
Effective Compliance with I.M.P.A.C.T.™

HCCA Healthcare Enforcement Compliance Institute

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Objectives



Image Source: Shutterstock

- ✓ Learn to develop and set a unified **Intention**.
- ✓ Learn the communication and team building skills necessary to manifest that **Intention** through specific, achievable, realistic, and time-bound goals.
- ✓ Use breath **Meditation** and visualization as a means to get the compliance team on the same page and working with directional harmony, using affirmation and visual reminders to reinforce goals.
- ✓ Design an **Action** plan consistent with the **Intention**, **Meditation**, and **Projection**, while nurturing consistency and **Commitment** to achieve stated goals.
- ✓ Refine communication and build rapport to enhance **Trust** and build team efficiency.

I.M.P.A.C.T.™

A Strategy for Achievement and Excellence



Intention

- Setting the fundamental intention of having an excellent and effective compliance program in place. Intention provides the attitudinal and energetic infrastructure for setting SMART* goals and developing communication and team-building skills necessary to achieve those goals



Meditation

- Using meditation and visualization as tools to create directional harmony for the compliance team



Projection

- Using affirmation and visual reminders to reinforce goals and neutralize negative beliefs and self-talk



Action

- Designing an action plan consistent with Intention, Meditation, and Projection efforts



Commitment

- Nurturing consistency and commitment to achieve the stated goals of the compliance team



Trust

- Refining communication and building rapport to enhance trust and build team efficiency

Source: <http://www.smart-goals-guide.com/smart-goal.html>



Intention

noun in·ten·tion \ in-'ten(t)-shən \

- A determination to act in a certain way
- What one intends to do or bring about

Intention

- Setting intentions
 - Focus on identity, recognize values and beliefs
 - Personal identity, values, beliefs
 - Compliance Program/Team identity, values, beliefs
 - Internal alignment
 - Eliminate internal duality based resistance
 - ***Establish team awareness and gauge receptivity to the compliance program within the organization***

Intention (cont'd)

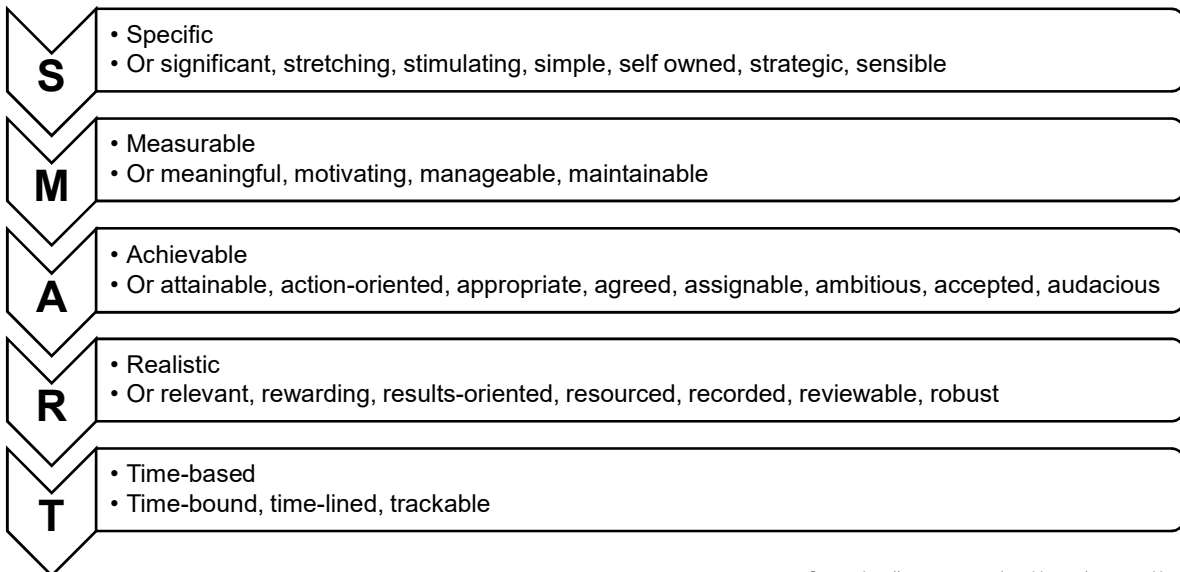


Intentions vs. Goals

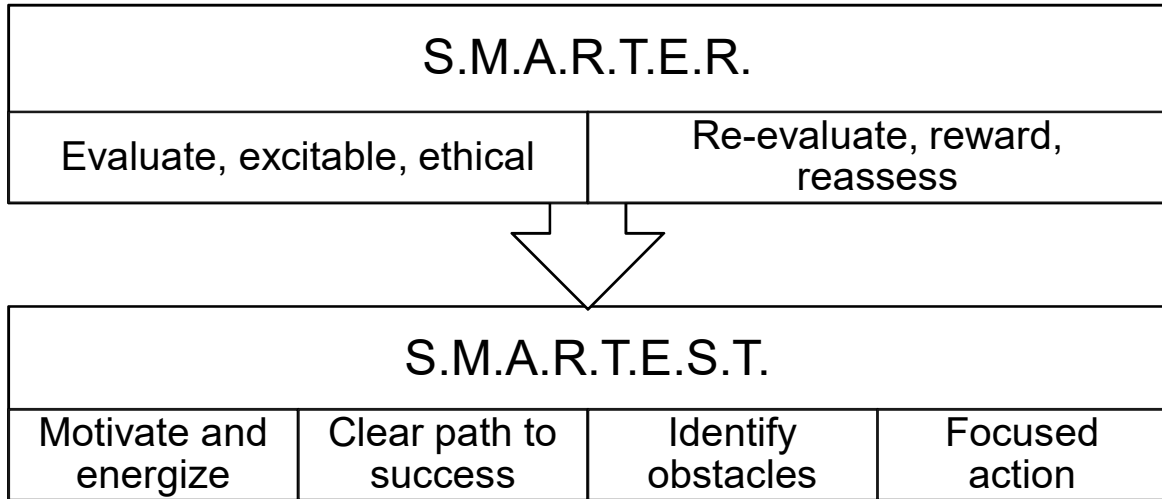


- Intention
 - A determination to act in a certain way
 - What one intends to do or bring about
- Goal
 - ***The objectively defined end toward which effort is directed***
 - The terminal point of a race

S.M.A.R.T. Goals



S.M.A.R.T.E.R. and S.M.A.R.T.E.S.T. Goals



Source: <http://www.smart-goals-guide.com/smart-goal.html>

A Smarter Approach

- How to use the goals to influence outcomes and enhance employee engagement.
 - Specific enough to change behavior
 - Meaningful so that they engage the team
 - Agreed-upon for shared success
 - Realistic given the resources to achieve them
 - Tracked so progress is communicated to the team

Source: Stamp & Chase LeaderBriefing, *A Smarter Approach to S.M.A.R.T. Goals*.
<http://www.stampandchase.com/wp-content/uploads/2017/11/StampChase-LeaderBriefing-A-Smarter-Approach-to-SMART-Goals.pdf>

Measuring Compliance Program Effectiveness: A Resource Guide Element 5: Monitoring, Auditing, and Internal Reporting Systems

5.1	Accessibility of reporting system	Interviews. Surveys. Ask employees and managers if the reporting system is accessible to them. Is it available in languages that are most spoken in the organization?
5.2	Adherence to 60-day overpayment rule	Review incident tracker; ensure days to open or days to close do not exceed that timeframe. Track efforts to identify; status benchmarks specific days to completion.
5.3	Trust in the system	Survey - Do you feel you can freely report ethics and compliance issues without fear of retaliation from managers? (Yes/No/Don't Know).
5.4	Reporting and Investigation Process	Review external benchmarking reports (# of calls, time it takes to close cases, anonymous, etc.).
5.5	Reporting system – compliance response to reporters	Document review. Focused groups and speaking with employees about hotline. <ul style="list-style-type: none"> • Are calls made through reporting system responsive to reporters? • Are policies followed regarding the response to reports received? • Are reports responded to on regular intervals and updated appropriately?
5.6	Reporting System: Hotline/Direct contacts	Document review, audit. <ul style="list-style-type: none"> • Are hotline calls or matters brought to the attention of the compliance department (direct contacts) categorized, trended, and reported to the compliance committee and board level committee? • Are there tracking, trending and reporting of how these matters have been resolved?
5.7	Reporting to compliance (hotline, report to the compliance officers, etc.)	Reports reflect communication methods (call, anonymous, email, direct, etc.)?

Source: <https://oig.hhs.gov/compliance/101/files/HCCA-OIG-Resource-Guide.pdf>



Meditation

noun med·i·ta·tion \ ,me-də-'tā-shən \

- The action or practice of meditating
- "A life of meditation"
- Synonyms: contemplation, thought, thinking, musing, pondering, consideration, reflection, deliberation, rumination, brooding, reverie, brown study, concentration

Source: Merriam-Webster Dictionary, <https://www.merriam-webster.com/dictionary/meditation>

Meditation: Example Types and Styles



- **Breath Meditation (Pranayam):** Focus, expansion, and elevation through the breath
- **Mantra and Meditation:** Naad yoga, and the science of the word as an elevating force
- **Mala Meditation:** Use of beads as a kinesthetic focal point for mindfulness
- **Visualization:** Use of internally created scenes and feelings to create conscious change in state.
- **Qi Gong and Tai Chi:** Movement and meditation; improves posture, respiration, balance and ability to relax while in motion (to go with the flow)
- **Mindfulness:** Systematic letting go of thoughts including judgments, assumptions, expectations, ideas, and images as they present in one's mind

Source: <https://visualmeditation.co/7-types-of-meditation/>

Meditations - Practicum Part I



1. **Breath:** Alternative nostril breathing
2. **Visualization:** Heart, Throat, Ajna visualization
3. **Mala Breathing Meditation**

Meditation - Applied

- Breathe - Relax and Center
- Visualization
 - Use projected inner vision to influence and direct your mind, body, and spirit
 - Project images of success
 - See the result, and through the “seeing”, create patterns within the physical and mental infrastructure of the mind/body to support and manifest that success
 - Your vision already exist within you
 - Create an internal representation of what is most important to you
 - Understand the sensory bench marks of success (what will success look like; sound; like and feel like
 - Visualize your goals to trigger the sensory bench marks of success

Source: <http://www.chopra.com/articles/how-to-use-meditation-to-visualize-your-goals#sm.0001o50n5x180hefykiqebz714ws>

Meditation - Applied



- Part Two – Applied Visualization
 - 5.1 Accessibility of reporting system (Hot Line):
 - Is the reporting system accessible to employees and managers? Is it available in languages that are most spoken in the organization?
 - Visualize the physical and interactive structure, function, and use of the system;
 - Visualize people communicating using the reporting system and hear the languages of your organization being spoken;
 - Visualize the posted signs; see the colors, the shape, the font; see employees stopping to read it and using it
 - See and fee the team pride in protecting the organization



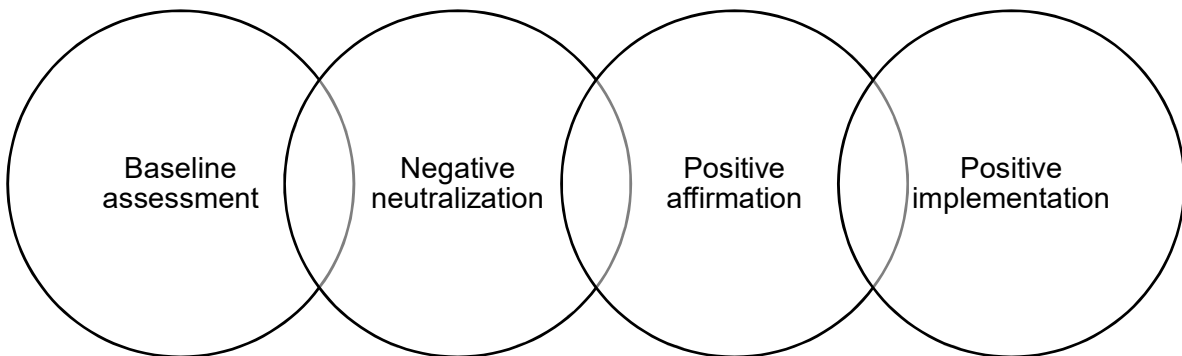
Projection

noun pro·jec·tion \ prə-'jek-shən \

- A systematic presentation of intersecting coordinate lines on a flat surface upon which features from a curved surface (as of the earth or the celestial sphere) may be mapped an equal-area map projection
- The process or technique of reproducing a spatial object upon a plane or curved surface or a line by projecting its points; also a graph or figure so formed
- A transforming change

Source: Merriam-Webster Dictionary, <https://www.merriam-webster.com/dictionary/projection>

Projection



Affirmations



- Sentences aimed to affect the conscious and the subconscious mind
- Creating affirmations:
 - Affirm what you want, not what you don't want
 - Use positive statements and avoid negative statements
 - Be present
 - Keep the mind focused on the goal
 - Frame statements “as if” they were true now, not as if they will occur in the future
 - “Be” rather than “become”

Affirmations (cont'd)



- Creating affirmations (cont'd):
 - Be concise
 - Commands to your subconscious
 - By rhythmic
 - Cadence and rhyme improves retention
 - *Float like a butterfly, sting like a bee*
 - *Fired up*
 - *No rebounds, no rings*
 - *I am the greatest*
 - *I can do this*

Affirmations as Preparation for Action



Image Source: Lilly, K. (2017) Photograph, personal collection

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Action

noun ac·tion \ 'ak-shən \

- A thing done; deed
- The accomplishment of a thing usually over a period of time, in stages, or with the possibility of repetition
- An act of will

Source: Merriam-Webster Dictionary, <https://www.merriam-webster.com/dictionary/action>

Action

- “He who hesitates meditates in the horizontal position.” - Ed Parker
- “Do. Or do not. There is no try.” - Yoda
- “God provides the wind, but man must raise the sail.” - St. Augustine
- “A dream becomes a goal when action is taken toward its achievement.” - Bo Bennett

Source: Grant-Hart, Kristy, "How to Be a Wildly Effective Compliance Officer" 2016. http://www.imglv.com/articles/Commitment_vs_Compliance.pdf

Action (cont'd)



Image Source: Lilly, K. (2017) Photograph, personal collection



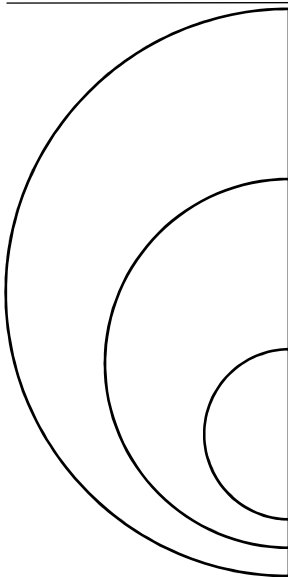
Commitment

noun com·mit·ment \ kə- 'mit-mənt \

- An act of committing to a charge or trust, such as:
 - An act of referring a matter to a legislative committee
 - An agreement or pledge to do something in the future

Source: Merriam-Webster Dictionary, <https://www.merriam-webster.com/dictionary/commitment>

Commitment



“There are significant behavioral and performance differences between employees who are fully committed and those who merely are compliant.”
– *Mac McIntire*

“Commitment doesn’t happen without culture.”
– *Kristen Lilly*

“The missing link in the compliance profession: interpersonal skills and influence.”
– *Roy Snell*

Source: http://www.imglv.com/articles/Commitment_vs_Compliance.pdf

Cultivate a Culture of Commitment

- Motivators
 - Getting the job done with excellence
 - Coming through for the team
 - Beneficial/higher purpose
 - Honoring agreement
 - Dignity and personal self esteem

Source: Grant-Hart, Kristy, "How to Be a Wildly Effective Compliance Officer" 2016. http://www.imglv.com/articles/Commitment_vs._Compliance.pdf

Commitment (cont'd)



Image Source: Lilly, K. (2017) Photograph, personal collection



Trust

noun trust \ˈtrəst\

- Assured reliance on the character, ability, strength, or truth of someone or something
- One in which confidence is placed
- Dependence on something future or contingent: hope

Source: Merriam-Webster Dictionary, <https://www.merriam-webster.com/dictionary/trust>

Circle of Trust



- *Trust* begets *Loyalty*
- *Loyalty* and *Devotion* beget *Bravery* and *Confidence*
- *Bravery* and *Confidence* beget the spirit of *Self-Sacrifice*.
- Demonstration of the spirit of *Self-Sacrifice* begets *Trust*.

Trust (cont'd)



Image Source: Lilly, K. (2017) Photograph, personal collection

Suggested Reading



- ***177 Mental Toughness Secrets of the World Class: The Thought Processes, Habits and Philosophies of the Great Ones*** by Steve Siebold
- ***How to be a Wildly Effective Compliance Officer*** by Kristy Grant-Hart
- ***A Smarter Approach to S.M.A.R.T. Goals*** by Burl E. Stamp, FACHE
- ***Kriya: Yoga Sets, Meditations & Classic Kriyas from the Early Years as Taught by Yogi Bhajan*** by Kundalini Research Institute
- ***Switch: How to Change Things When Change is Hard*** by Chip Heath and Dan Heath
- ***The Teachings of Yogi Bhajan*** by Yogi Bhajan
- ***Thinking Body, Dancing Mind: Taosports for Extraordinary Performance in Athletics, Business, and Life*** by Chungliang Al Huang and Jerry Lynch
- ***The Zen of Kenpo*** by Ed Parker

Questions?



THANK YOU



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