



**Local expertise,
regional teams,
and multinational
compliance**

an interview with
Jonathan Turner

by Tish Henderson, MSIT, CHC, CCA

Compliance project management 101

- » Guidance is available to help you tailor a sound compliance program.
- » Employing some basic organizational steps can lend credibility to compliance programs.
- » Designing a mission and goals-rich compliance program is a smart move.
- » Using a step-by-step process will help make project management easier.
- » The hardest thing to do before starting your project is to make the commitment to do it.

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At a recent conference, I met a few people who asked curiously about how to move a compliance program from paper to electronic. Although there is no easy answer that can adequately be shared over lunch, there are simple steps for managing large projects, and as a result of our very thoughtful conversation, this article was born. If you have spent any time in the past few months thinking about how to strengthen your existing compliance program, for any reason, but have been paralyzed by how much time, money, and effort it would take—keep reading.



Henderson

Compliance programs are subjected to greater scrutiny

The prevention, detection, collaboration, and enforcement of an organization's mission and goals are fortified by a good compliance program. In 2019, Medicare and Medicaid requirements for participation for long-term care (LTC) will be surveyed under section 42 CFR, Part 483, Subpart B, Section 483.85

and 483.95 for Compliance and Ethics program and training requirements.¹

By issuing regulations and guidance, it is clear the government seeks to change the corporate conduct of healthcare organizations by giving guidance into a better model of self-governance and corporate compliance. Getting tagged by a federal or state agency can be enough to inform the quality of any compliance program, but it is equally important for a healthcare organization to develop and tailor a compliance program for the benefit of living out its mission and goals.

Before starting a compliance project

Getting proper buy-in from the top helps set the tone. In *Compliance 101*, Fourth Edition, the authors share the organizational steps for tailoring a compliance program.² Those steps include:

- ▶ Gaining support and commitment
- ▶ Developing a Compliance budget
- ▶ Developing a Code of Conduct
- ▶ Identifying staffing needs
- ▶ Conducting risk assessments
- ▶ Developing a mission and goals
- ▶ Having a Plan, Do, Check, Act (PDCA) arrangement in place³

After approval and buy-in, the next step is to implement.

Designing a mission and goals-rich compliance program

Review your compliance program for areas of opportunity by analyzing feedback from staff and patients, stay up to date with regulatory changes and surveys, and recognize the need to revamp an outdated compliance program. It is important to have a clear and honest picture of how your compliance program is working, what's not working, and how informed your organization is about the importance of compliance.

Five important activities for building a mission and goals-rich program are:

1. Examine the current and future state.
2. List the basic process for pulling it all together.
3. Set goal(s) and timelines.
4. Identify roles and visibility.
5. Determine important front-line connections.

A full review of each step will allow the project to move forward in an efficient, organized manner and at a productive pace. Depending on the size of your organization and the efforts and resources applied, designing a mission and goals-rich compliance program should take anywhere from 3 to 6 months. Once your program is developed and in practice, the next important phase is monitoring and auditing.⁴

Examine the current and future state

Examine the current state by taking a snapshot of the tools and processes used. A tools list may include spreadsheets, hotline phone numbers, emails, hard drives, and other assets used to deliver the program.

A process list may include how spreadsheets are used, how phone calls and emails

are responded to, what's stored on hard drives and who has access, updates, and the content and frequency of meetings.

If your compliance program is a little unorganized, own it. That was certainly the current state of the compliance programs shared by the ladies at lunch—and that's okay. They knew it was time to do a better job of tailoring their organization's compliance program, and they were ready.

In addition to tools and resources, identify the compliance areas managed. Some health-care organizations only have one business line; other organizations have multiple lines, which means it's necessary to have a seamless management process for different policies and regulations as well as ways to seamlessly manage varying degrees of incidences and breaches across different business lines.

Whether the tailored compliance program is paper based or electronic, organizations should locate policies/procedures, forms used, and assessments taken. Additionally, organizations should be familiar with the process followed for risks, incidents and privacy breaches. Knowing these processes will help inform the design of the future state.

For example, depending on the business line's needs, policies and forms are accessed from a compliance software program, as opposed to hard drives or printed copies. In a future-state designed compliance program, policies can have bi-directional or multi-directional relationships and references to regulations, incidents, third-party risk, and privacy breaches.

Compliance software delivers content based on modules and module access, which makes it easier to create connections. In a paper-based compliance program, the connections are harder to make, maintain, and monitor, but they should be made as a part of your compliance project pre-work actions and tasks.

The future state is built as the most productive and direct path to a mission and goals rich compliance program.

List the basic process for pulling it all together

Some basic considerations are:

- ▶ Identify who should be on the compliance implementation team.
- ▶ Prioritize and categorize areas that need attention first, second, and next (e.g., policies, regulations, incidents). This is the area where a lot of the current and future—state work takes place on a more specific and granular level.
- ▶ Determine meeting agendas, action items, and assignments. It is very helpful to do this per module, form, or tool.
- ▶ Preschedule weekly and monthly meetings (e.g., phone, live, and webinars). Meetings should include discussions around process, workflows, demonstrations, and training.
- ▶ Get buy-in and tie-in from appropriate leadership in specific departments.

Set goals and time lines

Project management software may not be needed, but it's important to create and use a one-page project management grid with project stages and dates, centered around consistent meetings.

Some project goals and milestones may include:

- ▶ Transition from paper to electronic
- ▶ Policy updates
- ▶ Education and training
- ▶ Proof of concepts
- ▶ Workflows
- ▶ Simplified, centralized reporting and data

Whatever this looks like, be sure to include dates, durations, dependencies, risks, meetings, C-suite approvals, milestones, actions completed, and upcoming actions.

Identify roles and visibility

Ask the question. Which roles report, resolve, and educate? These are the roles that should have greater visibility in the workflow of a compliance program as well as higher levels of security and access. Compliance software programs allow for security and permission-based visibility. In a paper-based compliance program, every effort should be made to give role-based access to the right documents and processes within the organization.

Determine important front-line connections

The ability to connect the dots requires a 30,000-foot view of processes, people, paper, and departments that have meaningful relationships and connected activities. This includes department contacts, content experts, hotline numbers, IT, and software partners. This also includes (among other connections) how incidents relate to policies, how policies relate to other policies, connecting policies to related forms and tools, and how education is assessed and saved.

Within any organization, there are a lot of frontline connections. Focus on the high-level, meaningful connections that fill reports, drive cohesive interactions, produce seamless workflows, reduce response times, and inform data.

Conclusion

To design a mission and goals-rich, smart compliance program, the next and hardest thing you must do is make the commitment. Once the commitment is made, it's inspiring and rewarding to watch your compliance program blossom into a real asset for your healthcare organization. 📌

1. 42 CFR, Part 483, Subpart B, Section 483.85 (Compliance and Ethics Program) and 483.95 (Training Requirements)
2. Debbie Troklus and Sheryl Vacca: *Compliance 101*, Fourth Edition. Health Care Compliance Association, 2016; pp 43 – 60.
3. Advice Manufacturing: "Plan, Do, Check, Act: The Deming Cycle" Available at <http://bit.ly/2Lu5PCH>
4. John E. Steiner Jr.: *Monitoring and Auditing Practices for Effective Compliance*, Second Edition. Health Care Compliance Association, 2008.