

Compliance Program Effectiveness in a Time of Healthcare Transformation

HCCA Regional Conference
November 2017

Jenny O'Brien
UnitedHealthcare Chief Compliance Officer

Keeping Up with a Moving Target

Top Risk Considerations in Health Care:

- **Culture Risk**
 - Determines decisions, conduct, risk tolerance
- **Cybersecurity**
 - Beyond cyber incidents and security risks
- **Third-Party Management**
 - Vendors, Research Partners, Revenue Cycle, IT, Sales Channel
- **Data Analytics**
 - Embrace, embed, apply and report
- **Integrated Assurance**
 - Business partners, Internal Audit, Compliance (who is the 1st, 2nd, 3rd line of defense?)

Keeping Up with a Moving Target

Top Risk Considerations in Health Care (cont'd):

- **Regulatory compliance**
 - Increasing number of regulations, more robust enforcement, impact on business operations, increasing mergers and acquisitions
- **Governance**
 - Transparency and accountability for compliance issues
- **Impact of Policies/Politics**
 - Need to remain flexible, nimble, agile
- **Reporting and Escalation**
 - Simplify reports that provide data driven insights
- **Strategic Alignment with Business Priorities**
 - Drives risk assessment and compliance work plan

Finding the Right Formula

Guiding Principles:

- Our program translates our values into actions
- Business operational leaders are responsible for compliance
- We will develop a strategy for effective compliance and support business leaders in implementing that strategy
- Our regulatory relationships are fundamental for our organization's success
- We will create clear accountability around compliance and foster open, honest and clear communications about our outcomes

Finding the Right Formula

- Compliance model follows the business model
- Lifeguard vs. Cop
- Scope of Compliance Program
- Change the Dialogue
- Compliance as a "flashlight"

Moving the Me



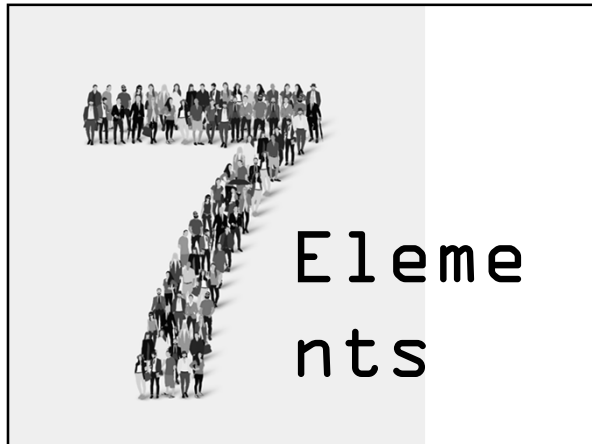
The Art of Persuasion

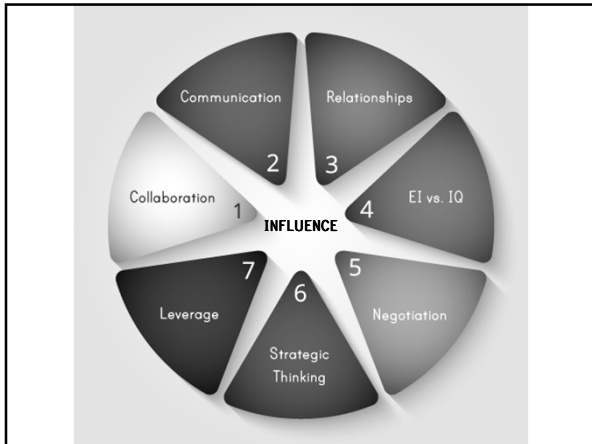
- Building Relationships
- Communicating Strategies
- Ensuring Accountability/Ownership
- Reporting Results

Influencing Change Influencing Decision-Making

*“The secret is to always
let the other person
have your way.”*

Claiborne Pell





COLLABORATION

- Know, acknowledge and use skills of others
- Let others give what they can, fill in gaps
- Document roles, tasks and expectations

COMMUNICATION

- Know Your Audience
- Objective vs Subjective
 - Be Relevant

RELATIONSHIPS

- Rapport and Trust
- Investment of Time
- Likeability and Reciprocity

EI vs IQ

- Self-Awareness and Humility
 - Measured
- Optimism, Curiosity, Passion

NEGOTIATION

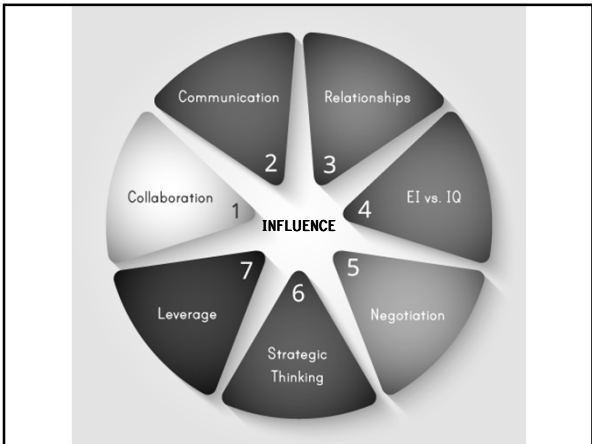
- Don't talk, ask questions and listen
- Determine what they need but didn't ask for
- Package solution giving more to both sides but drop sticking points

STRATEGIC THINKING

- New vs Old School thinking list
- Stay focused on mission
- Consider ROI of every effort

LEVERAGE

- Vision and Implementation
 - Value Proposition
 - Reciprocity



Let's Talk About Skill Set

- **Challenge Yourself**
 - Can you own the room?
 - Do you have courage of conviction?
 - Do you have great communication skills – especially active listening?
 - Can you change language, tone, pitch to suit audience?
 - Can you read people?
- **Top Ten Skills List**
 - Visibility
 - Rapport
 - Transparency
 - Impose Rigor
 - Role Model
 - Don't Overstep Your Role
 - Persistence
 - Analytical and Objective
 - Poker Face
 - Informal Power



Thank You!

jennifer.obrien@uhc.com
