

## Compliance Today – November 2020 Using the seven elements as a common framework for effective compliance and quality programs

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Anyone who has been engaged over time in the healthcare quality and safety (quality) debate has probably come to the same epiphany: If you have seen one quality program, you have seen just that—one quality program. Quality, by its very nature, is somewhat subjective. Fundamentally, quality is defined as an assurance that the care provided meets or exceeds best practices or nationally recognized professional standards. Countless medical professionals have spent much of their careers trying to appropriately define those professional standards, or identify those best practices, so that they can be objectively measured. But quality is not just a set of mandated metrics to track or a department that manages them. Quality is a way of being; a culture that, when done well, is woven into the very fabric of an organization. Quality metrics may measure performance, but that performance is generated by people and their actions, which are in turn guided by the cultural and behavioral norms of the organization in which they serve. Quality is everyone's responsibility.

To date, that “special sauce” that forms the underpinning of an effective quality program has not been fully elucidated. Few organizations have managed to build highly successful quality programs, and success has been born out of a wide variety of programmatic shapes, sizes, and approaches. Consistency, however, is somewhat elusive. As consideration is given to the nature of quality as defined above, the mind wanders to other organizational oversight functions that have similar dependencies; compliance and ethics (compliance) programs immediately come into mind.

Compliance is woven from a similar fabric. An effective compliance program promotes an organizational culture that supports integrity, accountability, and ethical behavior. Compliance is not just a set of policies and procedures in a binder but is dependent on the behavioral norms of the organization in much the same manner as quality. However, compliance is not entirely subjective; it is bound by clearly defined regulatory and corporate integrity standards. This clarity with respect to the end result lends itself to structure, and with this structure, compliance has something that quality, as of yet, does not.

### **The compliance program framework**

In an effort to promote the maturation of healthcare compliance program structure and standardization, beginning in 1998, the Office of Inspector General (OIG) of the United States Department of Health & Human Services developed voluntary compliance program guidance documents for nearly all segments of the healthcare industry.<sup>[1]</sup> These OIG guidance documents have become industry standard. The OIG guidance includes seven core elements that, when implemented in concert, unlock the keys to compliance program effectiveness and sustainability.<sup>[2]</sup>

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As organizational oversight functions, compliance and quality programs share much in common. In many ways, they perform very similar assurance functions—one within the administration and operations space, and the other in the clinical realm. Both programs are designed to prevent, detect, and mitigate organizational risk; provide open and effective lines of communication to promote a culture of reporting and accountability that is free of retaliation; and position the organization at the forefront of the industry with respect to legal and ethical business conduct and high-quality clinical care delivery.

If compliance and quality can be viewed in this context, can quality programs thrive through the application of the OIG's seven elements to a quality program? And beyond, can these mirror functions be synergistically strengthened by using a common framework?

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