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

Second line of defense

Third line of defense

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

**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

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