



WHITE PAPER

DOUBLING YOUR IMPACT: Demonstrating Compliance's Value and Shaping Culture

Best Practices for Proving It in Five Key Areas



Contents

Introduction	2
Tangible Ways Compliance Creates Value	3
Building on the OIG’s Seven Elements	3
Beyond the Seven Elements	4
<i>Effective compliance</i>	4
<i>Revenue protection</i>	5
<i>Hiring and retention</i>	6
<i>Patient care</i>	8
<i>Avoidance of fines</i>	8
Three Keys to Shaping a Strong Compliance Culture	9
1. Demonstrate and communicate the value Compliance creates	9
2. Effectively measure culture	11
3. Embed regulatory change management process	11
Conclusion	13
About the Experts	13

Introduction

Leading healthcare organizations create a culture where the chief compliance officer (CCO) helps facilitate the delivery of excellent patient care. When Compliance is an integral part of the team, the CCO shapes the organization’s strategies around delivering a better patient experience and sustainable operations.

Yet not all healthcare organizations support their compliance officers. CCOs are often relegated to overseeing tactics to reduce fines. Without top-level support, CCOs are in the unenviable position of defending their value rather than demonstrating it in their day-to-day interactions.

Three compliance experts – Lisa Herota, senior director of Compliance & Privacy at Vail Health; Maeve O’Neill, national compliance director at Circa Behavioral Healthcare Solutions; and Brett Short, chief compliance officer at UK HealthCare, University of Kentucky – share their experiences of earning recognition as value creators and shaping a culture of compliance.

They explain how to demonstrate Compliance’s value and shape culture by aligning Compliance’s work to the organization’s mission, vision, and values. They also show how to meet organization leaders where they’re at and make changes from there. And they share how to partner with clinical and operational leaders to leverage their expertise in making policy and procedure decisions.

Their efforts emphasize five tangible areas where Compliance creates value: effective compliance, revenue protection, hiring and retention, patient care, and avoidance of fines. They also highlight how a culture with effective training and measurement enables the organization to better manage and control risk. To shape a strong Compliance culture, prioritize efforts to:

1. Demonstrate and communicate the value Compliance creates
2. Effectively measure culture
3. Embed regulatory change management process



Tangible Ways Compliance Creates Value

Building on the OIG's Seven Elements

Brett Short says that providing effective compliance is a baseline for how Compliance adds value to the organization.

“Compliance is table stakes,” Short says. “If we can’t demonstrate that we’re doing this work, the organization will be in trouble.”

Maeve O’Neill emphasizes the importance of following the [OIG’s seven-elements](#) to demonstrate how Compliance delivers value.

“The OIG’s seven elements are foundational, and they’re a good starting point for behavioral health, where compliance programs are new,” O’Neill explains.

Short agrees and adds that the seven elements are also useful as metrics.

“You should be able to document what you’re doing for all of the seven elements,” Short says. “It may be on a quarterly basis for a compliance committee meeting or elsewhere; there’s no magic formula. But the seven elements can help you choose measurements and demonstrate how you’re meeting them.”

O’Neill advises using the seven elements almost as a checklist, starting with an assessment of which elements you already have. She recommends working with colleagues across the organization to look at all the things they’re doing – staffing,

policies, standard operating procedures, documentation.

She notes that most organizations have the seven elements in some form – even if they haven’t been organized in a work plan or an annual assessment. She says that ethics are another building block of an effective compliance program.

“Look at your program and ask, ‘Do we have ethics embedded in what we’re doing – in all of our codes, all of our standards?’” O’Neill says. “What are we doing on a daily basis to prevent, attack, and correct any issues?”

“The seven elements are a great starting point for any compliance program to begin showing its value,” agrees Lisa Herota. “You can use the seven elements to guide implementing policies and procedures around revenue protection through billing and coding policies, brand protection through marketing policies, and privacy compliance through standard HIPAA and privacy policies.”

Herota notes the importance of partnering with operational leaders in implementing policies and procedures.

“The level of value created through compliance is dependent on the effectiveness of those policies,” Herota says. “You can work with other policy owners to create the best policies, but if staff can’t understand them, interpret them, or easily apply them to their day-to-day functions, they are not valuable.”

This is why it’s important to partner with operational leaders on education and training – another one of the seven elements.



“Compliance is table stakes. If we can’t demonstrate that we’re doing this work, the organization will be in trouble.”

– BRETT SHORT
Chief Compliance Officer,
UK HealthCare, University
of Kentucky

She says that education and training can feel overwhelming. But sometimes, education is simply responding to an employee's question, such as, "Can my nurse accept a gift from a patient?"

"Instead of emailing back, 'No,' provide a link to the regulations and the policy to include more detail," Herota advises. "It gives them 'the meat.' When questions come up, ask your leaders to talk with their teams about the issues and share them in their daily huddles. Or say, 'Invite me to your meeting and let me talk to them.'"

Herota adds that the value of education is diminished when training attendance is low or when training sessions are ineffective. She says part of delivering effective compliance is creating less legalistic, more user-friendly policies.

"Work to create effective education that is digestible to all levels of employees," Herota says. "It's a great way to increase the value Compliance brings to an organization."



Beyond the Seven Elements

Using the OIG's seven elements is crucial to showing how compliance officers add value. But making an impact in areas such as effective compliance, revenue protection, hiring and retention, patient care, and avoidance of fines is equally important for proving Compliance's value to the organization.

Effective Compliance

Maeve O'Neill shares how an experience with a Joint Commission survey epitomizes delivering effective compliance.

"I'm a big believer in standardization," O'Neill says. "I had worked for years to standardize policies and procedures in my organization. And when we had our three-year Joint Commission survey, the Joint Commission was impressed with how we had four different states plus the Joint Commission and all our payors embedded into our policies. They published a success story about our work because they were so impressed with how we spread this information across the whole organization."

She says establishing an effective compliance program involved several years of extensive efforts to build relationships and partner with colleagues across the organization.

"We had monthly meetings with our medical and operational heads to really integrate these practices into our daily work," O'Neill explains. "We'd had duplicates – in those old binders – of the same forms, but we worked to standardize all our policies."

Earning recognition from the Joint Commission reinforced the value of O'Neill's work to leaders.

"Standardizing everything was helpful for our internal and external customers too – our payors and our creditors," O'Neill adds. "Selfishly, it made my life easier to just have one rule, one regulation, one policy."

"Look at your program and ask, 'Do we have ethics embedded in what we're doing – in all of our codes, all of our standards?' What are we doing on a daily basis to prevent, attack, and correct any issues?"

– MAEVE O'NEILL

National Compliance Director, Circa Behavioral Healthcare Solutions



“You can work with other policy owners to create the best policies, but if staff can’t understand them, interpret them, or easily apply them to their day-to-day functions, they are not valuable.”

– LISA HEROTA

Senior Director of Compliance & Privacy,
Vail Health

Revenue Protection

Revenue protection is another tangible area where Compliance adds value.

“When I look at revenue protection, I consider how to make sure we’re protecting the integrity of the revenue that we’re getting,” Lisa Herota says. “With increased salary and supply expenses as well as changes to reimbursement and payor shifts going on, our executive team is feeling the pressure of revenue protection, like most healthcare organizations. Compliance plays an instrumental role in maximizing revenue through ensuring accurate and proper billing.”

She says it’s daunting to make sure her organization won’t have to give back in an audit. Ensuring that everyone is billing and coding correctly is also tough.

“We have several different types of organizations in our system, and as a department of three, it can be challenging to figure out how on earth I’m going to audit all these different areas,” Herota says.

She shares how to keep it manageable: “Piece it out to keep it from becoming overwhelming; you don’t have to do everything all at once.”

“Use your risk assessments to help focus and narrow your scope,” Herota adds. “Start when a patient enters your organization. Are the consent forms being done? Are they being signed in the timeline that they’re supposed to? Are you getting the expected reimbursements?”

She adds, “My Compliance team works closely with operational leaders over our various service lines to complete end-to-end Revenue Cycle audits so we can address gaps

throughout the entire patient experience. We’ve identified areas where consents aren’t being signed all the way through to modifier concerns – all impact the organization’s ability to bill for services and receive full reimbursement.”

Herota says that you can’t identify all the gaps, but you can look for holes and where you need to focus. Focusing on one area makes it less overwhelming, as does partnering with internal and external experts.

“We can’t know everything in Compliance,” Herota adds. “We do audits internally and rely on our subject matter experts whenever we can. But if we can’t, we go to external auditors.”

In Brett Short’s academic setting, Compliance protects revenue by helping operational colleagues be good at what they do. Short adds that it’s helpful to avoid surprises in terms of revenue.

“We’re one of the most transferred-to hospitals in the nation, in a poor part of the country,” Short says. “If we’re spending all our time on investigations, we can’t protect the sickest people in the state.”

Maeve O’Neill shares how she helped her organization protect revenue during a routine quarterly mock audit.

“My best and worst example of a mock audit is one I conducted with a former employer,” O’Neill says. “It was the seventh or eighth mock survey I’d done with them. We did audits quarterly and discovered something new every time. But this was the biggest dollar value I’ve ever uncovered in an audit.”

As she went through her usual process of doing chart reviews and looking for any issues with documentation, it came to light that months’ worth of invoices had not been billed.

“It was simply because the Billing department had not done it,” O’Neill says. “The invoices were sitting there ready to be billed. But we were in the midst of taking on new patients and adding new programs, and the invoices were overlooked. And we didn’t have the right systems in place to say, ‘How long can an invoice go without being billed?’”

She adds, “When we totaled up the unbilled services, it ended up being \$9 million.”

People were shocked and embarrassed by the amount, O’Neill says.

“There was definitely some frustration,” O’Neill says. “But once we got past the initial shock, everyone was grateful that we caught it so we could address it and move forward.”

O’Neill says that transparency from leadership is critical for successful audits.

“My goal with audits is to normalize whatever happens, so that regardless of what we find, no one needs to be defensive,” O’Neill says. “It’s about creating a healthy culture where people aren’t penalized for audit results. And in this situation, nobody got in trouble. The unbilled services certainly were not due to any one person’s fault or incompetence.”

She says their first step was taking care of the billing.

“The payor also came and did additional audits,” O’Neill adds.

Then they reviewed processes, and asked questions such as, How did this happen? Where did this communication fail?

After a thorough look across the organization did not uncover additional issues, O’Neill worked with operational leaders to put corrective actions in place across the system.

They established more controls and added more checks and balances, including a monthly billing report to identify what was and wasn’t billed – and why – and what’s pending. Another addition was a monthly meeting to review whether anything was missed.

“That’s one of the beauties of uncovering such opportunities,” O’Neill says. “It pushed us to look everywhere to see what else we could improve. You never know when a routine activity – like a mock audit – will uncover revenue and, in turn, protect physicians and people. I don’t want to be the one to find that, but if I do, it can be a plus.”

Hiring and Retention

Employee hiring and retention is another area where Compliance makes an impact. Brett Short says that attracting and retaining employees is more important now than ever.

“As an employer, we have to differentiate what’s better about our facility than a competitor’s facility, and it comes down to culture,” Short explains. “Nobody wants to work at a place where they are afraid. Compliance can help create a healthy organization that does not operate in fear. Our role is to help impact and influence culture; it’s not just about having compliance expertise.”

O’Neill agrees and says compliance officers should prioritize employee wellbeing.

“I’m a big believer in making sure we’re integrating wellbeing for our staff,” O’Neill says. “The mantra I play in my head is, ‘Happy and healthy staff are ethical and compliant to provide quality and safe care.’ If they’re not happy and healthy I can’t tell them, ‘Just be compliant and provide quality care.’”

O’Neill adds, “My job is to help that happen. I see a culture of compliance as taking care of people. Are staff burning out? Is there a lot of turnover? Is there a toxic culture in the organization or within a team? And if so, what are we doing about it?”

She says employees can tell when they’re working in a healthy culture, even if they can’t articulate it.

“People look at Google to see employee reviews on Glassdoor and other sites before they interview, and they indeed see culture when they’re hired” O’Neill says. “Employees know what it feels like when the culture is right and good.”

Lisa Herota partnered with Human Resources (HR) on hiring processes and aligning leadership competencies with organizational values. She says collaborating with HR enabled her organization to show employees that no matter what their role is, compliance is important.

“Partnering with HR demonstrates the organization’s commitment to compliance and ethics,” Herota says. “And it helps ensure that the organization hires people who will uphold its mission, vision, and values.”

First, she partnered with HR to develop standard interview questions assessing an ethical and compliance focus. Sample interview questions and follow-ups include:

- What do you believe compromises ethics in the workplace? Follow up: How do you handle situations where ethics have been or might be compromised?
- Have you worked for a company that had a code of conduct? Did you have positive or negative experiences related to the code of conduct? Follow-up for a leadership role: Give an example of a situation involving one of your direct reports who violated or compromised the code of conduct and how you handled the situation.

“Partnering with HR doesn’t mean Compliance is at every interview,” Herota adds. “However, there’s an exception to this: It’s important for Compliance to be included in executive-level leadership interviews to start building relationships.”

Herota says this also reinforces that the organization values compliance, expects ethical behavior, and supports leaders in these areas.

“Another way I reinforced this is by collaborating with HR to build leadership competencies,” Herota says. “We incorporated the competencies into our organization’s merit increases and goal planning”

She adds: “Connecting the incentive structure to the skills, behaviors, and attributes we want our leaders to demonstrate ensures that they’re aligned with the organization’s mission, vision, and values. It’s a meaningful way for Compliance to shape culture.”

Herota emphasizes that it takes extra effort to put the mission, vision, and values at the heart of your work.

“Sometimes it means being willing to take a risk and stick your neck out,” Herota says. “It may mean making the first move, especially if you don’t have a strong relationship with your organization’s HR leaders. Start by reaching out to them. A good opening question to ask is, ‘How can Compliance partner with HR to make the screening process better and add a focus on compliance?’”

If you don’t have that relationship with HR, Herota recommends finding operational leaders who you’re comfortable with and who want to change their own departments.

“Partner with them on shifting their leadership styles or incorporating compliance into their respective interview processes,” Herota says. “Once you start shifting an operational area’s culture and influencing their processes, your HR team will notice the changes. And the operational leaders you partnered with can help champion the changes with HR.”

Herota stresses that it’s worth the effort to build relationships and show colleagues that Compliance is there to partner with them in all aspects of the business.

“The key to success in our role as compliance professionals is looking at how we can shape the culture,” Herota says. “It’s critical to get out of your office and engage with the rest of the organization. Ask how you can improve things.”

She says it doesn’t have to be a huge initiative.

“Just reach out and start asking questions like, ‘What keeps you up at night?’” Herota advises.

What’s important is your willingness to be a genuine partner and put in the work, she says.

“Bring questions to the table as well as suggestions and solutions,” Herota says. “That’s what true partnership looks like. My willingness to get into the trenches of operational leaders’ workflows and their problems has been the key to my success.”



“When I look at revenue protection, I consider how to make sure we’re protecting the integrity of the revenue that we’re getting... Compliance plays an instrumental role in maximizing revenue through ensuring accurate and proper billing.”

—LISA HEROTA

Senior Director of Compliance & Privacy, Vail Health

“We’re one of the most transferred-to hospitals in the nation, in a poor part of the country. If we’re spending all our time on investigations, we can’t protect the sickest people in the state.”

—BRETT SHORT

Chief Compliance Officer, UK HealthCare,
University of Kentucky



Patient Care

Compliance can also shape the patient experience and create a culture where delivering superior care is valued.

“When employees are educated and trained in an ethical and compliant way, this comes through in the decisions they make on a day-to-day basis and in the care they provide to their patients,” says Lisa Herota.

She says it comes down to making sure employees know what the policies are and how to follow them. Compliance’s role with the patient experience is making sure that employees know what the expectations are, what the rules and guidelines are, and how to implement those in their day-to-day choices.

Maeve O’Neill recommends relying on Compliance hotline data to support patient care.

“The hotline tells us if the care isn’t good or if there are ongoing issues to address,” O’Neill explains. “I look at the data to identify themes among certain departments, teams, or even individual people.”

O’Neill advises examining data from patient surveys, staff exit surveys, annual employee surveys, and pulse surveys.

“We often don’t take the time to look at the data in these surveys,” O’Neill says. “But a lot of times, if there’s something going on from a patient care standpoint, the story is there in the data.”

She says when survey data shows that a department is doing a good job taking care of patients, recognize their efforts and highlight their work across the enterprise.

“Or if there’s a problem, get ahead of it and prevent it,” O’Neill says. “It’s about working with the source of the data – whether it’s the patient or a patient’s loved one – to resolve the issue. It shows that we’re not perfect, but we’re responsive.”

Avoidance of Fines

Reducing fines is another area where Compliance delivers value, as Maeve O’Neill knows from her efforts conducting mock audits.

“Mock surveys certainly minimize the risk, and they improve the likelihood that you are meeting all relevant regulations because you’ve had a chance to talk through issues and problem solve across operational areas,” O’Neill says.

She adds that mock audits are also an opportunity for Compliance to find areas for improvement: “By building in predictable processes, we’re creating healthier cultures that are more compliant and more financially stable, with fewer fines and lawsuits and less wasted money.”

Lisa Herota says highlighting data from your regulatory change management system is another way to show how Compliance helps prevent fines.

“It’s all about metrics,” Herota says. “My CEO is very data driven. When I go to him and say, ‘Look at the 594 regulatory changes and the number of compliance issues coming in,’ he can see the significant administrative burden we’re dealing with.”

Herota also recommends shifting the focus from fines to helping employees understand the risks associated with corporate integrity agreements and potential fine situations. She emphasizes the positive consequences of Compliance’s work.

“You might not be able to quantify it or put it in an annual report, but you can infuse a conversation and get leaders’ attention,” Herota says. “Use it to reinforce the value of the work Compliance is doing.”

“I encourage acting in an ethical manner because it’s the right thing to do, and then we won’t have to worry about fines,” Herota adds. “If you focus on creating partnerships across the organization, Compliance isn’t just the bad guy enforcing rules.”

Three Keys To Shaping A Strong Compliance Culture

Strong cultures may look different across healthcare organizations, yet they share similar characteristics.

“A healthy culture of compliance is one where the CEO all the way to front-line staff knows the rules, the policies, the code of conduct, what is correct behavior and what isn't,” Lisa Herota says.

In strong cultures, everyone wants to ensure that rules are followed because they see value in them.

“It's about everyone understanding the impact that acting ethically has on their patients, themselves, and the organization,” Herota says. “The way to get to this point is by Compliance truly being a partner to the organization.”

1. Demonstrate and communicate the value Compliance creates

To shape a strong culture, Herota says compliance professionals must prove how they deliver value.

“We need to create the view throughout our organization that we are not the department where ideas go to die,” Herota says. “People should feel that Compliance is their partner, not the police. We have to show how we're here to help and support them.”

She says rather than shutting down colleagues when they present a proposal with, “You can't do that,” work with them to understand what their plan or program is trying to accomplish. Then partner with them to accomplish their goals in a compliant and ethical way

By better understanding their goals, you can say, “Yes, you can do this in some form or fashion, and [here are the guardrails.](#)”

Herota says to establish a healthy culture, Compliance must be a department that people are willing to come to.

“Having a culture of compliance means staff and leaders want to engage Compliance and know how to do things the right way before making the decision – instead of only when something goes wrong,” Herota says.

Shaping a culture of compliance involves bringing the organization's mission, values, and strategies into every aspect of your work, from HR projects to leadership meetings.

“Be willing to do the work to put your organization's mission, vision, and values at the heart of your work,” Herota says. “You have to be willing to take a risk and stick your neck out.”

She says that building relationships is fundamental to creating a culture of compliance.

“You've got to get out of your office to shape a culture of compliance,” Herota says. “It's hard when you're a department of one or you don't have much staff. But in order to create a culture of compliance, you have to be present throughout the organization.”

She says it's helpful if you can get a seat at the executive table. However, there are workarounds if that's not an option.

“If leadership doesn't welcome you, get out and round,” Herota advises. “I have a department of three. One employee does rounds and engages with teams to find out what's keeping them up at night. He then gives that feedback to my director, who reaches out to the respective department leader and asks to attend a staff meeting.”

Herota says her director then shares a presentation with takeaways from the rounding, addressing any concerns brought up and tailoring education as needed.

“You've got to be willing to get out there and connect with people,” Herota emphasizes. “Put yourself out there so colleagues can see who you are and develop a partnership.”



“When we totaled up the unbilled services, it ended up being \$9 million.”

— MAEVE O'NEILL

National Compliance Director, Circa Behavioral Healthcare Solutions

Another way to shape culture is through incentive programs. The Department of Justice recently updated its guidance on [how Compliance shapes incentive structures](#).

Maeve O'Neill says the DOJ memo can add credibility to Compliance's proposals to align incentive and compensation plans with the organization's vision and values to shape a strong culture.

It may mean basing an executive's bonus on accuracy of audits or other operational considerations rather than purely on revenue. This can be an effective way for incentives to communicate the organization's priorities – and to align them with the culture.

Also, compliance officers can help executives and board members better understand how different incentives lead to different standards of behavior.

As Lisa Herota points out, "It's not going to look the same for everyone."

"Being a state entity, it's difficult to incentivize people given our regulatory environment," Brett Short says.



"It's about creating a healthy culture where people aren't penalized for audit results. And in this situation, nobody got in trouble. The unbilled services certainly were not due to any one person's fault or incompetence."

–MAEVE O'NEILL

National Compliance Director, Circa Behavioral Healthcare Solutions

He adds, "Develop a plan and document your efforts because it's better to show that you tried, even if leadership decides not to take your plan. We have a responsibility to help the CEO make reasonable decisions on compliance and incentives."

"Brett's story emphasizes the differences in organizations," Herota says. "When the DOJ's new guidance came out, I sent a note to my vice president of HR, and HR was already on it. HR is restructuring our incentives to tie them to leadership competencies, and not just at the leadership level. Compliance is part of building that structure. We're rolling out a new incentive plan throughout the entire organization."

Herota says the differing approaches demonstrate the importance of knowing your industry and your organization.

"Know whether or not you're going to have an uphill battle when new regulations come out," Herota says. "Don't be overwhelmed by it, whether you're taking baby steps or giant leaps – just take a step toward some sort of implementation. You have to understand the style of your organization and work within it, especially with guidance documents from the DOJ."

Herota recalls how her understanding of the organization – as well as the strong relationships she cultivated – enabled her to effectively influence culture when dealing with "the burden of cybersecurity."

Last year, her team responded to a cyber issue by creating a simulated phishing email platform as an educational tool. When she presented the platform for approval to executives, it included increasingly punitive sanctions if employees clicked a link, responded to an email, or opened an attachment.

Executives asked for more aggressive sanctions, including immediate termination. They likened it to not allowing an employee to set a fire in the operating room more than once.

Herota pushed back, explaining that employees first need education – whether it's on preventing a fire or avoiding a phishing scam. They compromised on starting with a four-step escalation program.

"We're now 10 months into the program, and we've only had two employees who have gotten to that third level of failed interactions," Herota says. "We have reduced our phish-prone percentage from over 30% to under 1%. It proves that educational training does work."

2. Effectively measure culture

Showing Compliance's impact on culture involves using the right measurements and metrics. Maeve O'Neill notes multiple quantitative metrics to gauge how the culture is helping the organization better manage and control risk.

"You can use data from staff surveys as well as look at patient outcomes, staff burnout, and performance" O'Neill says. "If you have ethical compliance then you might have less staff burnout; if you do have staff burnout, you have work to do. Staff burnout may indicate there are issues with how we comply with rules around staffing, for instance."

In a recent presentation to the Joint Commission, O'Neill proposed standards for how the healthcare field measures and responds to staff burnout.

"In my last role, I was in a large health system, and we did ProQOL – professional quality of life – for our physicians but not our overnight staff, therapists, or night techs," O'Neill says. "Why do we do that only for certain groups of people instead of all of our staff?"

O'Neill says it should be measured for all staff, and organizations should address any issues identified.

Lisa Herota shares additional measurements for gauging the effectiveness of a culture of compliance.

"At an HCCA basic healthcare academy I attended a couple years ago, they gave guidelines on how to measure effectiveness across all seven elements of compliance," Herota says. "For example, to measure general program effectiveness, one approach they recommended was an employee survey."

The employee survey should include questions such as:

- Do employees know who the compliance officer is?
- Do employees know how to report compliance concerns?
- Do employees have a fear of retaliation if they report?
- Do employees know what the Code of Conduct is and how it applies to them?
- Do employees feel their leaders and managers support a culture of compliance?

"Nobody wants to work at a place where they are afraid. Compliance can help create a healthy organization that does not operate in fear. Our role is to help impact and influence culture."

– BRETT SHORT

Chief Compliance Officer, UK HealthCare, University of Kentucky



3. Embed regulatory change management process

Creating a culture with effective training and measurement includes successfully handling everyday processes, such as regulatory change management. Developing a scalable, repeatable process for managing regulations across the organization is another critical way Compliance shapes culture.

Establishing a process includes everything from tracking regulations so you know what's changing, deciding which regulations apply to your organization, managing what needs to be done to comply, and verifying the required changes have been made. With an effective regulatory change management process in place, you're free to spend time on more value-creating activities, such as building relationships.

Brett Short acknowledges it can be challenging to know where to begin with regulatory change management.

"If you're just getting started as a compliance officer or you're an army of one, get a plan together," advises Short. "Prioritize what's on your list. And by this time next year, if you've knocked 10 things off that list of 200, it's not a terrible thing. It's about baby steps, having a plan, and putting it in place."

He also emphasizes developing strong relationships across the organization.

“Building relationships helps so that when those regulatory changes come in, you can reach out to the right people,” Short says.

In addition to cultivating relationships internally, he says building relationships outside of the organization can guide how you handle regulatory change management.

“Meet with other people and listen to webinars,” Short says. “Talk to people in other hospitals or other companies like yours. Rely on industry communities, like HCCA, to help grow and connect you on your journey.”

Maeve O’Neill echoes the importance of learning from others in the industry.

“It helps to be a regulatory nerd,” says O’Neill. “Go to conferences, see what’s changing, and update your policies and practices based on what you’re learning. Integrate it into new employee orientation or compliance trainings.”

O’Neill says embedding regulatory change management into your culture helps demonstrate how Compliance adds value: “When a new regulation rolls out, I just put it into the various part of my plan or program, so nobody else has to do that or figure it out. I’ve done it for them and I’m adding value.”

Lisa Herota handles regulatory change management differently.

She says, “All of our operational leaders subscribe to a listserv, and they get their regulations from folks who are certified in their respective areas.”

Herota developed her approach after her CEO asked, “How do we know what we don’t know? How do we keep our eyes on this entire enterprise and wrap our heads around all the regulatory changes for this health system?”

After Herota conducted research, she implemented a new software solution to track changing and new federal, state, and local regulations. It also greatly facilitates the organization’s implementation and creates a database of record.

“Our department of three assigns those regulations out to the operational leader,” Herota explains. “Let them do the reviews and then tell you, ‘Yes, we’ve got a policy; here’s what the policy is.’ Or if it’s a change to a regulation, let them decide how we need to change the policy and then they can report back in the system to show what they’ve done.”

Her system makes it easy to use metrics to show Compliance’s value.

“I can run reports out of the system and take them to my board,” Herota says. “I showed them that in 2022, we touched 594 regulatory changes. When I showed them that and demonstrated through the data exactly what we do, it truly showed the value of a very small department. It was pretty significant for our organization, especially for board members who didn’t really understand what Compliance does or the value we bring.”



“You’ve got to be willing to get out there and connect with people. Put yourself out there so colleagues can see who you are and develop a partnership.”

— LISA HEROTA
Senior Director of Compliance & Privacy,
Vail Health

Conclusion

Quantifying the value Compliance delivers and demonstrating it to leadership can be especially challenging in healthcare organizations without top-level support. Yet as our experts shared, there are ways to effectively demonstrate Compliance's impact and to shape a strong culture.

Start by using the [OIG's seven-elements](#) as a foundation for delivering effective compliance and for metrics in demonstrating how Compliance adds value. Also, partner with operational leaders to show Compliance's value in four additional key areas, including revenue protection, hiring and retention, patient care, and avoidance of fines.

Earning recognition as a value creator helps set the stage for shaping a strong culture of compliance. A healthy culture, with effective training and measurement, enables the organization to better manage and control risk.

You can successfully build a strong culture by prioritizing efforts to:

1. Demonstrate and communicate the value Compliance creates
2. Effectively measure culture
3. Embed regulatory change management process

Concentrating on these key areas – along with focusing on the five tangible areas where Compliance adds value – can empower you to double Compliance's impact. Proving Compliance's value to leaders and influencing culture positions the organization for growth and success by helping to better manage and control risk.



“Develop a plan and document your efforts because it’s better to show that you tried, even if leadership decides not to take your plan. We have a responsibility to help the CEO make reasonable decisions on compliance and incentives.”

–BRETT SHORT

Chief Compliance Officer, UK HealthCare, University of Kentucky

About the experts



LISA HEROTA
Compliance and Privacy
Officer at Vail Health



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



BRETT SHORT
Chief Compliance Officer, UK
HealthCare, University of Kentucky