



**POLICY TITLE:** Duties of Corporate Compliance Director

**Responsible Department:** Audit and Compliance

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**SUMMARY & PURPOSE:**

To delineate the authority, duties and responsibilities of the Corporate Compliance Director

**POLICY:**

The Corporate Compliance Director is a full-time position. The Corporate Compliance Director devotes his/her full professional time to carrying out the duties and responsibilities of the Corporate Compliance Director as a member of the Audit and Compliance Department.

At the direction of and under the supervision of the Corporate Assistant Vice President of Compliance, the Corporate Compliance Director coordinates compliance throughout the system in accordance with Compliance Program standards and procedures, and the procedures described below.

**SCOPE/APPLICABILITY:**

This policy applies to Corporate Compliance Director.

**PROCEDURES TO ENSURE COMPLIANCE:**

The Corporate Compliance Director is appointed by the Corporate Assistant Vice President (AVP) of Compliance and reports to the Corporate AVP of Compliance.

Responsibilities of the Corporate Compliance Director include:

- a.
- b. Understand the impact of various health care regulations on operations throughout Baptist Health, including, but not limited to, federal laws and regulations related to the Medicare program, and provide proactive guidance, support, and training to operational departments.

- c. Serve as a compliance resource available to anyone seeking guidance related to the ethical standards set forth in the Code of Ethics, answering situational questions based upon established Compliance Program guidelines.
- d. Coordinate all aspects of compliance training and communication across Baptist Health, maintaining accurate records of those activities.
- e. Prepare professional presentations to effectively communicate, to a variety of audiences, Baptist Health's standards as they apply to day-to-day operations throughout the organization, including topics such as ethical standards, regulatory requirements, fraud, waste and abuse, policies and procedures, non-retaliation, and reporting suspected violations of the Code of Ethics.
- f. Direct and coordinate compliance audit activities according to the standards promulgated by the Institute of Internal Auditors, including presentation of audit findings to operational department leaders and monitoring implementation of audit recommendations.
- g. Manage department staff in order to effect the successful completion of the department's annual audit plan, maintaining the confidentiality of all departmental activities.
- h. Interact proactively with all departments throughout the organization to provide guidance, education and training assistance in regard to compliance with various laws and regulations in order to ensure the accurate submission of claims to federally funded programs.
- i. Take proactive steps to ensure that the Corporate Compliance Program is structured and performs according to the guidelines set forth by the U.S. Federal Sentencing Commission and the Department of Health and Human Services, Office of Inspector General's Compliance Program Guidance.
- j. Under the direction of the Assistant Vice President of Compliance, plan and perform proactive, confidential audits/investigations of suspected wrongdoing.
- k. Develop alternative means of distributing updates and education regarding topics related to BHSF's Code of Ethics.
- l. Review and distribute regulatory updates related to compliance to appropriate department heads throughout the organization.
- m. Develop relationships throughout the organization in order to promote the importance of compliance with conducting day-to-day activities according to the highest legal and ethical standards.
- n. Such other actions as directed by the Corporate AVP of Compliance.

**SUPPORTING/REFERENCE DOCUMENTATION:**

- United States Federal Sentencing Guidelines
- Office of the Inspector General Compliance Program Guidance for Hospitals
- Office of the Inspector General Supplemental Compliance Program Guidance for Hospitals
- International Standards for the Professional Practice of Internal Auditing (Standards)

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

- BHSF Administrative Policy: 801 Department Responsibilities and Charter Policy – Audit and Compliance
- BHSF Administrative Policy: 819 Code of Ethics – Audit and Compliance

**ENFORCEMENT & SANCTIONS:**

Enforcement of this policy is the responsibility of the Audit and Compliance Department.