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Verify your policies and procedures

by Catherine Boerner

It may be time to verify that your organization has policies and procedures for high-risk areas to “address the regulatory exposure for each function or department of the hospital.”

The U.S. Sentencing Guidelines require that an organization must have established compliance standards and procedures to be followed by its employees and other agents that are reasonably capable of reducing the prospect of criminal conduct. The U.S. Department of Health & Human Services Office of Inspector General’s (OIG) guidance for hospitals further clarified that every compliance program should require—in addition to the code of conduct—written policies and procedures that promote the hospital’s commitment to compliance and address the regulatory exposure for each function or department of the hospital.

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