


COMPLIANCE	 From DentaQuest			
	<i>Policy and Procedure</i>			
	Policy Name:	Policy and Procedure Development; Version Control	Policy ID:	PLANCG-69
	Approved By:	Courtney Ransom, Head of Risk Management, Ethics & Compliance	Last Revision Date:	08/28/2023
	States:	Oregon	Last Review Date:	01/02/2024
Application:	Medicaid	Effective Date:	01/02/2024	

PURPOSE

To provide a standardized process for developing and approving formal, written policies and procedures when processes are initiated or modified. Policies and procedures promote the DCO’s mission, enhance operational efficiency, and communicate expectations relating to conduct, thereby reducing organizational risk. The DCO expects all workforce members to be familiar with and adhere to all applicable policies. In order to promote accessibility to current policies, as well as consistency and clarity of content, this policy establishes a framework, common format, roles and responsibilities and process for adoption, review, revision and dissemination of all policies as defined in this policy. The workstream outlined in this policy applies to all new The DCO policies that are drafted and adopted after the effective date of this policy, and to existing The DCO policies as they are revised after that date.

POLICY

Whenever an operational process is initiated or revised, an accompanying written policy and procedure will be developed and disseminated to the appropriate operational department and published to all workforce members.

DEFINITIONS

- **“Application”** means applicable lines of business. The Application will include clarification for Vision or Dental if it applies to only one or the other. If it does not indicate specifically Vision or Dental, it applies to both.
- **“Approval Date”** means the date that policy language is recorded as accepted in the The DCO’s document management system. Policy language will be deemed effective on the day following the Approval Date.
- **“Executive Approver”** means the appropriate The DCO officer whose jurisdiction covers the subject matter of the policy.
- **“Last Review Date”** means the date a policy was last read by any individual in the context of the policy revision process, including annual review, whether or not any revisions are made.
- **“Policy”** means a statement of management philosophy and direction, established to provide guidance and assistance to the the DCO community in the conduct of the DCO affairs.
- **“Policy Owner”** means the employee(s) within an operational area responsible for drafting and updating policy language.

- **“Process”** means a guideline or series of interrelated steps taken to help operationalize the policy.

PROCEDURE

- A. The operational area to which the policy applies is responsible for obtaining approval of and distributing written policies and procedures for operational activities.
 1. When a process is initiated or modified which directly or indirectly affects the DCO’s operations, staff, or activities, the impacted operational area(s) will determine if the DCO has one or more existing, relevant policy/-ies, and evaluate such policy/-ies for accuracy and completeness.
 - a. If modifications are indicated, the operational area will initiate the necessary policy language changes, with input from the Compliance and Legal Departments.
 - b. If the DCO does not have an existing, relevant policy, the operational area will initiate development of a new Policy & Procedure, with input from the Compliance and Legal Departments, as necessary.
 2. The Policy Owner will be responsible for discussing the policy development and process with the Compliance and Legal Departments, as well as any Policy Owner(s) in other involved departments.
 3. After a policy is written, it will be presented to the Compliance and Legal Departments for evaluation, modification (if applicable) and approval.
 4. When approval has been obtained from the Compliance and Legal Departments, the written policy will be presented to the Executive Approver in the relevant operational area for approval.
 5. Upon executive approval, the policy will be published for distribution to the impacted operational area(s) with an effective date of the calendar day following the executive Approval Date, and the updated version will be saved in the DCO’s document management system.
 6. All policies in each operational area will be reviewed annually and presented to the Corporate Compliance Committee during the fourth quarter Committee meeting, for review and adoption to be effective January 1 of the upcoming calendar year. Following Committee approval, updated policies will be saved in the DCO’s document management system and all operational staff will be notified that current policy language has been published. The updated policy effective date will be recorded on the policy to signify Corporate Compliance Committee approval, which will be noted in the Committee meeting minutes and in the policy history.
- B. Some policies and procedures may require staff education and training. Appropriate management team(s) will schedule accordingly for staff education and training to ensure all workforce members have been oriented to the new process.
- C. In the event of merger and acquisition activity, Policy owners and business departments are responsible for ensuring appropriate policies are updated and integrated according to the enterprise standard.

VERSION CONTROL

The DCO P&Ps are managed and tracked for version control using the DCO's document management system. The document management system:

1. Ensures that the date the policy is created or revised is identified on the policy;
2. Assigns existing policies to the appropriate Policy Owner, Compliance and Legal Department representatives, and Executive Approver, for initiation, revision, and annual review protocols;
3. Documents all changes to policy language among previous versions, subsequent drafts, and final approved versions;
4. Manages annual review protocols from initiation to completion, including final approval by the Corporate Compliance Committee.

Revision History

Date	Description
7/12/2018	Policy drafted
7/19/2018	Compliance updates
11/12/2018	Corporate Compliance Committee approval
11/25/2019	Annual Review
11/10/2020	DCO Compliance Committee approval
10/5/2021	Updates based on annual review.
12/31/2022	Updates based on annual review.
08/28/2023	Updates based on annual review.