

Surviving as a Compliance Officer Wearing Multiple Hats

24th HCCA Compliance Institute
Nashville, Tennessee
March 29-April 1, 2020

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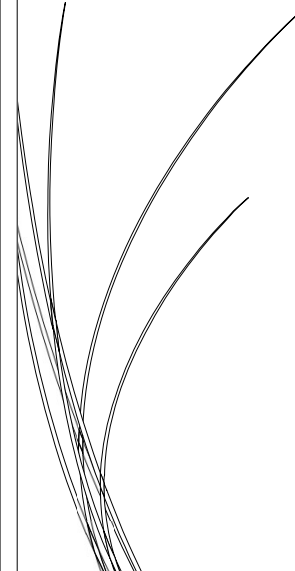
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Objectives


- How Did We Get Multiple Roles?
- Positives and Negatives
- How To Make It Work
- Multiple Bosses
- Take Care Of You

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What Are Your Roles?



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 Multiple Role Examples	<input type="checkbox"/> Compliance/Risk Management <input type="checkbox"/>
	<input type="checkbox"/> Compliance/Privacy <input type="checkbox"/>
	<input type="checkbox"/> Compliance/Quality <input type="checkbox"/>
	<input type="checkbox"/> Compliance/HR <input type="checkbox"/>
	<input type="checkbox"/> Compliance/Chief Operating Officer <input type="checkbox"/>
	<input type="checkbox"/> Compliance/Infection Control <input type="checkbox"/>
	<input type="checkbox"/> Compliance/HIM <input type="checkbox"/>
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	<input type="checkbox"/> Compliance/Legal <input type="checkbox"/>

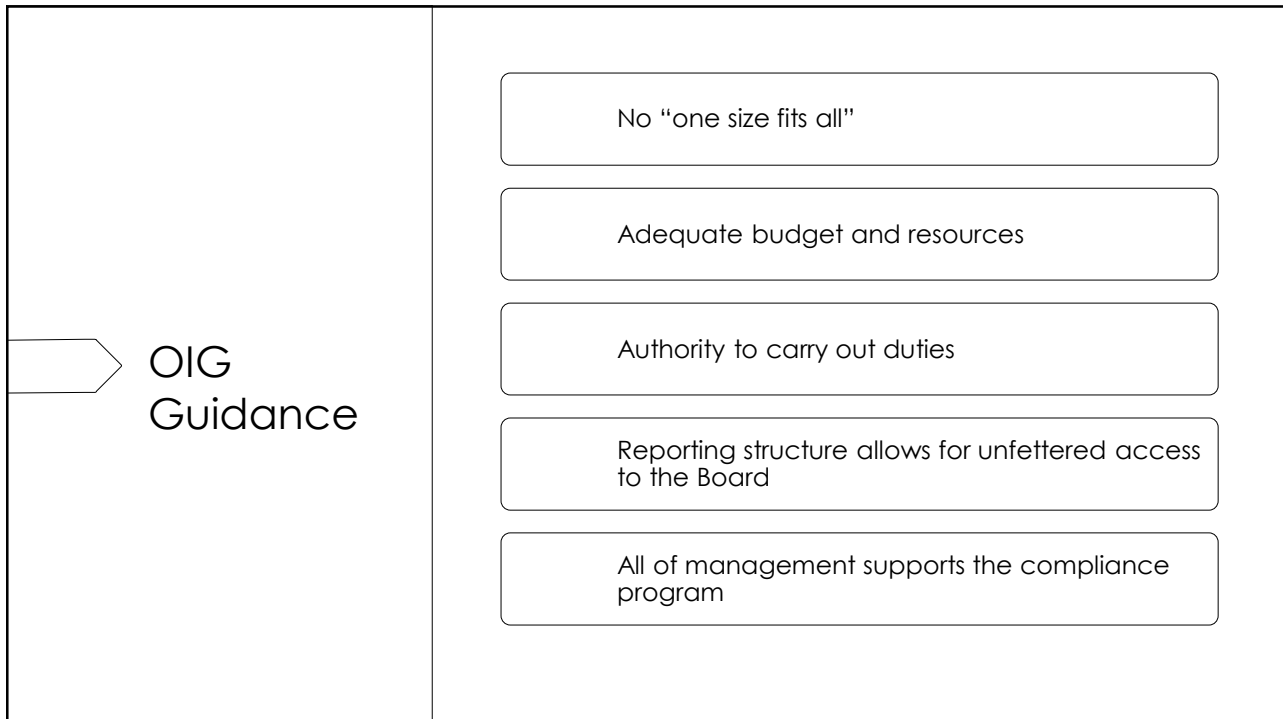
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<h1>How Did We Get Here?</h1>	<p>Size of the Organization? Finances? Lack of Understanding? "You are good at everything!"</p>
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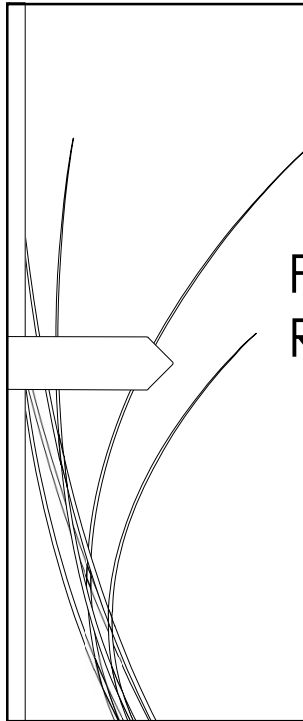
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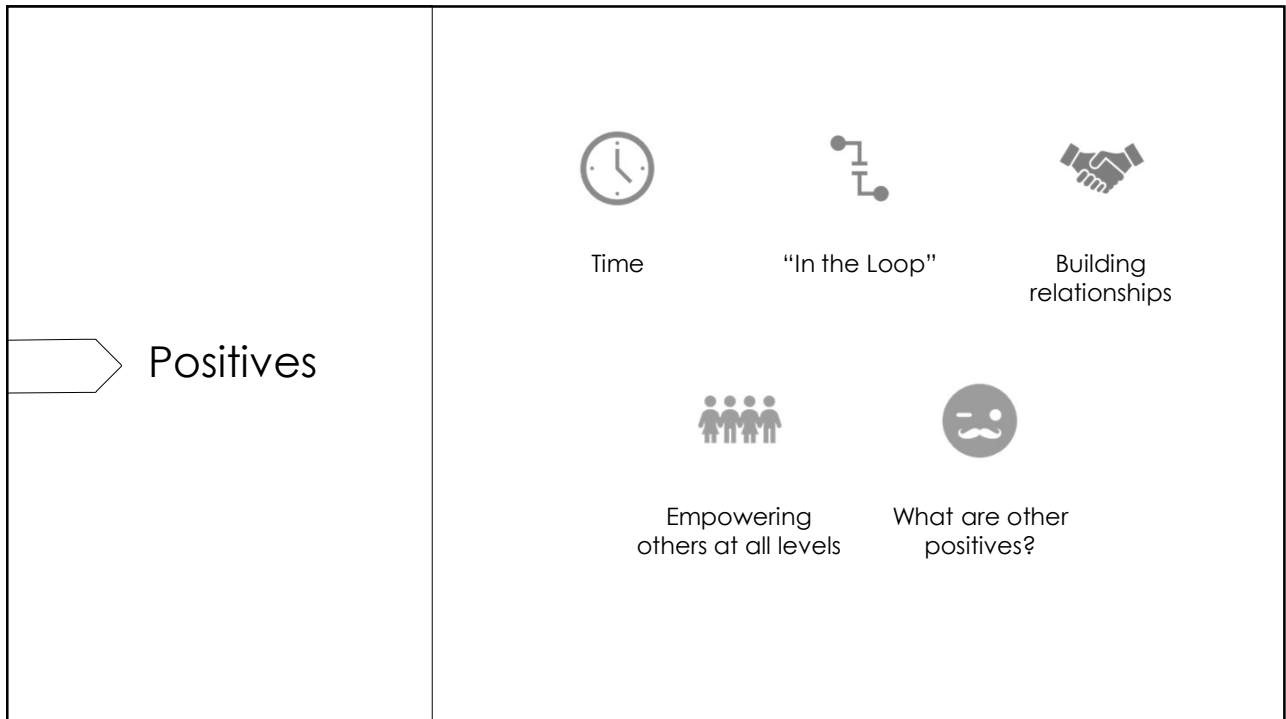


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Positives and Negatives of Multiple Roles

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➤ Negatives

- Time
- Depth of knowledge
- Multiple tasks with multiple deadlines
- Lack of support
- Education is always on the chopping block
- What are some others?

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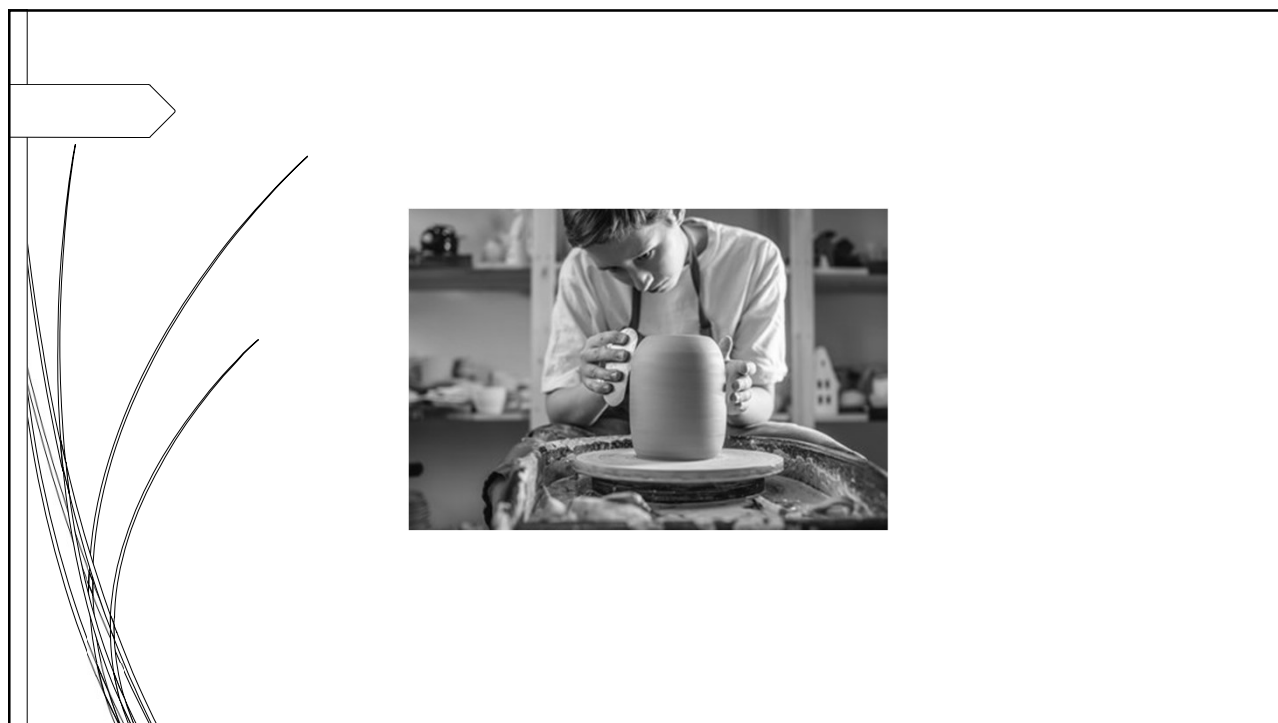
➤ “feels like juggling shards of glass”



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Clearly Define the Various Roles

- ▶ Job Description
- ▶ Tasks
- ▶ Required meetings for each role
- ▶ Reporting requirements
- ▶ Risk Assessment—patient safety, legal, financial, reputational
 - ▶ Prioritize

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The Compliance Lens



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Build Relationships

- ▶ Engage the workforce in your organization
 - Leaders: What works? What is the view? What are their needs?
 - Is there a reliable "go to" person within the department to serve as a Liaison?
 - Incorporate the assistance and contributions from subject matter experts
 - Conflict is inevitable—mitigate
 - Be approachable—not the "police", point out what is right
 - Be available—rounding, attend department meetings
 - Clear concise communication with all parties



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Credibility

 Education and certification

 Research

 Incorporate subject matter experts

 Network

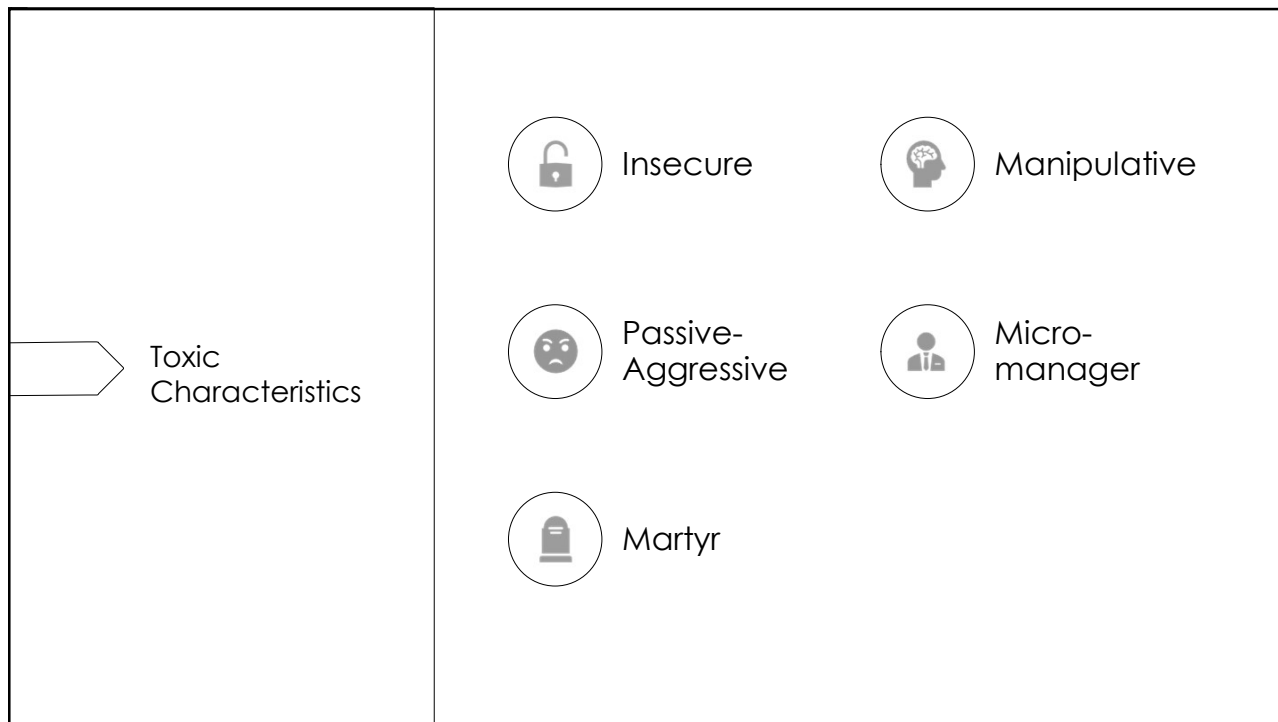
 HCCA, COSMOS, Conferences, Webinars

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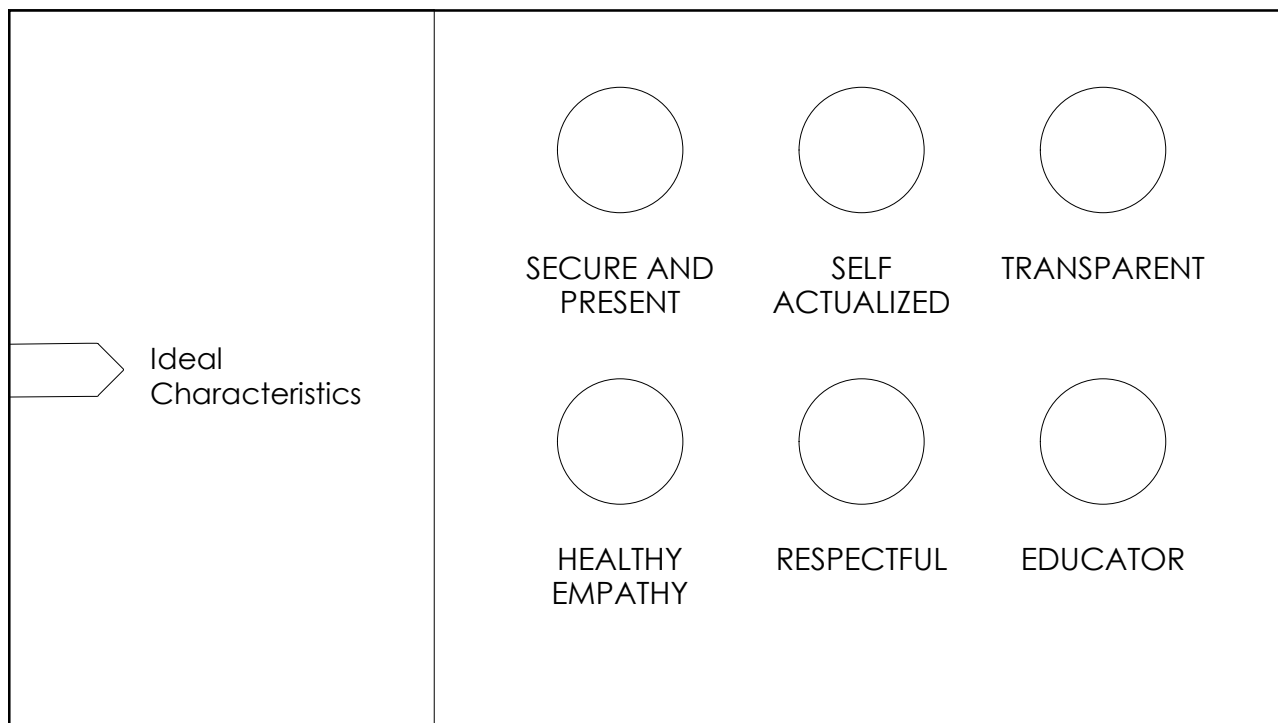
Multiple Bosses



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Communication

Educate, educate, educate—offer solutions

Propose scheduled meetings with all supervisors—what's in the hopper?

Have the supervisors work out differences—don't get caught in the middle





Share your calendar/projects

Know when to say "uncle"

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Prioritize

EISENHOWER MATRIX

	Urgent	Not Urgent
Important	 DO Do It Now	 DECIDE Do It Now
Not Important	 DELEGATE Who Can Do It for You?	 DELETE Eliminate it


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Is Your Program Effective?

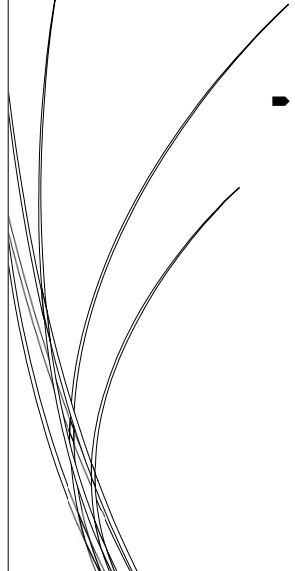
- Seven Elements
 - Written policies and procedures/Code of conduct
 - Compliance Officer and Compliance Committee
 - Education and training
 - Method of reporting, including anonymous
 - Monitoring and auditing
 - Investigations and remediation
 - Well publicized disciplinary guidelines

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There is an 8th Element-Effectiveness

- Documentation:
 - Policies, plans and other documents
 - Regular self assessments
 - How does it relate to other departments
 - Compliance committee and board resolutions, agendas and minutes
 - Compliance training and communications initiatives
 - Hotline information, logs and "in person"
 - Auditing and Monitoring-trends, corrective action
 - Case summaries of incidents, including self-reporting and disclosures
 - Evidence of corrective action—continuous evaluation



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<p>Measuring Compliance Program Effectiveness: A Resource Guide</p>	<p>https://oig.hhs.gov/compliance/101/files/HCCA-OIG-Resource-Guide.pdf</p> <p>HCCA-OIG Compliance Effectiveness Roundtable January 17, 2017</p> <p>It is not a checklist, but a guide to measure your program</p> <p>Program measurement options</p>
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<p>What Does My Organization Project</p> <ul style="list-style-type: none">Is Compliance woven into the fabric of your organization?	 <p>© ROYAL FURNISH</p>
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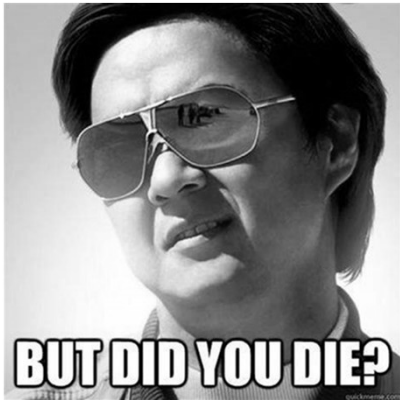
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Established Culture

- Accountability among senior leadership
- Unfettered access to the Board
- Compliance and ethics are part of the tapestry that makes up your organization
- Compliance is part of operations—what can we do instead of 'no'
- Consistent monitoring and evaluation—is it still working?

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Take Care of Yourself



BUT DID YOU DIE?

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Don't Forget to Breathe

MINDFULNESS

MEDITATION BREATHE BALANCE STRESS REDUCTION AWARENESS BODY SOUL

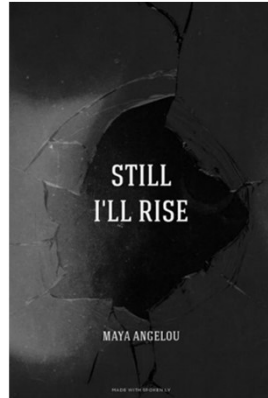
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Fill Up Your Tank.....

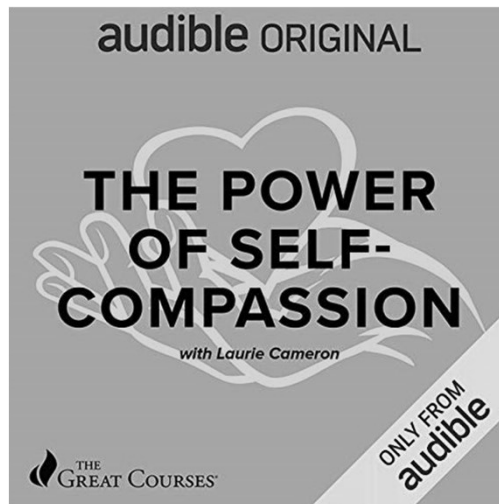
You can't pour from an empty cup. Take care of yourself first!

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You Are Not Alone.....



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Questions???

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