

Compliance Assurance Framework

First line of defense



MANAGEMENT

- Culture
- Process (controls, risk tolerance, monitoring)

Second line of defense



COMPLIANCE

- Ethics
- Liaison Oversight
- Privacy Program
- Advisory/Facilitation Coordination
- Centralized Review Programs
 - HIPAA
 - Research Compliance Assurance
 - Department - Highest Priority Risks

Third line of defense



AUDIT

- Horizontal Process
- Vertical Departments with Identified or Suspected Challenges
- Investigations Coordination

Compliance Assurance Framework

First line of defense



MANAGEMENT

- Culture
- Process (controls, risk tolerance, monitoring)

Second line of defense



COMPLIANCE

- Ethics
 - COI
 - Code of Conduct
- Liaison Oversight
 - Risk Assessment
 - Inventory
 - Adequacy of Monitoring / Oversight
- Privacy Program
- Facilitation / Coordination Advisory
 - Process
 - Right-size process with risk streamline
- Centralized Review Programs
 - Privacy
 - Research Compliance Assurance
 - Highest Priority Risks
 - Establish samples and reporting process
 - Departmental reviews of specific compliance risk
 - Primarily outcomes / transaction testing

Third line of defense



AUDIT

- Horizontal Process
- Vertical Departments with Identified or Suspected Challenges
- Investigations Coordination