







Follow protocol

- Without a detailed investigations policy, providers are likely to do just that: panic or snooze.
- A well-designed compliance investigation protocol keeps compliance officers between the panic and snooze buttons.

Follow protocol

- What should a compliance investigation policy cover?

Follow protocol

- What does industry data tell us about investigation timelines?



Respect anonymity

"If the Internet has taught us anything, it's that sometimes it's easier to speak our minds anonymously."

Season 1, Episode 2:
Biscuits

Respect anonymity

- Does your organization protect anonymity?
- Does your organization *encourage* anonymity?
- Does your organization encourage people to communicate *non-anonymously*, too?

Respect anonymity

- What does industry data tell us about anonymous reporting?



Lesson Three:
Follow your
policies

Follow your policies

*There ain't no policy like a hospital policy
cause a hospital policy don't stop.*

Season 2, Episode 8:
Fathers and Sons

Follow your policies

- Are your policies in a binder, or beyond?
- How do we ensure policies are followed?
- What do we do when policies are challenged?



Lesson Four:
Help your employees
believe in themselves

Help your employees believe in themselves

Rebecca: Do you believe in ghosts?

Ted: I do. But more importantly, I believe they need to believe in themselves.

Season 1, Episode 1:
Pilot

Help your employees believe in themselves

- Do employees know when they help the compliance effort?
- Do they believe they make a difference for compliance?
- How can you show them that they DO make a difference?



Learn from mistakes

Be curious, not judgmental.

(quoting Walt Whitman)

Season 1, Episode 8:
The Diamond Dogs

Learn from mistakes

- Mistakes WILL HAPPEN.
- Sometimes, it matters whose fault it is – and a lot of times, it doesn't.
- How do you address mistakes and move forward?



Keep improving

Don't you dare settle for fine.

- Roy Kent

Keep improving

- Healthcare is constantly evolving. This means compliance must evolve, too.
- Are you using the same audit plan every year? The same training program? The same policies? The same program for Compliance Week?
- That's fine. But could it be better?



Remember that compliance is a team effort

I think that you might be so sure that you're one in a million, that sometimes you forget that out there you're just one in 11.

Season 1, Episode 2:
Biscuits

Remember that compliance is a team effort

- The Compliance Officer's to do list is long and always growing.
- But one fantastic Compliance Officer is not as strong as a compliance team.
- Support from senior management and the Board are key.

Remember that compliance is a team effort

- Whose input might make your ideas better?
- Who can provide you with real-world examples to make that training program you are drafting more relatable?
- Who is in a good position to identify new risks – ones that haven't crossed your mind?
- Who might see compliance as an opportunity – and be an asset to the compliance effort?



Mind your social media

Oh Sam there's a bunch of crazy stuff on Twitter. Heck someone made an account for my mustache.

Season 2, Episode 2:
Lavender

Mind your social media

- The pandemic only increased social media risk.
- Social media is a HIPAA risk, a PR risk, and can be an abuse risk
- What policies, training, and audits are in place to manage social media?



Embrace new challenges

Taking on a challenge is a lot like riding a horse, isn't it?

If you're comfortable while you're doing it, probably doing it wrong.

Season 1, Episode 1:
Pilot

Embrace new challenges

- Healthcare changes all the time, and it's not easy. (See: COVID-19)
- What strategies do you have in place to anticipate new challenges and incorporate them into your compliance program?



Keep evolving

- Continue to look for new ideas to advance your compliance program and keep it fresh!
- Collaborate.
- Stay open to new ideas.

*"You know what the happiest animal on Earth is?
It's a goldfish.
You know why?
It's got a 10-second memory."*



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