Compliance Liaisons, Required for SNFs, Can Help Outreach Everywhere

By Jane Anderson

Compliance liaisons—now required for larger skilled nursing facility (SNF) organizations—can help extend the reach and engagement of a compliance program, and organizations not required to have compliance liaisons might want to consider adding them.

Joseph Zielinski, attorney and director of legal affairs at CarDon & Associates Inc.—a senior living company that operates 20 senior centers in central and southern Indiana—said that adding compliance liaisons can help bridge gaps between operations and compliance and increase engagement with individual departments and offsite facilities.

Organizations are free to design the program that fits their corporate structure best, Zielinski said Sept. 7 at a webinar sponsored by the Health Care Compliance Association.[1] "There is no one-size-fits-all program," he said. "You need to be aware of what your individual program needs to have and what the risks to your program are."

Compliance liaisons function as an intermediary between the compliance program and the operation stakeholders throughout the organization. While some types of organizations have chosen a compliance liaison model to promote compliance program effectiveness, SNF operators with five or more facilities are required to have compliance liaisons under Phase III of CMS's updated Requirements of Participation for Long-Term Care Facilities, updated in 2016.[2]

The "compliance liaison" isn't a defined term, Zielinski said. Although there aren't prescriptive job responsibilities in the rule, "[a]t a minimum, these liaisons should be responsible for assisting the compliance officer with his or her duties under the operating organization's program at their individual facilities."[3] SNF operators also must designate a compliance officer at the corporate level.

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