

Code of Conduct Compliance Program Guidance Checklist

1.	Clearly delineated commitment to compliance by the members of the organization
2.	Organization's mission, goals, and ethical requirements of compliance
3.	Fundamental principles, values, and framework for action
4.	Policies, Standards and Practices address areas of risk and vulnerability
5.	Clear expectation and requirement of compliance with Federal health care programs and organization policies and procedures by all organization members
6.	Understandable – brief, translated into other languages and written at appropriate reading levels, not “legalese or at difficult reading levels”
7.	Participation and involvement from Senior Leadership
8.	Organization commitment to compliance with Federal health care programs
9.	Requirement to follow ethical standards set by professional organizations
10.	Distributed to organization employees
11.	Regularly updated
12.	How to respond to practices that may violate the Code
13.	Obligation to report compliance suspected violations of Federal health care programs or organization policies
14.	Right of all individuals to report compliance concerns
15.	Commitment to non-retaliation and confidentiality/anonymity
16.	Recurring pitfalls because of lack of guidance
17.	Billing failures because of lack of guidance
18.	Survey for:
	<ul style="list-style-type: none"> • Awareness of the Code
	<ul style="list-style-type: none"> • Knowledge of the Code contents
	<ul style="list-style-type: none"> • Knowledge of how to locate Code
19.	Audit for:
	<ul style="list-style-type: none"> • Written Code document
	<ul style="list-style-type: none"> • Review dates
	<ul style="list-style-type: none"> • Board approval of the Code
	<ul style="list-style-type: none"> • Attestations from all affected persons that they have received, read, and will abide by the Code
	<ul style="list-style-type: none"> • Code is accessible by all employees
	<ul style="list-style-type: none"> • New employees are trained and oriented on the Code within 30 days
	<ul style="list-style-type: none"> • Understanding through post-training test scores