

# **ALIGNING FORMS MANAGEMENT WITH CORPORATE POLICIES AND COMPLIANCE PARTNERS**

Session 28

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*This article describes how a new forms management team at Premera Blue Cross (otherwise known as Document Administration) aligned itself with existing corporate policies and compliance partners when implementing their new corporate-wide forms management program. It includes:*

- *Tasks we faced*
- *Issues we found*
- *Alliances we formed*
- *Corporate policy we created*

*Regardless of whether you have a new or existing forms management program, the chain of command you report up through or where your forms management team resides in the corporate structure, a successful program can be implemented and/or maintained when critical alliances are formed.*

## Tasks We Faced

As a new forms management program, our purpose was defined as: “develop, implement, and maintain a corporate-wide forms management system.” We identified several goals that we wanted to achieve. These are pretty typical of any new forms management implementation.

### Goals

- Identify systems requirements and available platforms to initiate forms management systems without additional software/hardware costs.
- Develop and implement processes to obtain and maintain the required data flow to successfully operate a corporate-wide forms management system.
- Perform analysis to consolidate, obsolete and reduce production costs of documents for Premera and its affiliates and subsidiaries.
- Implement processes to eliminate duplication of effort and enforce compliance requirements.

## Issues We Found

Our first step in developing this program was to explore Premera and discover just how documents were currently being managed. We found several issues along the way and will outline briefly our solution to each of the main issues.

### **Issue 1 — Document identification and versioning**

Thousands of forms and documents needed identification and versioning. Documents were created in multiple locations including the marketing group, in-house print shop and on associates' desktops. Form numbers had not been used on all documents and versioning was not tracked.

Our solution was to put ourselves flat in the middle of the processes for the marketing group and in-house print shop. We would modify processes for both of these areas to route all orders through Document Administration, and utilize the forms management database we created to assign form numbers, track versioning and other applicable data.

### **Issue 2 — Compliance audit trail**

Whether regulated by branding, state or federal government, documents with external exposure needed to be under tight control. Alliance with compliance partners like legal, regulatory, corporate compliance, communications, contract services, and eBusiness was needed to develop a process that would guarantee that all external documents would have an audit trail of the proper approvals prior to release.

Our solution was to search out existing corporate policies to support external document requirements. We would build a process with our compliance partners to block the release of external documents without their prior approval.

### **Issue 3 — Centralized repository**

Scattered throughout shared directories and internal web sites, thousands of documents needed a library or centralized repository that could be available to the entire internal population, and version control needed to be maintained. Documents posted on external web sites needed to also depend on this version control.

Our solution was to set up a Document Administration internal web site on an existing content management server to store electronic document history and provide a searchable document library list. We would create a workflow with eBusiness where all external posting requests route through our team. We would set the process in concrete by interfacing the repository with the external web server so all external postings are routed exclusively from the repository for version control. We would also work with our internal web masters to setup document links on their sites to the repository for version control, and to eliminate broken links.

### **Issue 4 — Efficient and cost-effective production**

A fix was needed for the various processes for design and production that were performed by the different groups involved. Departments throughout the company were placing orders direct with multiple vendors so complete information was not gathered. The marketing and in-house print shop were using separate tools to track their orders.

Our solution was to adjust the process to funnel all production orders through a central data entry process in Document Administration, and then route the order to the appropriate group for design or production utilizing a single database tool for tracking. We would also identify and contract with a primary external print vendor and secure a corporate policy to direct all print requests through the centralized function.

## **Alliances We Formed**

Having identified the main issues with the current state of Premera's document management and then offering up solutions that supported a centralized forms management structure, we have created the

following significant alliances for our program. Some of these alliances have actually helped us to increase staff members, and overall, have engrained our Document Administration practices into Premera's culture.

### **In-house print shop**

We utilized our robust forms management system and processes to streamline production orders and maintain version control. Although the in-house print shop has since been replaced by exclusive print vendor contracts, it gave Document Administration the beginning structure for streamlined processes and system production requirements.

### **Marketing group**

We integrated system and processes with both the in-house print shop and the marketing group to streamline production orders and maintain version control. We capitalized on marketing's new branding strategy to prove the success of our function regarding document review and branding status reports. Since then, we have enhanced this relationship with more robust reporting on document management, design resource costs, production costs and so on. Marketing utilizes the Document Administration system one hundred percent in their day-to-day operations.

### **Compliance Partners**

We established workflow with multiple compliance partners to support their corporate policies and/or document review requirements. Our Document Administration system provides a centralized compliance audit trail available for state audit reviews or court litigation requests. Since the inception of our program, we now have a full time employee that supports the routing of all documents for applicable compliance partner reviews.

- **Corporate Communications** – We support their corporate policy that states all external documents intended for an audience of 25 or more require corporate communications approval prior to release. We utilize our consolidated systems and processes to route documents for their review and log their approvals.
- **Legal** – We capitalized on existing ERISA and HIPAA regulations to route all applicable documents through legal for their review and log their approvals. With this proven success, we expanded this process to include all documents that require legal review.
- **Contract Services** – as a requirement of our health plan industry, multiple company documents require state insurance commissioner approvals prior to their use and distribution. We utilize our Document Administration systems and processes to “lock-down” documents until approval is met and to log approvals to a centralized corporate audit trail.

### **eBusiness**

We have gained version control by routing all web site posting requests through Document Administration. This moved the true document intelligence to our forms management team and eliminated the eBusiness anxiety regarding approved and compliant postings. Here again we gained another full time employee to manage this process.

## **IT**

We have helped to reduce utilization of server space for both the web and network drive platforms by consolidating documents to a single repository.

## **Finance**

We have reduced production costs with our exclusive vendor contracts. Finance supports our contracts by not paying print invoices from any vendors other than these. We also aligned our Document Administration system with the corporate financial structure to provide detailed budget reporting to support the move of a single print budget to department allocated production budgets.

## **Print vendors**

Our internal copy center will not print documents with item numbers unless the order comes from Document Administration, and they will even send people to Document Administration if they have an item that looks like it should have an item number. Our external print vendors help us by only accepting print orders from authorized Document Administration personnel.

## **Ownership approval**

We uphold the process that no changes are made to documents without approvals from the document owner and any additional required document approvers as maintained in the Document Administration system.

## **Stakeholders**

We offer a multitude of resources that have gained document stakeholder alliances. We send out availability notifications each time a new item and new version of an item is available either as printed copies or posted on any of our web sites. We give our power user's access to our Document Administration Systems Viewer that allows them to view order status, production history, inventory balance and usage information, change control, etc. We can perform content searches on repository documents, as well as provide endless reporting capabilities.

## **Disaster recovery**

We utilize our Document Administration systems to track documents applicable to disaster recovery and business continuity plans.

## **Corporate Policy We Created**

Our Document Administration team churned from the bottom up, made alliances, built supportive systems, streamlined processes and proved to key groups and major players that forms management played a vital role to the organization. At this point, we secured our own corporate policy to ensure that the entire Premera population complied.

## **Policy**

In order to comply with Blue Cross Blue Shield Association (BCBSA) branding and other legal and regulatory requirements, corporate documents that are either printed, or posted on the Internet or Intranet must be reviewed and coordinated by the Document Administration Department.

- **Document Control**

Corporate documents that are either printed or posted on the Internet or Intranet must be submitted to the Document Administration Department in order to:

- Maintain version control;
- Provide uniformity of work products;
- Reduce costs;
- Take advantage of reporting mechanisms for budgetary purposes; and
- Ensure compliance with laws, regulations and corporate standards

- **Branding and Corporate Style Requirements**

All external Corporate documents must adhere to BCBSA branding and Premera's Corporate Style Guide requirements. The Document Administration Department reviews documents intended for external audiences to ensure they meet such requirements.

- **Procurement**

Print Coordinators in the Document Administration Department are responsible for the procurement of printed materials, and use pre-selected vendors to realize cost savings. When printed materials need to be ordered, contact the Document Administration Department via the Print Inventory Requests mailbox in Outlook.

- **Violations of Policy**

Violations of this policy may be grounds for disciplinary action. The level of discipline will depend on the nature, severity, and frequency of the violation. Disciplinary actions may include any of the following: (1) verbal warning; (2) written warning; (3) suspension; (4) termination; and (5) restitution.

- **Controls**

The following measures ensure compliance with this policy:

- Legal and regulatory reviews are conducted as appropriate;
- The centralized repository for document files for print and Internet and Intranet posting ensures version control;
- The Document Information Database and Production Tracking System tracks historical information about the development and production of each document, and allows for tracking for such purposes as budgeting, compliance audits, usage history and ownership;
- Item Numbers are assigned to work products for use in assuring version control;
- Documents that are created or revised are reviewed by Document Owners, Document Approvers, and Reviewers;
- Print Coordinators monitor work products; and
- Finance verifies that pre-selected print vendors are used.

## **Conclusion**

On a day-to-day basis, our Document Administration team is grateful for all the alliances we've formed, as well as for our own corporate policy that we uphold. We have successfully met our purpose and have achieved our original goals, but continue to strive for improvement, and involvement throughout our organization. We have done all of this by reporting up the "Facilities" chain of command. Moral of the story: regardless of whether you have a new or existing forms management program, the chain of command you report up through or where your forms management team resides in the corporate structure, a successful program can be implemented and/or maintained when critical alliances are formed.

*Tamra S. Gutscher, CFSP, CFC, was instrumental in the implementation and maintenance of the Document Administration Program for Premera Blue Cross. Positions held prior to Premera include operations management and print procurement for a marketing agency and prepress management for a business forms manufacturer. Ms. Gutscher practically grew up in our industry and with over 18 years of professional experience, her expertise spans from design to print production to forms management. She has been actively involved with BFMA since 1994, was recently appointed to FSCB, and has a great passion for our industry, BFMA and CFSP.*