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# Celebrating Compliance and Ethics Week at the Department of Veterans Affairs: A team approach

- » Compliance and Ethics Week is VA's primary vehicle for promoting the connection between compliance, ethics, and VA's mission.
- » Support from all levels of the organization is critical for success.
- » Executing an effective campaign requires collaboration, creativity, flexibility, and strategy.
- » Compliance and ethics professionals hosted informational booths, live presentations, educational games, and virtual activities to celebrate the week.
- » Lessons learned guide planning activities for next year.

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*"To care for him who shall have borne the battle,  
and for his widow and his orphan."  
-Abraham Lincoln*

Serving Veterans is the core mission at the Department of Veterans Affairs (VA). We are deeply committed to ensuring Veterans receive the top-notch care and services that they've earned, and as the operator of the nation's largest integrated healthcare system, it's critical that we embody the spirit of our mission through our actions. Celebrating Compliance and Ethics Week (CEW) throughout the VA is one way that we strive to support the mission. Conducted annually, activities are planned and hosted across VA to educate Veterans and employees on the role that business integrity, compliance, and ethics play in ensuring healthcare services are delivered

seamlessly and efficiently. It should be noted that CBI originally celebrated CEW in conjunction with HCCA's celebration; however, a few years ago, we found ourselves in conflict with other VHA events. Therefore, we moved the date for VHA's Compliance and Ethics Week to enable wide-spread participation that did not conflict with other important dates at VHA.

At the Veterans Health Administration's (VHA's) Office of Compliance and Business Integrity (CBI), our focus is on providing internal compliance oversight of the complex financial operations that enable Veterans to receive health care at VA and at non-VA providers. CBI sets the strategic direction for VHA's compliance and business integrity program, providing support and policy guidance to CBI officers stationed at VA medical centers and others facilities across the country. Through its efforts, CBI has identified hundreds of



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millions of dollars in annual cost avoidance, allowing funds to be reallocated to care and services for Veterans.

A key factor to CBI's success is emphasis on building a culture of integrity within VHA's business operations. CEW is a prime opportunity to spotlight compliance and business integrity work and how it positively impacts services to Veterans.

### **Support for CEW at VA**

Leadership support is a critical aspect of a strong compliance program, and it is also essential for generating enthusiasm and buzz for CEW. As a result, we work with VHA leaders to find ways for them to personally endorse and support the event. During this year's campaign, VHA Under Secretary for Health, Dr. David Shulkin, recorded a video message aimed at all VHA employees. The video highlighted the connection between ethical and compliant practices and service to Veterans:

As Under Secretary for Health, I've shared my five priorities, one of which is to restore the trust and confidence Veterans and the American public have in the services we provide. A simple, yet powerful way to demonstrate our commitment to this priority is by participating in National Compliance & Ethics Week. Compliance and Business Integrity and Ethics professionals play a vital role in helping us ensure that every single interaction we have with a Veteran, family member, fellow employee or member of the general public is rooted in integrity, transparency, and trustworthiness.

In addition to garnering leadership support, another critical component is the ability to explain the connections between compliance, ethics, the VA's mission, and the

VA's core values of Integrity, Commitment, Accountability, Respect, and Excellence (ICARE). Activities and events during CEW provide a platform for generating attention and enthusiasm for the promotion of ethical and compliant business practices throughout the VA healthcare system.

### **The nitty gritty**

Executing an effective campaign targeting all VHA employees and Veterans requires heavy doses of creativity, flexibility, and strategy. CBI partners with the VHA National Center for Ethics in Health Care (NCEHC) to conceptualize and plan events during the week. This includes selecting a new theme and developing branded resources and activities that can be used by CBI officers and ethics staff across the country.

To kick off the annual planning process, a project plan is developed that contains goals, objectives, and deliverables for the event. From the start to finish, the plan covers roughly six months. In addition to the staff within the CBI and NCEHC offices, a national planning committee is established that helps inform and execute the plan. In 2016, over 20 CBI officers and ethics professionals from VHA medical centers across the country volunteered to join the committee.

### **Spotlight on creativity**

VHA's talented and dedicated CBI officers and ethics professionals are the backbone of CEW activities across the country. While the CBI and NCEHC national offices focus on producing materials for field staff, CBI officers and ethics professionals at VA medical centers begin planning unique and creative activities for the week by engaging with a variety of hospital staff for support. Typically, these partners are employees involved in public affairs, education, and members of the compliance committee. Leadership is also engaged to lend

emphasis to the week's events. Through these collaborative relationships, CBI officers and ethics professionals are able to conduct meaningful, relevant events for their audiences.

After the conclusion of the week's activities, CBI officers and ethics professionals share their experiences with the national office. This effort is made not only to get the creative juices flowing, but also to highlight and acknowledge all of the hard work and energy expended in support of local events. All of the activity submissions are featured in the CBI *Effectiveness Bulletin*, an internal newsletter which is distributed broadly to VHA employees.

In addition to hosting activities at the main hospital campus, other activities are often coordinated at clinical locations associated with the healthcare system. Activities celebrating CEW generally include hosting informational booths in high traffic areas, and distributing brochures and materials to Veterans and VA employees. Competitive knowledge games and interactive activities were also a popular choice this year. Two of the most popular games were "Are You Smarter than a Compliance Officer?" and "Who Wants to Be a Compliance Millionaire?" Employees split into teams, with the winning team earning bragging rights as compliance gurus. Games were a popular choice because it offered an opportunity to approach serious topics in a non-threatening and fun way. Another medical center took a more academic route by hosting a book club. The compliance committee selected a book that discussed the impact of patients' background on the type of medical care they received. After reading the book, subject matter experts led a panel discussion discussing the themes of the book, and the connection to care at the medical center.

To generate buzz about CEW, one CBI officer relied on humor as a tool for engaging

employees. Wearing a yellow feathered boa, she invited hospital staff to take a short breather and color "compliance chicks." Individuals put their completed drawing in a cardboard box made to look like a chicken coop. 150+ stopped by to color the "chicks." A winner was drawn from the "coop" and received a small prize. The CBI officer noted that many of the people who stopped by said they enjoyed taking a few minutes out of the day to do something "fun."

Meeting VA employees where they work was an idea embraced by several CBI officers. One group brightly decorated a "Compliance to Go" cart packed with information on compliance, and then toured the medical center to distribute brochures and to talk to employees and Veterans. Several other groups also set up informational displays in high traffic areas of the hospitals and facilities. As simple as it sounds, a few groups set out candy and small refreshments as an incentive to stop by. Another VA medical center conducted panel discussions, both in person and online. This enabled individuals to attend when it suited their schedule. In a busy and fast-paced hospital setting, meeting employees and Veterans where they are helped spread the message of compliance without sacrificing productivity.

Through the discussion of these topics in meaningful and engaging ways as discussed above, Veterans, their family members, and VA employees gain an understanding of how compliant practices lead to positive Veteran' experiences.

### **Evaluating our impact, improving year by year**

Celebrating CEW takes time and energy to plan and implement. This year, more than 85,000 VHA employees were reached and over 10,000 actively participated in events held across the enterprise. As you can imagine, it takes a lot of time to plan and coordinate events and requires support at

many levels to achieve this level of engagement year after year. How do we know if our national and local event efforts during the week pay off? Have we transmitted our message effectively?

CBI's primary method to measure the effectiveness of the campaign is to distribute a national survey. The survey asks such questions as how many people attended or helped plan event, the level of support received from specific groups of employees in conducting an event, and which national resources were the most useful or highest quality. We also ask for recommendations on how to improve in future years. As a result, the survey is a critical tool for us to further refine our planning efforts for the following year. In addition to the survey, we also measure the amount of activity on our CEW website in order to understand our reach and the popularity of certain resources.

As the event grows each year at VA, it gives us the opportunity to evaluate our processes and strategies. Through collaborative relationships with our various stakeholders, we conduct open and honest discussions about areas for improvement. Below are few of our lessons learned:

- ▶ **Choosing a theme.** When we develop a theme, we discuss how the theme supports our service to Veterans. This year, we selected the theme, "Service. Integrity. Trust." because of the clear connection to Veterans. Think about your organization: What are the values or key messages that are meaningful to employees or customers? Consider a theme that connects to the mission and can serve the

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- ▶ **Selecting the message medium.** The VA healthcare system is *big*. We have to engage in communication on many levels, and we also have to be cognizant of our employees—hospital employees are engaged in patient care, so we have to consider the type of resources we provide and how to best distribute them across

the organization. When planning your activities, consider the methods you use to get the word out. Are you meeting employees where they are? Even seemingly small things, like how many words are on the compliance flyer, can affect the transmission of the message.

- ▶ **Manage planning activities.** No matter the size or complexity of CEW events, creating a strategic plan has helped us hone and refine the time and energy we spend on planning. Before implementing our project plan, we found ourselves crunching 6 months of work into 3 months. Listing out our support activities and being able to divvy up the work has helped us keep ourselves and each other on task. Remember, this does not have to be a fancy or extremely detailed plan—it can be scaled to your needs—but it will help to have everything documented in one area.
- ▶ **Enlist helpers.** Many of us are at the mercy of external factors when it comes time for planning CEW activities: other aspects of our jobs, limited time, and shrinking resources. The involvement of volunteers on our planning committee has made a huge difference in the quality of events that we're able to host. Do you have

the opportunity to ask for help from a colleague or to solicit volunteers? While not everyone will be in a position to help, it never hurts to ask. You may be surprised who is willing to help.

- ▶ **Reflect on lessons learned.** After the event, reflect on what went well and what areas can be improved upon. Include the people who planned and implemented activities. Make no mistake: while we work hard each year to host meaningful and well-attended activities, some activities are better received than others. Don't be afraid to acknowledge those components that didn't work well. Objectively examine what occurred and tweak the approach. Looking back objectively on events will give you a jumping off point for planning future activities.

### Final thoughts

Serving Veterans is at the heart of all we do at VA, and we strive to do so in a way that reflects our core ICARE values. CEW is VA's primary vehicle for promoting the connection between compliance, ethics, and the VA's mission. If just one Veteran comes away from an event with a greater sense of confidence knowing that there are processes in place to prevent, detect, and mitigate noncompliant behavior and that there are checks and balances built into the system, we consider our efforts worthwhile. We are VA's compliance professionals because we know that what we do in compliance leads to positive outcomes for Veterans to strengthen their trust in the care they receive through VA.

*The Veterans Health Administration's (VHA's) Office of Compliance and Business Integrity (CBI) was created in 1999 to implement healthcare compliance in accordance with guidance issued by the HHS Office of Inspector General and the United States Sentencing Commission, and in alignment with healthcare industry standards. As a government entity, "Corporate" was not an accurate descriptor and was not included in the title of our event. ©*

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