

Compliance Today – November 2018 Strategic messaging as conduit in compliance orientation

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Anyone starting out in compliance knows all too well about the seven elements of an effective compliance program. The Federal Sentencing Guidelines, HHS OIG, and associations such as the HCCA have done a lot to preach the gospel of the seven elements. This article is about Element 3: Conducting appropriate training and education.^[1] It discusses the role of strategic messaging in communicating, sensitizing, and educating the workforce on the importance of compliance.

Strategic messaging is a “clear value communication framework that company uses in all interactions with employees, prospects, customers, partners, investors, and other stakeholders.”^[2] Here the focus is on interactions with employees who are the foot soldiers in compliance.

Strategic messaging has an objective and an audience. The onus is on the promoter or champion of the message to be knowledgeable (a) about the audience, and (b) about the medium that would give the message maximum exposure so as to achieve the stated objective. In “compliance speak,” the audience comprises employees and business associates and the objective is compliance awareness. “Effective corporate compliance and ethics programs require a well-designed awareness campaign to inform employees and others of the company’s definition of and commitment to appropriate behavior, and of the various elements of the program.”^[3]

Strategic messaging is an important, effective, and ready-made tool for an awareness campaign. Strategic messaging has its dictate: The compliance officer must come to see compliance awareness in the light of brand building. “What does it take to build brand awareness?” becomes “What does it take to build compliance awareness?” With this mind-set, the compliance officer assumes the role of a chief awareness officer who is preoccupied with creating a culture of (compliance) awareness in the organization. An organization’s culture features prominently in compliance. A corporate culture could mar or make an organization’s compliance program. “If the culture of the organization does not support principled performance, then all of the people, processes, and technologies that are put in place to mitigate ethics and compliance risks cannot be effective.”^[4] This article does not get into the age-old argument of the chicken or the egg: Which one comes first — corporate culture or a culture of compliance awareness? Both need to be present for a compliance program to be effective. Strategic messaging serves to reinforce and orient the workforce to the values and tone at the top.

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