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Calling all compliance officers: Setting up for success from day one

by Susan K. Craig and Alka Kumar

Whether you're an experienced compliance officer, new to an organization, or have been in the same role for a while and want to rebuild your compliance program, re-invent your compliance brand, and explore innovative techniques to take it to the next level, this article is for you. It includes ideas, tips, and advice that we (the authors) have tried and tested. We also share some mistakes we've made in our journey as compliance officers, as those are often the lessons that can have a lasting impact on our professional growth.

Assess the organization's culture

Upon crossing that threshold on day one as a new compliance officer, it is often our tendency to immediately learn everything we can about the current compliance program. We are eager to discover what the organization has in place for the seven elements of an effective compliance program.[1] Compliance officers may be laser-focused on identifying gaps or weak areas right out of the gate so that they can build work plans, set priorities, and get working on fixing the problems. After all, the overarching purpose of our role is to develop and implement an effective compliance program that prevents, detects, and responds to fraud, waste, and abuse. It sure seems tangible—mostly black and white.

What we might not realize is that we could be missing opportunities in those first few weeks and months to really understand the organization's culture—those elements that are more nuanced and less technical, but important to consider as we build our compliance program. Culture is the way things *really* work in an organization, human behaviors, and the things that we notice when we look up from our compliance work plans and take some time to listen, explore, and ask lots of questions.

In the following sections, we will discuss how to assess the culture and why it's beneficial not only to understand but also *leverage* the organization's culture in the development and implementation of your compliance program.

How to assess the culture

Understand the business. One critical aspect of understanding the culture is to understand the business well. What services does the organization provide? Who does it serve? Who are the leaders responsible for those areas? Does this match the organizational chart to a "T," or are responsibilities in flux and more fluid? A lot of changes in responsibilities can mean rapid growth or high turnover.

Set up meetingswith leadership and stakeholders. Use this opportunity to listen, understand their pain points, and ask about their compliance concerns. Identify how they view the compliance role. Do they see the compliance officer as the organization's "police," the "fixer," or a partner who can be a resource in answering questions and helping to advance their department's goals?

Understand the tone at the top and the mood in the middle. Get buy-in from the CEO and executive leaders by building these relationships early on. Equally vital is getting to know middle management, as well as decision-makers and informal leaders who have influence but maybe not the big titles.

Get a sense of the organization's current priorities, initiatives, and projects. Is the organization in the middle of implementing a new electronic medical record (EMR) system, undergoing a merger/acquisition, or perhaps overhauling its revenue cycle management process? Understanding the timing and milestones of significant projects may impact how you decide to design your work plan based on available resources.

Look for examples of the organization's values in action. Do employees know the organization's values? Do they feel that their roles support the organization's goals? Does the organization recognize and reward employees for outstanding performances that embody a particular value? All these answers can tell us a lot about how engaged and connected employees feel and if values drive employee behavior.

Assess if and how workflows reflect the policies and procedures. Are policies in digital files collecting dust on the shelf, or are they regularly reviewed, revised as needed, and accessible to the workforce? Does a policy committee have oversight, or is there a more informal approach? What is the process for deploying new policies to the workforce? Are policy acknowledgments required and tracked, and by whom? Knowing all of this will help you as you draft, finalize, and roll out new compliance policies.

Assess the pace at which the organization moves. You will want to get a sense of the organization's appetite for change and to understand what pace the sweet spot is. If there are too many changes happening too quickly, people may tune out.

Review results of recent employee surveys and action plans. Find out if the organization conducts any employee satisfaction surveys—this is an indicator that feedback and engagement are essential. Are there any survey questions related to compliance or employees' willingness to report concerns? This can provide insight into open communication and trust that concerns are taken seriously.

Read the organization's current strategic plan. Read it to understand not only the long-term goals and where the organization is going but also how it is developed—who has input and responsibility, and are the goals reasonable or lofty? Are milestones measurable and specific? This information can be helpful when you are building your compliance work plan and long-term goals to align your compliance goals with the organization's goals to complement or support them.

Get a sense of the decision-making process. Are employees invited to provide input on decisions that will impact them? Is there transparency around how decisions are made and explanations provided for unpopular decisions? Are new initiatives rolled out on a pilot or trial basis and evaluated, or implemented everywhere all at once?

Assess communication styles. Assess if they are formal, informal, top-down, or more collaborative. Is information shared by word of mouth or leadership with key talking points and reasons? Is communication proactive and timely or is it more reactive after the big news spreads through the rumor mill?

Identify culture clues. Cultivate a sense of curiosity. Visit different locations and departments, observe, and talk to colleagues in various roles. Get yourself invited to meetings where you can learn about the department and service line. Introduce yourself, be a sponge, and just listen to clues about the culture.

Make no assumptions and ask lots of questions. Don't assume the culture is embodied identically across the organization. If your organization is like many, as you assess the culture, you'll identify variations among departments, service lines, locations, and regions. As you continue to meet employees, asking questions to flesh out these nuances will help you gain insight into everything from communication channels and decision-making to values alignment, transparency, and how concerns and conflicts are handled.