

## Hiring Experts to Cover Compliance Officer Vacancies

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*September 2018*

### Overview

Compliance Officers who leave health care organizations can do so for a variety of reasons such as retiring, moving to better opportunities, or even changing their career path. This can lead to Compliance Officer vacancies and organizations that lack necessary day-to-day management of the Compliance Program, which increases the risk of unaddressed compliance problems and potential liabilities. In today's challenging regulatory environment, losing a key leader such as the Compliance Officer from a sudden departure often creates chaos for health care organizations. However, there are easy ways to fill the Compliance Officer role that ensure operations continue smoothly during the transition period.

### Engaging an Interim Compliance Officer to Fill Vacancy

Many organizations turn to expert consultants to fill in gaps in key leadership positions, including that of the Compliance Officer. Organizations often decide to either outsource the Compliance Officer function to a consulting firm, or hire an expert to provide interim servicing. The more immediate, but short term option, is to engage an interim Compliance Officer because it may take longer than expected to find and hire a full time replacement. Interim Compliance Officers generally work with an organization for 90 days, but in specific cases, the engagement may run as long as six or more months. Smaller organizations may only need a part-time interim Compliance Officer to keep the Compliance Program going, while other organizations may need the position to be full-time, but still temporary.

There are many benefits to engaging a qualified interim Compliance Officer, such as their compliance experience and technical skills. The key to investing in an interim Compliance Officer is to design the engagement in a way that brings an optimum return of benefit for the cost and by ensuring added value. High quality interim Compliance Officers can:

- Provide a fresh set of eyes in examining the Program to confirm strengths and identify opportunities for improvement.
- Conduct an independent evaluation of the Compliance Program that will be reported to senior management and the Board of Directors.
- Provide independent and objective feedback on the status of the Compliance Program, as well as provide an assessment of high-risk areas that may warrant special attention.

- Review the existing Code of Conduct and other written guidance and evaluate the quality and effectiveness of compliance training and ongoing monitoring of high risk areas.
- Assist in assessing the resources needed to effectively operate the Compliance Program.
- Identify or build metrics that evidence compliance program effectiveness.
- Assist in the identification and evaluation of candidates for the permanent position.
- Provide a road map for the incoming Compliance Officer that can assist him or her in starting off with a strong foundation.
- Prepare and deliver a comprehensive report for management and board on the state of the Compliance Program at the conclusion of the engagement.

Given these benefits, interim Compliance Officers can provide the best solution to the compliance issues that many organizations are facing, including a Compliance Officer vacancy. One way organizations can engage a qualified interim Compliance Officer is through an external health care compliance firm. These firms have highly-experienced consultants on deck who can provide temporary assistance that best suits the organization's most critical compliance needs until a full-time Compliance Officer is employed.

## **In Review**

In the instance that the Compliance Officer role becomes vacant, there are available options that can help keep the Compliance Program running smoothly until the right candidate can step in full-time and permanently. Interim Compliance Officers offer an easy and effective solution to aid the Compliance Program and the organization during the transition period between permanent Compliance Officers. They can provide compliance expertise and additional resources to address ongoing federal and state regulatory requirements while upholding internal policies and procedures.

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## **About the Author**

Richard P. Kusserow is currently the President and CEO of Compliance Resource Center. He served as the Inspector General of HHS for 11 years and brings decades of valuable experience from the government sector to Compliance Resource Center. Mr. Kusserow's expertise on compliance policy and regulation as well as his extensive knowledge of compliance solutions enables Compliance Resource Center to effectively help health care organizations best manage their compliance programs.

## **About Compliance Resource Center**

Compliance Resource Center has been leading the compliance industry since 2010 with our complete suite of solutions that are geared towards improving compliance program operations. Our

solutions ensure that organizations regularly meet federal and state laws and supply the necessary resources to sustain long-term compliance.