



Partnering with Senior Leadership on Ethics and Compliance



In this spotlight, we interview Todd Cioni, Vice President and Chief Compliance, Ethics, and Privacy Officer, to learn how he works with senior leadership to embed ethics and compliance across the diverse teams at CareFirst.

ABOUT CAREFIRST

CareFirst BlueCross BlueShield, an independent licensee of the Blue Cross and Blue Shield Association, is a not-for-profit health care company that, through its affiliates and subsidiaries, offers a comprehensive portfolio of health insurance products and administrative services to 3.2 million individuals and groups in the mid-Atlantic.

CareFirst is a member of the Business Ethics Leadership Alliance (BELA) and a seven-time World's Most Ethical Companies® honoree.

THE CAREFIRST COMPLIANCE TEAM

Todd Cioni, Vice President and Chief Compliance, Ethics, and Privacy Officer.

Fourteen members of the compliance group (program director, three ethics analysts, an investigator, an integrated program director, three integrated risk managers, and five risk analysts) and 12 compliance teams embedded in different business units.

CareFirst's senior leadership is very engaged with ethics and compliance. What steps have you taken to partner with your CEO and others in the management team? What advice would you give to others looking to do the same?

I am lucky to have our CEO, Brian D. Pieninck. He is invested in compliance, so I don't have to fight for face time with him. We go on compliance road shows to the various offices to get the message out—we have dubbed these "Brian and Todd's Excellent Adventures." When wide audiences see that the CEO will spend six hours in the car with the Chief Ethics and Compliance Officer, to personally meet with associates, it sends a message. We also have an active Board that's interested in ethics and compliance.

Compliance can only be successful if your leadership sees you as a business partner, and the first step is to make sure that it's not painful to deal with us. We work to show our value-add to leadership. When new people come on board, I tell them, don't schedule lunches. We're not a corporation where value is conveyed over lunch. When you see a problem, volunteer, get involved. Be a part of the solution. Be likable. Be sensible between both compliance and business operations. Over time this model has shown its value-add to the leadership.

What actions do you take to foster a strong tone from the top?

How do you get leadership actively engaged with the associate base? That's on us. For our compliance week, our CEO does a kick-off video. This year he said, "I really want to get engaged and reach out." So I said, we need to humanize you—let's put together a blooper reel. It engaged the associates because it really humanized compliance and ethics, took it beyond talking points.

When we do videos of our executive leadership team, even corporate videos, we will tack a question onto the end of it. Most recently, it was "What does it mean to you to be one of the World's Most Ethical Companies?" Nine executive leadership members gave nine different answers. Each one was 30 seconds in length, so we shot a montage of them and pushed them back out. If you're in a division, it means a lot to hear directly from your boss about what it means to them. There were some funny videos. Again, it's just continuing to get the message out in a way that doesn't feel like a canned process from corporate.

Anytime I can convey a message and I can convey it with my leadership, I do it. It is my preferred method. Bottom line is, people listen to their executive vice president more than they listen to the compliance officer.



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Are there any other ways you work with senior leadership to get the message out?

To bring awareness to our compliance program, we have branded it—on cups, pens, Post-it notes, and other materials. Each promotes the hotline and helpline. Our CEO carries the cup around everywhere. It's subtle, but he uses it. I'll say, "When you go to the leadership meetings, would you take our cup?" "Sure!" When he became CEO, the first thing he did was to hang the values poster in his office—believing in it and knowing that it would impact those visiting him.

What other ways have you embedded ethics and compliance across CareFirst?

What has made the CareFirst program so successful is an approach we developed—the integrative compliance model. As Chief Compliance, Ethics, and Privacy Officer, I lead our corporate compliance office, and our team is very modestly staffed—nine people. We have embedded and integrated compliance people throughout all of our business units—medical, claims, business operations, finance, and all of our divisions. Each person has a dotted-line reporting structure to me, but they ultimately report to and reside in those business units. People have subject matter expertise in the areas that they're operating in, but still carry the tenets of culture and the seven pillars of the Federal U.S. Sentencing Guidelines. The dotted line gives them access directly to the Audit Committee or the Board. So they can come through me to get to the Audit Committee, and they cannot be fired without my approval.

Our integrative compliance model also means I don't have to go around the company pitching training to 12 divisions. We send out the corporate message, and the embedded compliance teams convey it within their division. It allows a corporate message to be customized for delivery in the most effective manner within each division. Sales may appreciate something in a different manner or may take in information differently than medical, who may take in something differently than an operations center. It allows those individuals to take our corporate philosophy and individualize it. It also gives them a better framework of when something's a problem. They also are not considered the policemen.

We structured the program with the passage of the Affordable Care Act, which drove fundamental changes to how we did business. We realized we needed to have people dedicated in that space and then adopted this approach one unit at a time afterwards.



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