



NAVEX Customer Success Story

How to Scale a Culture of Ethics

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**Director, compliance risk and hotline reporting,
major United States-based health system**



Highlights



Industry

Healthcare



Number of Employees

155,000



Challenge

Scale compliance operations following the merger of two relatively large health systems



Solution

Successful and ongoing optimization of large-enterprise compliance operations with NAVEX

Solution

NAVEX One®

WHISTLEBLOWING & INCIDENT MANAGEMENT
POLICY & PROCEDURE MANAGEMENT

About this organization

Formed by the merger of two large health systems in 2022, this nonprofit organization operates 69 hospitals and over 1,000 other sites of care across six states in the Midwest and southern United States. The organization's specialties of care are wide ranging across its multi-state footprint, including cardiology, neurosciences, oncology, pediatrics, rehabilitation, and organ transplantation.

The organization employs nearly 155,000 individuals. A total of over 21,000 doctors and 42,000 nurses provide care to nearly six million unique patients. The organization also offers one of the nation's largest graduate medical education programs, with over 2,000 residents and fellows.

Challenge

Even before merging, two health systems in the United States were large organizations in their own right. Roughly of equal size and scope, the two systems each served millions of patients across dozens of hospitals and other sites of care. Their respective operations included critical compliance functions like internal reporting and policy management. Following the merger – which created what is now the nation's third-largest nonprofit integrated health system – those functions began operating on a profoundly expanded scale.

Among the early priorities for Compliance in the new organization was ensuring the same “speak-up culture” extended across the combined organization's entire footprint. Individuals, no matter their location, should feel empowered and eager to use the internal reporting system to raise issues and make inquiries without fear of retaliation. Relevant policies should also be available on-demand to all necessary parties.

Automation would be critical in helping to ensure reports and inquiries to the system efficiently made it into the right hands in the now-larger organization. A solution to bring policy management from two large predecessor organizations into a cohesive whole would be another key effort.

Finally, data analytics would be more important than ever, informing the board of directors and other leaders of real-time trends unfolding across what was now thousands of locations of care.

These were just some of the many considerations the organization faced in scaling, and strengthening, its compliance programs. What tools would be up to the task?

Solution

Both health systems previously used NAVEX One for their internal reporting and incident management programs. Following the merger, the combined organization continues to leverage NAVEX One EthicsPoint, finding it capable of scaling to meet the needs of their expanded operations.

Today, the combined organization also uses NAVEX One for policy and procedure management.

Results

The combined organization has successfully embarked on ambitious new compliance initiatives as the integration of its two predecessor organizations matures. This includes scaling its internal reporting program, as well as refining policy management capabilities across a complex footprint, with NAVEX.

Ranking highly among those initiatives is the effort to increase awareness and utilization of the internal reporting program in general. Messaging spans the entire organization, and its director of compliance risk and hotline reporting said the high-level view afforded through the NAVEX One internal reporting system helped identify priority regions with relatively lower levels of reporting. Outreach and education at these sites in particular are meant to ensure individuals felt confident and encouraged to use the system.



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A greater level of reporting is a sign of a healthy speak-up culture, the director noted, with reporters acting as the local eyes and ears for issues that might otherwise go unnoticed by those who can act to fix them. While multiple channels exist for individuals to report issues within the organization, the NAVEX One internal reporting channels always allow the user to do so anonymously – a feature he said users have found meaningful.

"We worked closely with Patient Experience and the clinical risk team to explain, 'We are a safety-first organization. You are expected as part of your role to raise a question or a potential concern,'" the director said. "If you feel uncomfortable identifying yourself – the hotline is there for you.' It has been a key part of that campaign regarding our patient safety mission, which has been really helpful to build that relationship with those departments."

The NAVEX One system also includes some unique functionality allowing ongoing communication with anonymous reporters that has proven valuable, the director said.

"We also leverage the functionality NAVEX One Incident Management provides, that a lot of other tools don't provide, that maintains the ability for us to communicate with reporters even though they are anonymous," the director said, referring to a unique email address provided to reporters that allows for anonymous follow-up communications.

The organization also reaffirmed its zero-tolerance policy for retaliation during its awareness campaign for internal reporting. Reporting rates have increased substantially, the director said, with some lower-volume regions nearly doubling their report rate since the awareness campaign began.

Automation through the NAVEX One system allowed the organization to automatically route the receipt of some types of reporting, an important function given the merged organization's larger size and complexity. A report involving a hospital in Charlotte would go to that hospital's respective compliance officer, for example. Meanwhile, reports regarding behavioral health, which are handled enterprise-wide, route differently, the director said.

The director said those automation efforts are complex and ongoing, but that the NAVEX One system provides the capability to scale over time in the scenario of future mergers and acquisitions.

"There's room to grow there. As we acquire or merge with other organizations, it should be easy to just slot them into our system," the director said. "It should be plug and play and should be pretty scalable."

Leveraging data

The organization currently uses dashboards available in the NAVEX One EthicsPoint incident management system to quickly identify some basic operational information such as compliance department case workload. Meanwhile, data exported from the system each week joins other operational information in an internally-built Microsoft Power BI dashboard to inform some deeper analysis.

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That analysis includes work to understand reporting trends across different demographics such as role, age, and other factors – insights that might inform the way the organization encourages system use across various groups, the director said.

"We want to see where we might have some demographics or roles that are less likely to report – and try to figure out why that might be and how to address those barriers," they said.

The director said their group is currently working on further enhanced dashboarding that will utilize the NAVEX One system data to generate simplified "green-yellow-red"-type information for audiences such as the organization's board of directors, which will streamline conversations around potentially important trends or needed action. A multidisciplinary group of leaders is also working on ways to enhance data sharing across functional silos to identify deeper trends across the organization.

Policy and disclosure management evolves with NAVEX

While NAVEX is continuing to support the organization's internal reporting and incident management program, it is not the only area where they are leveraging NAVEX One. The health system also turned to NAVEX One PolicyTech, streamlining the way policy management unfolds for a combined organization that is continuing to optimize its integrated operations.

With NAVEX, the organization has the tool that will support refined policy management processes into the future, according to the ISO and Accreditation Consultant who oversees policy integration.

"We definitely have a lot of room to grow, and we have a lot of features in the system that we'll be able to use over time," they said. "...at the end of the day, this is the best way to reach frontline teammates, reach our audience, hold people accountable, and to be able to refer to an organized process that is up to date. It's at the forefront."

As these and other compliance functions grow, the compliance risk and hotline director was quick to affirm that even behind-the-scenes administrative work circles back to patient care. They noted that the relatively new organization launched a new code of conduct in late 2023, an opportunity to reestablish an ethos focused on patient care.

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