

## Compliance Today – October 2021

### My compliance program doesn't work

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Compliance programs are a cornerstone of the healthcare sector. Regardless of whether you are in industry, hospital, or nursing, the expectation is that your organization will have a compliance program. Have you ever sat back and thought, “My compliance program doesn't work”?

You invested resources into creating this program, and now it doesn't work. You have set up policies and procedures, which you always seem to be updating, and still there are noncompliance events and inconsistent behaviours everywhere. No one seems to care about it; it is just there!

Maybe you did a good job of setting up a compliance framework, but it was never given life. Compliance programs have to live and breathe to be successful, and they need passion behind them to be truly successful.

Why doesn't my compliance program work? Here are six possible reasons why it may not be working and suggestions as to how to overcome them.

### Inconsistencies

The success of a compliance program is based on consistency across all aspects of the program. The ultimate aim of the program is to create consistent behaviour and to provide reference for the expected behaviours of all employees in your organization. Everybody from the CEO down to the lowest position in your organization should be subjected to the same standard of expectation—consistent compliance.

That does not mean, using training as an example, that all employees have to be trained in everything. There are no doubt certain tasks associated with the implementation of the compliance program that will be more relevant to some employees than others. At a minimum, the principles of your program and the expectations behind its policies and processes should be understood by everyone. Consistency is the backbone of any compliance program.

### You are not walking the walk

You have talked it up, put it in place, but you are not following through with walking the walk. Like any program, it cannot be introduced with a fanfare of excitement and then left. It will need constant care and attention and periodic reminders to the organization of its purpose. It is also important to show people the value of the program. If you have done such a great job that you have no compliance concerns, there are plenty of examples in the broader sector that can be used to demonstrate the failings of a program (and the consequences) and where the value of your policies and/or processes may be.

When the ISO 9001 quality standard was first introduced, it became the gold stamp to show that organizations

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had a quality system and in many parts of the world was required by governments to be considered as an approved vendor. This was a great example of where a program (much like a compliance program) was introduced—usually by consultants—but just sat there. Yes, the organization became certified, and they had five of six folders to show for it, but no one walked the walk. Its value was not expressed; it was not consistently used (if at all); and at the first annual recertification, the company lost their certification.

The best program on paper may not be the best program in practice. A compliance program is only as good as the results it produces.

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