

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

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Effective Date: 01/01/2018

### 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 Next Generation Participants, Preferred Providers, Next Generation Professionals 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 person within the organization is responsible for tracking documentation of each policy, ensuring the policy meets regulatory requirements and monitoring elements.
- B. 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.

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6. In event of updates required by regulatory changes, updated guidance, or identified instances of non-compliance, P&Ps may be updated and adopted after review by the Compliance Officer. The P&P will still need to be approved by the appropriate Committee and the Governing Body at the next regularly scheduled meetings.

### Reporting

- 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.