



Compliance TODAY

A PUBLICATION OF THE HEALTH CARE COMPLIANCE ASSOCIATION

MAY 2018



**Ensuring that rules
and regulations
are met**

**an interview with
Lynda S. Hilliard**



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HCCA *The Compliance & Ethics Blog Highlights*

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Why leading a compliance program is like going to the gym

by Margaret C. Scavotto, JD, CHC

President at Management Performance Associates in St. Louis, MO

Leading a compliance program is like going to the gym. You don't set up a gym in your basement, try out the treadmill, do ten sit ups, cross the gym off your list, and never go back. To thrive, your body needs you to go to the gym regularly. You might modify your gym routine, but to be healthy, it takes continuous work. An Olympian who quits the gym and never goes back will become out of shape.



Scavotto

Just ask Olympic gymnast Simone Biles. In 2016, Biles took home 10 gold medals, two silver medals, two bronze medals, and a Nike sponsorship. Here is her daily routine:

"I have practice from 9 a.m. to 12 p.m. and... 3 p.m. to 6 p.m. and usually have more routines. After that, I either

have therapy at the gym or at home, and... do it all again the next day." <http://bit.ly/2FJavFS>

Six hours at the gym. That's commitment—day in, and day out.

Compliance is the same: You cannot have an effective program without continuous work.

Do you know any compliance officers who bought a compliance binder online? Or printed out policy templates, 3-hole-punched them, and put them in a binder titled "COMPLIANCE?" Are those binders stuck on a cobwebbed shelf? We call this the "Abandoned Home Gym Compliance Program." Without training, audits, communication, and updates, a "binder" compliance program

is not effective—even if the binder's contents are fantastic.

Compliance takes work (don't worry, even Simone gets days off). This applies to a new compliance program, and to a sophisticated, "Olympic" level program.

What's the difference between an Abandoned Home Gym Compliance Program, and an Olympic one? A routine. Borrow from Simone Biles' playbook and put together a compliance routine. Let's take compliance training as an example. If you are trying to move beyond the abandoned home gym, you might be doing annual employee compliance training—or no training. Here's a sample compliance training routine:

- ▶ Yearly: Train employees, contractors, and the board. Attend a compliance conference to keep up your expertise. Hold a Compliance Week.
- ▶ Quarterly: Train staff on compliance risk areas.
- ▶ Monthly: Post compliance reminders.
- ▶ Weekly: Send compliance news to your Compliance Committee.
- ▶ Daily: Read compliance enforcement and headlines. Keep a list of issues to share with staff.

These examples are a starting point, and soon your list will grow. But if you follow a routine and give your compliance program a regular workout, you can achieve medal-worthy results. 🏅

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