

Complete Healthcare Compliance Manual

Hiring Compliance Staff

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As a compliance officer, it is important to ensure the department has appropriate resources to run the compliance function. In hiring compliance staff, it is essential to assess the areas of compliance that require the most resources. This determination will depend partly upon the size, scope, and type of organization. It will also depend upon any known gaps within the compliance program (e.g., no formalized audit function) or any known material risks within the organization that need to be addressed.

A decision to hire staff for a specific job role or skill set will also depend upon the existing skill sets of the current staff in the compliance department or any other departments that assist compliance in fulfilling certain compliance functions (e.g., coding education, reviewing privacy/security incidents). For example, it may be helpful for a compliance department to hire someone who is a certified coder to conduct coding and billing audits if no one else in the department has that specific background. Alternatively, it may be helpful for a compliance department to hire someone with a strong investigative background if no one else in the department has that particular experience.

Often, the hardest part of hiring compliance staff is obtaining the budget funds to obtain approval to hire for a position. The approval process to obtain permission to hire compliance personnel will differ within each organization. In some organizations, the compliance department will meet separately with Finance and Management to assess the budget needs of its department. In other organizations, the compliance department may fall under another department's budget, such as the legal department. For larger organizations, the compliance department may need to have another facility or department help fund the position. For example, a compliance department for a health system may work with its laboratory to fund a compliance position for the laboratory.

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