance changes, whichever occurs first. P&Ps will be executed by the appropriate Committee.
  1. Committee chairs are responsible for the annual review and update of each policy that falls under their Committee.
  2. The Compliance & Ethics Subcommittee or assigned Compliance person within the organization is responsible for tracking documentation of each policy, ensuring the policy meets regulatory requirements and monitoring elements.
- B. Complete the P&P Template as follows:
  1. Style guide: Font Type and Size – Calibri 11 point for body of policy and Calibri 16 point for Section Titles.
  2. Listed below are detailed instructions on how to complete the specific sections of the P&P template:
    - a. Header
      - i. Title – Name of Policy.
      - ii. Logo – Place in upper left hand corner.
      - iii. Effective Date – The original date the policy was created. It will not change with any subsequent reviews. This date is generally established by the effective date in the regulations which prompted the creation of the policy.
      - iv. Draft/Review Date –
        - a. Draft – This is the date that the policy was originally drafted for the first time.

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- b. Review – With any subsequent reviews the title should be changed to “Review Date” and a new date put in the policy. This date may be the same as the effective date. The review date captures the last time that a change was made to the policy itself. This date is only updated if changes are made to the document during annual review.
- b. Footer
  - i. Left – “Confidential.”
  - ii. Center – Policy Title and number.
    - a. The ACO may choose whether to assign policy numbers, and any number assignment will be made by the Compliance & Ethics Subcommittee.
      - i. If the ACO chooses to assign numbers, the ACO should follow this numbering convention: First two initials of Committee, number of policy, followed by a period (“.”) and the revision number, if applicable.
      - ii. Example: Version 1 of Compliance Policy Number 1 may be numbered as follows – CO-01.01.
    - b. Regardless of whether the ACO chooses to assign policy numbers, the ACO must track the revision number of each P&P using a versioning system.
      - i. Example: Version 1 of Compliance Policy may be titled “Compliance Policy, v1” and subsequent revisions may be titled “Compliance Policy, v2,” “Compliance Policy, v3,” etc.
      - ii. All copies of the previous versions should be retained for recordkeeping purposes.
  - iii. Right – “Page #’ of #”.
- c. Body
  - i. Policy – Summarizes the scope of principles adopted by the ACO and/or Committee(s) for which the specific subject matter is based. Consider basic regulatory requirements and optional best practice policies.
  - ii. Applicability – Explains to which department(s), Committee(s) or individual(s) the policy applies.
  - iii. Procedure – Includes the specific actions to be taken to demonstrate compliance with the scope of the policy. Include all basic regulatory requirements and define best practices chosen related to the subject matter.

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- a. Note: Some P&P templates provided by Collaborative Health Systems (CHS) include sections marked as “Guidance.” “Guidance” denotes an action item and must be addressed by the ACO prior to adoption. P&Ps in final form cannot include any such guidance.
  - iv. Reporting – Outlines reporting details, if applicable. If not applicable, put N/A.
  - v. Related Documentation – Identifies related CMS documentation and other federal or state regulatory guidance as well as attachments associated with the P&P and/or cross-references of other P&Ps containing relevant information.
  - vi. Additional Guidance –
    - a. May include any best practice concepts that may not be “policy” but do provide direction or other guidance on exceptional performance to Participants, Providers/Suppliers and other individuals performing services related to the ACO’s activities.
    - b. Document any specific information that assists in education on the subject matter, further reasoning, or intent of the policy and include the contact information of individuals who can provide assistance and guidance.
    - c. Provide links to resource documents or websites related to the subject matter that may assist a reader in understanding the P&P.
- C. Policy Review
1. All new P&Ps shall be reviewed by the Committee that creates the document (“owner Committee”) as well as any individuals or departments that will perform tasks contained in the P&P.
  2. P&Ps will be reviewed annually by the owner Committee and revised, as necessary. Any revisions to existing P&Ps must be tracked using a versioning system. Historical versions of the P&Ps must be retained in an archive indefinitely. Versions may be noted in the title of the file or within the title of the document itself; however the versioning system must be consistent across all P&Ps.
  3. Senior management should review and provide feedback to the owner Committee.
  4. The final P&P must be sent to the Governing Body for final approval/adoption.
  5. Committee Meeting Minutes will serve as proof of review, adoption, and execution of each P&P adopted by the ACO.

## Reporting

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A. N/A

### Related Documentation

A. ACO Policy Guidance Template

### Additional Guidance

Contact your Executive Director, Compliance Officer or the Policy Team at CHS for further assistance.