Compliance program (and officer) effectiveness in a time of crisis

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> "Lead through a crisis day in the same way you would an ordinary day." Tammie Jo Shults, Southwest Airlines pilot

I had the pleasure of hearing Tammie Jo Shults speak at one of our organization's leadership events. You may not remember her name (she prefers it that way, because she is a very humble person), but you likely remember her story. On April 17, 2018, an engine on the plane she was flying exploded, spraying shrapnel that blew out a window.[1] One passenger died, and several others were injured. In the midst of chaos and fear in the cabin, Tammie Jo calmly coached her crew and completed an emergency landing to save the lives of 148 people. When our CEO asked if she had any advice for leaders, she said her mantra was "Lead through a crisis day in the same way you would an ordinary day."

In 20 years as a healthcare compliance professional, I have had the opportunity to help organizations work through a fair share of compliance crises, such as Department of Justice investigations, Office of Inspector General audits, corporate integrity agreements, qui tams, privacy breaches, and complex internal investigations. These are typically the types of things that require us to be flexible; adjust plans; divert resources; do more homework; and strategically communicate with our leadership, compliance committee, and governing board stakeholders. On an ordinary day, a compliance officer may be proactively preparing their team to deal with such matters should they arise, problem-solving, and doing the many other things required to operate an effective compliance program. On an ordinary day, we need to remain up to speed on government agency and regulatory developments; anticipate impacts on our organizations; and identify compliance education, guidance, and monitoring and auditing needs. Perhaps we even find a bit of time to complete a project and some compliance program strategic planning.

Well, this is no ordinary day. These aren't going to be an ordinary few months, and 2020 isn't going to be an ordinary year. COVID-19 has presented a crisis like no other. It came quickly, requiring *everyone* to immediately pivot to what is most important: saving lives; protecting our brave healthcare clinicians and team members; and obtaining the appropriate supplies, space, and resources to do so.

As I do each year during the first quarter, I recently reviewed and updated what we call the "Compliance Program Effectiveness Strategic Plan" for our department. This rolling multiyear plan outlines and tracks various projects to facilitate incremental and continuous enhancements to our program, and each project aligns to one or more of the longstanding elements of effective compliance programs. Although I am optimistic that we will forge ahead on our plan in due time, daily and long-term priorities shifted quickly with the onset of the COVID-19 pandemic.

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