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Nurturing your compliance program: Lessons learned from parenting

By J. Veronica Xu, Esq., CHC, CHPC, CCEP

J. Veronica Xu (veronica.xu@saberhealth.com) is the Chief Compliance Officer for Saber Healthcare Group, headquartered in Cleveland, OH.



J. Veronica Xu

“How hard can it be to raise a child, right? If a person could successfully pass one of the most notoriously difficult bar exams on the first try while being eight months pregnant, nothing would be harder than that,” I thought to myself. Little did I know about how naive I was, and that pregnancy is a relatively easy part of the long journey. Not surprisingly, after my child was born, the seemingly never-ending nursing-changing-feeding-and-cleaning cycle completely overwhelmed and terrorized the then-inexperienced me. Even now, more than a decade later, I still find myself continually supervising, teaching, and guiding my preteen on a variety of subjects with new sets of challenges, including the ever-changing social environment—more like a compliance officer at home. I am sure this can resonate with many parents who are also compliance professionals.

As an enthusiastic compliance person, I am constantly thinking and reflecting upon the work I do. My parenting experience prompted me to ponder, and I can’t help but be amazed by how similar it is to the growth of a compliance program. At each stage of a compliance program, we are faced with a wide array of distinct challenges and barriers. As with raising a child, we need to nurture our compliance program and grow with it. It is truly rewarding to see it mature, advance, and succeed.

This article aims to deploy, apply, and share parenting tactics and strategies to assist my fellow compliance professionals with the development and management of their compliance programs.

Tips and traits that nurture and energize your program

The U.S. Department of Justice, the Office of Inspector General at the U.S. Department of Health & Human Services, and various other agencies have published considerable amounts of guidance and recommendations to assist organizations with developing their own compliance programs as well as evaluating their programs’ effectiveness. But the practical question encountered by many compliance professionals is how to help our compliance program grow and reach a level of maturity so that risks can be proactively and effectively monitored, detected, and managed. Actually, we do not have to look too far for tips and ideas.

Be patient and repetitive

Educators often say each child is unique and learns at their own pace. My son, for example, did not babble or talk even when he was almost two-and-a-half years old. Although I was understandably concerned about his hearing and speaking abilities, his pediatrician did not seem worried at all. He counseled, “Just continue to talk with him, and he will learn.” Miraculously, shortly thereafter, my son started to talk in complete sentences in two different languages that are spoken in our household. As such, patience is essential—it will allow children to reach certain milestones when they are ready. I have found that the same level of patience is needed for a compliance program, regardless of your industry. In the world of compliance, you may not see desired results right away after the

implementation of your compliance plans and policies, no matter how effective they may be. But with time, your dedicated efforts will pay off. It is often the case that information needs to be repeated multiple times before it registers in a person's mind. How many times did you have to remind your child before their coat actually got hung in the closet instead of thrown on the couch? Likewise, it takes time for compliance messages to sink in and take root in an organization's culture. It would be unreasonable and unrealistic to expect the culture to shift overnight—after all, Rome was not built in a day. So be patient and repeat your message often.

Be understanding

Putting ourselves in the shoes of frontline staff enables us to balance what needs to be done with how it can be done. Compliance professionals often feel frustrated, exhausted, discouraged, and ineffective because of an incident, violations of policies, repeated errors, stragglers who have yet to complete the required training, and a wide range of other things. Keep in mind that compliance may be new to some of your employees and may therefore scare them the way that my then-restless baby terrorized me as a new mother. Instead of pursuing perfection, it is wise to take a step back and try to understand the obstacles and pressures that our workforce is facing. To err is human. The compliance team should anticipate repeated mistakes, which in fact are signals for us to dig deeper to decipher the root cause, rather than letting them become the driving source of our irritation and exasperation. The truth is, we all learn from mistakes, and they help us improve. The key is to focus on the bigger picture and to not lose sight of the long-term goal of compliance. For a compliance measure or process to succeed, it is inevitable that several rounds of reviews, communications, practices, and assessments will be needed.

Be inspirational and collaborative

Encourage employees to speak up, and foster growth in people. Compliance is a function that is sometimes associated with intimidating mandates and nerve-racking punishments. It does not have to be that way. True, violating laws and regulations could lead to dire consequences, but compliance is largely about encouraging employees to do the right thing and promoting ethics, honesty, and integrity. Compliance inspires people to be leaders by holding themselves to a higher moral standard, which will not only allow issues to be detected early on but will also help minimize the organization's exposure to potential risks in the long run. Furthermore, when we promote compliant conduct, we are not solely preaching or practicing. Rather, we are cultivating a mindset and building alliances with leaders within our organization. After all, compliance is collaborative work that requires leadership support, interdepartmental rapport, and cross-functional cooperation.

Be fun and celebratory

All work and no play makes Jack a dull boy. Just as parents sign their children up for extracurricular activities to enrich their lives and learning experiences, compliance can engage employees through creative activities and intriguing events. For example, I have written compliance fairy tales^[1] and compliance rhymes^[2] and invited our employees to write their own compliance stories, songs, or poems. Keeping your message fun, thought-provoking, simple, and short is a great way to engage employees, raise their compliance awareness, and celebrate teams' compliance spirit. Although the compliance role might be perceived as authoritarian and boring, we can still make communications and activities entertaining and memorable for employees while sharing rules and policies. Moreover, we should not forget to celebrate successes. As parents, we used to be excited about every little thing our children achieved (such as baby's first steps, first spoken word, first bike ride, etc.), and we celebrated them all. A behavior encouraged and rewarded is the behavior repeated. The same holds true for employees' compliance conduct. So why not cheer for your compliance program and give out treats and recognition to staff? Whether it is the 100% training completion rate or the anniversary of your hotline system, it

is all worth celebrating because small things add up, and accumulation of efforts leads to compliance successes.

Be diligent and open-minded

Diligence—one of the secret ingredients for extraordinary accomplishments—is paramount to the success of a compliance program. As parents, we always try to give our children the best, and we put our hearts, souls, and hard work into raising them without regret because we love them and we care. Giving birth to a child is less onerous compared to years of nurturing and nourishing their physical, mental, and emotional well-being, health, and development. My father advised me when my son was born, “You are raising a person, not a pig. A child requires parents’ continuous attention, care, energy, self-reflection, guidance, patience, love, and devotion.”

Comparatively, so does the compliance program—it also needs our persistent efforts, guidance, and dedication. Establishing a structural framework for a compliance program may be accomplished relatively quickly, but the ongoing maintenance and growth of the program is not an effortless undertaking. Compliance is not merely an empty word used for marketing purposes. Instead, it’s a commitment we make, the responsibility we take, and a promise made for the trust people placed in us. To help a program to take off and excel, one must be open-minded. By seeking feedback from stakeholders and employees who are affected by your compliance policies, as well as conducting periodic progress surveys and evaluations, you can ensure your measures are effective and the program development is on the right track.

Be positive and humorous

Children are blessings, but they sometimes drive parents crazy, especially when they are stubborn, naughty, mischievous, and rebellious. I am sure many parents can relate to that. As parents, don’t we all want our children to listen to us and take our advice so that they can stay out of trouble? Similarly, as compliance professionals, we wish everyone would strictly follow the rules and policies—then all the risk concerns and compliance problems would be solved and incidents prevented. But just like with parenting, ensuring compliance is never that easy. It is normal for compliance professionals to feel frustrated and even helpless when training requirements are not met, hotline investigations have piled up, or incidents occur frequently. Knowing that there will always be accidents and incidents, positive thinking and a sense of humor will surely alleviate the headache and stress we compliance professionals experience.

For instance, my young boy used to lose his winter gloves all the time and claim that his gloves went somewhere nice and sunny because they were tired of the long winter here. Rather than scolding him, I said to him in a playful way, “I need to have a serious conversation with your hands. When your gloves went on their fancy vacation, they took all the money with them. If your hands don’t grab the gloves before they escape next time, then there will be no money left to buy you another pair of gloves.” Sure enough, the gloves never left him for another “vacation.” For compliance professionals, creative role-playing or a humorous story based on the real events and lessons learned can help elevate compliance messages.

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