

# Compliance and Legal Important Partners

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1

## Agenda

- Discuss the roles and responsibilities of the compliance officer and in house counsel
- Know when to involve legal in compliance matters
- Present example of a scenario and tool developed to guide investigation/conversations

2



## Roles



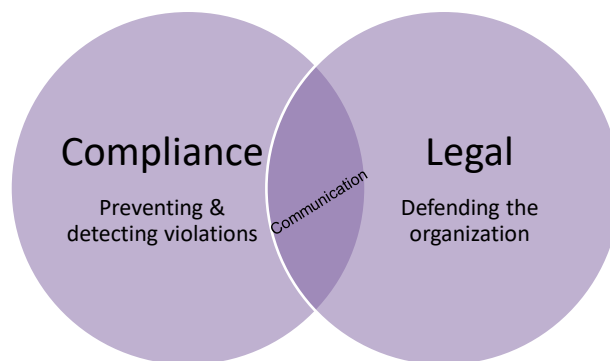
### Compliance

- Developing and implementing practices/procedures
- Overseeing and monitoring compliance program
- Resource for compliance issues
- Identifying, mitigating and reducing risk areas
- Coordinates and investigates compliance issues

### Legal

- Acts as legal counselor to defend organization
- Wears many hats: advisor, strategist, business partner
- Member of senior management
- Deep understanding of business/environment
- Directs the response to violations

3



4



## Partnership



### Know when to involve legal:

- When allegations involve violations of the law
- When misconduct may result in self-disclosure to government
- To protect an investigation from discovery
- To get legal advice
- To inform and get a second set of eyes on matters
- Early and often

5

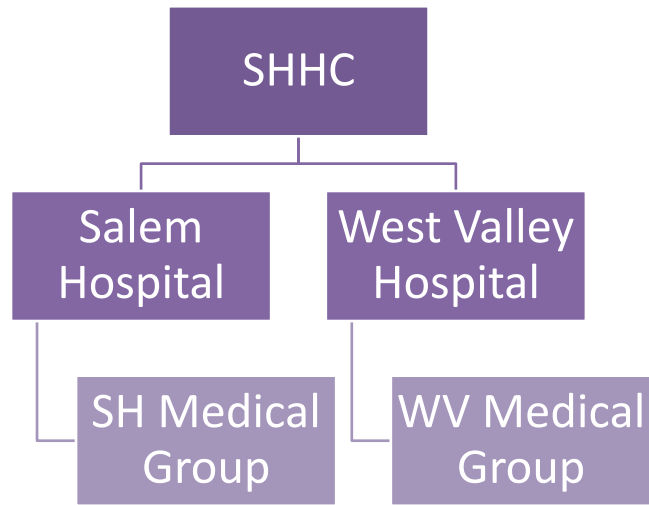


## Salem Health Hospitals and Clinics

- Not for profit healthcare system in Oregon's Mid-Willamette Valley
  - Salem Hospital – 494 acute care beds
  - West Valley Hospital – Critical Access
  - Salem Health Clinics – 21 primary and specialty care clinics
  - 5,000 employees
  - 800 medical staff
  - Busiest ED on west coast

6

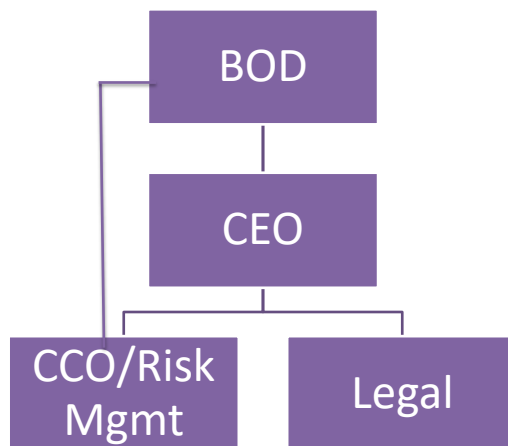




7



### Hierarchy



8



# Example

Report: Provider texting patients, using paper Rx pads and possibly seeing patients outside of clinic

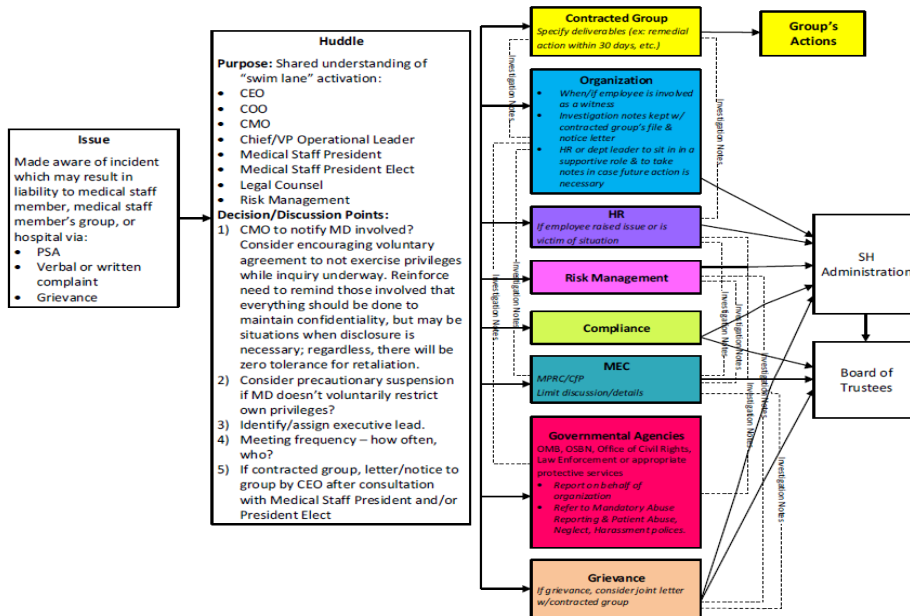
Immediate steps taken:

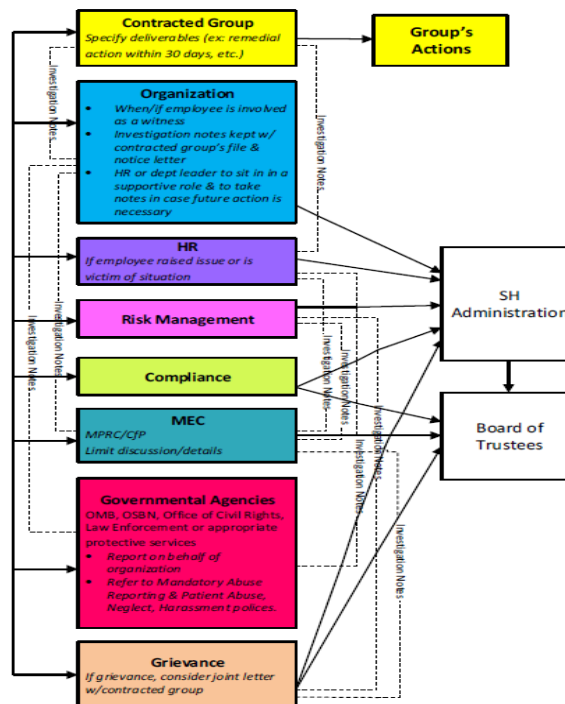
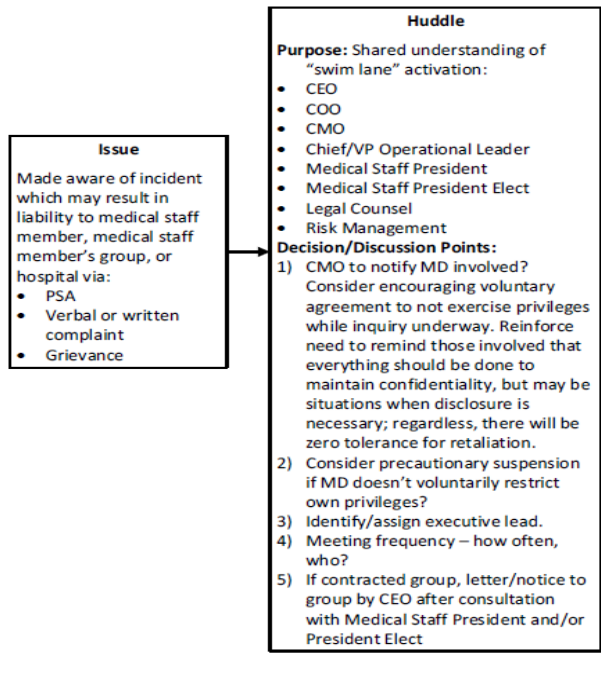
- Complete incident report
- Notify legal
- Notify HR
- Huddle with key leaders to develop plan of action



9

## High Risk Provider Concern Swim Lane Document





## Things to consider

- Who leads investigation?
- Which files are protected?
- Who takes notes?
- Who's notes are shared?
- What is meeting cadence?
- Who attends meetings?
- What information is shared at meetings?



13



## What we did



Swim lanes activated:

- Human Resources - employee relations
- Risk Management
- Compliance
- Peer Review/Medical Executive Committee
- Governmental Agencies

14



