



**POLICY TITLE:** Compliance Liaison

**Responsible Department:** Audit and Compliance

**Creation Date:** 02/07

**Review Date:** 01/17, 01/18, 01/19, 01/20

**Revision Date:** 05/14

**SUBMITTED BY (AUTHOR):** Beth Gillis

**Title:** Corporate Assistant Vice President, Compliance

**APPROVED BY:** Wendy Kemp

**Title:** Corporate Assistant Vice President, Audit

**APPROVED BY:** Karen Brady

**Title:** Corporate Vice President and Chief Compliance Officer

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**SUMMARY & PURPOSE:**

To delineate the duties and responsibilities of the Compliance Liaison.

**POLICY:**

The Compliance Liaison will support the organization's dedication to compliance with the Code of Ethics, and more specifically, will support the Corporate Vice President and Chief Compliance Officer (CCO) in fulfilling the goals of an effective compliance program as established under the United States Federal Sentencing Guidelines. All activities regarding the Corporate Compliance Program undertaken by the Compliance Liaison will be under the direction and supervision of the Corporate Assistant Vice President of Compliance.

**SCOPE/APPLICABILITY:**

This policy applies at a minimum to all BHSF hospitals. The scope may be expanded to additional business units as deemed necessary by the Corporate Vice President and Chief Compliance Officer.

**PROCEDURES TO ENSURE COMPLIANCE:**

1. A Compliance Liaison shall be designated for each hospital.
2. The Compliance Liaison shall be a member of management.
3. The responsibilities of the Compliance Liaison include:
  - a. Assist in promoting the standards of the Code of Ethics within their assigned business unit.
  - b. Advise the Corporate Assistant Vice President of Compliance on the business unit's risks, needs and concerns as they relate to the standards established in the Code of Ethics.
  - c. Serve as a resource to the business unit's staff regarding the Corporate Compliance Program.
  - d. Serve as a resource to the Audit and Compliance Department.

4. All new activities undertaken in regard to the Corporate Compliance Program by the Compliance Liaison must be approved and reported to the Corporate Assistant Vice President of Compliance.
5. Any reports of alleged misconduct received by the Compliance Liaison must be held in the strictest confidence and must be immediately reported only to the Corporate Assistant Vice President of Compliance or her designee, who will determine the appropriate course of action according to the established policies and procedures.
6. The Compliance Liaison must abide by all the policies and procedures of the Corporate Compliance Program particularly in regard to allegations of misconduct, investigations of misconduct, non-retaliation for reporting concerns, and confidentiality.
7. The Compliance Liaison will serve as a member of the Compliance Advisory Committee.

**SUPPORTING/REFERENCE DOCUMENTATION:**

U.S. Federal Sentencing Guidelines

**RELATED POLICIES, PROCEDURES, AND ASSOCIATED FORMS:**

- BHSF Administrative Policy: 819 Code of Ethics – Audit and Compliance
- BHSF Administrative Policy: 807 Audit and Compliance Department Audits and Investigations – Audit and Compliance
- BHSF Administrative Policy: 822 Non-Retaliation for Reporting Potential or Actual Violations of the Code of Ethics
- BHSF Administrative Policy: 850 Appropriate Routing of Requests for Information and Notification of Potential Billing Discrepancies by Federally Funded Programs

**ENFORCEMENT & SANCTIONS:**

Enforcement of this policy is the responsibility of Baptist Health South Florida's Audit and Compliance Department. Failure to comply with or report a violation of a compliance program policy can lead to disciplinary action up to and including termination of employment.