



**Building a  
consistent  
approach across  
broad enterprises**

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an interview with  
**R. Brett Short**

by Eva J. Goldenberg, Esq., CHC, CHPC

# “Make Good Choices”: 2017 Corporate Compliance and Ethics Week

- » Prepare for and promote the event well in advance.
- » Encourage compliance staff to visit inpatient and outpatient sites, and don't overlook sites that can't be visited.
- » Provide key information about your compliance program and how to report a compliance issue.
- » Use various formats to garner attention and communicate this information.
- » Remember to give away compliance-branded swag!

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**A**ttention corporate compliance teams! Use this nationwide recognition week to gain attention for your compliance and ethics programs. Similar to National Nurses Week and Doctors' Day, Corporate Compliance and Ethics Week can help high-



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light your organization's compliance program. You can use this week to remind your workforce, medical staff, and vendors about your compliance program, how to contact the Corporate Compliance department, and what can happen without an effective compliance program.

Atlantic Health System is headquartered in Morristown, New Jersey. It employs more than 16,000 team members and has 4,800 affiliated physicians. The system comprises more than 400 sites of care, including six hospitals and more than 900

physicians and providers within the Atlantic Medical Group. It also includes a clinically integrated network representing 2,500 health-care providers, including two accountable care organizations (ACOs). At Atlantic Health System, Corporate Compliance and Internal Audit collaborate within the same department. Both were involved in Corporate Compliance and Ethics Week and will generally be referred to in this article as the “Corporate Compliance department.”

## Putting it all together

Below is a description of how Atlantic Health System recognized Corporate Compliance and Ethics Week during November 5–11, 2017.

## Before

A month before Corporate Compliance and Ethics Week, Corporate Compliance department members conducted brief presentations at each medical center's monthly management meetings and physician practice coordinators meetings (and any other meetings that would give us a few minutes on the agenda!) to

advise management about the upcoming recognition of Corporate Compliance and Ethics Week, providing dates and locations of celebrations. Celebrations were to be held at each medical center (in or near employee cafeteria), in medical office buildings where outpatient services and physician practices are located, and other sites within the healthcare system.

We also collaborated with Human Resources to include several compliance questions in the annual web-based employee engagement survey, which was scheduled to take place over a period of weeks that included Corporate Compliance and Ethics Week.

- ▶ A week before the event, the chief compliance officer (CCO) sent an email to all employees announcing the dates and locations of the celebrations.
- ▶ The morning of the first day of Corporate Compliance and Ethics Week, the CCO sent an email to all employees reminding them of the dates and locations of the celebrations.

### **During**

At each celebration location, the Corporate Compliance department set up information tables with educational flyers and tri-fold brochures that contained information about the compliance program and how to contact the Corporate Compliance department. Members of the department were present at the information tables to greet employees. The tables also had a “compliance wheel” showing various compliance prizes. Employees spun the wheel and received the corresponding compliance prize. Prizes included pens, notepads, iPad cases, and flashlights branded with the compliance hotline phone number.

The information tables were also stocked with candy (probably not healthy, but it was enticing). And for a photo opportunity, next to the information tables, we set up a cardboard, life-size (licensed) Captain Integrity, which

had a hole cut out in place of the Captain’s face. Employees could take turns putting their faces in the cutout and have their photos taken as Captain Integrity. Photos were later posted on our organization’s intranet. The tables were set up for several hours at each location during various days of Corporate Compliance and Ethics Week.

At sites where informational tables were not possible (e.g., physician practices, labs), Corporate Compliance staff delivered boxes containing:

- ▶ Compliance flyers,
- ▶ A memo from the CCO reminding employees to complete the employee engagement survey that contained several compliance questions, and
- ▶ Compliance swag (same as what was distributed at the information tables at the onsite celebrations).

Employees completed an annual web-based engagement survey, which included three compliance questions. On a scale of one to five, employees were asked to rate their level of agreement with the following statements:

1. I understand I am obligated to report any compliance concerns.
2. I am aware of this organization’s corporate compliance program.
3. I know how to contact the Corporate Compliance department team to report a concern.

A good time was had by all!

### **After**

The compliance questions that were contained in the web-based employee engagement survey were “sliced and diced” by the survey vendor. We received survey results by department, job position, and shift.

Survey results were overwhelmingly positive for all three questions. The departments,

job positions, and shifts least familiar with the three topics presented by the compliance survey questions were identified.

Corporate compliance flyers were created and sent to all management to use at their department, staff, or unit meetings or huddles to reinforce the elements of the compliance program, examples of compliance issues, and how to contact the Compliance department.

Corporate compliance staff conducted on-site visits to departments or areas of the healthcare system where employees could benefit from a brief, live compliance presentation. The presentation highlighted similar topics to those contained in the flyers (e.g., elements of the compliance program, examples of compliance issues, and how to contact the Compliance department).

### Other ideas

2017 wasn't our first rodeo. During prior years' Corporate Compliance and Ethics Weeks, we:

- ▶ Created a "compliance wheel" containing compliance questions. Employees spun the wheel and answered the corresponding question. Correct answers (and good attempts!) were rewarded with compliance swag branded with contact information for the Compliance department.
- ▶ Used on-the-spot, old-fashioned paper compliance surveys at the information tables. We strategically set up the tables at locations where the greatest number of

employees would see them. As employees passed by, we gave them clipboards and pens to complete the compliance survey. They got to keep the pen (branded, of course, with the compliance hotline phone number).

- ▶ Distributed other compliance gifts, including mousepads and magnets printed with "Ways to Report a Compliance Issue", stylus pens and toiletries bags branded with compliance information, and mugs and tote bags branded with the company logo and event motto.

2018 Corporate Compliance and Ethics Week—What will we do??

- ▶ Swag works! Pens, notepads, magnets, and any accessories for cell phones—all branded with important compliance information—are useful and appreciated.
- ▶ Information is useful! Flyers and brochures that can be left in break rooms or posted on bulletin boards are helpful.

Nationwide, we celebrate Corporate Compliance and Ethics Week one week every year. However, in reality, every week is compliance week, and every day is a day that we must support our compliance program.

If you would like more information about how we celebrated Corporate Compliance and Ethics Week, feel free to contact me. ☺