Surviving as a Compliance Officer Wearing Multiple Hats
24th HCCA Compliance Institute
Nashville, Tennessee
March 29-April 1, 2020
Objectives

- How Did We Get Multiple Roles?
- Positives and Negatives
- How To Make It Work
- Multiple Bosses
- Take Care Of You

What Are Your Roles?
How Did We Get Here?

- Size of the Organization?
- Finances?
- Lack of Understanding?
- “You are good at everything!”

Multiple Role Examples

- Compliance/Risk Management
- Compliance/Privacy
- Compliance/Quality
- Compliance/HR
- Compliance/Chief Operating Officer
- Compliance/Infection Control
- Compliance/HIM
- Compliance/CFO
- Compliance/Legal
### OIG Guidance

- No “one size fits all”
- Adequate budget and resources
- Authority to carry out duties
- Reporting structure allows for unfettered access to the Board
- All of management supports the compliance program
Positives and Negatives of Multiple Roles

Positives

- Time
- "In the Loop"
- Building relationships
- Empowering others at all levels
- What are other positives?
Negatives

- Time
- Depth of knowledge
- Multiple tasks with multiple deadlines
- Lack of support
- Education is always on the chopping block
- What are some others?

“feels like juggling shards of glass”
How to make it work
Clearly Define the Various Roles

- Job Description
- Tasks
- Required meetings for each role
- Reporting requirements
- Risk Assessment—patient safety, legal, financial, reputational
  - Prioritize

The Compliance Lens
Build Relationships

- Engage the workforce in your organization
  - Leaders: What works? What is the view? What are their needs?
  - Is there a reliable “go to” person within the department to serve as a Liaison?
  - Incorporate the assistance and contributions from subject matter experts
  - Conflict is inevitable—mitigate
  - Be approachable—not the “police”, point out what is right
  - Be available—rounding, attend department meetings
  - Clear concise communication with all parties
Credibility

- Education and certification
- Research
- Incorporate subject matter experts
- Network
- HCCA, COSMOS, Conferences, Webinars

Multiple Bosses
Toxic Characteristics

- Insecure
- Manipulative
- Passive-Aggressive
- Micro-manager
- Martyr

Ideal Characteristics

- Secure and Present
- Self Actualized
- Transparent
- Healthy Empathy
- Respectful
- Educator
Communication

Educate, educate, educate—offer solutions

Propose scheduled meetings with all supervisors—what’s in the hopper?

Have the supervisors work out differences—don’t get caught in the middle

Share your calendar/projects

Know when to say “uncle”

Prioritize

Eisenhower Matrix

Urgent

Important

DO

Direct Attention

Decide

Do it Now

Not Important

Urgent

Delegated

Who Can Do It For You?

Not Urgent

Not Important

Delegate

Who Can Do It For You?

Important

Important

Important

Delete

Eliminate It

Delete
Is Your Program Effective?

- Seven Elements
  - Written policies and procedures/Code of conduct
  - Compliance Officer and Compliance Committee
  - Education and training
  - Method of reporting, including anonymous
  - Monitoring and auditing
  - Investigations and remediation
  - Well publicized disciplinary guidelines

There is an 8th Element—Effectiveness

- Documentation:
  - Policies, plans and other documents
  - Regular self assessments
  - How does it relate to other departments
  - Compliance committee and board resolutions, agendas and minutes
  - Compliance training and communications initiatives
  - Hotline information, logs and “in person”
  - Auditing and Monitoring-trends, corrective action
  - Case summaries of incidents, including self-reporting and disclosures
  - Evidence of corrective action—continuous evaluation
Measuring Compliance Program Effectiveness: A Resource Guide


HCCA-OIG Compliance Effectiveness Roundtable
January 17, 2017

It is not a checklist, but a guide to measure your program

Program measurement options

What Does My Organization Project

- Is Compliance woven into the fabric of your organization?
Established Culture

- Accountability among senior leadership
- Unfettered access to the Board
- Compliance and ethics are part of the tapestry that makes up your organization
- Compliance is part of operations—what can we do instead of "no"
- Consistent monitoring and evaluation—is it still working?

Take Care of Yourself

BUT DID YOU DIE?
Don’t Forget to Breathe

Fill Up Your Tank........
You Are Not Alone……
Questions???