



November 5-11, 2023  
**COMPLIANCE & ETHICS WEEK**  
*Compliance begins with you*

## GROWING A CULTURE OF COMPLIANCE

There is no point throwing a seed into the ground and expecting it to take root unless you are willing to nurture it. Similarly, there is no point in putting together a compliance binder and saying you have a compliance program.

To illustrate how an effective compliance program evolves, think about the hard work that's involved in cultivating and maintaining a garden. Growing a culture of compliance is like tending to a garden. Just as a garden requires careful nurturing, monitoring, and ongoing maintenance to flourish, a compliance program needs similar attention and care to ensure its effectiveness and longevity.

**Planting the Seeds:** In the beginning, you need to establish the foundational elements of your compliance program, just like planting seeds. This involves setting up policies, procedures and a code of conduct that will serve as the roots of your program.

**Watering and Nourishing:** Regularly updating and improving your compliance program is like watering and providing nutrients to your garden. This includes ongoing training, risk assessments, and staying current with regulatory changes.

**Weeding and Pruning:** Just as you need to remove weeds and trim overgrown branches in a garden, you must identify and address compliance issues or violations promptly. This means conducting investigations, taking corrective actions and enforcing policies.

**Protecting from Pests:** Like protecting your garden from pests and diseases, safeguard your compliance program from potential threats and misconduct by implementing strong controls, internal audits and monitoring.

**Growing and Expanding:** As your garden and compliance program mature, you may want to expand your efforts. This could involve adding new plants (or, expanding into new lines of business) or increasing your garden's size (expanding your organization's footprint).





**Harvesting the Fruits:** Ultimately, a well-cared-for garden yields a bountiful harvest, while a robust compliance program safeguards your organization, mitigates risks, and fosters trust.

**Sharing the Bounty:** You may share your garden's produce with others. In a compliance program, you should communicate your successes and best practices with stakeholders, employees and regulators to build trust and reputation.

**Adapting to the Seasons:** Just as a garden changes with the seasons, you should continuously refine and adapt your approach to ensure it thrives with the changing environment. Your compliance program must adapt to evolving regulations, industry standards and internal changes to remain effective and relevant.

Up to this point, the focus has been on the garden without considering the gardener, or the compliance officer/official. And yet the gardener is a vital element in the garden – and each gardener brings something unique to each garden. The gardener's characteristics can be directly correlated with the qualities and responsibilities of a dedicated compliance officer/official.

They consistently show up to work, rain or shine, demonstrating unwavering dedication to ensuring the organization's adherence to regulations and ethical standards. They understand that compliance is an ongoing effort, not just a seasonal task.

They carefully monitor each plant's health and regularly assess the program to ensure it is thriving and meeting its objectives.

They provide support and guidance, like trellises and stakes, to help departments or individuals navigate complex regulatory requirements, offering training and resources when necessary.

They appreciate the diversity of the garden and value the uniqueness of each plant. They understand that different parts of the organization may have distinct compliance needs, and they honor these differences while upholding overall compliance.

Gardeners also recognize that they do not know everything and remain open to learning.

They have access to garden consultants, just as a compliance official has to FSA Compliance Services. A gardening consultant can help gardeners define their specific goals for their gardens. Whether it is growing food, cultivating flowers, or creating a tranquil outdoor space, they cater to gardeners at all levels, from beginners to advanced. They offer guidance and education appropriate to the gardener's current skill level, helping them progress and avoid common pitfalls.

By working with a garden consultant, gardeners can experience the joy of success sooner and find greater satisfaction in their gardening efforts.

This analogy underscores the importance of patience, persistence, and care in creating a successful culture of compliance. Similar to a garden, compliance efforts may not yield immediate results, but with a well-designed program, dedicated compliance officer/official and compliance committee, the organization can ultimately reap long-term rewards in the form of ethical conduct, reduced risks and a strong reputation.



# CODED INSPIRATION

Technology has gone from being a tool that was nice to have to something that is essential to the compliance function because of the value it provides. One simple piece of technology is the QR code. Creative uses of QR codes in compliance programs can enhance user engagement and make it easier for individuals and organizations to meet their regulatory and ethical obligations. These approaches can also streamline processes and increase accountability within compliance initiatives.

**Compliance Training and Resources:** Create QR codes linked to training materials or video tutorials for employees. This ensures that they have easy access to important compliance information during new hire orientation as well as annual training.

**Code of Conduct and Policies:** Link QR codes in employee handbooks or posters to the organization's code of conduct, and compliance and HIPAA policies, making it easy for employees to access them as needed.

**Hotline:** Create anonymous reporting mechanisms for compliance violations. Employees can scan a QR code to access a secure online reporting system, ensuring anonymity and encouraging the reporting of violations.

**Compliance Policy Acknowledgment:** Include QR codes on compliance policy documents. Employees and stakeholders can scan the code to confirm they have read and understood the policy, which is essential for legal and ethical compliance.

**Remote Work Compliance:** For remote employees, include QR codes in digital documents or communication tools that lead to remote work policies, cybersecurity guidelines and compliance resources.

**Safety Protocols:** Place QR codes at strategic locations within community, linking to safety guidelines, evacuation plans and emergency procedures. This is especially useful for quick reference in case of accidents or incidents.

**Accessibility Compliance:** QR codes on printed materials can provide access to alternative formats, such as audio descriptions, large print or digital versions, to ensure compliance with accessibility standards.

Remember to ensure that the content linked through QR codes is regularly updated and secure, especially when dealing with sensitive compliance information. Additionally, consider the privacy and security implications of using QR codes and comply with relevant data protection regulations.





'Tis the season...for celebrating and gifting. Prior to the holiday season, it is essential to remind all team members about the organization's policies regarding gifting and business courtesies. Residents and families often wish to show their appreciation for the care and services rendered by team members. Similarly, as a form of gratitude, vendors and referral sources may extend business courtesies.

In general, team members should not accept gifts directly from residents or families. They may accept perishable or consumable gifts from family members and friends, as long as these gifts are intended for a department or unit rather than a specific team member. This approach prevents preferential treatment and ensures fairness. Team members are not allowed to solicit gifts from residents and are prohibited from giving gifts to residents.

When it comes to interactions with vendors or referral sources, any form of business or professional courtesy should be declined if it could give the appearance of attempting to corrupt, influence judgment, secure preferential treatment, or reward referrals. Some organizations choose to set a cap on the value of gifts that can be accepted, ensuring that gifts remain within reasonable and ethical limits.

When in doubt about whether to accept a gift or business courtesy, team members are encouraged to consult with the organization's compliance officer or compliance official. This is a valuable resource for clarifying any questions or concerns related to the policies.

# Unwrapping the Art of Giving: Holiday Gifting Policy Insights



## Minimizing Risks From Within

Maintaining a "No-Interference" zone in the kitchen while preparing the feast

## How To Explain What You Do at

# Thanksgiving

## Seamless Task Execution Through Automated Teamwork

Watching the floats glide along during the Macy's parade

## Establishing a Risk Mitigation Initiative

Strategically designing the ideal seating plan to prevent unwanted drama

## Tailoring Control Measures

Making three types of potatoes because one family member likes garlic mashed potatoes, one likes sweet potato casserole and one wants black truffle potatoes

## Seeking Increased Funding for the Compliance Program

Breaking the wishbone