



How to Engage Your Business Partners to Embrace Compliance?

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PRESENTATION OUTLINE

- ❖ Know your audience**
- ❖ Building effective partnerships
(*with boundaries*)**
- ❖ Creative Strategies**

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SYNONYMS

• ENGAGE:

- Participate in
- Take part in
- Become involved in
- Share in
- Play a part/role

• EMBRACE:

- Support
- Accept
- Welcome
- Adopt



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KNOW YOUR AUDIENCE



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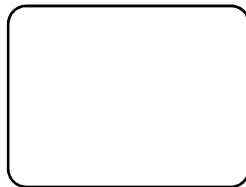
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WHO ARE YOU CONNECTING WITH – ROLES

- **Board of Directors (BOD)**
 - Serve as senior advisors who support, guide and enhance the Compliance Officers and Senior Leaders.
- **Chief Executive Officer (CEO)**
 - Holds overall responsibility for day-to-day responsibilities of the company, implementation of Company's long and short-term plans, acts as the main point of communication between the board of directors and corporate operations. Can be a huge catalyst for "top down" embracing of compliance and support!!
- **Compliance Committee**
 - Assists Compliance Officers with effecting compliance across the organization, driving accountability for compliance in business operations, acting as the Board of Directors delegate to oversee and approve certain aspects of the compliance programs, providing regular reports to the CEO and the Board of Directors (via Chief Compliance Officer).
- **Senior Executive Leaders**
 - Can serve in making high level, strategic and operational decisions. May work closely with the CEO to ensure that long and short-term goals of the company are accomplished. Serves to manage the day-to-day tasks of operating the company. Again, can have a large impact for the overall embracing of compliance.
- **Operational Leaders**
 - Responsible for day-to-day management and decision making for a specific business unit(s).
- **Line level staff**
 - Individuals carrying out the day to day operational work of a given business unit.

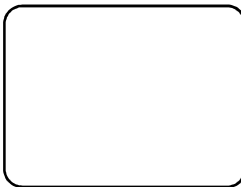
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HOW TO COMMUNICATE BASED ON KNOWLEDGE LEVEL



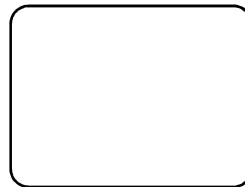
Board:

- They want to know the overall compliance health of the company at a high level. Think about what they need to provide the company drive compliance;
- Significant risks, regulatory enforcements and notices, and significant issues should be communicated in "lay person" language;
- Acronyms and details should be streamlined and to the point.



CEO:

- CEO, while engaged in Compliance, will also require streamlined information in layman language;
- Should be informed prior to meetings of information provided to the Board (unless it's something tied into executive session);
- As needed, in-depth discussions when significant issues or changes to regulations are identified.



Compliance Committee

- The members of the Committee are overseers of Compliance in the company;
- More "in the weeds" than the Board or CEO as they are a main overseer and supporter Compliance Activities. They also see all non-compliance;
- Reporting will be more at a detailed level, however, acronyms may still not be a day to day usage and so more lay language should be used.

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HOW TO COMMUNICATE BASED ON KNOWLEDGE LEVEL



Senior Leader:

- They want to know the overall compliance health for their areas of responsibility;
- Usually a higher level, but also should know what they can do to help drive compliance in their area(s);
- Acronyms and details should be streamlined and to the point.



Operational Leaders:

- Should be well tuned into to their area of expertise so can be detailed;
- They should be involved and aware of any issue in their area;
- Ongoing in-depth discussions should be occurring with these leaders.



Line Staff

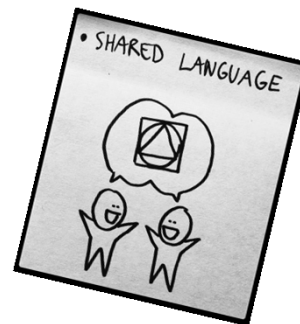
- Should also be tuned into their area of expertise;
- They are much more process oriented and may not be globally aware of every process;
- A lot of the information to the area may come from the Operational Leaders.

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WHAT ARE YOU TRYING TO SAY

THE LANGUAGE YOU SPEAK MAY NOT BE WHAT THEY HEAR

- Are you speaking in riddles?
- Are you getting too deep?
- Do they understand acronyms?
- Are you confusing vs providing clarity?



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BUILDING EFFECTIVE PARTNERSHIPS

WITH BOUNDARIES

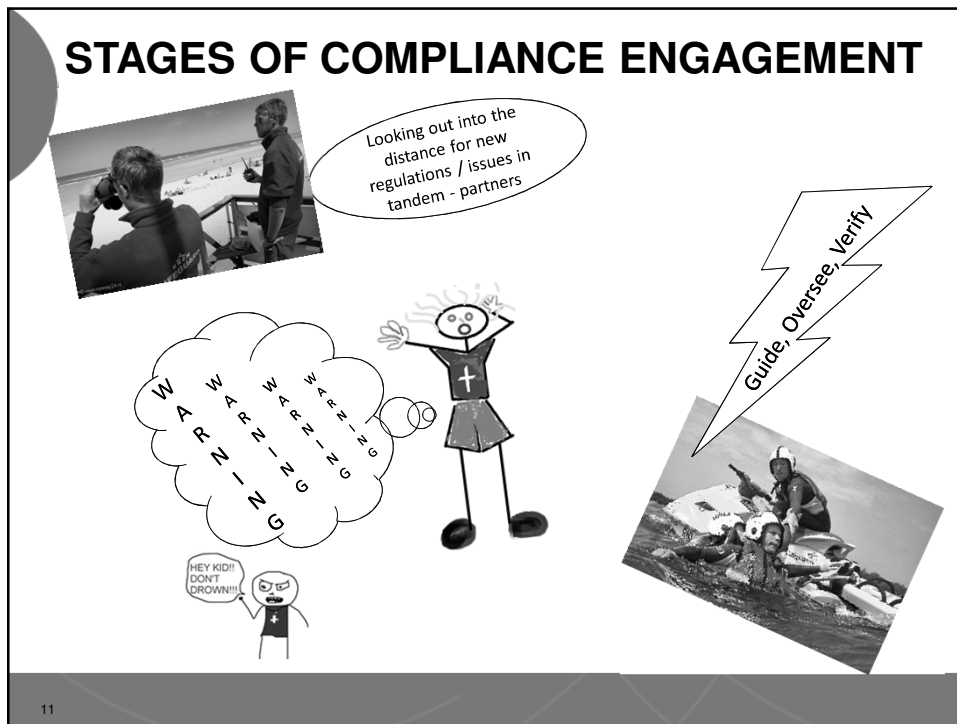
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Let's start at the very beginning .. It's a very good pace to start!

When you think in life about what you want in a business partner, what words come to mind?

- *Trustworthy*
- *Ethical*
- *Honest*
- *Integrity*
- *Respect*
- *Supportive*
- *Cooperative*
- *Good communicator: Both in speaking and listening*

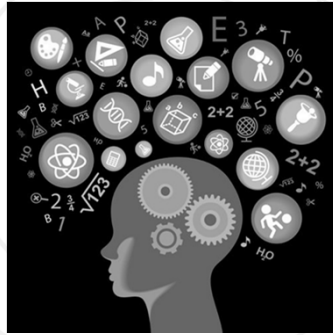
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So .. What role can Compliance play?

- While we truly can, and I believe, SHOULD, be partners, we know that the Compliance Department must have boundaries and remain unbiased;
- We should not own operational policies, procedures, processes, responsibilities and accountabilities;
- It is a **wonderful position** to be in when a business unit sees value you, sees you as a trusted advisor whom is not only "invited to the table" when an issue is detected, but from the beginning.
- Of course, there will be times when Compliance must escalate actions; however, maintaining a positive, collaborative and good working relationship with business units is key to an effective compliance program.

CREATIVE STRATEGIES



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IMPLEMENTATIONS / UPDATED GUIDANCE

Be a partner in:

- Helping to ensure that the law/regulation is fully understood:
 - Help paint the picture of the underlying requirement:
 - » Where is the regulation coming from? Federal Regulators, States, City, other.
 - » What is trying to be accomplished by the regulation?
- Be open to be a reviewer of policies outlining the regulation(s) involved
 - Do they include Regulatory Citation(s) Covered (i.e., CFRs - Code of Federal Regulation)?;
 - Do they appropriately address requirements?;
 - Are there features that are stricter than the regulations require?
 - Don't own the policy; but you can be a support in reviewing.
- Process and Workflows
 - Look at controls that are in place to serve as a quality check point in a process or workflow.
 - Does something seem missing?
- Controls
 - Are there good controls in place including business monitoring the business unit?
- FDRs / Vendors
 - If the business unit is responsible for a vendor relationship, are they prepared to do appropriate oversight? You can help bring that to focus.

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TRAINING

UTILIZING ANNUAL and SPECIALIZED TRAINING

- How can you be creative with your annual training to engage the company as a whole to think “compliance.”
- Reminders of the fact that each moment they act on behalf of the company and those consumer’s they serve compliance should be top of mind.
 - » Everything we touch has an underlying purpose of maintaining compliance, integrity and ethics;
 - » Reinforce this in your training – that no matter what task is at hand, if compliance is always on the front of an individual’s mind they are in a good position to act appropriately.
- Ask a staff line employee that doesn’t have a day-to-day intimate linkage with compliance activities to review the training; does it make sense to them?
- Can you be partners with your business units when they do specialized training? A reviewer? Attend in person? Add a slide about compliance?

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MONITORING / AUDITING

- Incorporate this as a way to engage your business partners:
 - You can help them maintain compliance by helping them understand how important monitoring is;
 - Talk together about what oversight you’ll be providing in looking at their own monitoring – and going maybe a level deeper;
 - How can you “enhance” their monitoring ... can they take one step, and then you validate?
- Discuss mock audits. Especially where we are at now in the numerous audits that are occurring by regulators – having them prepared and feeling confident in what they are doing can be a relief.
 - Yes, findings will occur, and yes corrective actions will be found.
 - » How much better to have them found internally or through a contractor?
 - » It will help them find gaps and assist in putting more controls in place

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BUDDY UP

- Fraud, Waste and Abuse:
 - If a separate unit, are they also collecting data you could use – to give your business partners a little break?
 - Overall Medic Findings / HEAT Map reviews
- Internal Audit Unit:
 - Can you “buddy” up on annual audits to be an integrated effort and look at compliance and controls? Again, this saves your business partners time.
- Risk Management Teams:
 - What are they seeing as risks. Other than your own annual risk assessment, are they hearing or seeing information that you could find useful?



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BE ONE WITH THE LOOKING GLASS

WHAT IS COMING DOWN THE PIKE

- Have your finger on the pulse, will give your teams added time to think about possible changes or additional processes needed;
- Regulatory Agencies
 - What information does your regulator have that you can share with your business units?
 - Do research; look at Regulatory reports;
 - Understand and provide summaries from the OIG Annual Work Plan;
 - Look at what enforcement actions are taking place;
 - What big implementations are coming down the pike?
- Read trade papers, attend conferences, share knowledge.
- Be a resource!



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PRAISE

RECOGNITION

- Most everyone wants to do a good job – and be recognized for a job well done. Some more publically, some quietly.
- Say “well done” and reinforce those who truly embrace compliance within their every day routines.
- Reach out to leadership within the organizational unit and share a little praise for someone in their unit.



BEST PRACTICES / “GOOD THINGS”

- Within each audit review done, find at least one or two “good thing;” if something jumps out as a best practice make sure to phrase it as that.

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OTHER HELPFUL HINTS

- Compliance Week:
 - Use this to engage individuals about compliance.
 - If you have multiple sites; be in those sites. As often as you can, but also during compliance week. It means the world to see you out and about;
 - Use games, special emails, swag, etc.
- Approachability:
 - Be approachable!
 - » Not many people want to partner with someone that doesn't want them around.
 - » Be available, be seen, be out and about – don't hide in an office.
- Listen:
 - Communication is a two-way street. If you want to be listened to, it's important that you take the time to listen.
 - Be open to flexibility, when you can
 - » Compliance, most of the time, cannot be overly flexible. But – are there times when you are really going way above and beyond, causing busy work that is not required?
 - You would be amazed at the information you can obtain while listening:
 - » can see struggles, misunderstandings, resource needs, questions that could be sent to clarify with regulators, etc.
- Newsletters/company communications:
 - Are you using newsletters and emails throughout the year reminding of compliance?
 - Will your CEO mention compliance in company reports and meetings?
 - Does something seem missing?

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NEVER FORGET WHO THIS IS ALL ABOUT



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QUESTIONS?