



# Compliance TODAY

April 2015

A PUBLICATION OF THE HEALTH CARE COMPLIANCE ASSOCIATION

WWW.HCCA-INFO.ORG

## On rising to the noble challenge of the Compliance profession

an interview with Marjorie Doyle

Principal, Marjorie Doyle & Associates  
and SCCE/HCCA Board Member

See page 20



27

2014 in review:  
What to know  
about privacy  
and security

Adam Solander and  
Evan Nagler

31

The 60-day  
Overpayment Rule:  
Strict standards enforced  
in first legal case

Erin M. Duffy and  
Alison T. Rosenblum

37

Planning and  
executing enterprise-wide  
compliance risk assessments  
in healthcare organizations

Heather Hagan and  
Dhara Satija

47

Reviewing focus  
arrangements  
to assess  
compliance

Bret S. Bissey and  
Michael P. McKeever

by Roy Snell, CHC, CCEP-F

# Corporate Compliance & Ethics Week is moving

*Please don't hesitate to call me about anything any time.*

612-709-6012 Cell • 952-933-8009 Direct

[roy.snell@corporatecompliance.org](mailto:roy.snell@corporatecompliance.org)

[@RoySnellSCCE](https://twitter.com/RoySnellSCCE) [in /in/roysnell](https://www.linkedin.com/in/roysnell)

We have been celebrating a week in the spring called Corporate Compliance & Ethics Week, for some time. The week has been moved from the spring to the fall (November 1–7 in 2015) to coincide with the anniversary of the creation of Chapter 8 of the Federal Sentencing Guidelines. It may cause a little confusion this year, but it should be fine over the next couple years. Everyone should feel free to celebrate compliance and ethics whenever they want. However, we will benefit from respecting the document that is generally credited for the creation



Snell

of our profession, as well as respecting a document that suggests there are financial incentives to hiring a compliance officer and implementing a compliance program. We will continue to offer Corporate Compliance & Ethics Weeks products (posters, pens, mugs, etc.) to help you with your celebration.

For those of you who are new to Corporate Compliance & Ethics Week, it is intended to help promote a better understanding of compliance and ethics programs. It is celebrated

by individual institutions and is typically coordinated by the compliance officer. Some compliance officers get other departments involved. Corporate Compliance & Ethics Week is helpful to send a message to all employees that leadership believes compliance and ethics is important. Celebrating the week can be as simple as just putting up a few posters, or as

For those of you who are new to Corporate Compliance & Ethics Week, it is intended to help promote a better understanding of compliance and ethics programs.

elaborate as holding all-staff meetings with leadership speaking and giving compliance and ethics awards. It's really just another excuse to make a little fuss to help the organization maintain their gains, and perhaps make a little more progress toward a compliant and ethical culture.

If you have any questions don't hesitate to call our office or check out the website at [www.hcca-info.org/CandEWeek](http://www.hcca-info.org/CandEWeek). ☎