



How to Survive as a Compliance Officer Wearing Many Hats

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Presented by:

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Agenda

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3. One Size Does *Not* Fit All
4. Combining Roles and Leveraging Resources
5. Mitigating the Risks of Combined Roles
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Speaker Introduction



Susan Thomas

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Susan has spent nearly three decades working in a variety of managerial and clinical capacities including compliance management, clinical department leadership, provider practice administration, internal audit, quality outcomes, and healthcare advocacy.

A former corporate compliance officer and clinical department director, she has a demonstrated record of success in program development and expansion as well as the ability to form mutually beneficial relationships.

Susan is a hands-on manager and decisive team leader with highly developed negotiation skills and experience cultivating strategic healthcare business partnerships, recruiting and directing teams, developing performance improvement measures, and creating effective training programs.

Speaker Introduction



Traci Waugh

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Traci has been immersed in the healthcare industry with an assortment of responsibilities. She started her career as the director of medical records and eagerly took on additional roles including utilization review, risk management, medical staff services, discharge planning, quality improvement, contracting, privacy, and compliance. Traci's enthusiasm as not subsided; she is always willing to help her peers and serve as a resource.

Along with her initial certification as Registered Health Information Administrator (RHIA), she obtained her Certification in Healthcare Privacy and Security (CHPS) and Certification in Healthcare Compliance (CHC).

Currently as the Director of Outreach Services and Compliance, Traci assists partner critical access hospitals with their compliance programs and provides customized compliance education to staff and board or directors. In addition, she serves as a liaison for other contracted services provided by Kalispell Regional Healthcare.

So Many Hats...

What Hats Do You Wear?

- Compliance
- Internal Audit
- Privacy
- Risk Management
- Legal
- HIM
- Information Security
- Quality
- *Many, many others!*



One Size Does *NOT* Fit All

- “Given the diversity of the hospital industry, there is no single ‘best’ hospital compliance program.”
- The OIG strongly encourages hospitals to identify and focus their compliance efforts on those areas of **potential concern or risk** that are most relevant to their individual organizations.
- “... the compliance function could be outsourced to an expert in compliance.”

Source: <https://oig.hhs.gov/documents/compliance-guidance/797/012705HospSupplementalGuidance.pdf>
<https://oig.hhs.gov/documents/compliance-guidance/805/thirdparty.pdf>



Essential Functions

- No matter what the size of the organization...
 - ✓ Adequate budget and resources
 - ✓ Authority to carry out duties
 - ✓ Reporting structure allow for unfettered access to the Board
 - ✓ A culture of compliance supported by all of management



Pros and Cons of Multiple Roles

• Pros

- Increased visibility
- Break down silos
- Increased understanding of operations
- Stay “in the loop”
- Trusted advisor
- Opportunities to collaborate
- Build meaningful relationships – diversity
- Empowering others from multiple aspects
- Survival
- Others?



Pros and Cons of Multiple Roles



• Cons

- Time
- Miss regulatory updates
- Depth of Knowledge
- Focus on areas of familiarity
- Multiple tasks with multiple deadlines
- Education tends to take a back seat
- Lack of support and resources
- Reporting to multiple leaders
- Others?

Combining Roles and Leveraging Resources

Why Combine Roles

- Compliance is in every aspect of the organization
- Comprehensive view of risk
- Risk mitigation frequently requires a multidisciplinary approach
- Strong advisory skills are necessary in multiple key roles
- Precious resources
- Efficiency
- Advancement opportunities



Leveraging Resources

- Ability to utilize similar frameworks, tools, and personnel for advisory roles
- Training for the multiple roles
- Ability to speak to executive management and the Board on multiple key issues
- Use data to address multiple aspects of organizational risks
- Develop a reporting matrix to ensure issues are handled properly
- Consider de-centralized compliance function



Mitigating the Risks of Combined Roles

Risk Mitigation

- Ensure Compliance maintains a direct reporting relationship to the Board
- Maintain independence and a certain degree of separation between the roles
- Clear objectives to each role
- Distinguish compliance program work from other areas of responsibility, e.g., privacy, internal audit, risk management
 - Job Description
 - Required meetings
 - Risk Assessment Results
 - Reporting requirements



Achieving Effectiveness

Build Critical Relationships



- Engage the workforce in your organization
 - What does leadership need? Expect?
 - Decentralization: Is there a reliable “go to” person within the department to serve as a compliance liaison?
 - Incorporate the assistance and contributions from subject matter experts
 - Conflict is inevitable -- accept the challenge
 - Be approachable -- not the “police”, point out what is right
 - Be available -- rounding, attend department meetings
 - Take advantage of teaching opportunities
 - Clear concise communication with all parties

Build Trust and Credibility



- Education and certification
- Network
 - Professional Groups
 - MHA colleagues
 - Compliance Hive
 - Articles & Webinars – reach out to the authors/presenters
- Utilize YOUR subject matter experts
- Find reputable resources to support the program

Communication



- Educate, educate, educate
- Meet regularly with leadership
- Make reporting easy
- Don't get caught in the middle
 - Serve as an advisor, not the "fixer"
- Know when to ask for help



- Policies, program plans, and other documents
- Regular program assessments
- Compliance Committee and Board resolutions, agendas, and minutes
- Compliance training and communications initiatives
- Hotline information, investigation log, and activity dashboard
- Auditing and monitoring trends, and corrective actions
- Case summaries of incidents, including self-reporting and disclosures
- Evidence of corrective action – continuous evaluation

Establish a Culture of Compliance



- Accountability among leadership
- Unfettered access to the Board
- Compliance is a key ingredient in the organizational recipe
- Compliance is an important part of operations – what we CAN do, not what we CAN'T do
- Consistent and meaningful monitoring, auditing, and evaluation – don't collect data that is not valuable to the organization
- Be cautious of duplication, work smarter not harder

Make It HAPPEN

Don't Let Stress Get to You

- Look at the big picture.
- Set realistic goals . . . and boundaries.
- Prioritize with time management.
 - Learn to say NO.
 - Learn to ask for help and to delegate.
 - Use technology to your advantage.
- Be the master of your schedule
 - Use one calendar – business and personal
 - Assign due dates and follow up
 - Estimate the time it will take to complete a task – and remember that most tasks take longer than anticipated



Don't Procrastinate

- Use positive self-talk.
You can do it!
- Break things down into small tasks or parts.
- Get the hard part out of the way first.
- Set a deadline.
- Work only with a project until it's done.
- If you're accomplishing nothing, set task aside and come back to it.
- Make things more fun and interesting when possible.



Effective Meetings

1. Determine the goal and outcome of the meeting
 - Don't just meet to meet . . .
2. Keep the attendance relevant to #1
 - Adjust the roster as appropriate
3. Develop a written agenda and stick to it.
4. Have a starting and ending time.
5. Keep the meeting on task.
 - Prohibit distractions or interruptions.
 - Stick to the issues, not personalities.
6. Summarize and ask questions.
7. Circulate minutes following the meeting – within 24 hours



Wrapping Thing Up . . .

- Know the responsibilities of each hat.
- Determine how much time you need for each hat.
- Delegate when possible and necessary.
- Don't waste time on unnecessary activities.
- Take time for yourself.
 - You're no good to others if you aren't good to yourself!





Questions and Group Discussion

Image Source: Shutterstock

Thank you!



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