

## Report on Medicare Compliance Volume 30, Number 34. September 27, 2021

### Scope Creep in Compliance Grows; Make Sure Opportunities 'Are Not Just Problems'

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By Nina Youngstrom

Melanie Sponholz, chief compliance officer for WCP Healthcare, has a hard time saying no, something that may fuel so-called scope creep in the compliance world. "I feel compelled to say yes to people," she said. "I want to take on everything people want me to do." That tendency may prove challenging in an environment of scope creep, with compliance programs increasingly asked to do more. While sometimes the additional responsibilities are incremental, other times they may be significant and fall outside the traditional compliance and ethics role. Sponholz said there's a risk that a project won't turn out well if she lacks the resources and skill set to pull it off, so "there's been a mindset change for me." Maybe she will accept the project but explain that accountability must be shared, or "I can have accountability but not execute alone," she said Sept. 20 at the Compliance & Ethics Institute sponsored by the Society of Corporate Compliance and Ethics.<sup>[1]</sup>

Those are some of the calculations that compliance professionals make as scope creep intensifies. Scope creep has been "a challenge for several years," said Adam Balfour, vice president and general counsel for corporate compliance and Latin America at Bridgestone Americas Inc. "We are starting to see an explosion of fascinating areas that compliance is suited to take on, but there are more and more things." Depending on the organization, scope creep could lead to more responsibility in a variety of areas, including Occupational Safety and Health Administration (OSHA) compliance; environmental, social and governance (ESG) concerns; corporate social responsibility (CSR); and enterprise risk management. "It has the potential to become even a bigger problem unless we get the resources," Balfour said. "Are your responsibilities and resources inversely proportional to each other?"

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