How the “Three Amigos” of a Compliance Program Can Work Together to Support and Advance an Effective Compliance Program

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About the Speakers

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Objectives

- Assess and identify how Compliance, Legal, and HR play critical roles in several key elements of a compliance program to include those related to policies and procedures, auditing and monitoring, response and investigation, and enforcement.

- Identify and learn how to align the strengths and weaknesses of these three areas so as to optimize their overall, collective contributions to the development of a compliance program.
Objectives

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• Identify and learn how to align the strengths and weaknesses of these three areas so as to optimize their overall, collective contributions to the development of a compliance program.

• Identify risks to mitigate the potential of sub optimization in the level of collaboration among Compliance, Legal, and HR given their respective duties that support an effective compliance program.
Let’s meet the Three Amigos!

Compliance Officer

- Develop, modify, implement compliance policies and procedures
- Administer compliance activities
- Monitor system wide compliance with the Code of conduct

Source: Health Care Compliance Association
Job Description: Compliance Officer
Compliance Officer (continued)

- Maintain compliance reporting systems
- Evaluate, investigate, and document report of non compliant activities
- Coordinate internal compliance investigations and routine audit

Compliance Officer (continued)

- Coordinate internal compliance investigations and routine audit
- Develop and review compliance education program
- Serve as coordinator for external investigations and inquires related to the program
- Report compliance issues and activities on a regular basis to Board of Trustee
• Annually reviews and makes recommendations for improvement of the organization's policies, procedures and practices on personnel matters.
• Maintains knowledge of industry trends and employment legislation and ensures organization's compliance.
• Maintains responsibility for organization compliance with federal, state and local legislation pertaining to all personnel matters including AA/EEO compliance and labor relations.

Source: Society for Human Resource Management
Job Description: Director of Human Resources

• Coordinates or conducts exit interviews to determine reasons behind separations.
• Consults with legal counsel as appropriate, or as directed by the CEO, on personnel matters.
• Recommends, evaluates and participates in staff development for the organization.
• Participates on committees and special projects and seeks additional responsibilities.
Legal Counsel

• Give accurate and timely counsel to executives in a variety of legal topics (labor law, partnerships, international ventures, corporate finance etc.)
• Collaborate with management to devise efficient defense strategies
• Specify internal governance policies and regularly monitor compliance
• Research and evaluate different risk factors regarding business decisions and operations

Source: Society for Human Resource Management
Job Description: Director of Human Resources

Legal Counsel (continued)

• Apply effective risk management techniques and offer proactive advise on possible legal issues
• Communicate and negotiate with external parties (regulators, external counsel, public authority etc.), creating relations of trust
• Draft and review legal documents to ensure the company’s legal rights
• Deal with complex matters with multiple stakeholders
Legal Counsel (continued)

- Provide clarification on legal language or specifications to everyone in the organization
- Conduct your work with integrity and responsibility
- Maintain current knowledge of alterations in legislation

Scenarios
Ours and Yours
### Which Amigo to Involve?

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Compliance, Human Resources and Legal
The Three Amigos thank you for attending!