

Compliance Program Startup Checklist

Step 1: Designate a Compliance Officer & Committee

- ☐ Appoint a compliance officer to lead the program
- ☐ Decide if a compliance committee is appropriate for your size
- ☐ Select committee members (billing, clinical/quality, IT, HR, etc.)
- ☐ Schedule compliance committee meetings for the year
- ☐ Establish a reporting schedule from the compliance officer to the governing body

Step 2: Start Drafting Your Compliance Program Manual

- ☐ Use OIG's General Compliance Program Guidance as your framework
- ☐ Create an outline that tracks each of the OIG's elements
- ☐ Pull internal policies that relate to each element and may be incorporated by referenced or summarized in the manual
- ☐ Assign responsibility for drafting each section
- ☐ Look for helpful samples but tailor the manual to your organization (don't copy/paste)
- ☐ Set a completion goal (6-12 months)
- ☐ Do not delay Steps 3 through 5 but continue doing those while working on your program manual

Step 3: Implement Basic Compliance Essentials

- ☐ Establish an anonymous reporting mechanism
- ☐ Draft and adopt a reporting policy or refresh a current one
- ☐ Develop or update your Code of Conduct (include it in employee handbook)
- ☐ Communicate these policies to all staff (e.g., "compliance communications blitz")

Step 4: Schedule and Plan a Risk Assessment

- ☐ Plan your organization's first compliance risk assessment
- ☐ Use risk assessment results to prioritize compliance activities
- ☐ Keep momentum going by completing this before the compliance manual is finalized

Step 5: Develop & Implement a First-Year Compliance Work Plan

- ☐ Identify 2–3 manageable priorities from your risk assessment
- ☐ Plan specific activities (e.g., targeted audits, refresher training, policy development)
- ☐ Document your work plan activities for the next 12 months
- ☐ Adjust scope to remain realistic while the manual is still in development

Step 6: Develop & Roll Out Basic Compliance Training

- ☐ Once the compliance manual is finalized, develop general compliance training
- ☐ Train all current employees
- ☐ Incorporate this compliance training into new-hire onboarding