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Ice cream, passwords, and building a culture of compliance

by Darrell W. Contreras, Esq., CHC-F, CHPC, CHRC

One challenge for any compliance program is developing compliance messaging that will be effective across an employee population that has diverse expertise, technical knowledge, experience, and education levels. Developing a message that will resonate requires creativity; however, sometimes your interactions and ideas for promoting your compliance program can have a larger impact on building a culture of compliance than you might expect. That is what happened recently with an ice cream social our compliance team hosted for our employees.



By way of background, as part of Millennium Health’s compliance program and our goal of building a compliance culture within all departments, I periodically attend department meetings to update employees on our compliance program and initiatives. Some departments are naturally interactive, while others are more difficult to engage. To build our culture of compliance, however, I needed to find a way to engage even the most reserved group of employees in the discussion. During one department meeting with a typically reserved group (we will

refer to them as “*The Quiet Group*”), I asked, “What do we need to do to get you out of your shell to ask questions and engage in the discussion?” One person spoke up—“ICE CREAM!” It was an interesting response that I was not sure would lead to engagement. However, I committed to considering the idea, making it clear that in exchange, I wanted more participation in compliance meetings moving forward, and thus, the challenge had been issued.

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