Get Control of Yourself

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Hello Fellow Hunker-Downers! As we wrap up this year when time seems to have crawled by at a snail's pace, I'd like to join Lew Folkerth and Sam Ciccone in their conversation regarding implied requirements.

If you already read Lew's Lighthouse then you know he describes an implied requirement as "an action your entity must perform to comply with the Standards, even though that action is not directly stated in the text of a Requirement." I've stated before that I view the Standards and Requirements as a means of identifying risks associated with the BPS, and the activities your organization performs to mitigate that risk are your internal controls. I think implied requirements occur within practically every Standard because it would be impossible for those who write the Standards to capture every activity associated with each Requirement. As Lew stated, the risk is the consequence of not following the implied requirement. Additionally, I feel the risk also includes the possibility of not recognizing the implied requirement.

Now that we've identified the risk, how do we mitigate it? Sam's Continuous Improvement article provides a data-driven quality strategy used to improve processes and walks you through the basis and benefits of following DMAIC. I would add that **how you prepare** to perform this process is as important as the process itself. Therefore, I suggest a well-defined and documented methodology to help ensure you have completely addressed the risk of implied requirements and properly performed your mitigating strategy. Sounds too easy, right? That's the beauty of internal controls, we've been doing many of them all along.

Every Standard requires a methodology to address the process that mitigates the risk identified by the Standard. A strong methodology will help ensure that you have addressed all risks associated with a Standard, even the implied ones, and properly performed your selected strategy. So how do we ensure we've written a strong methodology?

I'm confident that by addressing the following four components you can appropriately mitigate your risk.

1. Have you invited all the required and relevant people to the conversation? This is a critical step. Often times the methodology is written by a few people who understand the process; unfortunately, this can omit crucial information. When determining who should be involved in designing your methodology, be sure to include all internal and external customers. We sometimes forget that our coworkers down the hall who rely on this information are our customers, too!
2. Brainstorm all the activities that occur within the process. When all the appropriate personnel are involved in the conversation, the risk of missing a critical step during this process is reduced. Once you've identified all the activities, list them in order so that your "process" begins to form.
3. What information (data) is required to perform all of the identified activities? And where do you get it from? If the data is from a source that is outside of your control, how do you ensure you are getting quality data? Does that data have to be obtained at a specific time? All of this type of information should be identified and clearly documented prior to implementing your strategy. You don't want to have to scramble to figure it out when you're performing the strategy.
4. Who do you need to communicate the results to? And how do you need to communicate it? Again, identifying everyone who relies on the information from the process is crucial to ensure the reliability of the grid. We often overlook outside customers, especially if we are only communicating information to them on an infrequent basis.

In order to ensure the accuracy of your methodology and strategy, you should perform a walk through of the entire process. This can be strengthened even more if it's performed by someone knowledgeable enough to perform the process, but not intimately involved with the process. This provides the opportunity for "fresh eyes" to review your process and ask questions that might be overlooked by employees who perform the activity daily.

Finally, document, document, document. You can't expect consistency of process if you don't provide the tools needed to ensure it.

If you combine this process with Lew's and Sam's suggestions, these approaches should help you mitigate any risks from implied requirements!

Wishing you all a safe, healthy, joyful holiday season. Be kind to each other and get control of yourself!