

A US-based Laboratory Services Company

Healthcare and Hospitals

51-200 Employees

English Speaking

US-Based

Private

Situations and Solutions

Compliance Scenario 2 – Sharing a password

Situation

Jennifer has to pull patient data from the hospital's system to load into our LMS system and her password request has been delayed for no valid reason. She is on a time crunch and has to input the data or her department will miss deadlines to present live, validated data to the client.

Her co-worker Sarah said, "Use my password. We do the same job and it's only a data warehouse, not a live production system."

Jennifer uses the password to pull large patient files to populate the system and makes the deadline.

Questions for consideration

What factors may have clouded judgement here?

Do you think this would have violated our policy?

What other issues or violations do you see with this situation?

What would we do?

CASE STUDY

1. Problem

- This organization wanted to incorporate brief, crisp compliance communications during onboarding sessions with new employees.
- The Chief Compliance Officer was looking for an engaging, conversational way to bring compliance and ethics situations to light for New Hires with fresh content that could be tailored to fit the organization's needs and tone.

2. Solution

- Upon gaining access to the Steele Compliance Wave Library, the Chief Compliance Officer and the team began to use **Situations and Solutions™** (hypotheticals) and **Compliance Illustrated™** (graphic storyboards) from the Steele Compliance Wave Library.
- The team was able to customize both the content and the look and feel to make it directly relatable to the organization's needs. Using a combination of real and potential ethics and compliance risks, the Chief Compliance Officer took examples from **Situations and Solutions** and created a short presentation to bring to the New Hire onboarding session.

i. "I would show the situation slide, then ask what factors, laws, other facts may be relevant in this situation. [The] audience would either ask clarifying questions, have some idea or know right off the bat what was incorrect. Typically, [however], they didn't know all the issues." – Chief Compliance Officer

- Following the discussion, the Chief Compliance Officer would flip to the solutions and see how well the audience matched up with what the correct course of action was.

3. Outcome/Reflection

- "Each case created a lot of discussion which was good because these were new employees and there was a lot of audience participation."*
– Chief Compliance Officer
- "I actually find this part of my job fun but it's all about finding the time, which CW has given back to me by providing content/format, etc."*
– Chief Compliance Officer

Compliance Illustrated

Compliance Moment – Code of Conduct Awareness



Have you ever been in a situation where achieving business success seemed to be in conflict with "doing the right thing"? Where a practical choice felt like it might not be the most ethical one?

For More Information:

Contact: CCO 858-XXX-XXXX or
Hotline: 855-XXX-XXXX @ ouethicsdepartment.com