

# 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
  - Human Subject Research Compliance
  - 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
  - Human Subject Research (Human Subject Research Compliance and Clinical Trials Billing)
  - Highest Priority Risks
    - Establish samples and reporting process
    - Departmental reviews of specific compliance risk
    - Primarily outcomes / transaction testing

Third line of defense

## AUDIT

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