

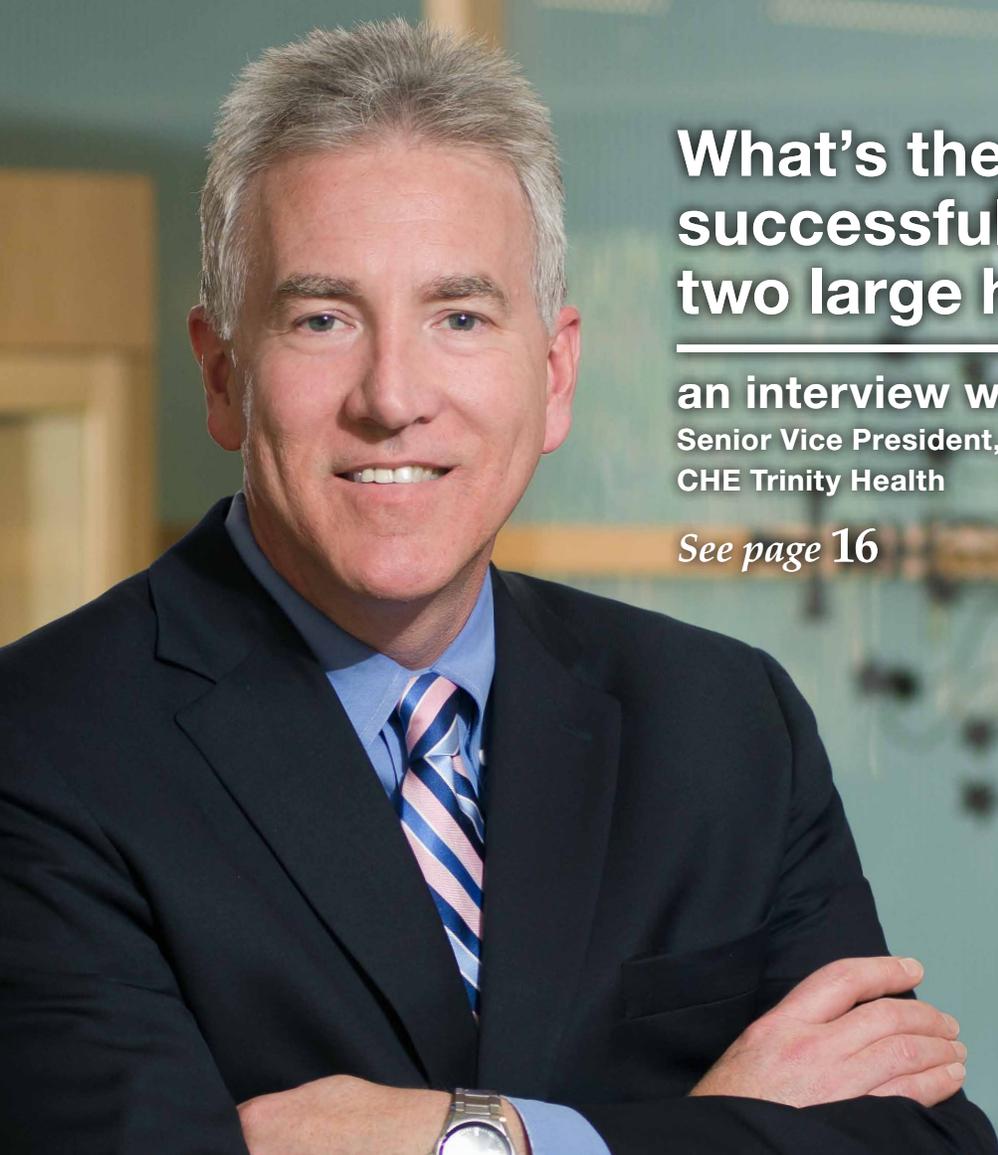


Compliance TODAY

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What's the key to successfully merging two large hospital systems?

an interview with **Michael R. Holper**
Senior Vice President, Integrity & Audit Services
CHE Trinity Health

See page 16

27

**Overcoming
the challenges of
conducting a thorough
and meaningful
risk assessment**

Charro Knight-Lilly

31

**Getting ahead
of the ACA
compliance
program
mandate**

Thomas A. Vallas

39

**Provider-based
departments:
Managing
risk**

Stephen
Sonnenfeldt-Goddard

43

**Ensuring ADA
compliance: Revising
the employment
and medical staff
application process**

Andrea Bell

by Roy Snell, CHC, CCEP-F

Compliance Officers leveraging other people's authority

*Please don't hesitate to call me about anything any time.
612-709-6012 Cell • 952-933-8009 Direct
roy.snell@corporatecompliance.org*

Dan Roach believes the key to compliance officer effectiveness is, in part, determined by your ability to leverage other people's authority. I could not agree more. In my opinion, the most important skill-set of the compliance officer is influence, and you don't have to do it all yourself. I have examples from my days as a compliance officer.



Snell

I have advocated for healthcare entities to use physicians as the chairs of the compliance committee. My suggestion is often met with strong resistance. I have advocated this precisely because I wanted to use other people's influence. Physicians listen to physicians. We used an anesthesiologist named Scott Springman. He was supportive of compliance, bright, articulate, reasonable, and was respected by other physicians. When we needed to get something difficult done, we went together. When we reported to the Board, he did a lot of the talking. When difficult decisions were made at the Compliance Committee, he was ready. He talked, and they listened to him. I took a back seat and used his influence to do my job.

I also used department chairs to head up investigations in their departments. By "head up" we meant, "be supportive, and let

us get our work done." We told them if the enforcement community found the problem before we fixed it, they needed everyone in the building to say, "The department chair was supportive of the effort to fix the problem."

I had a Harvard-trained attorney as COO. His Wharton MBA didn't hurt either. He helped get support, particularly with other related entities. I was often not in those meetings and didn't care. He was getting my job done, and that is all that mattered. When we had the mother of all investigations, we hired an outside counsel who was second to none.

...the key to compliance officer effectiveness is, in part, determined by your ability to leverage other people's authority.

She was a silver-tongued individual who could work a room, and her experience as a former US Magistrate didn't hurt. She also happened to think I was unworthy. As long as she was doing my work by influencing leadership, I didn't care what she thought.

My motto was, "If you just keep doing my work for me, we are going to get along just fine." You should take a back seat any chance you get. Let others help you. You have plenty of chances to work your tail off. Let others, with influence, do what they can for you. ☺