

# Strategies for the Compliance Officer in Co-Managing Key Risk Areas with the C-Suite

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## AGENDA

- Building relationships and partnerships with compliance owners within the business
- How to drive culture into decision-making
- Get a seat at the table early on and often
- Proactively articulate the strategic value that compliance can deliver



## Compliance Officer Questions

- What is my role?
- How do I navigate in my culture?
- How do I add value?
- How do we deal with those who push back and other bad habits?
- What is the legal obligation?
- What is the “right” answer and what is the obligation?
- How do we avoid making things worse?



## Overarching Keys to Success

- Establish a relationship of trust and mutual respect
- Communicate frequently and articulate “the why”
- Understand and promote how compliance adds value to the business and brings a competitive advantage to the organization/company
- Provide the CCO with a seat at the table (early and often)



## ...Overarching Keys to Success (continued)

- Increase the CCO's awareness of strategic initiatives and priorities
- Define leadership roles
- Develop strong and collaborative relationships
- Provide sufficient resources for Compliance initiatives
- Celebrate small victories and showcase them
- Measure what matters and use data along with anecdotes

## Support from Senior Leaders

- Compliance is a team effort
- The CCO must be a valued team member
- C-level leaders must openly support and endorse the CCO and the Compliance Program
- C-level leaders have to walk the walk
- Compliance is best viewed as a business imperative



## Dealing with Stakeholders...

- Who is kept informed and what are they told?
- Whether and how much to pay back?
- Personnel actions.
- Policy changes.
- Who is responsible for...
  - fixes?
  - noncompliance?
  - follow-up?



## Maintaining Credibility

- Don't cry wolf
- Don't shoot from the hip
- Focus on core competencies and know when to seek internal or external expertise
- Avoid the tag of perennial naysayer
- Be passionate, flexible, and open-minded
- Recognize stakeholder needs and perspectives
- Give stakeholders a voice and **listen**



## Gaining Compliance Commitment

- Walk the walk
- Don't play favorites
- Articulate potential risks and potential financial and reputational harm to the company
- Avoid being known as Dr. No
- Use the nobody's looking test
- Provide a forum for open dialogue and questions
- Do not sweat the small stuff



## Delivering Unfortunate News

- Setting the stage appropriately and timely.
- Conditioning for flexibility.
- Locking in commitments to “do the right thing” early.



Expectations are the Seeds of Resentment. . . .

## Common Pushback Themes

- We are an ethical organization.
- It will never happen to us.
- Fix it and forget it.
- Compliance is an unnecessary evil.
- Compliance is the Revenue Prevention Department.



## Challenges We See

- Role Definition
- Burn Out
- Fire fighter
- Master of all, master of none
- Blame game
- Sheriff vs Mayor



# Compliance Challenges

- Fear and lack of understanding of CCO's role
- Compliance viewed only as "Dr. No" or "Revenue Prevention Department"
- Can't shoot from the hip. Must develop an Annual Work Plan with associated deadlines and accountability to make meaningful progress
- Misconception that only the CCO is responsible for compliance
- Compliance seen as an impediment, not an organizational protector or strategic partner



# Recipe for Success

- Build and develop relationships
- Serve as a trusted, thoughtful, insightful partner
- Celebrate small victories and showcase them
- Find compliance champions
- Be human and personal but don't take things personally.
- **Communicate clearly, simply, and often**
- Compliance is a competitive advantage
- Can't boil the ocean



## Culture Matters

- Culture! Culture! Culture! – not just paper and processes
- Culture of fear? Culture of going along? Culture of blame?
- Are probing questions welcome?
- Is transparency important?
- Is self-assessment valued?
- What gets rewarded and recognized?
- What is the tone at the top and mood in the middle?
- What feedback loops exist?



## Successful Attributes of a CCO

- Passionate
- Change Agent
- Trustworthy
- Understand the business and the vision
- Approachable
- Level-headed, not impulsive and frantic
- Communicate well with C-levels and with all employee levels
- Avoid being labeled as Dr. No but rather viewed as a thoughtful and **responsive** leader





# Articulate the Value of Compliance

- Consider the multiple audiences: Board, Leadership Team, Management, Per Diem Staff, Nurses, Billers, Coders.....
- Keep the message simple
- Use data for support
- Use anecdotes
- Use headlines and press releases
- Use technology advances
- Show progress
- Celebrate successes!!
- Recognize and reward ethical conduct and hitting compliance goals/targets



## QUESTIONS???



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