

University of Alaska Anchorage

College of Health

Development of Compliance Program

June 20, 2013

Background:

Compliance programs are formal efforts to inform, monitor and continually assess an organization's compliance with the law and ethical commitments. Compliance programs are considered best practice for managing regulatory risk. Health care is a highly regulated area and compliance programs are quickly becoming the industry standard in health sciences higher education.

Compliance programs are typically organized around seven elements:

1. Standards and procedures for activities covered by the compliance program
2. Oversight (Compliance Officer and Compliance Committee)
3. Education and training on compliance obligations and policies
4. Monitoring and auditing of compliance risks
5. Ability to report non-compliance to a compliance oversight entity
6. Enforcement and discipline in regards to compliance policies
7. Response to possible non-compliance

Developing a Compliance Program for COH

UAA-COH will be establishing a compliance program over the next 12-18 months. Parts of the UAA-COH Compliance Program will likely be implemented before others in order to meet certain regulatory deadlines. The development of our compliance program will be a significant undertaking which will require all administrators as well as faculty and staff to be aware of the efforts as they roll out.

Initially, the UAA-COH Compliance Program will focus on the following areas:

- General compliance
- Health information privacy and security
- Research regulatory compliance

To assist us, UAA has retained Aegis Compliance & Ethics Center, LLP, a consulting firm which specializes in the development of compliance programs for health care and higher education.

To begin the process Aegis will be developing a Readiness Plan during the summer of 2013. This will involve interviews and resource reviews to determine UAA-COH's compliance needs and then recommending a structure for our compliance program.

As we consider what organizational structure makes sense for the COH Dean's Office, as we develop and implement our strategic plan, as we become more focused and committed to our work in regards to research, interdisciplinary education and ensuring student success and are truly seen as "Leading toward a Healthier Tomorrow" we need to ensure we are undertaking our mission in an ethical and legal manner. The creation of a compliance program will enable us to do this.

Please take the opportunity to meet with our consultants on June 26, 27 and 28, 2013 so they can better understand our operations – understand what we are doing well and where we need to improve.

First by attending our "Kick Off" on Wednesday June 26, 2013 @ 8:30 a.m. at the University Lake Building (ULB) Room 104 and secondly by being available and signing up for a 30 minute individual interview.

Bill Hogan, Dean College of Health