

**Policies and Procedures: Policy & Procedure Development**

**Section: Compliance**  
**Chapter: Administration**  
**Policy: Compliance Related Policy & Procedure Development**

**I. PURPOSE**

To establish protocols for the development, revision, editing and implementation of policies and procedures for areas that: 1) pose risk for non-compliance with laws & regulations; and 2) promote adherence with the WVUPC Code of Conduct.

**II. APPLICABILITY**

This policy applies to all WVUPC employees and associates.

**III. POLICY**

WVUPC shall have written policies and procedures to address issues relating to compliance with state and federal health care laws and regulations. These policies and procedures shall be consistent with current law and accessible to all WVUPC employees and associates.

**IV. PROCEDURE**

1. The WVUPC Compliance Department, with input from departmental faculty and staff, shall identify issues or activities that pose risk of compliance related violations, and which should be the subject of organization-wide compliance policies and procedures.
2. Departmental faculty and employees may identify areas of potential policy and procedure development for consideration by the Compliance Department, and should communicate such need to the Compliance Department, either through the Compliance Officer or Corporate Compliance Committee.
3. All proposed compliance related policies shall be prepared by the Director of Corporate Compliance and Regulatory Affairs, with the advice and input of the Corporate Compliance Committee whenever deemed necessary by the Compliance Officer, prior to being submitted to the Board of Directors for approval. Non-substantive technical corrections may be made by the Compliance Officer without advance approval by the Board, and any such corrections shall be communicated to the Board at its next regularly scheduled meeting. New and substantively amended compliance related policies and procedures become effect upon Board approval and non-substantive

corrections shall take place immediately. All WVUPC compliance policies and procedures shall be posted on the WVUPC compliance website (www.wvupc.org)

4. WVUPC's compliance related policies and procedures shall be reviewed by the Compliance Department on a biennial basis to determine the need, if any, for revision. Revisions shall be made on an ongoing basis in order to comply with any known changes to the rules and laws relating to compliance with federal health care program requirements, and/or compliance with federal and state health care billing rules.
5. Any revisions to compliance related policies and procedures shall be distributed by the Compliance Department to the Practice Administrators of each department, and placed on the WVUPC compliance website.

**V. Amendment or Termination of this Policy**

This policy may be amended or terminated at any time.

**VI. References**

- WVUPC Corporate Integrity Agreement, p. 5.