

# **What Boards Miss in Their Oversight: The Power of Culture**

**Marianne M. Jennings, JD  
Professor Emeritus, Arizona State University**

**Judy Ringholz, JD, RN, CHC, Vice President of Compliance and  
Ethics & Chief Compliance Officer, Jackson Health System**

**Steven Ortquist, CCEP, CHC-F, CHRC**

# **Our Experiences as Compliance Professionals: 1996 - Today**

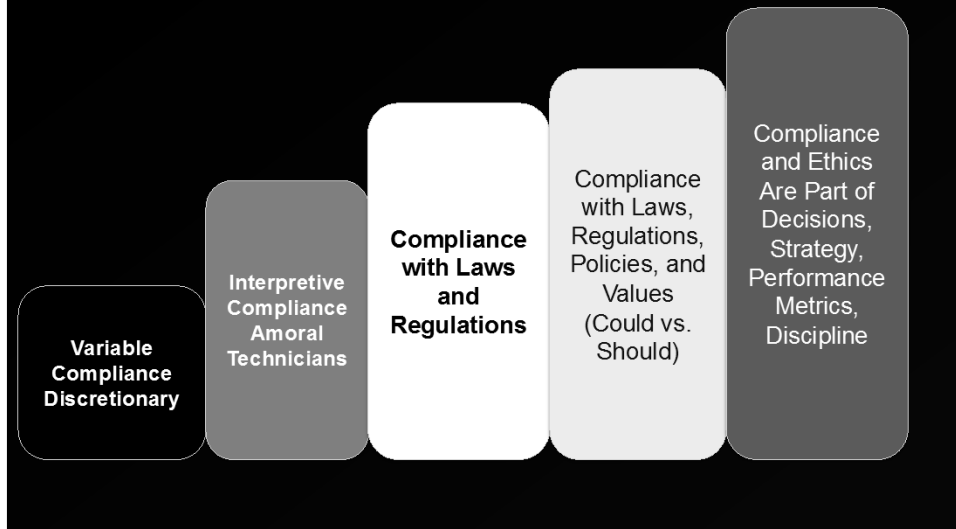
## The Control and Power of Culture

- How, what, and why things are done
- Rules vs. Culture
- *“Culture determines and limits strategy.”*
  - *Dr. Edgar Schein*
- Paraphrased by many:
  - “Culture eats strategy for breakfast.”
  - “Culture eats strategy for lunch.”
  - “Culture trumps everything.”

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## Shades of Compliance and Ethics

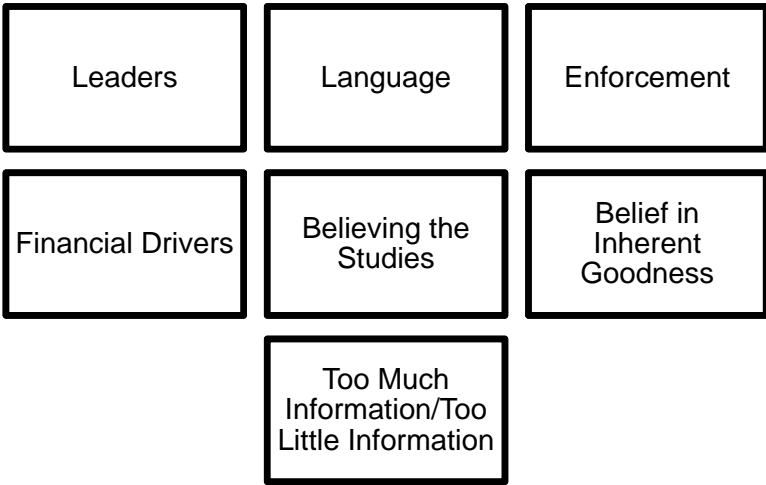


# Transition From Compliance and Reporting to Ethical Culture: The Obstacles

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## The 6 Culture Influences



# **Financial Drivers**

**What you measure**

**What behaviors result**

**Data cross-comparisons**

# **The Belief in Health Care That WE Are Ethical**

**Ends and Means**

**Rules vs. Taking Care of Patients**

**Conflicts? Never!**

# **Our Language**

**Lack of Introspection**

**Regulator bashing: “They are picking on us.”**

**“Not really a big thing”**

**Doesn't everyone have a corporate integrity agreement?**

**The Struggle to Acknowledge Cultural Issues**

# **Believing the Studies**

**Compliance Program Maturity**

**Employee Engagement**

**Ethics Surveys**

**Surveys vs. cultural assessments**

# **Enforcement**

**Timeliness**

**Consistency**

**Firing the “Stars”**

**“Enforcement is to organizations what integrity is to individuals.”**

**Key communication: Who is fired? Who is hired? How long do those actions take?**

# **Leadership**

**Boards**

**Executive Management**

**Compliance officer’s reporting, relationships, and seat at the table**

**The risk of using leadership video messaging and ethics “talks”**

## **Too much information Too little information**

**Following the basics  
Drowning in the board book  
The skill of tracking information from meeting to meeting  
Industry issues and developments  
Dangers of the committee structure**

## **Changing Culture**

**The importance of visible and dramatic change for a real culture shift  
Leadership changes  
Board involvement  
Investigation backlogs  
Restructuring**