Compliance Today - July 2023

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Compliance needs project management too

by Dhara Satija, Caitlin Holleran, and Kaitlin McCarthy

Whether you are reviewing your annual work plan, identifying personal development goals, or assessing the capabilities of your team, consider including an objective for strengthening project management skills. Complementary to technical compliance skills and knowledge, project management is the practical "how" to get things done and can prove equally important. Intentional or not, compliance professionals are often de facto project managers in the work we do for our organizations. While there is no defined "right way" to manage a project, your compliance program and team will improve the likelihood of meeting objectives on time and within budget by understanding the core project management concepts and tools.

Project management comes in all shapes and sizes

As compliance professionals, we are often in the project manager role without a formal title. Managing internal business and compliance stakeholders, planning and executing compliance project objectives, and managing timely responses to government inquiries are all examples of activities requiring organization, communication, detailed planning, efficient execution, and stakeholder management.

What is project management, and why is it important?

Project management is the strategy of breaking down activities, small and large, simple and complex, short and long, into more digestible segments with the end goal of completing the activities within a project's scope, which is the project's defined parameters, desired outcomes, and timeline. Project management should be tailored to the scale and complexity of the project.

Project management requires critical attention to scope, resources, budget, and timeline. It is the engine that moves objectives and organizations forward. Project management will:

- Provide project team stakeholders with clearly defined objectives, goals, roles, and responsibilities.

- Increase stakeholder engagement and support by facilitating communication and logging issues, risks, and actionable items.

- Drive timely results through efficiency and achieving desired project outcomes within the project budget.

Illustrative project management cycle

Project management's lifecycle consists of initiating, planning, executing, and assessing until completion and close-out. Table 1 includes key activities associated with each phase.

Table 1

Phase	Activities
Develop project goals and objectives	• **Project goals and objectives** should be defined upfront and used to inform project decisions • Frequently, project goals and objectives are documented in a formal **project charter**
Develop project plan and establish timeline	• **Project plans** help to break down complex tasks into more manageable activities • Estimate how long each activity will take, the level of effort, and interdependencies to estimate the **overall project timeline**
Define project team and resources	• Project team members should be identified with the correct subject matter expertise to support specific project activities • Stakeholders may consist of a **core project team and extended stakeholders**
Align on roles and responsibilities	• Clearly define roles and responsibilities increase accountability of the team • Tools such as **RACI (Responsible, Accountable, Consulted, and Informed) matrix and project plans, with assigned tasks,** are frequently used
Project kick-off and determine communication cadence	• Projects are officially launched (kick-off) with **communications to align project teams** on the project objectives and project plan • Projects will define **communication plan**, based on project complexity and need
Project execution and progress tracking	• Project teams begin working through the activities in the project plan • **Project status is assessed** against plan, with assessments and updates occurring regularly, at least weekly • Proactive **risk and issue monitoring** occurs
Project close-out	• Complete **project objectives and outputs** • Archive project materials • Host **project debrief**, including successes and losses, and discuss lessons learned

Project management roles and responsibilities

Project management comes in all shapes and sizes and should be tailored to the scale and complexity of the project. Table 2 illustrates critical project management roles and responsibilities, from project leadership to core task owners. A skilled project manager will appropriately engage and tailor communications to each role to drive alignment throughout the project's life cycle.

Table 2

Roles	Responsibilities
Project Sponsor	• "The Buyer" of the project, typically responsible for the project business case, securing and approving budget funds, and managing senior stakeholders • Not involved in the day-to-day running of the project
Project Manager	• Responsible for delivery of project per the project charter and its day-to-day management against the project plan • Manages and collaborates with project workstream team leads, as needed • Reports status and significant issues to Project Sponsor/Steering Committee
Team Leader	• Responsible for the delivery of a specific project workstream objective • Manages workstream activities and resources & provides status updates to project manager
Team Member	• Responsible for the delivery of a specific project workstream task • Executes workstream tasks per direction of Team Leader
Project Steering Committee	• Be informed of project status and provide advice and resources to ensure delivery of the project outputs and the achievement of project outcomes • Responsible for key decisions identified by project charter (e.g. scope change) • Not involved in the day-to-day running of the project

Leading practices and common pitfalls

An effective compliance department requires implementing and using traditional project management activities to ensure successful implementation and integration of compliance activities across the organization. Table 3 highlights project management leading practices and more common pitfalls.

Table 3

| Audit and Monitoring | Strategic Initiatives and Projects | Policies & Procedures | Training and Education | Technology Improvements | Remediation Support and Advisory |

Many compliance activities may benefit from project management leading practices

Leading practices

- Clear goals and objectives outlined to orient all stakeholders
- Understand scope of activities and dependencies with respect to needed subject matter experts; ensure needed resources are available per project plan expectations
- Define comprehensive stakeholder list, inclusive of internal and external stakeholders and compliance and non-compliance functions, with clearly articulated roles and responsibilities
- Develop robust project plan and update throughout the project
- Implement defined communication cadence to ensure prompt attention to issues and risks
- Document meeting minutes and final decisions
- Manage and track financials
- Celebrate project milestones / successes

Common pitfalls

- Unrealistic project plan, level of effort, and timeline
- Not involving the appropriate resources
- Not ensuring needed resources are available and dedicated for project requirements
- Not defining accountable parties / decision makers
- Not documenting risks and issues
- Waiting too long to pivot
- Lack of consideration of project team's wellbeing
- Lack of identification of project interdependencies and lack of risk mitigation

Project management technologies and tools

A project plan is the foundation for project management. *The project plan* breaks up project objectives into manageable tasks with clear task owners and target dates. Some organizations have licensed project-specific tools to aid in project management, such as MS Project, while others may not have access to or funding for those tools. Project plan templates are plentiful on the internet, and we recommend leveraging a plan structure that will support your organization's reporting expectations.

Project management also goes beyond a project plan. While a project plan is the foundation, major additional tools—such as the status report, risk and issue log, communication plan, and project milestone tracker— facilitate project execution and management. The following are some simple tools and templates that can be built into Word documents, spreadsheets, or PowerPoint applications to accelerate project management principles.

Status update report

This report is used to communicate project status proactively and regularly to key stakeholders providing awareness against timeline and milestones and enumerating significant risks or delays that may require course correction (see Table 4).

Table 4

Status Update

On Track ▪ Complete ▪ Watch Item ▪ Behind Track

Key Accomplishments	Upcoming Activities

Milestones	Due Date	Status

Risks and Issues			
Description	Type (Risk/issue)	Date	Mitigation

Risk and issue log

This log should contain detailed tracking of future risks or current issues that could negatively affect project timelines, resourcing, or goals, with associated mitigations and resolutions documented. It illustrates and supports timely escalation and visibility of current and past challenges to the project.

Communication plan

The communication plan provides a clear depiction of stakeholders and the type, level, and format of project communication to enhance the effectiveness of project governance and change management for all stakeholders.

Project milestone tracker

For compliance professionals, the day-to-day work can be elevated by simple project plans. The subsequent examples (see Table 5) depict essential milestones for standard compliance work and may aid in ensuring complete and timely execution of work.

Table 5

Compliance Audits Status

Audit ID:		
	Illustrative Steps	
1	Select Accounts	
2	Issue RFP	
3	Create Contract	
4	Coordinate Remote Access	
5	Kick-Off Meeting/Walk-Through	
6	Conduct Audit Review	
7	Validate Results	
8	Gather Reviewer Feedback & Reconciliation	
9	Conduct Workgroup Meeting, if needed	
10	Prepare Data Summary	
11	Draft Executive Summary and Corrective Action Plan (CAP)	
12	Conduct Audit Findings Meeting and Agree on CAP	
13	Monitor CAP implementation	

Internal Compliance Investigation

Investigation ID:		
	Illustrative Steps	
1	Log Investigation	
2	Research/Gather Evidence	
3	Review Record	
4	Interview Witnesses/Inquirer	
5	Interview Alleged Individual/Leader's Entity	
6	Discuss with Response Team	
7	Draft Interview Report	
8	Draft Findings Analysis and Recommendations	
9	Draft Investigation Report w/ Corrective Action Plan (CAP)	
10	Request Feedback	
11	Finalize Reports/CAPs	
12	Closing Meeting/Investigation Conclusion	
13	Close Investigation & issue Final Report w/ CAP	

Conclusion

Understanding and applying basic project management skills can drive attainment of project goals whether compliance is in a leading or supporting role. Using tools outside the standard project plan can help ensure stakeholders remain engaged and aligned with project goals and status.

All projects can benefit from applying some basic principles, including:

- Clearly defined goals and objectives

- Identification and agreement on roles and key stakeholders

- Work plan or task list with noted dependencies

- Celebrating success

Whether you are a de facto project manager or a participant, understanding and applying scaled project management principles will enable you and your project team to effectively utilize time and resources to achieve your project objectives. And, in the words of Denis Waitley, project management allows us to "expect the best, plan for the worst, and expect to be surprised."[1]

The authors would like to thank Sharon Chin, Manager at Paul Hastings LLP, who also contributed to this article. *Note:* The illustrative tools included in this article are based on the Paul Hastings Life Sciences Consulting Group project management methodology and toolkit and the authors' collective experiences.

Takeaways

- Project management provides project team stakeholders with clearly defined objectives, goals, roles, and responsibilities.

- Understanding your role on a project can increase the value of your participation in the project.

- By facilitating communication and logging issues, risks, and actionable items, project teams can increase stakeholder engagement and support.

- Dedicated project software is not required to develop tools such as a status report, risk and issue log, communication plan, and project timeline/milestone tracker.

- Applying scaled project management principles will enable you and your team to effectively utilize time and resources to achieve your project objectives.

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1 Denis Witley, "Expect the best, plan for the worst, and prepare to be surprised," BrainyQuote, accessed May 1, 2023, https://www.brainyquote.com/quotes/denis_waitley_165018.

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