

How to Create a Culture for Compliant Business Writing

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Why is Compliant Business Writing Important?

Professionals in pharmaceutical sales and marketing groups need to document information for planning purposes, sharing with others, or for record keeping. Due to the heightened scrutiny of their activities, pharmaceutical sales and marketing groups face unique challenges when balancing risks against needs for business writing. All written documentation must meet ethical and compliance standards.

Why is Creating a Culture for Compliant Business Writing Important?

Ensuring that sales and marketing professionals know what and how they can record in a compliant fashion is an important first step to ensuring compliant business writing. However, when changing behavior in an organization, the underlying values, beliefs, and practices that exist in the organization's culture tend to produce behavior that is pervasive and resistant to change. Unless elements of an organization's culture are directly addressed, simple efforts to educate or teach new skills, (i.e., a single communication or set of PowerPoint training slides) will have limited long-term effects on behavior. There needs to be an alignment from the organization's values and beliefs to the goals of compliant business writing. For this reason, the implementation of compliant business writing throughout the sales and marketing groups of the organization must be thought of as an "organizational change" initiative.

How Do You Create a Culture for Compliant Business Writing?

Culture change requires careful planning and a disciplined approach to effectively address elements of an organization's culture. This will aid in determining and reinforcing the desired behavior.

We recommend the following approach:

1. Perform a risk assessment to identify areas of vulnerability or potential scrutiny and determine how best to proactively address them:

- Include all forms of business writing in your initial assessment to determine areas of risk (any writing or recording of information on any media).
- The assessment should be broad enough to include people at all levels of the organization, not just leaders. In some cases, people in the field may have the most information.
- Carefully examine findings and use this opportunity to take corrective actions early in the process.

2. Identify what is meant by desirable and undesirable writing and documentation:

- Provide examples of what "not to do" for clarification and identification. These examples should include specific language and phrases to be avoided (*see Table 1, below*).

- Provide best practice examples of compliant business writing to convey expectations.
- Identify “grey areas” and use these to create workshop situations and scenarios for group discussion and learning.

Phrases and Language to Avoid in Business Writing

“I don’t care how you do it, just make it happen...”
 “Everyone does it...”
 “We had better destroy this document...”
 “This is off the record...”
 “There is a risk of winding up in jail if we don’t fix this...”

3. Involve all levels of the organization in the change management effort:

- Solicit input from all levels to ensure “buy-in and ownership” of the change effort.
- Ensure roles and responsibilities are clear with accountabilities for oversight assigned.

4. Develop a disciplined communication and learning cascade:

- Cascade learning throughout the organization.
- Customize training to meet individual and group needs.
- Use leaders to clearly communicate, model, and reinforce desired behaviors.

5. Use learning best practices to produce behavior change:

- To create lasting behavioral change, learning programs should convey knowledge of compliance regulations and behavioral expectations to assist with the learning transfer to real world scenarios.
- Include opportunities for learners to practice “what” they are learning and receive feedback and coaching on application.
- Use the workshop situations and scenarios developed above to help develop consensus on what to do in “grey areas.”

6. Identify “reinforcing experiences” to help support learning:

- According to Connors and Smith (1999) in Journey to the Emerald City, behavior is a function of experiences, beliefs, and actions – these latter three being the essential components of organizational culture. They argue that beliefs drive actions and action produces results, but the experiences we have are what shape our beliefs. For example, what are we rewarded for doing and what do we see others rewarded for doing?
- Leaders need to ensure that the experiences of their direct reports reinforce the behavior change they want to produce. Managers and leaders can do this by specifically creating experiences to shape and reinforce desired beliefs.
- Ensure that your incentives match your messages, i.e., do not reward bad behavior or results at any cost.

7. Effectively monitor behavior and create a closed loop reporting system:

- Monitoring of business writing should be usual and customary to convey the notion that compliant business writing is an ongoing expectation.
- Create a reporting system that enables responsiveness to potential compliance issues, e.g. automatic notifications and follow-up procedures to close the loop to reduce the risk of external scrutiny.
- Ongoing reporting also makes it possible for the organization to proactively discover behavioral trends and areas of future risk.
- Have a formal process for retaining and reviewing prior potential issues to create the “organizational memory” that can help avoid repetition of important and costly mistakes.

These seven steps are designed to help sales leaders create a culture for compliant business writing. By first defining and then using behavior-based training to convey expectations, leaders can shape business writing behavior. Through effective monitoring and closed loop reporting, they reinforce these expectations and mitigate risks on an ongoing basis.