

Report on Medicare Compliance Volume 30, Number 38. October 25, 2021 Charter for Compliance Champions

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Matthew Silverman, senior counsel at Viavi Solutions in Scottsdale, Arizona, said compliance champions are a valuable way to embed compliance. [1] He developed a charter as a framework for their roles and responsibilities. Contact Silverman at matthew.silverman@viavisolutions.com.

[COMPLIANCE AREA] CHAMPIONS NETWORK - CHARTER

Purpose

- Utilizing knowledgeable, local employees to serve as part-time [AREA OF COMPLIANCE] 'champions' achieves the goal of having a larger compliance presence and increased compliance awareness throughout [COMPANY NAME].
- Having a greater [AREA OF COMPLIANCE] presence throughout [COMPANY NAME] contributes to local employee engagement, creates greater awareness of [AREA OF COMPLIANCE] policies, touchpoints and responsibilities across all employees, sites and relevant functional groups, and helps [COMPLIANCE DEPARTMENT NAME] remain aware of local questions, concerns and/or developments.

Scope

- The Champions Network will initially be implemented in [COUNTRY] with [NUMBER OF CHAMPIONS] appointed from each of the following sectors: [LIST APPLICABLE SECTORS/DEPARTMENTS]; ideally representing each of the following sites: [LIST APPLICABLE SITES]
- The goal is to eventually expand the scope of the Champions Network to [COMPANY NAME] sites in [LIST APPLICABLE COUNTRIES].

Structure

- Champions will be formally appointed by the [NAME OF COMPLIANCE DEPARTMENT HEAD], with the approval of the Champion's manager.
- Champions commit [%] of their time to the responsibilities listed in this Charter.
- All Champions will have their responsibilities included as a determined percentage of their [PERFORMANCE MANAGEMENT], upon approval from their manager.
- [COMPLIANCE DEPARTMENT] will develop an organizational chart that includes all assigned Champions, including the region, site and functional group represented.

Operation - Responsibilities of [COMPLIANCE DEPARTMENT]

[COMPLIANCE DEPARTMENT] Shall:

- Implement an initial training program and schedule for all Champions.
- Hold quarterly group Champion's meetings with a defined agenda.
- Meet periodically with individual Champions to discuss specific matters.
- Regularly communicate with Champions to provide updates, disseminate information and inquire regarding local questions, concerns or developments.

Operation - Responsibilities of Champions

Champions Shall:

- Act as a trusted person and point of contact whom local employees can go to for assistance with [COMPLIANCE AREA] questions/concerns (champions shall not act as subject matter experts).
- Ask for assistance from [COMPLIANCE DEPARTMENT] about any local questions or concerns that require expert attention.
- Promote local awareness of [COMPLIANCE AREA].
- · Assist, as necessary, in drafting and disseminating policies, procedures, guidance and communications.
- Provide assistance in the coordination and execution of local [COMPLIANCE AREA] investigations.
- Be proactive in spotting issues/concerns and reporting such matters to [COMPLIANCE DEPARTMENT].
- Make time when approached by an employee with [COMPLIANCE AREA] questions/concerns. If unable to answer questions or address concerns, ensure that employees are directed to someone who can assist.
- Maintain confidentiality regarding potential violations of internal policy.
- Participate in trainings, read documents and attend meetings organized by [COMPLIANCE DEPARTMENT].
- Communicate in a timely and transparent manner with [COMPLIANCE DEPARTMENT].

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