

A Note to Managers – Your Role in Supporting a Culture of Compliance

Jan Smith is a manager of several busy clinical areas. Several months ago she approached her director with a question specific to the structure of one of the clinical programs Jan is responsible to administer. Very complex federal payer rules apply to this program and govern how billing for the services provided must be structured. The director said she would research the question and get Jan an answer, however months have passed and Jan is not satisfied that an answer will be forthcoming. What advice can we give to Jan?

Don't ignore or cover up a problem. This rarely turns out well. If you become aware of a problem or concern that is not addressed or appropriately resolved, it is important that you speak up. And, as a manager in our organization, you have a responsibility to take action to ensure that the right people are involved to properly address the situation.

Everyone has heard the old adage, “the cover-up is worse than the crime.” So why do we continue to read news stories about organizations that knew—or should have known—about problems that go unaddressed?

Research shows that there are two reasons why people don't speak up or report issues: the belief that nothing will be done, and fear of retaliation. If employees at our company have these concerns then some version of the scenario described above *could* happen here. UConn Health expects that the standards expressed in our Code of Conduct are routinely followed, specifically non-retaliation and an expectation that we understand our shared responsibility for keeping UConn Health in full compliance with all applicable laws, regulations and policies.

Our Code: <http://policy.uconn.edu/wp-content/uploads/sites/243/2015/01/codeofconduct.pdf>

So how do we prevent problems and protect our good name and reputation?

Doing Your Part

To help protect our organization, our employees and our reputation, managers must help others to be sure to:

- Work issues to a satisfactory outcome
- Recognize inappropriate pressure and be aware of the messages you send
- Provide clear direction and make good and timely decisions
- Watch for red flags
- Hold others accountable to the same high standards, while showing respect
- Cultivate and practice good communication skills and establish an open environment where retaliation is not tolerated
 - Our non-retaliation policy: http://policies.uchc.edu/policies/policy_2003_40.pdf
- If you don't believe the issue has been satisfactorily resolved, use another of the multiple available resources to report your concern, including the 'REPORTLINE'.
 - Our Reporting policy: http://www.policies.uchc.edu/policies/policy_2003_33.pdf
- Be a great role model—do what's right, even when it is difficult