

Y-Comply: Don't let the term "Internal Controls" intimidate you.

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Most compliance issues discovered in organizations are a result of not having adequate internal controls in place. Simply defined, internal controls can be systems and procedures, checklists, and assignment of responsibility to oversee a particular risk area. Internal controls are instruments to measure or evaluate how well an area is performing and indicators that show that conditions are. Internal controls help address or lower risk that may impact the organization, employees, and members. They help us do our jobs more effectively.

We encounter internal controls in our lives on a daily basis. For example, the instruments in our vehicles indicate a present

condition of the vehicle. Some of the instruments tell us how fast we are going, the temperature of the engine, the oil pressure, some have warning systems when the tire pressure is low, and so on. It's important to pay attention to those controls. If the controls are not working, chances are we won't know about the existence of an issue, so we can eliminate a small problem before it becomes a big one. Let's say we ignore a low oil warning because we are too busy and we think it will cost us too much to get it evaluated. The potential consequence is that the vehicle engine ceases to run. If we would have addressed the issue early on the incident would

have cost us less time and money; now the consequence is more money and more time to fix an even bigger problem.

In the business world, people ignore warning signs and take risks for multiple reasons. It could be that a workforce member receives pressure from a manager to ignore a failure. Perhaps resources are scarce and the worker is concerned about not meeting performance expectations, so the individual takes a short cut to work around the controls processes. We can find ourselves in many situations where we have to make decisions regarding how we should respond. It's always best to follow Care1st's policies for responding to issues.

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Consider how you might feel if an incident was discovered and, had you notified someone earlier, the incident would have never occurred. Remember too, when we fail to report an issue or potential failure, we implicate ourselves in the situation and there could be great consequences that go beyond just not meeting performance expectations.

Addressing risk can be costly, but it can be more costly if we don't. Compliance programs exist to help organizations evaluate and address risks, but it's everyone's responsibility to identify, evaluate, and report concerns of potential or actual failures. After all, reporting is also part of the control environment.

Y-Comply is a Compliance and Ethics Newsletter from the Health Care Compliance Association (HCCA).

If you suspect compliance, ethics, or integrity violation, or have questions about specific practices, please use the following resources:

- Talk to your Supervisor or Manager
- Call the Care1st HOTLINE at 1-877-837-6057. Anonymous. Available 24/7. Trained Professionals. Toll-Free

- Contact the Compliance Department at ComplianceSIU@care1st.com or ComplianceDepartment@care1st.com
- Call the Corporate Compliance Officer, Brooks Jones, CHC, at extension 6202
- Call Ellen Smart, AVP, Human Resources at extension 6203