

Complete Healthcare Compliance Manual 2024 Infrastructure of a Compliance Program

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The complexity and size of an organization, as well as regulatory requirements and particular preferences of the board or governing body, affect the infrastructure of the compliance program. The size of a healthcare organization and the types of services and/or products influence where the compliance department is housed within the organizational structure and what reporting relationships of the compliance officer and compliance committee exist. As noted previously, three functions—compliance officer, compliance committee, and board/governing body—are the core components that define the infrastructure and assigned responsibility for the compliance program. Organizational charts displaying these three components and their functional relationships vary.

In smaller organizations, such as small group practices for example, the compliance function may be performed as a part-time duty by the practice administrator. Smaller entities or individual practitioners with a very small staff may not have or need separate compliance committees as decision-making is in the hands of very few. Larger national organizations or health systems, on the other hand, usually have a full-time corporate compliance officer/chief compliance officer with regional or facility compliance officers or compliance managers as direct reports. They also establish compliance committees that include senior leadership.

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