

Compliance Today – May 2019 Effective compliance with I.M.P.A.C.T.

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I.M.P.A.C.T. is a strategy for achievement and excellence that stands for Intention, Meditation, Projection, Action, Commitment, and Trust.

Intention is where the strategy begins by communicating and agreeing upon a unified intention.

Meditation is followed by individual and/or group meditation, visualizing to define and crystallize the desired outcome.

Projecting the vision involves affirming the outcome (“as-if”) and creating creative motivational catch phrases.

Action is the plan consistent with the Intention, Meditation, and Projection of the stated goals.

Commitment is necessary to achieve the stated goals.

Trust is built with refined communication and team efficiency and accountability.

Effective compliance with I.M.P.A.C.T. is a strategy for achievement and excellence to assist compliance professionals in developing, implementing, and managing their compliance programs to garner program effectiveness throughout an organization. For purposes of this discussion, if we articulate the intention of having an engaged and highly functioning compliance committee, we can use the I.M.P.A.C.T. strategy as one way to achieve that result.

Intention

The fundamental intention of having an excellent and effective compliance program is the first step of the effective compliance with I.M.P.A.C.T. strategy. Intention provides the attitudinal and energetic infrastructure for setting SMART goals (Specific, Measurable, Achievable, Realistic, Time based),^[1] as well as developing communication and team-building skills necessary to achieve those goals. Setting and living your intentions allows you to focus on your identity, to recognize values and beliefs, and to live your values. Intention also relates to your compliance program’s and team’s identity, values, and beliefs, therefore raising your emotional energy by providing internal alignment among the three.

Acting in mental and physical alignment raises your physical energy by eliminating internal, duality-based resistance. Alignment of body, mind, and spirit creates balance. For example, the intention of your compliance program supports and complements the intention of providing quality patient care. Identifying gaps and mitigating compliance risks ultimately assists with providing quality care.

Mental and physical balance allows for clear and effective decision making. Alignment allows you to stay aware

and present in the moment and to experience how the environment is responding to and shaping your intention. Setting an intention is a way to identify, articulate, and incorporate your values into your everyday existence. It is also a way to identify, articulate, and incorporate the values of your compliance program into everyday interactions with your peers.

Setting an intention provides a GPS-like road map and reminder that you have the ability to alter your course, if necessary, to reach your destination despite traffic, accidents, or policy interference. The presence of intention gives a sense of purpose, as well as the inspiration and motivation to achieve said purpose.

Once an intention has been established, the next step is to develop goals around the intention to see it come to life.

Intentions versus goals

Intentions are not to be confused with goals. Intentions are a determination to act in certain ways and to focus on what one intends to do or bring about. Goals are the actual steps one takes to manifest the intention. An intention of any compliance professional is to have a robust and effective compliance program; however, it is audacious to think of in singular form. Moreover, somebody has to deliver that robust and effective program.

Once the intention has been established, the next step is to establish the goals and the steps to realize the intention. If the task seems overwhelming, sometimes it's best to go back to the basics when establishing goals. The original SMART goals were introduced in the early 1980s, and the approach is as valuable today as it was when first introduced. Although there have been varying interpretations over the years, the basics remain the same; the goals must be specific, measurable, achievable, realistic, and time based. The SMART approach is an easy and valuable tool to help compliance professionals define the clear steps necessary to accomplish the goals of their compliance programs.

First, let's define what it looks like, feels like, and sounds like to have an engaged and highly functioning compliance committee. An engaged and highly functioning compliance committee:

- Has excellent internal and external communication and regular reporting of regulatory updates, auditing, and monitoring activities;
- Is working from a recent risk assessment, which provides clarity and a landscape for action; and
- Has a work plan and timeline consistent with the current regulatory and statutory requirements.

Given these criteria, it is necessary to assess your compliance committee and define your baseline status, including strengths and weaknesses. Once that assessment is complete, then it is time to set goals. Here are some questions you may want to pose:

- Do you need to improve internal communication?
- Do you need to improve your reporting of compliance activities to senior leadership?
- What are the results of your recent risk assessment, and how do they correlate to the status of your work plan and timeline for implementation?
- What steps are needed to answer these questions?

When setting goals, it is important to approach them from a positive perspective (e.g., you may want to say “breach free” as opposed to “we will not tolerate any breaches”); state outcomes in terms of ability, rather than

lack of ability; and understand the context and overall ecology of your compliance environment (e.g., hospital, provider, health plan, nursing home).

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