



WHITE PAPER

A STRONG COMPLIANCE CULTURE CREATES VALUE

Best practices for creating and measuring the impact
of a strong compliance culture

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FROM CHAOS TO CONFIDENCE

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Introduction

In a perfect world, C-Suite executives would create compliance cultures in their healthcare organizations and cascade their support from leaders to front-line staff. This top-down approach works well when executives recognize how a solid regulatory compliance program helps facilitate the delivery of quality patient care and protect revenue.

Yet many compliance officers lack support from the top. This requires them to earn a seat at the table and convince leaders that a strong compliance culture adds value to the organization.

Three compliance experts – Jay Anstine, compliance program director, Western Division, Banner Health; Donnetta Horseman, chief compliance officer, Moffitt Cancer Center; and Maeve O’Neill, national compliance director, Circa Behavioral Healthcare Solutions –

share their experiences with earning recognition as value creators.

They explain how to build compliance cultures in healthcare settings. They share how establishing a culture with effective training and measurement helps Compliance add value to the larger organization by better managing and controlling risk. Creating a culture that shows how Compliance makes an impact involves four key areas:

- Building relationships and leading as an influencer
- Emphasizing education and training
- Embracing metrics
- Connecting Compliance to quality patient care



Defining A Culture Of Compliance

A healthy compliance culture helps healthcare organizations effectively manage and control risk. Yet it may not look the same across every healthcare organization.

“We know that compliance is about following regulations, adhering to the rules, and following policies and procedures,” says Maeve O’Neill, a behavioral health compliance officer who has worked in and consults with behavioral health organizations. “What we don’t have is a clear, consistent definition of culture for everyone.”

The lack of a definition is due, in part, to the varying healthcare settings compliance professionals work in.

“We all know what CEOs do; they run the business,” O’Neill says. “But when we say, chief compliance officer, it’s not really clear what we do. It’s partly because we do different things in different settings, whether we’re working in a cancer hospital or a behavioral health organization.”

Jay Anstine, compliance program director, Western Division, Banner Health, says it’s also due to healthcare organizations’ differing tolerances for risk.

“Some organizations have a great tolerance for risk in many areas,” Anstine says. “Others may be more conservative in terms of how risk averse decision makers in the organization are and this affects the culture of compliance.”

Donnetta Horseman, chief compliance officer, Moffitt Cancer Center, offers suggestions for assessing an organization’s risk tolerance.

“One way to gauge your organization’s tolerance of risk is putting tools in place, such as risk assessments and regular touch points with leadership,” Horseman says. “And if you’re new coming into an organization, it’s simply asking the question, ‘What is the organization’s risk tolerance?’ As a compliance officer, you have to learn whether an organization is more conservative in their tolerance of risk to know how to navigate that.”

Horseman mentions the U.S. Department of Health and Human Services’ recent bulletin on tracking technologies as an example of how different organizations may navigate the same issue.

“If you’re determining whether it’s a breach of PHI when organizations use these tracking technologies on their website, an ultraconservative response is: ‘Turn them all off,’” Horseman explains. “A more measured response is to say, ‘Which ones are we not really using or getting value from that would be easy to turn off? Which ones are we getting value from, and how does that impact the organization’s objectives and institutional goals?’”

Determining which response aligns with the organization’s risk tolerance is one way compliance officers serve as a strategic partner to the business. It’s about outlining the issues, Horseman says, “and then having conversations with all the right stakeholders to understand what’s impacted.”

Horseman notes that these types of conversations occur organically when compliance officers have regular touch points with executives and operational leaders. Resolving issues like how the organization addresses tracking technologies underscores why cultivating relationships is key to creating a positive culture.



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Compliance Program Director, Western Division, Banner Health

“When culture is strong, it comes from the top down. It’s about having an organization where everyone feels comfortable and free to report. Employees aren’t afraid to go to Compliance, and they see Compliance as a value-adding partner.”

– **DONNETTA HORSEMAN**
Chief Compliance Officer,
Moffitt Cancer Center

Indicators Of Positive Culture

While defining culture may be more art than science, healthy cultures share several characteristics. Positive cultures that help organizations manage and control risk are created when compliance officers embrace metrics, build relationships, emphasize education, and connect their work to better patient care.

“I define a culture of compliance as a commitment throughout all levels of the organization to doing the right thing and doing things right,” explains Anstine.

Horseman agrees, citing her hospital’s work on clinical trials as an example of the importance of doing things right the first time.

“At our cancer hospital, we do a ton of clinical trials,” Horseman says. “Getting a clinical trial right from a billing perspective can be really difficult” because some components are billed to sponsors, and others to insurance companies.

“The standard of care is complex, and cancer care is expensive,” she adds. “When you have a culture of compliance, individuals try to get it right from the beginning. You also have checks and balances on the back end, such as Compliance conducting audits and finding and fixing issues proactively.”

Horseman says that open communications are also key.

“When culture is strong, it comes from the top down,” Horseman says. “It’s about having an organization where everyone feels comfortable and free to report. Employees aren’t afraid to go to Compliance, and they see Compliance as a value-adding partner.”

When a compliance officer is new to an organization, it may not be easy to discern what the culture is. “It takes time to

distinguish between a positive and negative culture when you’re new to the organization,” Anstine says.

Anstine explains that signs of a positive culture include an organization-wide commitment – from executives through front-line managers – to engaging with compliance activities. This includes everything from ensuring that staff are completing training to making sure Compliance is at the table when proposed business deals are being considered or strategic decisions are being made.

On the flip side, Anstine notes key indicators that an organization has a negative culture.

“You might see executives, directors, or managers who aren’t holding their staff accountable for complying with the organization’s policies and procedures or regulatory requirements,” he says. “Or they might speak negatively about Compliance, like complaining, ‘Compliance is making me do this.’”

Horseman shares another indicator of a negative culture.

“Sometimes an employee comes to report an issue and says, ‘My manager told me not to come to Compliance,’ she says. “When there isn’t that support for Compliance, employees won’t think it’s safe to report.”

Organizations with negative cultures often refer to Compliance as “the police,” O’Neill adds. This usually happens when Compliance has a reputation for engaging only when something bad is happening or an employee is noncompliant.

“We all fight that perception of what compliance officers do, and a lot of our job in building a positive culture is changing that perception,” O’Neill says.

Pockets Of Noncompliance

Larger organizations may have areas that don't have a healthy compliance culture.

"If you're conducting an audit or an investigation, and you uncover something else that's going on – separate from the primary reason you're conducting the audit or investigation – that's one way to find a pocket of noncompliance," Anstine says.

He has encountered instances, for example, when a manager isn't holding staff accountable around certain documentation that needs to be in place to bill out a particular procedure.

"Sometimes, it's employees who report these issues into the compliance hotline, or they contact you directly," Anstine says.

"The reality is a lot of the time compliance officers are more reactive than we want to be," O'Neill adds.

She says when there's a grievance or a hotline complaint comes in, she investigates and follows up to manage the issue.

"Then we do a root cause analysis to see where there are opportunities for improvement," O'Neill says. "And sometimes within that, you're recognizing culture issues, or risk issues, or pockets of culture problems where employees aren't on board."

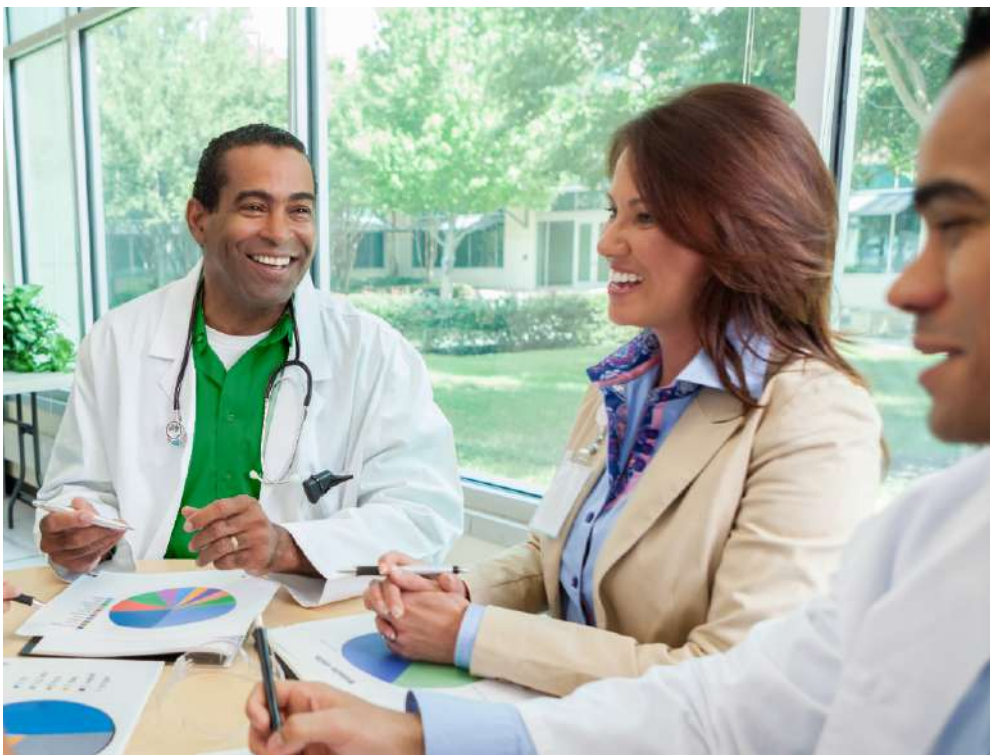
The Preventative Side

"Our goal is to get on the preventative side and get ahead of having to react to incidents," O'Neill explains. "I want to make sure, 'Does my policy address these issues?' If I'm doing staff training, I want to bring up those examples and gauge whether people understand how to prevent rather than react. What I've experienced in my career as a compliance professional is that when you're trying to prevent rather than react, you're not the 'compliance police.'"

Anstine says rounding helps foster a proactive, rather than reactive, culture.

"Are employees proactively coming to me and reporting issues, or are they telling me after the fact?" Anstine asks. When it's after the fact, it's often an issue that could have been avoided if employees had reported it up front.

Proving that the preventative approach works involves consistently partnering with executives and operational leaders to manage and address issues that arise. Eventually, leaders realize that it's preferable to involve Compliance before there are issues. This is at the heart of why solid relationships are key to creating a positive culture.



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Circa Behavioral Healthcare
Solutions

Four Keys To Building A Culture That Adds Value



1. Building Relationships and Leading As An Influencer

Cultivating solid relationships and being visible across the organization is crucial to building a culture of compliance and to helping manage and control risk. Acting with empathy helps compliance officers encourage others to proactively work with them.

“It’s important to lead with that empathy side,” O’Neill says. “At my old organization, we practiced lean management, and one of my favorite sayings was, ‘Hard on the process, easy on the people.’”

Her approach stems from her belief that people want to be compliant and do the right thing.

“Assume that employees are doing their best with what they have, and lead with that,” says O’Neill. “If there’s an issue, it’s often because employees have not been given the right information, resources, or skills. Our job in compliance is to give employees the information, resources, skills, and support they need – not to assume they’re bad or lazy.”

She notes that empathy is more effective than blaming and pointing fingers. O’Neill prefers telling a noncompliant employee, “It’s my fault. ‘Compliance failed you by not giving you a good enough policy, procedure, or training.’”

O’Neill adds, “When I take this approach, you can feel the energy in the room shift. It transitions from a negative and fearful moment to a foundation of empathy and a healthy culture for compliance.”

Anstine also believes in leading with empathy.

“A big thing for me is taking an empathetic approach to how you’re doing this work,” Anstine says. “Sometimes noncompliance may not be intentional; individuals may not be aware of what the rules or requirements are. You have to consider whether Compliance provided ample opportunities for them to know? Did Compliance do a good enough job of educating staff on what the requirements are? It’s a two-way street. And sometimes it points back to the Compliance department.”

“Resistance Is Normal”

In addition to leading with empathy, O’Neill says it’s helpful to have an open-door policy. She says if you’re new to an organization, having conversations to assess your colleagues’ previous experience with Compliance is useful.

“When I come into an organization, I talk with colleagues and really listen to their feedback,” she says. “You have to be willing to hear things that are tough to hear and be responsive to that. It’s key to building trust and being able to shape culture as an influencer. And it’s important to follow through on integrating their feedback into your compliance program.”

She tells new colleagues, “Here are the things I’ve heard that didn’t work, and this is what we want to do differently.”

She says the change management process is a continual effort to build and make it better, and acknowledges it takes time to get everyone’s buy-in. She says resistance is normal and to be expected.

“To overcome resistance, communicate the why behind what you’re doing,” O’Neill says. “Communicating and doing a lot of listening builds trust. If you’re changing policies or processes, explain why you have a better way to do it. Emphasize the importance of following the OIG’s seven elements and integrating them into daily workflows.”

She emphasizes the importance of showing confidence that you have the knowledge, skills, and abilities to address the compliance issues the organization is facing.

“Be confident to push back, to question, and to challenge,” O’Neill advises. “As compliance officers, we bring a specialization that is rare. Don’t be afraid to be a person of influence.”

“Did Compliance do a good enough job of educating staff on what the requirements are? It’s a two-way street. And sometimes it points back to the Compliance department.”

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Compliance Program Director, Western Division, Banner Health

Influencing Through Change

In a consolidating industry like healthcare, change is inevitable – from new organizational structures and leadership transitions to new licensures or payors.

“Organizations are always changing and growing, and you can’t expect culture to stay the same,” Horseman says.

To prepare for changes, Horseman advises having consistent processes in place. “Make sure your risk assessment process is standardized, and focus on the OIG’s seven elements.”

Horseman and Anstine also emphasize the importance of understanding the organization’s strategic direction and serving as a business partner. Know how the business generates revenue and where risk resides, so you can help operational leaders to do the same.

“If you want to connect with leadership or anybody in operations, you have to be engaged in their work,” Anstine says. “And that means understanding how the organization makes money and how each department contributes. It’s about getting to know the business side of the environment, not just the compliance side. You need to be able to climb in the head of a business or operational leader and understand things from their perspective as you try to shape culture and find resolutions to issues. Shadowing staff and doing department walk-throughs can help show employees that compliance officers understand operations.”

During leadership transitions, Anstine says it’s important to “know your organizational chart and where your allies are to engage for support.”

Horseman adds, “It always comes back to cultivating strong relationships across the organization. If there’s a shift or the tone starts to change in your organization, fall back on relationships.”

O’Neill notes that compliance officers can serve as “champions of change” because they’re accustomed to acknowledging risk and changing regulations.

“Any sort of change management can live with Compliance because it will affect the policies, procedures, and processes that go along with that,” O’Neill says.

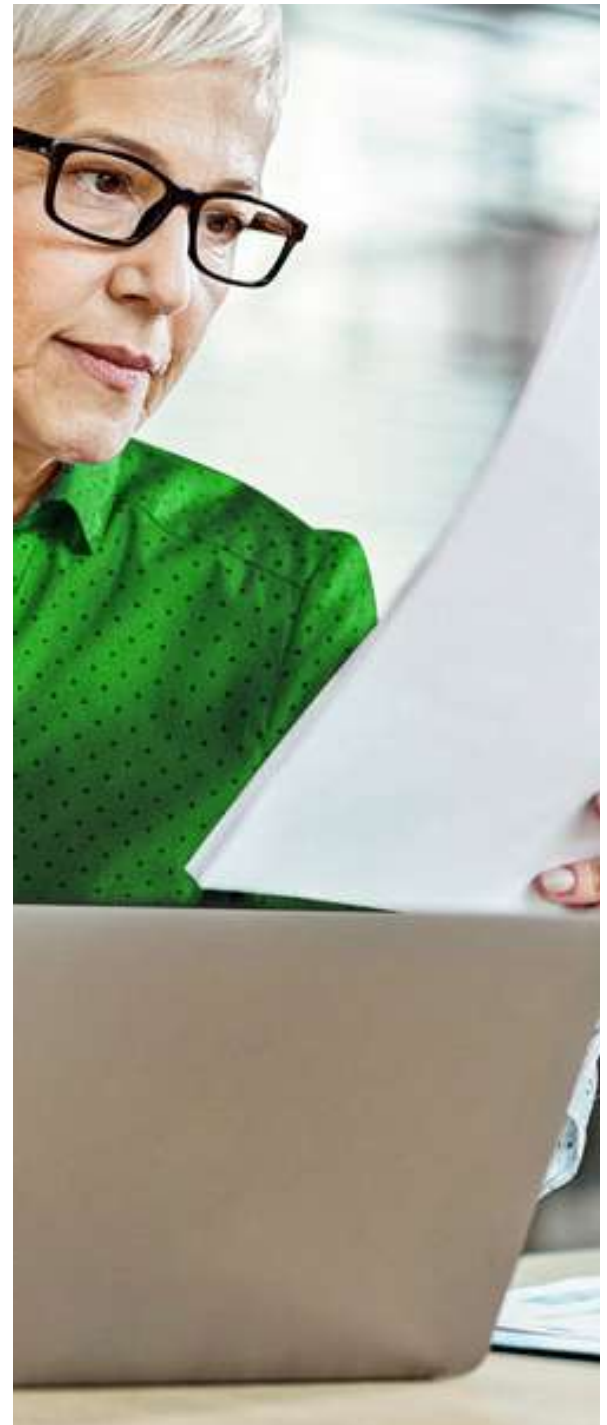
She says being a positive force for change management can be as simple as a phone call with a department leader asking, “How can I support you in this change?”

Acknowledging change and offering to help colleagues navigate it is another way to shape the culture by leading as an influencer.

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Chief Compliance Officer, Moffitt Cancer Center



“One person doesn’t make or break the culture”

Influencing through change is more challenging when top-level support for compliance is missing. Yet as Horseman notes, “One person doesn’t make or break the culture.”

“The CEO definitely has a huge impact on what the culture is,” Horseman says. “But if you’ve cultivated relationships with leaders across the organization, you can still build a culture even without CEO support.”

“Invest in keeping those relationships with other leaders strong,” Horseman advises. “Keep lines of communication open and have regular touch points with other leaders, so that you’re not just calling to discuss an issue.”

Horseman recommends, for example, reaching out to leaders when you have positive audit results. Or checking in to ask what challenges they’re facing and how you can help.

“Your efforts may funnel back to the CEO and may start to change the CEO’s perception of Compliance – and even make the culture stronger,” Horseman says.

O’Neill recommends cultivating relationships with executives and operational leaders as well as front-line workers.

“Do annual trainings with the board and the C-Suite to stress the importance of compliance activities and share metrics around how Compliance supported the success of the organization,” O’Neill says. “You want to have that tone at the top, but you also want to have buy-in at the bottom of organization. Ideally, it all comes together where the whole organization sees that Compliance is ingrained in the business.”

O’Neill says embedding yourself into each operational area is a helpful way to influence front-line employees. Be part of each area’s initial orientation with staff, go to trainings, do mock surveys, and attend team meetings.

She says when you’re embedded, you’ll start hearing about issues to look into. Then you can follow up with teams and say, “I wonder about this. Do you have any concerns in this area?”

The more visible you are, the more that colleagues see you and trust you as a partner. They’ll appreciate what you bring, and in turn, they’re more likely to bring issues to you. This can help you catch a potential problem early to prevent it from becoming a bigger issue.

2. Emphasizing Education And Training

Taking a preventative approach also involves ongoing education and training, which are critical to helping healthcare organizations manage and control risk.

An example of embedding education into the culture, O’Neill says, is doing monthly check-ins.

“I do monthly phone calls with all of our medical leads or nursing leads,” she says. “It’s an opportunity for sharing and cross-training across different levels of care, or different settings, for everyone to learn best practices from one another.”

O’Neill says in an earlier role, she joined an organization where policies had not been updated in about 10 years.

There were missing policies as well as conflicting and duplicative policies. And she received pushback from employees who were reluctant to change their processes – despite ongoing citations from state regulators.

O’Neill worked with each department – from nursing to medical directors to human resources – to review their policies and make sure they were aligned with their actual practices. Her approach allowed each operational area to contribute to their policies and to secure any funding and training needed to resolve the discrepancy issues.

“We put in standardized processes and policies,” O’Neill explains. “And when the state came to visit, for the first time in about 10 years, they had zero citations. Our HR person said, ‘Ok, I get it now, Maeve. I see that all this time and effort was worth it to be more proactive and build in the standardizations.’”

O’Neill adds, “It was an opportunity for education around regulations and why they were in place, and to get employees’ buy-in and help them become champions of it. They put the policies to work every day and now they understand why.”

This experience – the result of extensive relationship building and ongoing education – went a long way toward creating a positive culture.

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National Compliance
Director, Circa Behavioral
Healthcare Solutions



Empathy in Education

Horseman says training and cultivating relationships often go hand in hand.

“We implemented new manager-level training for Compliance,” Horseman says. “We get a report of new managers – whether they’re newly promoted or new to the organization – and we reach out to them via email, asking to meet with them for an hour.”

The meetings include sharing compliance resources and outlining which policies are most relevant to managers in their respective operational area. They discuss what it would look like if there’s an investigation involving one of their departments. It’s educational, plus it cultivates relationships and builds awareness of how Compliance partners with operational areas.

For Anstine, educating and training involves reciprocal engagement.

“I take the approach of reciprocation,” Anstine says. “If I want colleagues involved in Compliance, then I need to be engaged in their work. Things like department walk-throughs and meetings with department managers to better understand their operations and their processes from the ground up. I also do shadowing.”

Reciprocal engagement is another opportunity to show how Compliance serves as a strategic partner to operational areas. Anstine shares how he combined education and empathy to influence culture several years ago with a different employer.

“I had a physician who was resistant to changes we had to make to comply with new privacy requirements,” Anstine explains. “The amount of time his staff would have to take to comply with these requirements was what really concerned

“I told him, ‘I’m here to enforce things, but you and your staff are the ones that have to live with these rules, so let’s see if we can come up with a way that will make everyone happy.’”

–JAY ANSTINE

Compliance Program Director, Western Division, Banner Health

him. When the changes were first proposed, I asked the physician if I could spend a day with his staff so we could find the most effective way to do this.”

Anstine joined the staff for the morning, helping to register patients and doing other operational activities, then ate lunch with the physician.

“He was really appreciative that I was willing to take the time to understand his operations and his concerns instead of just telling him what to do,” Anstine says. “I told him, ‘I’m here to enforce things, but you and your staff are the ones that have to live with these rules, so let’s see if we can come up with a way that will make everyone happy.’ Several months later, he told me that he was not a huge fan of compliance but that I’d opened his eyes to knowing more about rules and regulations, and he was appreciative of the approach I took.”

Liaison Programs and Compliance Week

Another component of education is implementing a compliance ambassador program, often called a liaison program. It enables Compliance to partner with individuals outside the department to promote compliance organization-wide.

Horseman runs a liaison program, where managers are asked to nominate front-line employees.

“Managers commit to allowing their staff to participate in the program,” Horseman says. “Typically, it’s for an hour a month. We meet with groups of about 10-20 employees and talk about compliance topics. We provide education and explain various requirements to the group.”

She says after employees complete the 10-month program, they’re certified compliance champions.

“They take the information they learned back to their departments, and they function as liaisons for folks in their areas, if they have questions about compliance or issues to report,” Horseman says. “We make a really big deal out of it. At the end of the session, we have their department leader and the CEO hand out certificates, and we take photos and include them in newsletters.”

She even has employees ask to join the program the next time it’s offered.

“We found it really successful in getting front-line folks engaged,” Horseman says.

Similar approaches are effective with physicians too, particularly amid organizational changes. Whether a new physician joining the organization, or a physician is referring patients to a facility, Anstine advises leveraging physician compliance champions.

“It’s helpful because physicians may be more receptive to hearing Compliance’s message from another physician than from the compliance officer,” Anstine says. “It improves your chances for success.”

Liaison programs are meaningful ways to both amplify Compliance’s messaging and to identify compliance issues.

Another educational tactic O’Neill finds helpful is sharing success stories across the organization. She advises doing shout-outs when a department has good audit results or positive patient satisfaction survey results in employee newsletter. This recognizes front-line employees for their

contributions, while bolstering awareness of Compliance’s impact on the organization.

Participating in national Compliance Week, usually held in November, also educates and engages the entire organization.

O’Neill says participating in a national event gives credibility to the compliance field. She sees it as an opportunity for fun and light-hearted interactions with employees, outside of their day-to-day work.

Horseman agrees that Compliance Week is a chance for compliance officers to meet employees when they’re not telling them something new they have to do.

She recalls when a new CEO came on board and asked how he could support Compliance. Horseman asked him introduce Compliance Week in an organization-wide video for employees.

The CEO agreed, and Horseman helped script his remarks. It was a strong show of support for Compliance that made an impact across the organization.

“When Compliance Week rolls around, we always have an in-person event at our bigger locations,” Horseman adds. “It’s probably the most popular thing we do. We plan lots of activities, play games with prizes, and offer snacks.”

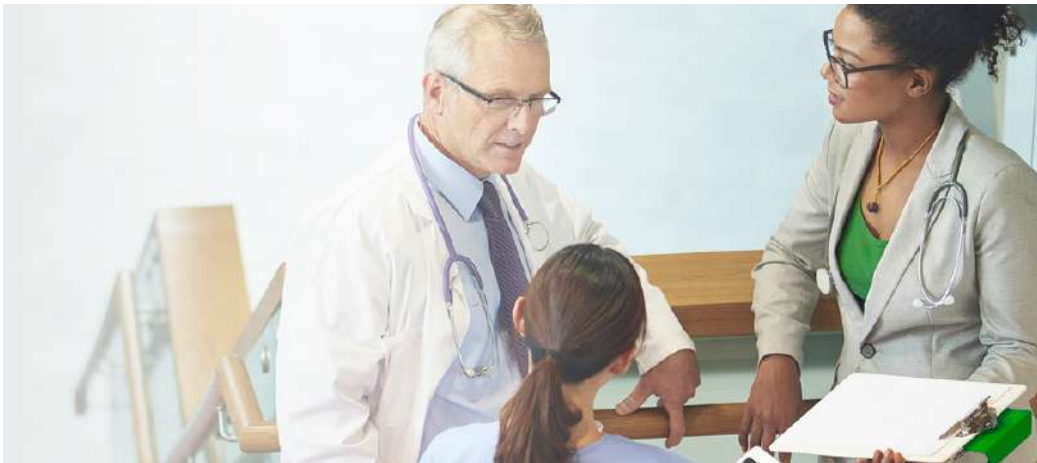
She advises hosting Compliance Week activities if you have a budget. If funding is lacking, Horseman recommends sending daily emails during the week to give Compliance recognition throughout the organization.

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3. Embracing Metrics

Measurement and metrics are also critical for showing Compliance’s value to the larger organization. Building financial and other metrics – whether it is fines reduced from cooperating in an investigation or revenue reclaimed because of audits – into the culture helps the organization better manage and control risk.

Prioritizing metrics is important even if you aren’t demonstrating a hard financial impact. Compliance professionals often turn to the Office of the Inspector General (OIG)’s seven elements as key performance indicators (KPIs) as well as a set of measurements called culturally impactful metrics.

KPIs help track an organization’s impact, financial performance, and overall business health. Element-based KPIs – such as requiring 100% of new employees to complete a Code of Conduct acknowledgment – can help gauge whether compliance activities are achieving results.

Beyond KPIs, culturally impactful metrics help ensure that compliance officers are building relationships and working to understand the business and how it generates revenue. Examples of culturally impactful metrics include the number of compliance roadshow sessions completed or meetings between the compliance officer and board members.

Using the OIG’s Seven Elements

O’Neill shares her experience using the OIG’s seven-elements framework in behavioral health.

“Using the OIG’s seven elements in behavioral health is still

pretty new,” O’Neill says. “The reality is a lot of behavioral health programs are rather unsophisticated in their policies.”

She says many behavioral health organizations still have their policies in big binders; they haven’t yet embraced technology to manage how they approach compliance. It’s partly because the focus in behavioral health has been on working with patients, not building infrastructure.

O’Neill recommends using the OIG’s seven elements almost as a checklist.

“Start by assessing which of the elements you already have,” O’Neill advises. “Most behavioral health organizations find that they have the seven elements in some iteration. But they haven’t been organized in a work plan or an annual assessment.”

O’Neill adds, “If you have all seven elements met – even if it’s minimally, as long as you have something in place for each of them – you have a good foundation for a compliance program. With the seven elements in place, you can build over time to create a strong compliance culture.”

She recommends starting by working with colleagues across the organization to go through and look at all the things they’re doing – staffing, policies, standard operating procedures, documentation.

“You can help them see the opportunities for simplification and standardization,” O’Neill says.

Beyond the seven elements, several measurements and qualitative indicators can help gauge the effectiveness of your compliance culture.

O'Neill relies on conducting a pre-test and a post-test, whether it's for a new employee orientation or an annual training. Metrics also support healthcare organizations' focus on regulatory change management.

"In my specific niche of behavioral healthcare, we're accredited by the Joint Commission and their standards change twice a year," O'Neill says. "If you're also accredited by CMS or other state regulatory agencies, that's a lot to track. I'm a big fan of building policies that embed the regulation into it. So, if there's a rule on, for example privacy or drug testing or a medical process, the policy says, 'Here's what CMS says on that.' It shows employees the regulatory reason and rationale behind the policy to make it more motivating to comply than simply because it's what Compliance said to do."

Embedding regulations into the organization's policies is also helpful if there's an audit or a state visit. Employees can point to their process being aligned to a specific regulation and show how that alignment has led to fewer issues over a period of time.

Beyond the OIG's Seven Elements

Horseman uses data from her organization's employee engagement surveys to gauge the strength of her culture.

Horseman says, "One of the questions is always, 'Do you understand how the compliance hotline works?' We look at that trending over time. We also use exit surveys. It may be a little too late, but our surveys ask whether people feared retaliation."

For managers and above, Horseman conducts in-person exit surveys on compliance.

"We ask if they're aware of incidents of compliance failures or issues that didn't get addressed," she says. "Or if there's anything they're still concerned about."

She says rounding is another effective qualitative measurement.

One way we do that is by department rounding, where we go for 10 minutes to a department meeting and talk about a compliance topic," she says.

Horseman also recommends participating in patient safety rounds.

"I was paired with our chief medical officer, and we went to our Sterile Processing Department," she says. "We asked them, 'What's working? What's not working?' Inevitably, as we went to different departments, compliance-related issues came up."

Horseman says rounding is a way to see if employees are comfortable reporting issues in their department and "a way to put faces with names."

Anstine finds rounding helpful for engaging with front-line employees and for measuring their compliance awareness. He advises to approach rounding "in the spirit of curiosity," noting that employees anticipate compliance officers will judge them.

"When you're rounding, you can talk about compliance messaging if there's a particular point you need to hit on – maybe a reminder to complete staff training or something HIPAA related," Anstine says. "But spend the time being curious about their operations and getting to know them. Taking this approach is a sign of engagement and helps you connect with employees on a personal level."

Anstine says a qualitative measurement is the tone and content of leaders' messaging to employees.

"I worked with a CEO several years ago who, when it came time to do annual training, she wanted to be on all the emails to staff reminding them to complete the training," he says. "She was always the first one to complete the training. It was a big indicator that she really bought into compliance."

Anstine says the CEO's proactive approach set the tone. Encouraging employees to do things the right way – the first time – helped avoid instances of refunding money to Medicare and amending or unwinding contracts.

"It's important for compliance professionals to help employees see how they're part of the overall mission – to deliver the best care to patients – by tying it back to how compliance activities support patient care and benefit our patients."

– DONNETTA HORSEMAN

Donnetta Horseman,
Chief Compliance Officer, Moffitt Cancer Center

4. Connecting Compliance To Quality Patient Care

A compliance culture benefits the overall organization, including the patients the organization serves. Emphasizing how culture is interconnected with better patient care helps show Compliance's impact on managing and controlling risk.

"I'm a big believer in if you have happy staff, they are ethical and compliant to provide quality and safe care," O'Neill says. "We need to have the foundational pieces in place. We can't have toxic cultures, burned out staff, and high turnover – then expect employees to be good with our patients."

To capture how Compliance helps the organization deliver quality patient care, O'Neill emphasizes with operational colleagues that her job isn't to make them simply check off boxes on forms; it's to help them streamline their operations and more effectively control risk.

She says being clear with employees about what you're doing and why keeps the focus on how Compliance helps departments operate more efficiently.

"The goal is giving everyone more time to focus on patient care and better serving patients," O'Neill says. "In the end, it makes the organization more money and more profitable."

Conclusion

Earning recognition as a value creator and establishing a compliance culture can be challenging. Yet as our experts shared, there are ways to successfully show leaders how a healthy culture with effective training and measurement helps the larger organization better manage and control risk.

It starts with understanding your organization's risk tolerance and defining the characteristics you want your culture to have. With this groundwork in place, you can elevate Compliance by focusing on four areas: embracing metrics, building relationships and leading as an influencer, emphasizing education, and connecting compliance activities to delivering quality patient care.

Prioritizing these areas can empower you to establish a strong culture that helps the organization manage and control risk – and demonstrates how Compliance adds value.

For example, O'Neill says better patient satisfaction leads to more referrals for the organization's services, which boosts revenue. The financial impact also extends to a stronger reputation for the organization in the market.

Horseman agrees that a compliance culture helps the organization reputationally and financially. She says that Compliance's financial impact sometimes involves refunding money, when necessary, to a government entity or to patients. In some cases, Horseman says, Compliance identifies money that was left on the table.

O'Neill adds that Compliance "may not always get the credit" for making a financial impact. Yet a compliance culture leads to fewer fines and citations for the organization. It also enables the organization to maintain, rather than lose, accreditations.

It's often up to compliance officers to demonstrate Compliance's contributions by connecting the dots between the regulations written to protect patients and how Compliance monitors them to improve the patient experience.

"It's important for compliance professionals to help employees see how they're part of the overall mission – to deliver the best care to patients – by tying it back to how compliance activities support patient care and benefit our patients," Horseman says.

About the experts



JAY ANSTINE
Compliance Program
Director, Western Division,
Banner Health



DONNETTA HORSEMAN
Chief Compliance Officer,
Moffitt Cancer Center



MAEVE O'NEILL
National Compliance Director,
Circa Behavioral Healthcare
Solutions