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Follow the four As of policy management

By Betsy Wade

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Following the four As—accountability, accessibility, approval, and assessment—will help compliance professionals ensure their organizations' policies and procedures are effective.

Policy and procedure management is one of the seven elements of having an effective compliance program under the Federal Sentencing Guidelines,^[1] addressed extensively in the *Measuring Compliance Program Effectiveness*^[2] resource guide and the *Evaluation of Corporate Compliance Programs*.^[3]

Compliance must ensure the organization develops and implements a code of conduct and policies on coding, compliance audits, confidentiality, conflicts of interest, copayments and deductibles, discipline and incentives, gifts, governance, interactions with healthcare industry representatives and vendors, nonretribution/nonretaliation, overpayments, privacy, record retention, and security, among others.



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