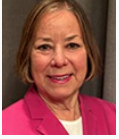


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Compliance and HR collaboration can drive effectiveness

by Amanda Bates, MS; Sarah M. Couture, RN, CHC, CHRC, CHPC; and Kasie Ray, CHC, PHR, SHRM-CP

Scenario

It was a crisp fall night in West Texas. Ellen was one hour into her fifth night shift of the week, working overtime for Sandy, who wanted to watch her son's high school football game. Football is legendary in West Texas, and the community was aflutter that a win tonight would seal their winning season and bode well as they readied for playoffs.

Ellen's phone started buzzing with texts. Sandy's son, Ryan, the star running back, had been injured on a tackle. They were taking Ryan off the field on a stretcher and headed for the hospital. All the neighbors wanted Ellen to check on Ryan and let them know if he'd be back next week.

Ellen was busy caring for a first-time mom in the mother-baby unit. Ellen felt bad for Sandy, a friend who was always worried about the rough and tumble of football. Out of concern and expectation, Ellen made a mental note to check the record on break. Two hours later, Ellen read in the electronic medical record that Ryan had a concussion. Ellen sent a text to Sandy expressing her support and asking if Sandy wanted her to do anything.

Unfortunately, situations like this happen in healthcare. Caring healthcare workers, wanting to be helpful, sometimes insert themselves in patient records for which they do not have a clinical or business reason. When these breaches or other issues related to noncompliance occur, successful organizations see the compliance and HR departments working in partnership and lockstep. When collaboration exists, addressing lapses in compliance goes much better. Without collaboration, an unfortunate situation can worsen, causing much more trouble than needed.

Most readers have undoubtedly experienced some version of this scenario. How this breach plays out from organization to organization is largely a function of cooperation, alignment, and shared goals of the compliance and HR functions. This article makes a case for taking the time and effort to build collaborative partnerships between two key departments that can synergistically influence the organization's culture and compliance mindset.

Collaborative partnership

Compliance and HR are essential strategic functions in every healthcare organization. While each has distinct responsibilities, compliance and HR have significant touchpoints in many areas, including culture, accountability, discipline and enforcement, education, training, communication, investigations, job descriptions, performance evaluations and promotions, incentives, exit interviews, hotline and reporting, and exclusion screening—to name a few.

With so many common areas of focus, it makes sense that compliance and HR should collaborate and that leaders and team members from each department should have strong working relationships. In fact, compliance will be more effective at its primary goal—prevention and detection of fraud, waste, and abuse—as it more successfully works in partnership with HR. The U.S. Department of Health and Human Services Office of Inspector General’s (OIG) *Compliance Program Guidance* discusses how collaboration drives effectiveness: “Coordination and communication are the compliance officer’s key tools for planning, implementing, and monitoring an effective compliance program. The compliance officer should strive to develop, and the entity should strive to promote, productive working relationships with organizational leaders. Coordinating work and sharing information with leaders of other support functions, including (as applicable), Legal, Internal Audit, IT and Health Information Management (HIM), Human Resources, Quality, Risk Management, and Security will enhance the strength and success of the compliance program.”^[1]

However, this meaningful collaboration is not always the case. In some healthcare organizations, compliance and HR function in silos with little or no interaction or communication on what areas of alignment and partnership should be. In other organizations, there may be turf wars, where compliance program leadership and HR leadership do not understand the functional distinctions. One or both may attempt to “own” what the other department should be responsible for.

Success for the effectiveness of the compliance program and HR function—and the organization as a whole—starts with intentionality and a relationship. The following section will describe why compliance and HR should collaborate and how they should work together more productively, and it will provide tips and recommendations for specific areas of cooperation. By improving collaboration, both compliance and HR stand to broaden their influence, mitigate potential risks, and increase their strategic impact within the organization.

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