

## Report on Medicare Compliance Volume 31, Number 44. December 12, 2022

### CCOs: Policies Employees Don't 'Hate' Help Them Comply, Manage 'Awkward' Situations

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By Nina Youngstrom

Half of a typical compliance policy at Bridgestone Americas Inc. is devoted to answers to frequently asked questions (FAQs), which serve as a bridge between the premise of the policy and applying it in the real world. "FAQs are mini-stories," said Adam Balfour, vice president and general counsel for corporate compliance and vice president for global risk management at Bridgestone. "Rather than having FAQs where you are just repeating the policy and not adding value, you can bring it to life for people."

That's one way Balfour helps ensure that Bridgestone has compliance policies that "humans don't hate." Although employees are never going to line up in anticipation of the next compliance policy—"we want to be realistic with expectations"—he said, "we can do better."

The key is to remember that people are at the heart of a compliance program—not policies—said Balfour and Lisa Fine, senior counsel and director of compliance for Pearson Education in Washington, D.C., at the Compliance & Ethics Institute sponsored by the Society of Corporate Compliance and Ethics Oct. 18 in Phoenix. "A compliance program is not about getting the corporation to comply. They are just legal entities. It's about [influencing] the people who do actions or omissions on behalf of the organization," Balfour said. "You have to be able" to affect how they think and behave. "It isn't about putting policies together to satisfy regulator expectations. Human beings should be at the center of what we are trying to do."

Balfour and Fine explained eight ways to create policies that humans won't hate:

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