

12 Compliance Planning Tips

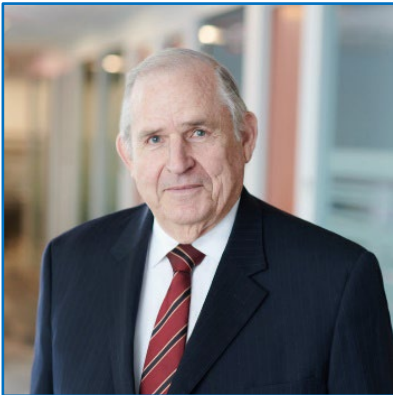
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Compliance Officers must remain focused on ensuring their organization has internal controls and measures to adequately manage, mitigate, and avoid risks that could give rise to liabilities or other unwanted results. The key to achieving the desired goal is focusing on the desired results. This requires developing specific, actionable objectives that assist in achieving the goal. Solid planning is necessary to identify what objectives are doable with the existing resources, and then breaking them down into smaller, measurable, and achievable tasks with a set timeline. The planning process should involve:

- 1. Strategy.** Develop a strategy for mitigating risks of non-compliance with applicable laws and regulations and advancing the Compliance Program's effectiveness.
- 2. Analyze Needs.** Examine the current situation and decide on how to improve it by gathering as much relevant information as possible to clarify objectives and the reason for them.
- 3. Identify Objectives.** Upon completing a realistic analysis of the situation, precisely define the desired outcome of the proposed plan to avoid wasting effort on less important issues.
- 4. Desired Results.** Identify what is desired in terms of the outcome from the planned objective and how the success can be evidenced.
- 5. Commitment Level.** Consider the level of work necessary to accomplish task work.
- 6. Available Resources.** Before planning any initiatives, assess currently available staff and others that assist with task work.
- 7. Set Realistic Objectives.** Critical to define achievable objectives with existing resources and other commitments. The WW2 movie "A Bridge Too Far" describes a plan that was over-ambitious and led to failure.
- 8. Detail Steps.** Establish the most efficient and effective way to achieve what is intended and determine who will do what, when, where, how, why, and at what cost.
- 9. Evaluate Plan Impact.** By this stage, there should be a good understanding of the situation and what is needed to achieve objectives. Take time to reflect on whether to go ahead with the plan as developed and decide if there are better options to consider.
- 10. Schedules and Routines.** Create a schedule and routine for the time and effort that should be spent working on compliance-related processes and reviews to help individuals stay focused.
- 11. Follow Through.** Consider the likely diversion of time and effort to other obligations to help avoid distraction and keep to the plan.

- 12. Track Progress.** Break down big objectives into manageable tasks that can be monitored for progress in achieving the desired end. This makes it possible to evidence progress and success.

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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.