

Complete Healthcare Compliance Manual

Role of a Compliance Officer

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The effective compliance officer leads the charge of the program and must be a person of high integrity, a problem solver, and a conflict manager with the capability of listening and having an open-door attitude and approach. Yet choosing the ideal candidate to be an organization's compliance officer means little if that person does not have the authority to operate independently. Independence is one of the most critical aspects of the compliance officer's role. Office of Inspector General (OIG) compliance guidance states this, advising that "designating a compliance officer with the appropriate authority is critical to the success of the program, necessitating the appointment of a high-level official...with direct access to the [organization's] governing body and the CEO."^[4] This is logical because it is the board that launches a compliance initiative and approves the hiring of a compliance officer. Board members may even have been actively involved in the interviewing and hiring of a compliance officer.

The compliance officers' duties will vary depending on the size and scope of the program. The main focus of the position should be the implementation, administration, and day-to-day oversight of the compliance program. A compliance officer's primary responsibilities, according to the OIG, should include:

- Overseeing and monitoring the implementation and ongoing operation of the compliance program
- Reporting on a regular basis to the governing body, CEO, and compliance committee
- Revising the compliance program periodically as appropriate
- Developing, coordinating, and participating in a multifaceted educational and training program
- Ensuring that independent contractors and agents are aware of the organization's compliance program requirements
- Ensuring that appropriate background checks are done to eliminate sanctioned individuals and contractors
- Assisting with auditing and monitoring activities
- Independently investigating and acting on matters related to compliance
- Developing policies and programs that encourage managers and employees to report fraud and issues without fear of retaliation^[5]

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