

## Engaging Liaisons to Project Compliance Program to Outlying Facilities

Richard P. Kusserow | April 2023

### Key Points:

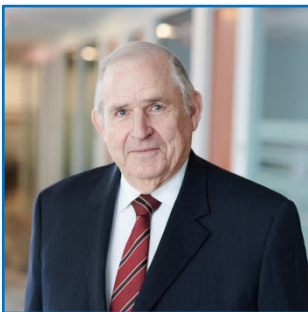
- A “go between function” extending Compliance Officer reach
- A point of contact to assist with compliance
- **Facilitates communication & coordination**

Compliance Liaisons are becoming increasingly popular as an extension of the Chief Compliance Officer’s reach within an organization. For larger organizations with managers and employees widely dispersed to outlying locations, the ability to have direct contact with them may be challenging. If the organization is large enough, there may be regional or separate facility Compliance Directors reporting and being responsible to the Chief Compliance Officer. However, having this added compliance office staffing may not be feasible or may be too costly. As an alternative, there has been a growing trend to establish a compliance liaison program. Liaisons would normally continue with their primary duties, but also have a dotted line to the Chief Compliance Officer. In this role, they would help the Chief Compliance Officer communicate and coordinate compliance initiatives and relay compliance issues found within the local environment back to the corporate compliance office. They can also help localize compliance risk monitoring and provide useful input to the compliance officer on how to measure compliance program effectiveness at facilities and operations that are removed from corporate headquarters. Their role and extent of services would depend on the size of the organization and diversity of services being provided. To ensure a successful Compliance Liaison program, it is important that: (a) duties and responsibilities are described in detail and included in their job description; (b) there is adequate time, resources, and ability to be able to perform duties; (c) there is appropriate level of support from local leadership; and (d) proper training and orientation to duties is provided. The Chief Compliance Officer may also provide input about the added duties to the Liaison’s annual performance evaluation. Duties to consider:

- Providing a communication channel to and from the compliance office
- Referring issues to the Chief Compliance Officer and collaborating in their resolution
- Assisting in raising and maintaining compliance awareness
- Assisting in facilitating compliance education and training programs
- Contributing to the [compliance risk assessment process](#)
- Identifying and assisting in addressing risk areas
- Aiding in resolving potential compliance issues
- Serving as a resource to address compliance questions
- Reporting allegations of wrongful behavior to the compliance office

For more answers to compliance FAQs, see [www.compliance.com/faqs/](http://www.compliance.com/faqs/).

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### **About the Author**

Richard P. Kusserow established Strategic Management Services, LLC, after retiring from being the DHHS Inspector General, and has assisted over 2,000 health care organizations and entities in developing, implementing and assessing compliance programs.