

The Accidental Compliance Professional

Lesson 13. Victoria and the Falsified Logs

People never seem to know what compliance professionals actually do. It's very frustrating. They think we create the rules they have to follow, when in reality compliance professionals create the process of following rules others impose on them. They think compliance is all about punishment, when in reality compliance finds problems early so fewer people are punished.

Recently I visited Victoria, someone I've known for 10 years. I knew she worked in healthcare, but we never really talked about what I do. When I told her, she threw her head back and said, "Nooooo, you're one of those Joint Commission guys!"

No, I am not one of those Joint Commission guys. The Joint Commission is a credentialing body for healthcare organizations and programs. If you break their rules, your healthcare organization can't be certified by them. Certification makes these organizations and programs eligible to receive federally funded payments from The Centers for Medicare & Medicaid Services programs. It is voluntary, but many healthcare organizations view it as essential.

"We don't make up rules," I told her. "We help people follow the rules and have nothing to do with The Joint Commission. You are a perfect example of how people spread misinformation about compliance professionals."

It was obvious to me that Victoria's organization was missing an effective compliance program.

Victoria's Problem

She went on to say that it was impossible to comply with The Joint Commission's overbearing rules, something her organization wanted employees to do. She cited one rule in particular. It was aimed at people who work with child patients and have toys available for them to play with. The requirement is to wash the toys . . . a ridiculous number of times each day.

"So I falsify the toy-washing logs," she said.

That's when I said, "Your case study has just gone from good to priceless. I am going to write about you in my book!"

What Victoria did goes on everyday all over this country—*good people doing bad things*. She's bright and funny, and a very, very good person. She has a college education and an advanced degree. Plus, she's dedicated her life and career to helping children. Yet Victoria is totally lost on the risks associated with falsifying a toy-washing log at a healthcare organization.

She sees the toy-washing rule as being ridiculous and a waste of time. Instead of washing, she wants to spend all the time she can helping her patients. So she falsified the toy-washing log. Sadly, what she thinks and does makes sense to many people. A majority of the population would side with Victoria. They would side with her until it all went wrong. Then Victoria would be the scapegoat for a scandal resulting from her misconduct.

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