

HCCA



HEALTH CARE
COMPLIANCE
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***Welcome to HCCA's
10th Anniversary
Compliance Institute!***



HCCA COMPLIANCE INSTITUTE

2006
10th Anniversary
Caesars Palace
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**Feature Interview:
Meet Joanie Block
and Mary Nicholson,
two of HCCA's
newest members!**

Letter from the CEO

Roy Snell

Back to the Basics: I can't believe how many people don't understand

the first thing about compliance. I have been around it too long and assume it's obvious. It is so simple that I think some people are confused by it. It is important for people to understand the basic principles and purpose of compliance. It's difficult to achieve an overarching corporate compliance culture if most employees don't understand. Too many people think it's just about ethics or law. They don't know it's about prevention and detection. They don't understand the "spirit" of compliance.

The problem is that many of us have been around too long or think it is such a simple concept that we don't bother explaining it well. We skip right to the thing we need at the moment and expect those listening to be able to put it into context. We wonder why they don't get behind our request or execute our request properly. Maybe they're not recalcitrant; they are just lost. Just ask someone to explain what compliance is to you. You may not be surprised but it might just hit you that that level of confusion is unacceptable.

This hit me when I suggested to my 17-year-old daughter to consider specializing in compliance in college. She has been accepted to an excellent business school. I thought that she could write one of her last high school papers on compliance to get a feel for it. She suggested some topics and I realized how lost she was. She is too young to understand but was just accepted into an excellent business school and about to spend a truckload of money. She probably should understand if we are going to build compliance into our corporate culture. But what hit me is that most people I meet are as clueless as my daughter. Are your employees clueless? Could they explain compliance? Can your management? Can all the members of your audit or compliance committee explain compliance?

When asked about compliance or ethics most people launch into a discussion about legal issues or ethics. Most people can't tell you it's about auditing or monitoring, education, hot lines or reporting to the Board. Brilliant people don't get this stuff. There are experienced and

well-educated lawyers who think they know but if you ask them to explain they miss fundamental basic concepts such as prevention and detection. Many think it is the study of law.



Do you want to find out how confused people are? Do a little test. Call someone right now. Call someone—an average employee, someone in management, or someone on the audit or compliance committee. Ask them to explain what compliance is. It may not surprise you but there is something about the stark reality of these people being unable to explain compliance. It may cause you to change the way you do things or to take action.

So what's my point? My point is go backwards. Stop for a moment and make sure that as many people understand this isn't just about the law or just ethics but rather a method for prevention, detection, and constant improvement of the organization's ability to meet the expectation of others. And that the tools we use are auditing and monitoring, response and prevention, education, investigation and reporting, hot lines, enforcement and discipline, code of conduct, a compliance officer and compliance committee and reporting to the Board.

You should help your colleagues get a basic understanding. Put up posters that list the seven elements. Send out a short written description. In addition to the seven elements talk about the overarching purpose of compliance. Find as many ways as you can to hit them over and over with the message over the next couple of years. You may find that compliance becomes more automatic and that others are fighting your battles for you. Wouldn't that be something? ■

8th Annual Compliance Survey Report Mailed in May

Thank you to all those members who participated in the HCCA's 8th Annual Compliance Survey – 2006 Profile of Health Care Compliance Officers. The final report will be mailed to members in May (a sample of the results is below):

How much are the following compliance staff positions compensated?

	Annual Base Salary			
	Average	Median	25 th Percentile	75 th Percentile
Assistant Compliance Officers	\$79,543	\$75,000	\$55,000	\$98,000
Compliance Auditors	\$57,728	\$56,400	\$45,000	\$70,000
Coders	\$45,096	\$42,000	\$32,500	\$55,000
Trainers	\$52,693	\$50,000	\$40,000	\$60,000
Compliance Generalists	\$60,513	\$57,000	\$45,000	\$75,000
Attorneys on the Compliance Staff	\$111,382	\$105,000	\$85,000	\$130,000