

## Promoting the Pull: Wouldn't You Rather They Ask?

Office of  
Accountability &  
Compliance

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## OAC's Mission

The Office of Accountability and Compliance is committed to fostering a transparent culture within which members of the University community are *encouraged*, and *feel supported in seeking guidance and assistance*, to promote accountability and address compliance concerns.

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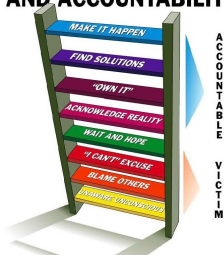
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## LADDER OF SELF-RESPONSIBILITY AND ACCOUNTABILITY

As compliance professionals, our goal is to provide our community with the tools they need to be accountable.



That means providing our communities with as many tools and motivations as we can to move them "up the ladder"

Figure 1. Ladder of Self-Responsibility and Accountability, n.d., Retrieved from: <https://www.towardsours.com/sites/default/files/1769229-Data-is-down-complety/page2>

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## The Compliance Toolbox

When creating our Toolbox, Compliance Professionals are, at minimum, responsive to the 7 Elements of an Effective Compliance Program (OIG, 2003):

- **Push:**
  - Policies and Procedures  
*Element 1*
  - Monitoring / Auditing  
*Element 5*
  - Education & Trainings
    - Mandatory
    - Recommended  
*Element 3*
- **Pull:**
  - Hotline  
*Element 4*



Toolbox w/Tool Tray. No Date. Retrieved from: <https://www.fazermal.com/products/details/6202809>

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**Accessible**  
**Collaborative**

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## Power of the Pull

- When our community is empowered with the tools to be partners in compliance, it promotes:
  - Personal Accountability
  - Intrinsic Motivation
  - Increased Engagement
  - Organizational Loyalty
  - Commitment to the Culture of Compliance

**A Culture of Commitment**

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## The Hotline

**Purpose:**  
A method for members of the UMB community, as well as visitors, guests, clients, contractors, patients, and research subjects, to report "serious matters requiring attention and corrective action" (Perman, 2017, n.p.).



- **Compliance Hotline**
  - **Benefiting Factors:**
    - Ethical Standards
      - Illegal Behavior Not Tolerated
      - Unethical Conduct Not Acceptable
    - Personal & Group Accountability
      - Empowers Community
    - Professionalism
      - Policies and Procedures
      - Civility
  - **Negating Factors:**
    - Negative Perception
    - Misplaced Loyalty
      - Colleagues
      - Management
    - Discouraged
      - Policies ("Credible Complaints")
      - Peer Pressure
    - Retaliation

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## The Consultation Line

**Purpose:**  
A method for members of the UMB community to ask questions, seek guidance, or request expert advice on a range of compliance issues, including: regulatory compliance, equal access/discrimination, civility, and general ethical conduct.

- Compliance Guidance
  - Proactive
  - Accessible
  - Consistent
  - Collaborative
  - ON DEMAND



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## Scenarios

Please look at the scenario information you were given when you arrived – its time for the interactive portion of our session

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## Discussion

- Effective Communication
  - Constructive Feedback
    - “Communicators should seek to use the tools that their audience is most comfortable with and to communicate at times and in places that the audience prefers” (Richards, 2017, n.p.)
- Guidance Availability
  - DOJ Evaluation Criteria
    - “Availability of Guidance – What resources have been available to employees to provide guidance relating to compliance policies? How has the company assessed whether its employees know when to seek advice and whether they would be willing to do so?” (Department of Justice, n.d., p. 5)



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## Creating the Consultation Device

- Similar to the Hotline, the consultation line should offer options:
  - Web based consultation form
  - Telephone service
  - App
  - Centralized E-mail address
- Customize to how your ‘customers’ want to interact with their Compliance Office

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## UMB Consultation Overview

- The UMB Consultation Line has been in place since August, 2017
- Inquiries have ranged from:
  - Training Assistance
    - Mandatory Title IX training
    - Harassment training
  - Request for Guidance on FERPA
  - New Supervisor Request for Assistance
    - Clarity on reporting responsibilities in the new role
  - Non-Affiliated Person Request for Assistance
    - Assistance for community member who had a potential drug addition



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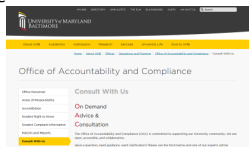
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## Conclusion

- Consultation Devices
  - Empower your Community
  - Demonstrate and promote engagement
  - Make your compliance program accessible
    - Support and strengthen your hotline
  - Increase your program effectiveness
    - Help identify gaps in your “Push” activities



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## References

Office of Inspector General's Compliance Program Guidance for Pharmaceutical Manufactures, 68 Fed. Reg. 23731-23743 (May 5, 2003), Retrieved from: <http://oig.hhs.gov/authorities/docs/03/050503FRCPGPharmac.pdf>

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U.S. Department of Justice. (No Date). *Evaluation of Corporate Compliance Programs*. Retrieved from: <https://www.justice.gov/criminal-fraud/page/file/937501/download>

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— Consult with Us!

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