When Project Success Becomes the Trap: Navigating "Never-Ending" Projects in Highly Regulated Industries Through Governance, Strategic Prioritization, and Emotional Intelligence [1, 2]

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Introduction

Most strong project managers have heard (or will hear) the phrase, 'You're too valuable to move.' In most professional contexts, this is a compliment. In project management, particularly within highly regulated industries, it can become a professional paradox--a trap built of your own competence. This case study explores that paradox through the lens of a complex, multi-year healthcare information technology initiative: the implementation of electronic claims attachments under evolving federal mandates. The program was intensified by shifting regulatory requirements, multi-vendor dependencies, and the political sensitivity common to publicly funded healthcare programs.

The project manager at the center of this case study repeatedly demonstrated the capacity to translate regulatory complexity into structured delivery. Leadership, recognizing this capability, made a strategic decision not to reassign her--ever. The result was a "never-ending" project with no defined finish line and no clear mechanism for closure. What began as a regulatory compliance initiative grew into a perpetual program fueled by continuous scope change, evolving payer requirements, and unresolved stakeholder accountability.

This paper examines how structured governance, strategic prioritization, and emotional intelligence (EI) were deployed to transform the project from reactive delivery to governed

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execution. Specifically, it addresses how a Change Control Board (CCB) with transparent evaluation criteria, a disciplined scope management framework, and advanced leadership capabilities--particularly the ability to influence without authority--helped move stakeholders from avoidance to accountability. These interventions align directly with the newly released PMBOK® Guide--Eighth Edition (PMI, 2025), which elevates Governance to a standalone performance domain and introduces "Lead Accountably" as one of six core principles guiding effective project management behavior.

The lessons drawn from this case study (illustrated in Figure 1 below) are broadly applicable to any program manager operating in a regulated environment where mandates evolve faster than project charters, and where organizational politics create invisible scope that quietly grows until it consumes all available capacity. The timing of this case study is also instructive: the structural and behavioral solutions described here mirror the very competencies the PMBOK 8th Edition now codifies as essential to modern project governance and stakeholder accountability.

The governance structures and leadership practices described in this case ultimately enabled the program to transition from individual dependency to institutional capability. By the end of the initiative (or rather, a phase of it), the program manager was able to transition to new professional opportunities while the governance framework continued to support ongoing regulatory implementation.

Case Study Approach. This paper uses a single-case practitioner analysis of a multi-year healthcare IT initiative in a highly regulated environment. The organization is anonymized. Observations draw on governance artifacts (intake submissions, change logs, and decision records) and retrospective synthesis of stakeholder and vendor interactions. The intent is analytic generalization: identifying transferable mechanisms and failure modes applicable to similarly regulated programs.

Figure 1: The Transformation Solution

Background: The Anatomy of a Never-Ending Project

Healthcare information technology programs operating under federal and/or state funding and regulatory oversight represent some of the most complex project environments in existence, characterized by regulatory volatility, multi-stakeholder accountability structures, and long implementation horizons that resist standard project lifecycle models (Daniel et al., 2018). The program at the center of this case study was tasked with implementing electronic claims attachments--a capability enabling healthcare providers to submit supporting documentation alongside insurance claims electronically rather than through paper or fax-based workflows. The regulatory catalyst was a series of federal rules from the Centers for Medicare and Medicaid Services (CMS) requiring payers and providers to adopt standardized electronic attachment transactions. Although claims attachments are distinct from prior authorization, they are closely connected: both rely on the same standards, vendors, and payer/provider systems. As a result, regulatory changes and shifting timelines in adjacent CMS rulemaking--including the CMS Interoperability and Prior Authorization Final Rule (CMS-0057-F)--continuously affected

what the project needed to deliver and when (Centers for Medicare and Medicaid Services, 2024).

On paper, this was a bounded initiative with a defined technical scope: design, build, test, and deploy an electronic attachment capability within the claims processing system. In practice, the initiative became something far more expansive. Regulatory guidance issued by CMS evolved through multiple drafts and comment periods, with final rules subject to delayed publication timelines. Payer organizations--including large commercial insurers and managed care organizations--adopted the standards at inconsistent rates, creating a moving target for provider readiness assessments. Compliance teams continuously re-evaluated organizational risk as interpretive guidance was issued and revised.

Each of these external forces generated internal scope requests. A new CMS sub-regulatory guidance document would trigger a compliance assessment, which would trigger a technical gap analysis, which would trigger a project change request--often arriving with urgency language that made scope prioritization challenging. The project's scope boundary became permeable. What was intended as a delivery project evolved into an operational program with no agreed-upon endpoint.

The program manager's effectiveness at managing this complexity became, paradoxically, the reason leadership chose not to close the project or transition it to a different team. Her ability to absorb ambiguity, navigate stakeholder conflict, and keep the program progressing despite constant disruption made her indispensable in leadership's eyes.

This paper refers to this dynamic in complex programs as **the competence trap: professional competence as captivity**--a situation in which an individual's demonstrated effectiveness leads the organization to rely repeatedly on that person rather than institutionalizing the governance systems that made that success possible.

The Challenge: Scope Without Boundaries

Regulatory-Driven Scope Creep

The primary driver of scope expansion in this program was the continuous evolution of federal and state mandates. Unlike scope creep that originates from stakeholder wish lists or poorly defined requirements, regulatory-driven scope change arrives with compliance authority behind it. When a federal agency issues sub-regulatory guidance or

a final rule, organizations in regulated industries do not have the option of deprioritizing that requirement based on strategic fit alone. The compliance obligation is real, and the consequences of non-compliance--financial penalties, audit findings, and reputational risk--are significant. Research confirms that keeping software system requirements aligned with evolving regulations represents one of the most persistent and under-addressed challenges in complex IT program management (Kosenkov et al., 2025).

This dynamic creates a fundamental tension in project management. Standard scope management practices advise rigorous change control: all scope additions must be evaluated against project baselines, approved through a formal process, and resourced accordingly. But when the change request is generated by a CMS final rule, the conversation is very different. The question is no longer 'should we do this?' but 'how quickly must we do this, and what do we defer to make room?'

Without a structured framework to evaluate and sequence regulatory-driven requirements, this program experienced what practitioners call decision drift – the gradual erosion of prioritization discipline as urgent requirements from multiple sources compete for finite team capacity. Each new requirement seemed equally critical. Every stakeholder believed their compliance priority was the highest. The absence of transparent evaluation criteria allowed urgency claims to go unchallenged.

Political Sensitivity and Stakeholder Accountability Gaps

A second dimension of complexity was the program's political environment. As a publicly funded healthcare program, the initiative operated within an ecosystem of stakeholders with overlapping authority and competing interests. State regulatory liaisons, federal compliance officers, clinical operations leaders, vendor partners, and executive sponsors each held a stake in the program's outcomes--and each brought their own interpretation of what success looked like.

In this environment, accountability gaps emerged naturally. When a compliance deadline was at risk, stakeholders were quick to identify root causes outside their own domains. Technical delays were attributed to vendor performance. Requirements ambiguity was attributed to federal agency communication gaps. Resource constraints were attributed to competing organizational priorities. While each of these factors was partially true, the cumulative effect was a diffusion of ownership that allowed problems to persist longer than they should have.

The program manager was expected to resolve these tensions without formal authority over most of the stakeholders involved. She had accountability for delivery outcomes but limited positional authority to enforce decisions. This is the influence without authority challenge that many senior program managers face: being responsible for results that depend on people and systems you do not control.

The Solution: Governance, Prioritization, and Emotional Intelligence

Establishing a Change Control Board with Transparent Evaluation Criteria

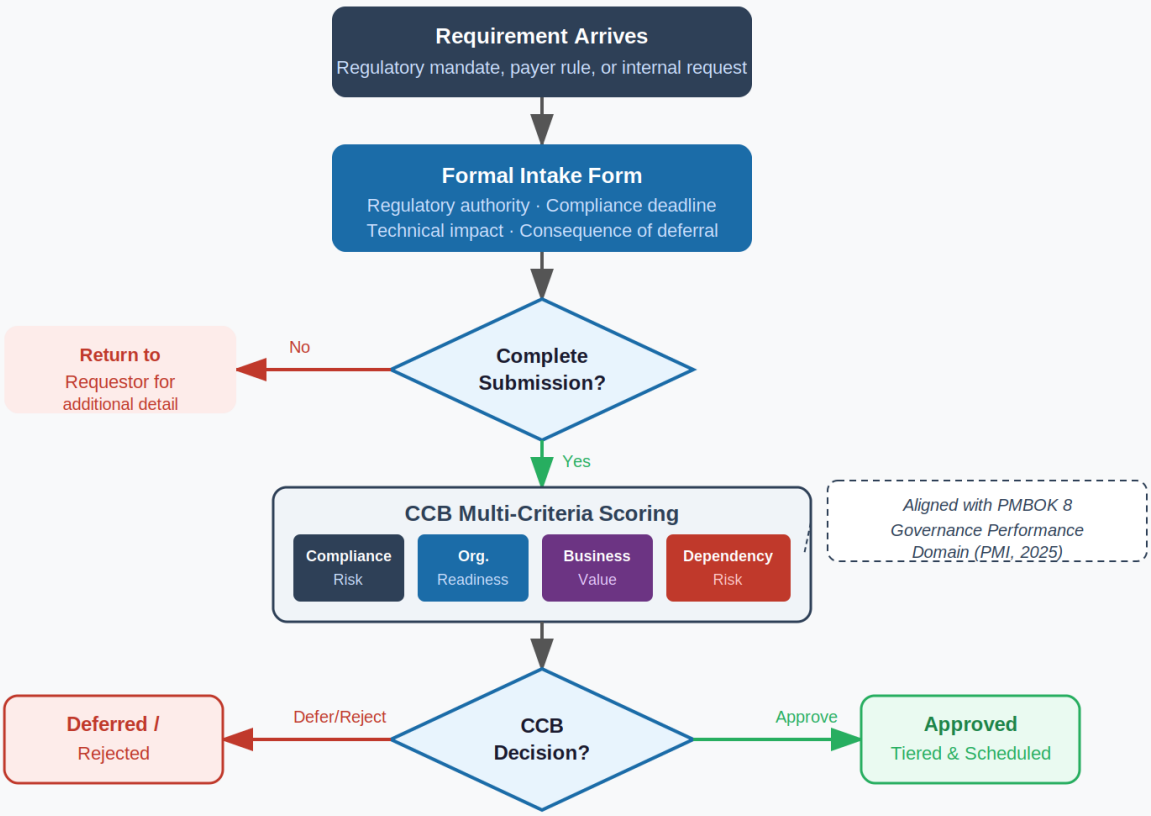
The foundational intervention in this program was the establishment of a formal Change Control Board with defined membership, a structured intake process, and transparent evaluation criteria. Prior to this governance structure, scope change was managed informally--requirements arrived through email, verbal conversations, and meeting action items, each with an implied urgency that made comparative prioritization nearly impossible. This informal state represents precisely what the PMBOK® Guide -- Eighth Edition identifies as a governance failure: the absence of structured oversight, decision-making frameworks, and mechanisms for connecting project activity to organizational value (PMI, 2025). Notably, PMBOK 8 is the first edition to elevate Governance to a standalone performance domain--a structural acknowledgment that oversight and accountability are not incidental to project success but foundational to it.

The CCB was designed with several critical features. First, membership was cross-functional, including representatives from compliance, clinical operations, IT, vendor management, and government program leadership. This ensured that scope decisions reflected organizational breadth rather than the loudest voice in the room. Second, a standardized change request intake form was implemented, requiring requestors to document the regulatory authority behind the change, the compliance deadline, the estimated technical impact, and the consequence of deferral. This documentation requirement alone significantly reduced frivolous or prematurely escalated requests.

Third, the CCB adopted a multi-criteria scoring framework (Figure 2) for evaluating incoming requests. Each change request was scored against four dimensions: regulatory compliance risk (the consequence of non-compliance with the driving mandate), organizational readiness (the technical and operational capacity to absorb the change), business value (the operational benefit beyond minimum compliance), and dependency risk (whether deferral would create downstream complications). This framework is a direct operationalization of PMBOK 8's Governance performance domain's emphasis on

structured decision-making and value realization--ensuring every scope decision could be traced back to organizational intent rather than political pressure (PMI, 2025). It allowed the board to make visible, defensible prioritization decisions that stakeholders could understand and challenge through formal channels rather than informal pressure.

Figure 2: CCB Change Request Intake and Evaluation Process



The impact of this governance structure was significant. Decision drift declined measurably as competing priorities were adjudicated through a common framework rather than through escalation wars. Stakeholders who previously bypassed formal channels to push requirements directly to the program manager now understood that the CCB was the appropriate pathway--and that their requests would receive fair, structured evaluation.

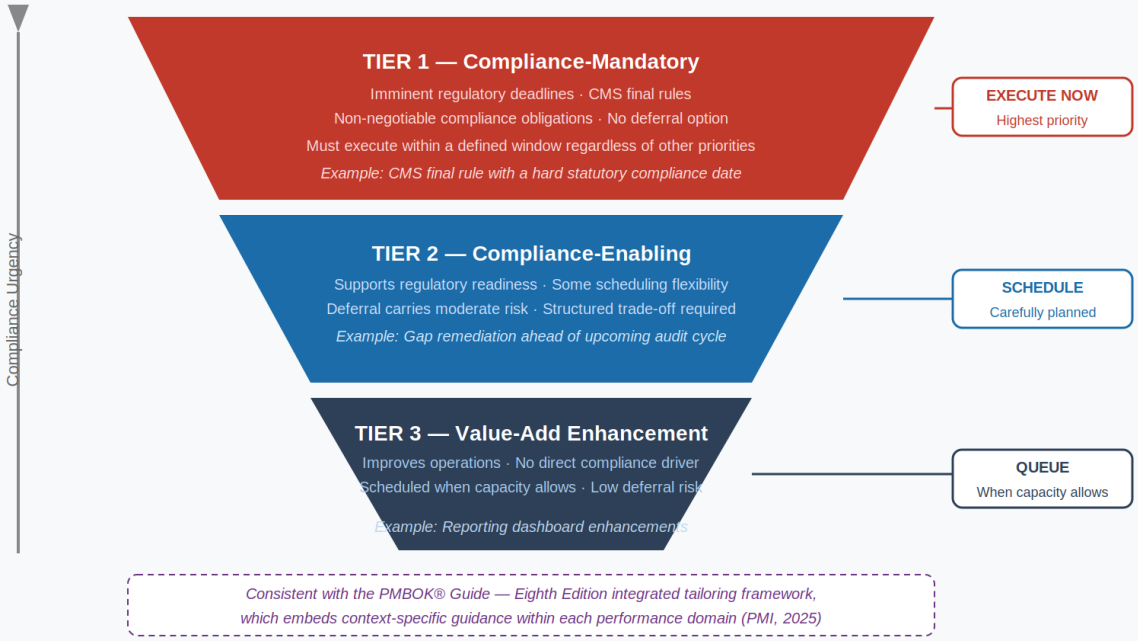
Strategic Prioritization in a Regulated Environment

Strategic prioritization in highly regulated environments requires a different calculus than traditional project prioritization. Standard frameworks based solely on business value or strategic alignment fail to account for the non-negotiable compliance obligations that constrain the priority landscape. An organization may derive significant strategic value from a new capability, but if a regulatory deadline for a separate requirement is imminent, the strategic initiative must yield.

This program adopted a tiered prioritization model (Figure 3) that explicitly recognized three categories of work. Tier 1 encompassed compliance-mandatory requirements with imminent regulatory deadlines--work that must be executed within a defined window regardless of other priorities. Tier 2 encompassed compliance-enabling requirements that support regulatory readiness but carry more scheduling flexibility. Tier 3 encompassed value-add enhancements that improve operational performance without a direct compliance driver. This tiering system is consistent with the tailoring principle reinforced throughout PMBOK 8, which integrates context-specific guidance directly within each performance domain rather than treating tailoring as a one-time exercise (PMI, 2025). Applied here, it provided a shared language for scope conversations and reduced the frequency of stakeholders inappropriately elevating Tier 2 or Tier 3 requests to Tier 1 urgency.

The tiered model also supported resource allocation conversations with executive sponsors. When new requirements arrived faster than available capacity, the program manager could present a clear trade-off analysis: 'We can absorb this Tier 1 requirement on schedule if we defer this Tier 2 item by six weeks. Here is the compliance risk of the deferral.' This evidence-based framing transformed resource negotiation from an emotional plea for more staff into a structured governance conversation about risk tolerance.

Figure 3: Tiered Prioritization Model for Regulated Environments



Emotional Intelligence as a Leadership Competency

Technical governance frameworks and prioritization models are necessary but insufficient for navigating the human complexity of a never-ending project. The program manager's ability to sustain forward momentum over multiple years of continuous uncertainty depended heavily on advanced emotional intelligence competencies, particularly self-awareness, empathy, social skills, and what researchers describe as the ability to manage relationships under conditions of chronic stress (Goleman, 1998). These competencies align directly with two PMBOK 8 constructs: the "Lead Accountably" principle--one of six core principles guiding effective project management behavior--and the Stakeholders performance domain, which in the 8th Edition absorbs communications management entirely, recognizing that stakeholder engagement and communication are inseparable leadership functions (PMI, 2025).

Self-awareness was critical because the program manager had to continuously monitor her own responses to the frustrations inherent in a program that seemed to have no end. Without this self-regulation, the natural human responses to sustained overload--withdrawal, cynicism, or defensive communication--would have undermined her

credibility with stakeholders who were depending on her calm, consistent leadership. She intentionally developed personal practices that supported her psychological resilience, including structured reflection time, peer mentoring relationships, and periodic conversations with her own leadership about workload sustainability.

Empathy was equally important in navigating stakeholder relationships characterized by competing pressures and conflicting interests. Compliance leaders were managing genuine regulatory risk and could not afford to minimize their urgency. Clinical operations leaders were managing patient care workflows that would be disrupted by system changes. IT architects were managing technical debt that made rapid change inherently risky. Rather than treating these tensions as obstacles to delivery, the program manager treated each stakeholder perspective as legitimate data about the organizational system she was managing. This stance created space for honest dialogue that adversarial or dismissive approaches would have foreclosed.

Conflict navigation--the ability to surface and address disagreements productively rather than allowing them to calcify into entrenched positions--was the skill that most directly enabled stakeholder accountability. Many of the accountability gaps described earlier persisted because no one was willing to name them directly. Raising accountability concerns in a politically sensitive environment carries real professional risk. The program manager developed a practice of naming these gaps in structured settings--CCB meetings, executive steering committee presentations, and one-on-one conversations with sponsor leadership--using data-driven framing that made the accountability observation about systemic risk rather than individual failure. This behavior is a lived expression of PMBOK 8's "Lead Accountably" principle, which calls on project professionals to take ownership for outcomes, model ethical behavior, and create conditions where shared accountability can flourish rather than concentrating risk in a single individual (PMI, 2025).

Outcomes: From Reactive to Governed Execution

The implementation of structured governance, tiered prioritization, and emotionally intelligent leadership produced measurable shifts in the program's operational character. Unmanaged scope intake declined substantially as the CCB intake process became the established norm. The volume of informal, ad-hoc scope requests--the primary driver of decision drift--decreased as stakeholders internalized the expectation that all scope changes required formal documentation and structured evaluation.

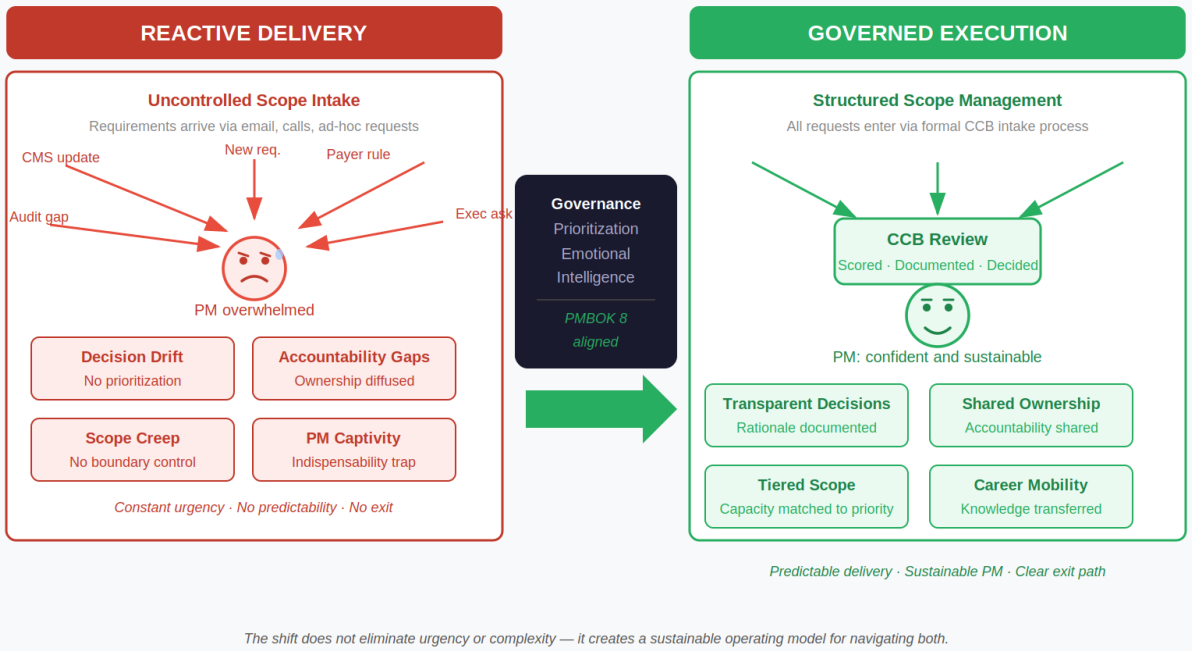
Decision quality improved as well. With transparent evaluation criteria and cross-functional CCB membership, scope decisions reflected broader organizational input and were better justified when challenged. Stakeholders who had previously relitigated scope decisions through informal pressure found fewer entry points for doing so when decisions were documented, the rationale was explicit, and the evaluation framework was publicly understood.

Stakeholder accountability also strengthened progressively as the governance structure created natural moments of shared ownership. When the CCB evaluated a change request, the requesting stakeholder was required to be present, document their case and reasoning, and accept the board's decision. This participation requirement made scope decisions a shared organizational act rather than a program management unilateral choice, distributing accountability in a way that proved more durable over time.

Perhaps most significantly, the program shifted from a posture of reactive delivery--constantly responding to the most recent urgent requirement--to governed execution (Figure 4), in which incoming requirements were processed through a defined system that matched organizational capacity to compliance obligations. This shift did not eliminate urgency or complexity; in a federally regulated environment, those conditions are structural. But it gave the program management team a sustainable operating model for navigating that complexity over the long term. Equally important, the governance structure itself became the institutional memory of the program. Because decision rationale was documented, evaluation criteria were transparent, and scope intake followed a defined process, the program was no longer dependent on any single individual's historical knowledge or accumulated experience to function effectively.

This created the conditions the organization had never previously achieved: the program manager was able to transition to new career growth opportunities, confident that the system she had built could onboard and orient a successor without loss of continuity. The trap, in other words, had been dismantled--not by performing less effectively, but by institutionalizing the knowledge that had made her indispensable in the first place.

Figure 4: The Shift from Reactive Delivery to Governed Execution



The shift does not eliminate urgency or complexity — it creates a sustainable operating model for navigating both.

Lessons Learned for Project Managers in Regulated Environments

Governance Is Not Bureaucracy--It Is Sustainability

One of the common objections to formal governance structures in complex programs is that they slow things down. In environments where compliance urgency is constant, this objection carries real weight. The counterintuitive lesson from this case study is that rigorous governance, when designed thoughtfully, actually accelerates decision-making by eliminating the informal escalation cycles and negotiation loops that consume far more time than structured intake processes. The CCB did not slow the program down--it reduced the energy lost to scope conflict and decision drift, freeing capacity for actual delivery work. The PMBOK® Guide -- Eighth Edition validates this perspective by elevating Governance to a dedicated performance domain focused on project oversight, decision-making frameworks, and value realization--a structural acknowledgment that governance is itself a delivery mechanism, not an administrative obstacle (PMI, 2025).

Prioritization Is a Leadership Act, Not a Technical Exercise

The tiered prioritization model described in this paper was only effective because it was championed by program leadership and accepted by executive sponsors. Prioritization frameworks without leadership commitment become theoretical artifacts--useful in presentations but ignored in practice. Securing leadership alignment on the tiered model required the program manager to invest time in building a shared understanding of the compliance landscape among sponsors who were not deep technical experts. This communication investment was as important as the framework design itself.

Emotional Intelligence Is a Professional Competency, Not a Soft Skill

The Project Management Institute (PMI) has increasingly emphasized what it calls Power Skills--leadership capabilities that include communication, emotional intelligence, collaborative leadership, and innovative mindset (PMI, 2023). The PMBOK® Guide -- Eighth Edition deepens this commitment by condensing twelve abstract principles from the 7th Edition into six actionable ones, including "Lead Accountably," which explicitly calls on project professionals to model ethical behavior, take ownership of outcomes, and build conditions for shared accountability (PMI, 2025). This case study illustrates why these skills are not peripheral to project management competency but central to it. In complex, politically sensitive programs, the limiting factor in delivery performance is almost never technical knowledge. It is the capacity to sustain productive relationships, navigate conflict, and maintain trust under conditions of sustained pressure.

Indispensability Is a Risk That Must Be Managed

The organizational dynamic at the heart of this case study--leadership's reluctance to transition or close a program managed by a high-performing individual--represents a genuine organizational risk that is rarely acknowledged in project management literature. Human factors, including the concentration of institutional knowledge in a single individual, are among the most frequently cited contributors to IT project failure (Schmidt, 2023). When a program becomes identified with a specific individual, knowledge transfer is delayed, succession planning is neglected, and the individual's professional development opportunities are constrained. Program managers who find themselves in this situation have a responsibility to proactively document institutional knowledge, mentor potential successors, and advocate transparently with leadership for their own professional development and eventual transition. Indispensability, while flattering, should be treated as a risk factor rather than a career achievement.

For program managers operating in regulated industries, the lessons from this case study highlight a critical leadership responsibility: ensuring that governance systems, not individuals, carry the weight of institutional knowledge. When regulatory complexity and political accountability structures converge, high-performing individuals are often relied upon as informal stabilizers of the system. While effective in the short term, this dependency creates long-term organizational risk. Sustainable program leadership therefore requires deliberate institutionalization of governance mechanisms that enable continuity beyond any single individual.

Conclusion

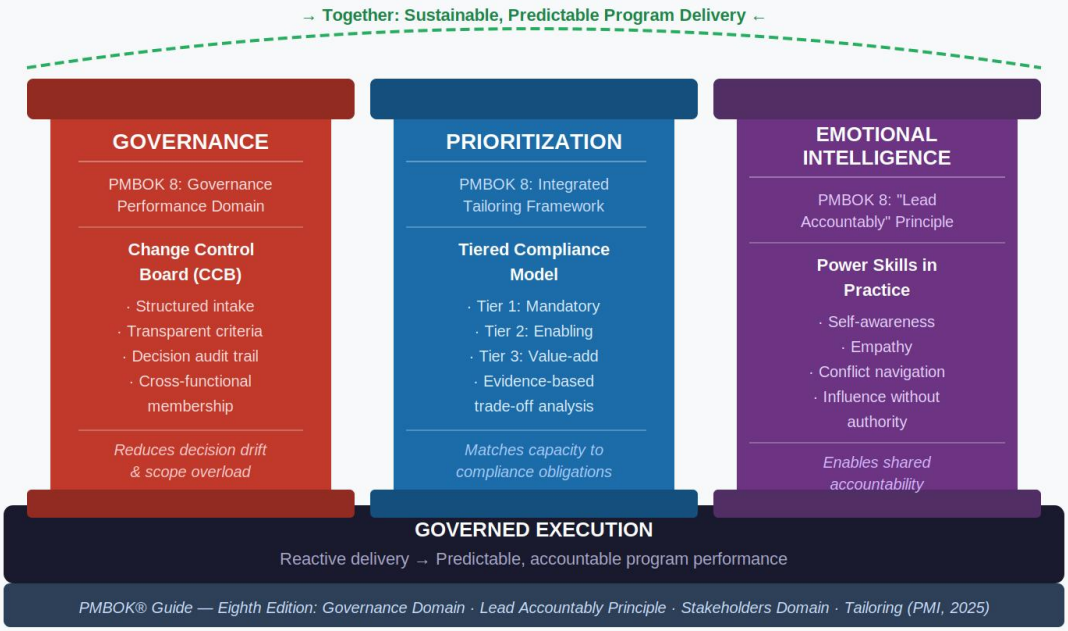
The case study examined in this paper illustrates a pattern that is likely far more common in regulated industries than the project management literature has recognized: the high-performing program manager who becomes institutionally trapped by their own competence. The solution to this trap is not to perform less effectively--it is to build the organizational structures and leadership capabilities that make individual indispensability unnecessary.

Formal governance, transparent prioritization, and emotionally intelligent leadership are not independent interventions. They are mutually reinforcing elements of a sustainable program management approach. Governance creates the structural conditions for accountability. Prioritization creates an analytical framework for decision-making. Emotional intelligence creates the relational foundation that makes governance and prioritization work in the messy, politically complex environments where they are most needed. The PMBOK® Guide -- Eighth Edition now formally codifies this integration: the Governance performance domain, the "Lead Accountably" principle, the unified Stakeholders domain, and the embedded tailoring framework together compose a coherent model for exactly the kind of adaptive, accountable program leadership this case study demonstrates (PMI, 2025).

Project managers in regulated industries will continue to face the conditions described in this paper: mandates that evolve faster than charters, stakeholders with overlapping authority and competing interests, and organizational dynamics that equate individual effectiveness with organizational dependence. The leaders who navigate these conditions most effectively will be those who build a three-pillared governance system with prioritization and emotional intelligence (Figure 5) robust enough to function beyond

themselves--and who combine rigorous structural discipline with the deeply human capacities that make sustained collaboration possible.

Figure 5: Three Pillars of Governed Execution (Aligned with PMBOK 8)



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Shawna Calhoun is an accomplished Program and Project Manager with extensive experience leading large-scale healthcare IT initiatives in highly regulated environments. Known for transforming complexity into clarity, she has delivered high-visibility programs spanning Medicaid modernization, electronic claims attachments, payer–provider interoperability, and regulatory compliance. Shawna's leadership blends strong technical execution with advanced Power Skills—emotional intelligence, conflict navigation, and strategic stakeholder alignment—enabling her to guide organizations through shifting mandates, multi-vendor landscapes, and politically sensitive decision environments.

She is currently completing her Doctor of Business Administration (DBA) in Project Management at Liberty University, where her research explores stakeholder influence, emotional intelligence, strategic prioritization, and governance effectiveness in complex projects. Shawna is also the author of the newly released book "If Jesus Was a Project Manager," the first in her Faith at Work leadership series. She is passionate about elevating the profession through speaking, writing, mentoring, and project management excellence.

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