

Section One

Regulatory & Form Review

- Review Anti-Kickback Statute, OIG guidance, and False Claims Act enforcement trends from the past year
- Check state conflict of interest laws, medical board requirements, and accreditation standards for updates
- Review all disclosure questions for relevance, clarity, and regulatory alignment with current safe harbors
- Assess coverage gaps based on last year's responses, investigation findings, and new business activities
- Test form on different devices and browsers; add explanatory text for complex questions

Section Two

Recipient Targeting & Communication

- Update recipient list from HRIS: remove terminated employees, add new high-risk roles, verify email addresses
- Identify all positions requiring disclosure (physicians, leadership, procurement, board members, clinical department heads)
- Request executive leadership support message and prepare department head talking points
- Draft announcement email, FAQ document, and reminder series (2-4 reminders at 25%, 50%, 75% of campaign period)
- Emphasize disclosure importance, clarify review process, and provide clear deadline and contact information

Section Three

Technical Setup & Reviewer Preparation

- Upload form, configure automatic reminder schedule, and set up completion tracking dashboards
- Test email delivery, branching logic, mobile functionality, HRIS integration, and data export
- Complete test submissions as different user types and verify reminder suppression works correctly
- Schedule reviewer training on approval standards, escalation procedures, and decision-making authority
- Update reviewer guidelines with regulatory changes and create decision flowchart for common scenarios

Section Four

Launch & Ongoing Management

- Send initial campaign email, post announcements, and monitor system performance and submission rates daily
- Review completion rates twice weekly and identify departments with low participation
- Send scheduled reminders and coordinate with department heads for targeted outreach to non-responders
- Monitor reviewer workload and turnaround times; address escalations and ensure consistent review standards
- Track common questions requiring policy clarification and compile FAQ responses

Section Five

Post-Campaign Analysis & Improvement

- Generate non-responder list, escalate to supervisors, and follow policy on consequences for non-compliance
- Analyze response rates by department/role/location and review types of relationships disclosed
- Compare results year-over-year for trends and assess whether form changes improved data quality
- Survey participants and reviewers about experience; document lessons learned for next year
- Establish trigger-based disclosures for new relationships and maintain year-round communication about requirements



Best Practice Reminder

Annual disclosure campaigns should be supplemented with trigger-based disclosures for new relationships that develop throughout the year. Consider quarterly campaigns for high-risk positions to close the gap between annual cycles.