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Health Plans

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Owner: *Merri Lavagnino: Executive Director-Compliance*
Area: *Compliance - Health Plans*
Tags:
Applicability: *Indiana University Health Plans*

Policy on Policies

I. PURPOSE

The purpose of this policy is to outline requirements for determining when a policy is needed, how policies are formatted, who develops policies, and how they get approved. It also provides requirements for the distribution and availability of policies to team members. The benefits of a formal approach are to make policy development consistent, to engage affected individuals and departments to ensure the policy is implementable and reflects the desired values, and to recognize policy development and policy approval authorities.

II. SCOPE

- A. This policy applies to Medicare, Fully-Insured, and Self-Insured.
- B. This policy applies to all IU Health Plans Team Members and departments.

III. EXCEPTIONS

Exceptions must be approved by the Policies Committee.

IV. DEFINITIONS

- A. **Administrative Policies** are those established at the organization level and owned by the Board of Directors, the President, a member of the Senior Leadership Team, or their delegate due to their significance and application organization-wide.
- B. **Departmental Policies** are those established at a division or department level and owned by the senior member of the division or department. Departmental policies typically apply to a subset of Team Members and departments performing specific duties.
- C. **Governing Body** is the group of individuals participating in the Board of Directors of IU Health Plans who formulate policy and direct IU Health Plans in the best interest of the organization and its enrollees.
- D. **Senior Leadership Team** is an executive committee comprised of the IU Health Plans President and the IU Health Plans Core Team.

V. POLICY STATEMENTS

- A. All policies must advance IU Health Plans' mission and values; be necessary to implement governing

body directives; address a risk to the organization that cannot be adequately addressed otherwise; achieve compliance with laws, rules, or regulations; or promote operational efficiency and effectiveness.

- B. The Policies Committee has delegated authority from the President to oversee the policy development and distribution process; to require all policies to adhere to a consistent format; to develop organization-wide administrative policies; and to review departmental policies for appropriateness and consistency.
- C. Administrative policies will receive review by the Committee, then be forwarded with a recommendation to the President for approval. Departmental policies, which may not be inconsistent with or less restrictive than organization-wide administrative policies, will receive review by the Committee, then be forwarded with a recommendation to the senior most leader of the department for approval. Vice Presidents and above may approve an interim policy when legal requirements or a significant risk exists and there is insufficient time to complete the standard review and approval process.
- D. All approved policies will be made readily available to all team members in an online, searchable system. Currently that system is PolicyStat, which is available on the IU Health Team Portal. All approved policies will be reviewed at least annually for continued applicability and alignment with changes in laws, regulations, and interpretive guidance. Minor changes (e.g., spelling, grammar, formatting, hyperlink or resource corrections, position title changes, etc.) that do not change the meaning or interpretation of the policy do not require approval.
- E. Team Members have the responsibility to be knowledgeable about where to locate policies and the policy requirements pertaining to their duties; to stay informed on new policies and policy updates; and to report any suspected or actual violations of policies.

VI. PROCEDURES

- A. The Department creates or updates a policy using the IU Health Plans Policy Template (see Forms/ Appendices).
- B. The Department asks its embedded compliance consultant to conduct a compliance review of the policy and makes any changes deemed necessary. If your Department does not have a compliance consultant then contact the Executive Director of Compliance for the assignment of a consultant. The goal of the compliance review is to ensure the policy is consistent with applicable regulations.
- C. The Department submits the policy to the Policies Committee Quality Consultant to obtain a quality review and makes any changes deemed necessary. This step helps ensure the policy aligns to standard definitions, phrasing, and consistent wording used in all IU Health Plans policies.
- D. The Department takes the policy through any local governance processes.
 - 1. The local governance process should ensure the Department's management has reviewed the policy.
 - 2. The local governance process may also include sending the policy through an advisory or steering committee, for example, when regulations advise or require a governance committee review. The members of these committees typically have subject matter expertise in the policy topic.
- E. The Department submits the policy to the Policies Committee Quality Consultant who will submit it for IU Health Plans Policy Committee review, approval by appropriate leadership, and posting in the online policy system.

VII. CROSS REFERENCES

The policy category was changed from All Staff - Health Plans to Compliance - Health Plans on January 25, 2021 to align this policy with the appropriate area.

VIII. REFERENCES/CITATIONS

- A. IU Health Plans Policies Committee Charter
- B. IU Health Plans Policies Committee Roster

IX. FORMS/APPENDICES

IU Health Plans Policy Template 2021

X. APPROVAL BODY, IF APPLICABLE

None

Attachments

[IU Health Plans Policy Template 2021.docx](#)

Approval Signatures

Step Description	Approver	Date
President	Stephanie Motter: President-Health Plans	2/22/2021
Policy Committee Approval	Merri Lavagnino: Executive Director-Compliance	2/18/2021
Quality Check	Merri Lavagnino: Executive Director-Compliance	2/18/2021
Quality Check	Denise Roach: Consultant-Compliance	2/9/2021

Applicability

IU Health Plans