Moving Your Compliance Program from Check the Box to Strategy

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Help us evaluate our compliance program. What do we need to do to be successful?

➢ What is the strategy for your Compliance Program?

Help us evaluate our compliance program. What do we need to do to be successful?

➢ Your Compliance Program budget is $xxx.xx. What are you hoping to accomplish by spending the budgeted funds?

➢ You’ve been asked to explain your compliance officer’s role to him/her in three sentences or less. What will you tell the compliance officer?
How did they answer?

- I don’t know
- No one has ever asked us to think about compliance in that way
- Make sure we are “in compliance”
- Keep me out of jail

What are the appropriate strategies for a compliance program?

| The utopian dream (e.g., “quality healthcare experience for all”) |
| The “what,” “why,” and “how” (e.g., “To create access to quality health for the greater Gotham area by establishing a world class health system.”) |
| Measurable broad goals (e.g., “Make primary care available within 5 miles of every Gotham citizen.”) |
| What will be achieved (e.g., increase primary physician coverage to levels above HRSA’s HPSA designation of 1:3500) |
| How strategies will be achieved (e.g., recruit 10 new primary care physicians) |
| SPECIFIC: action steps, responsible parties, due dates, required resources, barriers, collaborations |

Vision

Mission

Objectives

Strategies

Tactics

Action Plans

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What are the appropriate strategies for a compliance program?

- Prevention
- Detection and Correction
- Defense

What are the appropriate strategies for a healthcare compliance program?

- Stark & AKS
- Privacy & Security
- Revenue Cycle; Billing & Coding

How do you help your organization think differently? Some ideas:

- Create a crisis?
- Provide information about ALL of the issues?
- Bring in an expert!
- Send them to training!
Thinking Differently: The Important Role of Leadership

“Culture is a shared set of attitudes, goals, behaviors and values that characterize a group. It is how things get done in a company, and it influences the entirety of the employee experience — and therefore the customer experience... and the CEO must constantly observe and manage for the culture he wants.

In my opinion the most critical word in definition of culture is values. It is the CEO’s job to ensure that a company’s values are applied consistently from top to bottom, across all departments. No person or group can be exempt.”

The CEO Tightrope: How to Master the Balancing Act of a Successful CEO, Joel Trammel (2014)

Thinking Differently: The Importance of Leadership

- Reporting & Working Relationships
- Board Oversight Committee
- The Executive Level Compliance Committee
Thinking Differently: Clear Assignment of Responsibility/Accountability

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Thinking Differently: The Programmatic Nature of Compliance – Understanding the Elements as Part of a Unified Program

- Leadership
- Written standards
- Training & communication
- Auditing & monitoring
- Risk assessment
- Screening - personnel & business partners
- Reporting mechanism (e.g., hotline)
- Investigation & response

Thinking Differently: The Importance of Involving Leaders in the Risk Assessment and Work Plan Planning Process

- Understanding the risk environment
  - External environment
  - Knowing your organization
- Providing context to assist leaders in prioritizing identified risks
  - Data is key
  - Concrete measures matter!
- Workplan: It's not just an audit plan!!
  - Target the controls environment
### Thinking Differently: DASHBOARDS

Establishing Targets, Measuring Achievements, Reporting and Creating Accountability

- Core Compliance Program Operations
  - training completion
  - policy review
  - average days to close an investigation
  - compliance audit plan performance
  - cost of investigations/audits

### Thinking Differently: DASHBOARDS

Establishing Targets, Measuring Achievements, Reporting and Creating Accountability

- Work Plan Focus Areas
  - physician contract renewals
  - appropriate admission orders
- Corrective Action Plan Implementation
  - implementation/completion by due date
- Connecting Compliance Metrics to Performance Evaluation and Compensation
Thinking Differently: Establishing Targets, Measuring Achievements, Reporting and Creating Accountability

What gets measured gets done

Thinking Differently: What Compliance Officers Should Understand

- Understand compliance risks from your leadership team’s perspective
- You are responsible for the compliance program – NOT for whether the organization is “in compliance”
- Perfection probably isn’t attainable
- Rome wasn’t built in a day

DISCUSSION/QUESTIONS