**Group Health Cooperative**

**Compliance Program Effectiveness Review**

Develop and assure implementation of plan to address recommendations from 2015 Compliance Program Effectiveness Review.

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| Owner | Chief Compliance and Ethics Officer |
| Approver | President/CEO |
| Reviewer | Health Plan Compliance & Performance Director, VP, Health Plan Business Management, Chief Information Security Officer, Executive Director Audit Services, Executive Compliance Committee, Audit and Compliance Committee of the Board of Trustees |
| Participant | Management staff member, HR staff member, Legal Department |
| Informed | Other Compliance Committees |

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**Recommendation:**

Develop a compliance specific decision making matrix to provide clarity in decision making authority and provide a framework to refer to when decision making authority is questioned.

1. Whether a compliance matter requires management develop a corrective action plan.
2. Whether management’s corrective action plan is sufficient to correct an instance of non-compliance.
3. Whether a compliance matter is reportable to a regulator.
4. The level of compliance risk related to a compliance matter.

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| Owner | OCE staff member |
| Approver | Chief Compliance and Ethics Officer |
| Reviewer | Management staff member |
| Participant | Legal Department staff member, Executive Director Audit Services |
| Informed | Compliance Committees, Regulators, CEO/President, Audit and Compliance Committee of the Board of Trustees, Staff member |

1. The level of overall operational risk related to a compliance matter and any Office of Compliance & Ethics (OCE) proposed remediation.
2. Whether management follows recommendations made by OCE.

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| Owner | Management staff member (In HPD, Division VP) |
| Approver | Division EVP |
| Reviewer | Chief Compliance and Ethics Officer, Legal Department staff member, Executive Director Audit Services |
| Participant | Compliance Committees |
| Informed | OCE staff member |

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| **How Roles Interact in the Process** | | | |
| **Decision Making Role** | **Role’s Level of Authority** | **Who Fulfills Role** | **Role Characteristics** |
| **Owner** | Drives the decision - making process, and makes decision recommendations to the Approver | Person closest to issue, and most accountable for execution and outcome. An owner does NOT have to be a manager. | Owner initiates, scopes, and drives the process. He/she invites involvement, collects input, and develops a recommended decision to take to the Approver. Once decision is made they get employee buy-in and execute |
| **Approver** | Final authority on decision. Can approve, adjust, or reject it. Does not drive process or execution. | Lowest-ranking leader whose authority encompasses entire size and scope of decision | Critical role to ensure the success of this decision making process. |
| **Reviewers** | Must agree with decisions or can force escalation to the Approver. (Cannot just veto a decision.) | Leaders with unique information about the decision and/or whose resources will be impacted by it | This role is ensures that the voices of key stakeholders are considered and provides appropriate escalation paths |
| **Participants** | Presents views to be considered by Owner. No veto or escalation rights. | Employees who will be impacted by decision, and/or have useful input | This role provides constructive, cooperative input regarding decisions |
| **Informed** | Is informed of the decision. No escalation. | Those who need to be informed of this decision in order for this to be completed successfully. | Is informed of decision. If they have feedback or input which affects the decision, reconsider if they should be a part of the “P” group |