

Time to Prepare the 2023 Annual Compliance Workplan

Richard P. Kusserow | December 2022

Key Points:

- All Compliance Programs are works in progress, never completed
- Plans for 2023 should be baselined by evidence of program progress
- Link strategy with specific, realistic, attainable objectives
- Time to engage in [an independent program evaluation](#)

As 2022 draws to a close, it is time to begin developing the annual [Compliance Program Workplan](#) that defines specific goals and objectives for 2023. The Workplan ought to inform executive leadership and the board of the progress of the program and objectives and strategies for advancing it in the coming year. It should be drafted with specific goals and objectives that are measurable, realistic, achievable, and time-related, with deadlines for achieving them, and linked to long-term strategic goals.

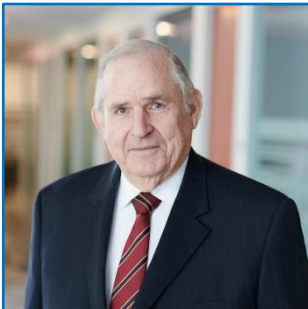
A key factor in developing the Workplan is tying it to the available resources (budget), with specific activities accounted for in both costs and revenues. As such, it should focus on connecting the goals and objectives with available resources. For each strategic objective, the plan should describe what activities are needed in 2023 to move toward a more effective compliance program and what resources are required to complete them.

To gain board and leadership active support, especially if added resources are needed, it is important to evidence significant improvement in the Compliance Program. As such, before drafting the Workplan of where the program needs to go, it is important to present evidence of where the program is today and how the Workplan will move the program forward in mitigating compliance risks. The answer to providing a current compliance program baseline can be found with the OIG and DOJ calling for a periodic [independent evaluation of the Compliance Program](#). The results of such a review can provide credible evidence to the board and executive leadership

that they are getting a positive return on their investment in compliance, and plans for the new year would continue advancing the program's effectiveness. For those Compliance Officers desiring to have this evidence as their baseline for their 2023 Workplan, arranging for such an evaluation should begin now so that results are available in the first quarter of the new year.

For more answers to compliance FAQs, see www.compliance.com/faqs/.

Keep up-to-date with Strategic Management Services by following us on [LinkedIn](#).



About the Author

Richard P. Kusserow established Strategic Management Services, LLC, after retiring from being the DHHS Inspector General, and has assisted over 2,000 health care organizations and entities in developing, implementing and assessing compliance programs.