Name of Standard: Standard on CWM Standards

Responsible Department
UMMS Office of Management (OoM)
Contact:  PrivacyandCompliance@umassmed.edu or 508-856-TEAM

STANDARD STATEMENT

Commonwealth Medicine (CWM) shall employ a consistent process and uniform format for the development, review, approval, implementation and revision of its Compliance Standards.

REASON FOR STANDARD

Regulatory requirements mandate regular review and revision of standards as well as a mechanism for informing workforce members of all standards as well as revisions to such standards.

ENTITIES AFFECTED BY THIS STANDARD

This Standard applies to the development, review, approval, implementation, and revision of Compliance Standards at CWM. This Standard applies to all workforce members.

SCOPE

Applies to all CWM Compliance Standards.

DEFINITIONS: (See Glossary on Office of Management (OoM) website for additional definitions)

STANDARDS (Procedures)

I. Standard Development

CWM Standards will address applicable compliance-related state and federal laws and regulations, business needs, best practices and operational efficiencies. OoM will be responsible for development, management of review, implementation and monitoring of the CWM standards. Standards will follow a uniform format using the attached template. When appropriate, OoM shall identify relevant CWM representatives or existing CWM committees to provide input into the development of new CWM compliance-related standards. OoM shall also ensure that the standards or material revisions are consistent with existing UMMS and University policies and determine if they require review from University offices external to CWM, including the Office of General Counsel, Human Resources, or Information Security.

II. Standard Approval and Implementation

A. Distribution to Center Directors: OoM shall circulate new CWM Standards or material changes to existing standards to Center Directors for distribution to their Program Directors. Program Directors shall provide to the Center Director within the specified time frame: 1) n/a to program; 2) no changes requested; or 3) seeking further input or modification including a description of proposed changes. If the Center Director agrees with the input or proposed modifications, s/he shall forward them to the OoM Director for further consideration and revision as appropriate within the specified time frame.
B. Submission to CWM Senior Leadership: The Standard shall be presented to CWM Senior Leadership for final review and approval.

C. Implementation: OoM shall be responsible for defining the implementation strategy for a new or revised standard, as deemed appropriate based on content.

D. Annual Review and Revision: Standards will be reviewed as needed, but no less frequently than once every twelve months to assess their relevance, accuracy, business need, operational efficiency and compliance with state and federal laws. Review of standards may be staggered throughout the year. Standards shall be timely updated to comply with regulatory changes even if the annual review has been completed.
   1. New standards or standards with material changes require review and approval as described in subsection II.A and B above.
   2. Standards that are reviewed with no changes or with no substantive changes made require only sign off by the Chair of the RMC.

E. Auditing and Monitoring: OoM shall be responsible for monitoring and auditing adherence to the CWM Compliance Standards.

III. Business Unit Standards/Policies/Procedures/Guidelines
Individual business units are expected to adapt the CWM Privacy and Compliance Standards to their own business processes. Business Units may:
   A. Adopt and implement unit-specific standards utilizing the attached template as a model, provided that individual unit standards are not inconsistent with the CWM Compliance Standard; or,
   B. Business Units may acknowledge the CWM Compliance Standard and institute standard operating procedures (SOPs) or guidelines that align with the CWM Compliance Standard and meet individual business requirements.

DOCUMENT HISTORY

Effective Date: January 1, 2016
Revision Dates(s) May 5, 2017; December 1, 2018
Review Date(s)

APPROVAL

Gerry Campbell
UMMS Senior Privacy Officer
Office of Management
Name of Standard:

Responsible Department
Commonwealth Medicine, Office of Compliance and Review
Contact: 508-856-6547

STANDARD STATEMENT
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REASON FOR STANDARD

ENTITIES AFFECTED BY THIS STANDARD

RELATED DOCUMENTS
DEFINITIONS: (See Glossary [on CWM Compliance website] for definitions)

SCOPE

STANDARDS (Procedures)

RESPONSIBILITY CHART

DOCUMENT HISTORY

Effective Date:
Revision Date(s)
Review Date(s)

APPROVAL

G.J. Campbell
Gerry Campbell
UMMS Senior Privacy Officer
Office of Management