

Compliance & Ethics Professional

January/February
2012



A PUBLICATION OF THE SOCIETY OF CORPORATE COMPLIANCE AND ETHICS

www.corporatecompliance.org

Meet Vernita Haynes

SCCE and HCCA
interview their 10,000th
member: Vernita Haynes,
Compliance & Privacy
Analyst for the University
of Virginia Health System

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by Roy Snell

Compliance is not rocket science

I had a great conversation with a woman yesterday who has spent twenty years in the audit profession. She could not have been nicer, but she wanted to know what the compliance professional's role was in conducting audits. We had a wonderful conversation. I



Snell

told her if I were the compliance professional and someone wanted to do an audit, I would get the heck out of their way. However, if the audit was not done correctly, I would make sure that it was.

Everyone wants to talk about who is supposed to do what. Legal is worried about their turf. Audit is worried about their turf. Risk is worried about their turf. HR is worried about their turf. And, to be perfectly fair, compliance professionals are worried about their turf. You people are driving me crazy. What we should all be worried about is preventing, finding, and fixing legal, regulatory, and company policy problems. That is our focus. That is our mission. That is why the compliance profession and compliance programs were created.

I told my new audit friend that the compliance professional should let Legal, Audit, Risk, and any other department help. Who cares who does the work? The only caveat is that if Audit doesn't pick the right sample size or check all the issues that need to be checked, or if they refuse to fix the problems they find, the compliance professional needs to finish. If the Legal department wants to help with the legal aspects of a project...let them. But if they decide the best way to deal with a known

problem is to deny and defend...the compliance professional needs to finish the process. If Risk wants to handle the compliance risk assessment, have at it. But if they do a risk assessment that primarily studies risks to the company as opposed to risks the company causes for others...the compliance professional has to do their own risk assessment.

Managing a compliance program is not rocket science. It may be one of the most difficult jobs in the company, but that is not because it's complicated. Laws are complicated, but compliance programs are not. There are those who write 700-page descriptions of compliance programs who would have you believe that they are just about as difficult as launching a space shuttle. Lost in the weeds doesn't even begin to describe their plight. The truth is somewhat different.

Compliance programs have no moving parts that did not exist before. Education, auditing, investigation, hotlines, risk assessments, and all the other tools of compliance have existed for a long time. We have exhaustively studied the development and use of all the tools for a hundred years. What we haven't had is someone to take all these previously siloed tools and use them in a coordinated fashion to prevent, find, and fix legal, policy, and ethical problems. This is not rocket science. This is mind-numbingly simple. It shouldn't take 700 pages to describe a compliance program. It's not complicated. It's just very hard, because people make it difficult for us to fix their problems. *

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