

## Integrating Quality & Safety into Your Compliance Program

Use this step-by-step guide to help ensure your compliance program aligns with OIG recommendations and effectively incorporates quality and safety oversight.

### Action Steps for Implementation

#### Governance & Committee Structure

- ☐ Add a quality/safety leader to the Compliance Committee (or invite as a regular presenter).
- ☐ Add the Compliance Officer to quality/safety committees (even as a non-voting member).

#### Quality & Safety Reporting

- ☐ Inventory current quality/safety reports.
- ☐ Identify what should be shared with compliance.
- ☐ Add relevant reports as a standing item in Compliance Committee meetings.

#### Collaborative Risk Assessment

- ☐ Include quality and safety issues in the compliance risk assessment.
- ☐ Collaborate with quality/safety leaders to identify risks and develop mitigation plans.

#### Incident Review & Auditing

- ☐ Establish procedures to loop compliance into serious safety events (e.g., wrong-site surgery).
- ☐ Create a joint approach for root cause analysis, corrective action, and billing oversight.

### Overcoming Resistance

If you encounter organizational resistance:

- ☐ Invite collaboration by offering to attend quality/safety meetings.
- ☐ Position compliance as a helpful partner, not an overseer.
- ☐ Start with “low-hanging fruit” (e.g., ensuring billing is stopped after a never event).
- ☐ Cite recent enforcement actions related to quality to justify compliance involvement.

This material is intended for educational and informational purposes only. This document is not intended to be legal advice. Legal advice must be tailored to the specific circumstances and users are responsible for obtaining such advice from their own counsel. Nothing provided on this site should be used as a substitute for the advice of legal counsel.

## **Start Small – Baby Steps That Build Momentum**

If more significant integration isn't possible yet:

- ☐ Open conversations between compliance and quality/safety leaders.
- ☐ Offer to provide compliance updates to quality committees, and vice versa.
- ☐ Identify shared priorities and mutual goals.
- ☐ Take incremental steps and build trust through collaboration.

## **Communication & Culture**

- ☐ Clearly communicate roles: compliance supports—not controls—quality/safety.
- ☐ Reinforce that the compliance officer is not taking over but partnering for better outcomes.
- ☐ Focus messaging on reducing risk, protecting the organization, and improving patient care.

## **Final Review**

- ☐ Is your compliance program visibly aligned with the OIG's quality/safety expectations?
- ☐ Are quality and safety leaders engaged and represented in compliance activities?
- ☐ Have you taken measurable steps to align both functions under a collaborative structure?