Compliance and Legal Important Partners

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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



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



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Partnership



Know when to involve legal:

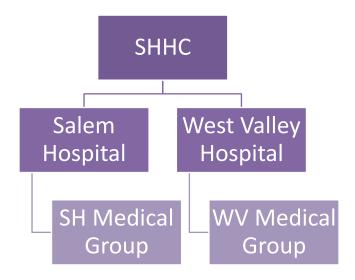
- When allegations involve violations of the law
- When misconduct may result in self-disclosure to government
- To protect an investigation from discovery
- To get legal advice
- To inform and get a second set of eyes on matters
- Early and often

Salem Health[®]
Hospitals & Clinics

Salem Health Hospitals and Clinics

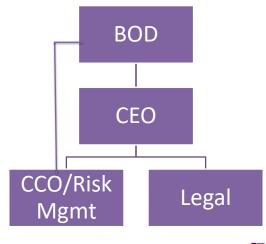
- Not for profit healthcare system in Oregon's Mid-Willamette Valley
 - Salem Hospital 494 acute care beds
 - West Valley Hospital Critical Access
 - Salem Health Clinics 21 primary and specialty care clinics
 - 5,000 employees
 - 800 medical staff
 - Busiest ED on west coast

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Hierarchy



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Example

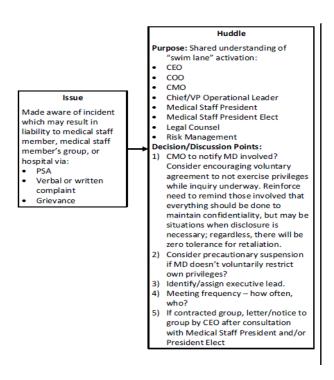
Report: Provider texting patients, using paper Rx pads and possibly seeing patients outside of clinic

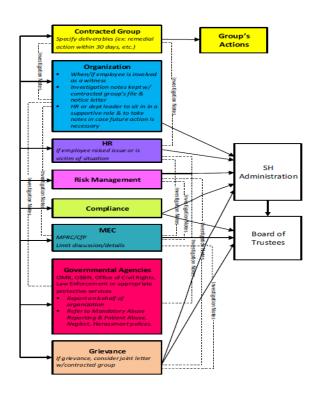
Immediate steps taken:

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



High Risk Provider Concern Swim Lane Document urpose: Shared understanding of "swim lane" activation: CEO coo Issue Chief/VP Operational Leader Medical Staff President Medical Staff President Elect Made aware of incident which may result in Legal Counsel liability to medical staff member, medical staff Risk Management
 Decision/Discussion Points:
 CMO to notify MD involved?
 Consider encouraging voluntary nember's group, or hospital via: SH agreement to not exercise privileges Verbal or written Administratio while inquiry underway. Reinforce need to remind those involved that complaint Grievance everything should be done to maintain confidentiality, but may be situations when disclosure is necessary; regardless, there will be zero tolerance for retaliation.
2) Consider precautionary suspension Trustees if MD doesn't voluntarily restrict own privileges? Identify/assign executive lead Meeting frequency – how often, 5) If contracted group, letter/notice to group by CEO after consultation with Medical Staff President and/or President Elect





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?

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What we did



Swim lanes activated:

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



