How to ensure a culture of compliance in your hospice

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A Matter of Focus

CoPs/ Accreditation
OIG 7 Elements
Value-Based Culture
Who’s In the Room?

Roles
1. Board Members
2. Chief Executive
3. Other staff
4. Consultant
5. Other

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OIG 7 Elements

Respond Promptly to Detected Offenses and Undertake Corrective Action
Implement Written Policies, Procedures and Standards of Conduct
Designate a Compliance Officer and Compliance Committee
Conduct Effective Training and Education
Enforce Standards Through Well-Publicized Disciplinary Guidelines
Develop Effective Lines of Communication
Conduct Internal Monitoring and Auditing
Effective Compliance Program
1. Policies, Procedures and Standards of Conduct

Empowering or legalistic?
Are you addressing all stakeholders?

Implementing an effective compliance program requires a substantial commitment of time, energy and resources by senior management and the governing body. Superficial programs that simply purport to comply with the elements...that are hastily constructed and implemented without appropriate ongoing monitoring will likely be ineffective. - OIG Compliance Program Guidance
OIG 7 Elements

5. Enforcement and Discipline

6. Monitoring and Auditing
OIG 7 Elements

7. Prompt Corrective Action

“8th” Element: Effectiveness

"We Will Not Lie, Steal Or Cheat, Nor Tolerate Among Us Anyone Who Does"

Code versus Reality
**culture -noun \ˈkəl-chər\**

1. the beliefs, customs, arts, etc., of a particular society, group, place, or time
2. a particular society that has its own beliefs, ways of life, art, etc.
3. *a way of thinking, behaving, or working that exists in a place or organization (such as a business)*
Commitment to Integrity

- Recruit for integrity
- Train proactively on integrity
- Discuss examples of:
  - Poor and good decisions
  - Transparency
IDT Meetings
Focus on Integrity

- Stimulate discussions in IDT meetings
- Share examples of moral courage

“Spend at least 10 times the energy in reinforcing training as in delivering it.”
- Ken Blanchard, author of The One Minute Manager

Meetings
Model Integrity

- Acknowledge ethics lapses and failures
- Be forthright about how such situations have been addressed

“MISTAKES ARE THE PORTALS OF DISCOVERY...”
- James Joyce (1882 – 1941)
Leadership Emphasizes Integrity

- Be present at ethics and compliance training
- Reinforce good decisions and recognize positive role models
- Give ethics and compliance stature through its placement on agendas and organization chart
- Strive for transparency and trust in all actions

Integrity is an Important Aspect of All Supervisory Relationships

Ensure ethics and compliance is an important aspect of:
- Hiring
- Performance evaluations
- Rewards

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Interview for Integrity

- How would you describe a person of integrity?
- What types of situations have you experienced where to speak up or hold to your values, there as a potential cost to you? How did you handle those situations?
- Describe a situation in which you felt it might be justifiable to ignore company policy or a standard procedure. What did you do?
- What would you do if someone asked you to do something unethical or you observed or heard about something that you thought might cross ethical boundaries?

We sometimes face situations of having to choose between what is ethically or legally right versus what is best in terms of financial results or public relations for the organization. Can you give us two examples of situations in which you faced this dilemma and how you handled them?

Describe how you think a person in a leadership/peer role can convey to the staff of the organization that ethical behavior is a high priority?
Creating Healthy Team Dynamics

Focus on Collective Goals ➔ Build Trust by being vulnerable ➔ Mine for Healthy Conflict ➔ Forge Commitment by forcing clarity and closure ➔ Assure Accountability by confronting difficult issues

Basic versus Advanced

CoPs/ Accreditation

OIG 7 Elements

Value-Based Culture

Adapted with permission from: The Five Dysfunctions of a Team, Patrick Lencioni, 2002 © John Wiley & Sons
1. Take one minute to rate (Strong/Medium/Weak) your organization’s intentional efforts to set the “tone at the top” in the following areas:
   A. Recognizing and rewarding positive ethical behavior?
   B. Creating an atmosphere where it’s encouraged to speak up about questions or concerns regarding ethical or compliance lapses?
   C. Including ethics as an element in the selection of staff and leadership?

2. In groups of two for one minute each share:
   A. A best intentional practice of your organization? OR
   B. What’s getting in your way of higher performance?

Commit to Action

What three things can I do this month to move my board forward in creating and reinforcing a culture of integrity?

1. 
2. 
3. 

Your Trusted Business Partner in Post-Acute Healthcare
Assess....Don’t Assume

If you were to observe what you think is a clear ethical or compliance issue, are you confident...

- that you know what to do?
- that raising an issue would be welcomed by your supervisor?
- that raising an issue would be welcomed by your peers?
How Often do Lapses Occur?

In the last three months, how frequently have you observed compliance lapses?

• If you observed a compliance concern, did you bring it to the attention of someone else in the organization? If so, do you know that action was taken to address the issue? Was the action effective?

• If you did not raise the issue with anyone else, what held you back?

References


Your Trusted Business Partner in Post-Acute Healthcare
References (cont’d)


