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Sarah M. Couture (sarah@couturecompliance.co, [linkedin.com/in/sarah-couture-rn-chc-chrc-chpc-367a4390/](https://www.linkedin.com/in/sarah-couture-rn-chc-chrc-chpc-367a4390/)) is Principal at Couture Compliance in Indianapolis, IN.

Senior leadership engagement

by Sarah M. Couture RN, CHC, CHRC, CHPC

It is essential that compliance programs engage their organization's senior leaders. This is not only an expectation from a regulatory perspective, but it is critical to foster compliance program effectiveness.

An organization's senior leadership is made up of executives who oversee various parts of operations. Frequently referred to as the "C-suite," they often have titles that include the term "chief" (e.g., chief operating officer (COO)), denoting that they have operational oversight of a function. For an organization to have a culture of compliance and pursue compliant operations, it is crucial that senior leaders be engaged in compliance; they must understand compliance, be "bought-in" to and drive compliance. As with the board of directors, senior leaders determine the "tone at the top" that feeds the culture of compliance. From a practical perspective, a compliance program will struggle to succeed without senior leadership's engagement. In addition to the pragmatic perspective, there is a regulatory compliance expectation of senior leaders. Government guidance makes it clear that senior leaders have a responsibility to not only ensure the organization has an effective compliance program^[1] but also actively promote the "company's ethical standards," as well as to convey and disseminate them "in clear and unambiguous terms," and demonstrate "rigorous adherence by example."^[2] The way that senior leaders make business decisions, lead their teams, communicate, etc., should evidence, both in word and action, their commitment to the compliance program and compliant operations.

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