

HCCA



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Meet

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PAGE 14



Feature Focus:

**2011 OIG Work Plan:
Projects reflect shifting
regulatory environment**

Part 1 – PAGE 20



**INSIDE PAGES
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SEE PAGE 19**

Letter from the CEO

If you have any questions that you would like Roy to answer in future columns, please e-mail them to: roy.snell@corporatecompliance.org.



Rory Jaffe

In a recent article, I made an “inside” joke that about three people laughed at. That’s assuming everyone who knew what I was joking about laughed. The rest of the readers may have come away from “the joke” thinking that Rory Jaffe doesn’t support strong and effective compliance programs. Just to be sure that no one is left in doubt, Dr. Jaffe is one of the most effective compliance professionals ever to practice in our profession. He supports a strong and effective approach to compliance with the law, company policy, and ethical behavior.

Learning the elements of an effective compliance program is very, very easy. Implementing a compliance program is a little harder. Implementing an effective compliance program is really hard. Achieving what Rory did as a compliance officer is the equivalent of finding the Holy Grail.

The hardest part of this job is knowing when to let something go and when to throw yourself in front of the bus. And

when you throw yourself in front of the bus, you have to know how to do it in a way that the bus stops inches from your nose. That is accomplished through years of experience negotiating, collaborating, compromising, and debating with very powerful people. Many people freeze or give up too easily. Rory has got this part of the job down pat. He believes that a strong compliance program is important and he knows how to do it without sounding like Chicken Little.

Some people run up and down the halls of their organization screaming, “The sky is falling!” every time a problem is found. They

have little regard for the size of the problem. They want to fix every problem instantly, and they want to do it with a Louisville Slugger. Rory tosses Nurf Balls at Nurf Ball problems and stands his ground when necessary. He also worries about the culture.

He tries to affect the culture. He understands that it is not an exact science, and it is a difficult thing to change. However, he appreciates the value of one of the most effective tools in a compliance professional’s arsenal, establishing an ethical culture. Although I agree with Rory,

I choose not to beat this drum because there are many people beating it, and many are implying it’s all you need. That said, any compliance professional who doesn’t do everything they can to affect the culture is missing a very important point.

And, Rory is a very nice guy. In fact, this summer a pig fell out of a truck right in front of his car. Rory caught the pig and put it in his car. They he raced after the truck to get the pig back to the owner. A policeman stopped him and said,

“Where are you going in such a hurry and why is that pig in the car?” Rory told him and the policeman said, “Slow down, you will never catch the truck now. Why don’t you take the pig to the zoo or something?” Three hours later the same policeman stopped Rory for speeding again and said, “Why are you speeding again, and I thought I told you to take that pig to the Zoo?” Rory said, “I did, and we had so much fun we are going out for dinner.” ■

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