

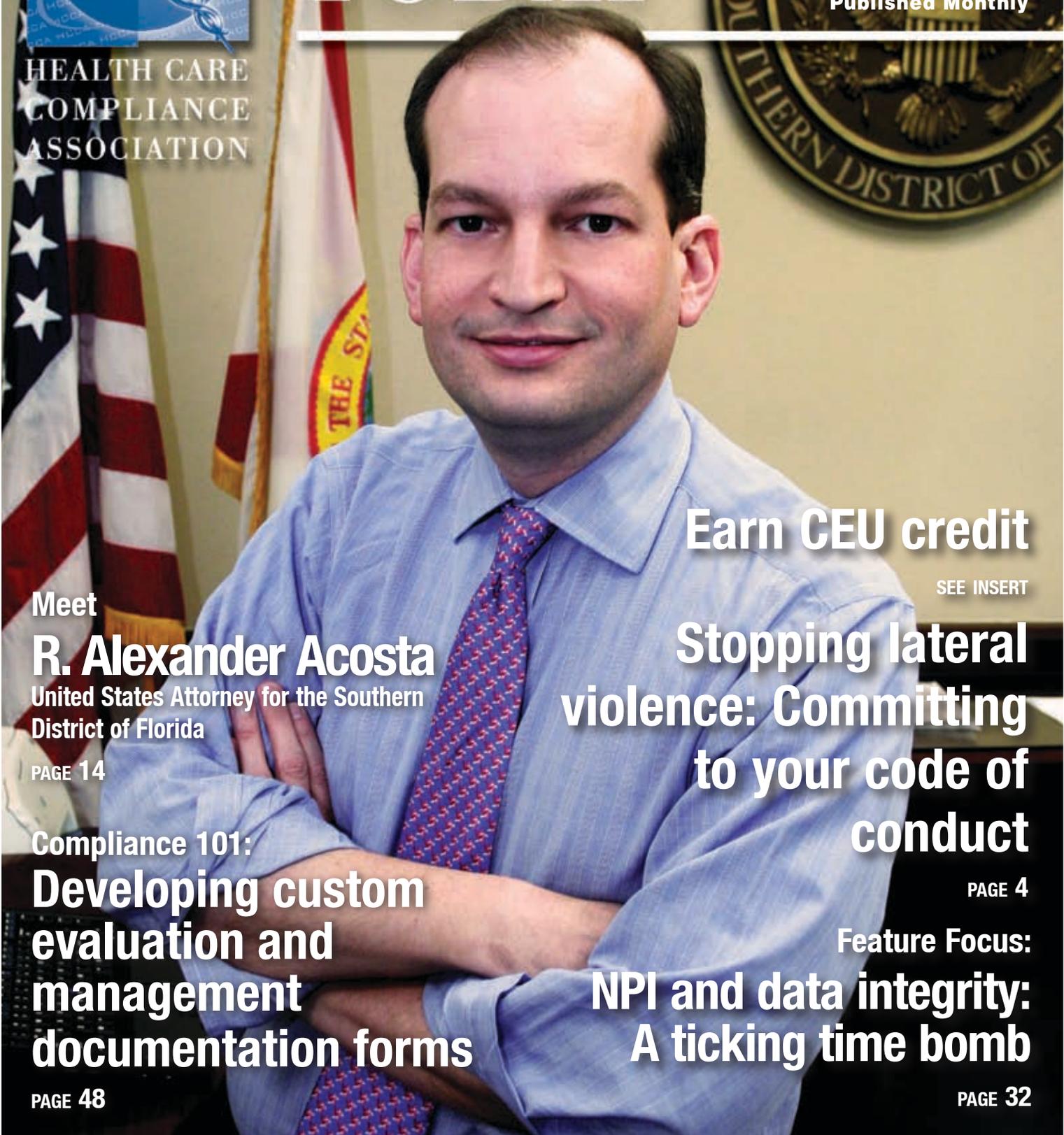
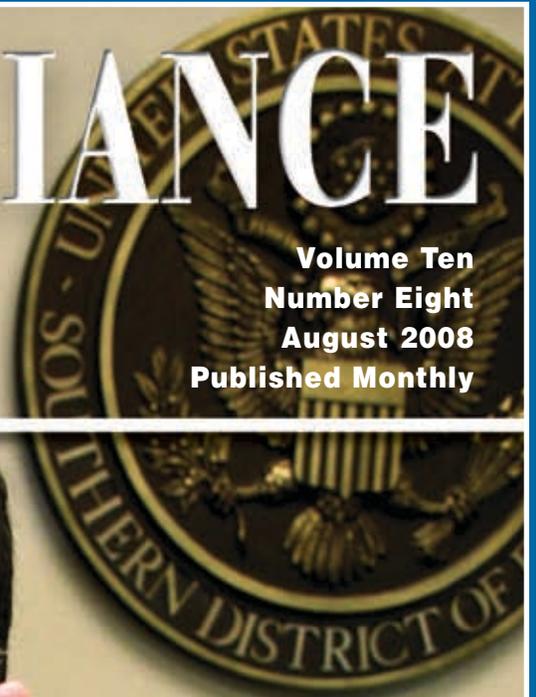
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**HEALTH CARE
COMPLIANCE
ASSOCIATION**

COMPLIANCE TODAY

**Volume Ten
Number Eight
August 2008
Published Monthly**



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Letter from the CEO



Spiderman

Odell Guyton, the Global compliance Officer for Microsoft was speaking at a recent conference and gave me an interesting analogy. He referred to all of the departments involved in compliance as a web. The rest of my analogy is rather off the wall and if you don't like it you should not blame Odell. I have "run amuck with it" in a way he should not be blamed for.

The Web

Legal, HR, management, employee's at large, Audit, Risk and many other departments are part of the "web." They are all looking for and becoming aware of problems. Imagine them all as a collection of strands in a spider's web.

The Problem

What happens next is that a problem is caught in the web (by a department or individual) and the web vibrates. That part of the web, let's say for example Audit, holds onto the problem. In the past, there was no spider in the web who could help deal with the problem caught in the web. There were people who could have or should have helped; however, timely resolution of the "problem" caught in the web did not always occur. What was missing was someone who could help correct the problem, implement controls to prevent it from recurring, ensure discipline was enforced if necessary, and occasionally, report the problem appropriately.

Spiderman

In an organization with an effective compliance program, there is Spiderman (aka the compliance/ethics officer) who feels the vibration

and moves toward the section of the web that has caught the problem. Spiderman gives them the strength (authority) and the resources to take care of the problem.

Any compliance and ethics program should have a web. The spider can not easily catch things without the web. The web can't always deal with what it catches. The spider and the web work together to find and fix problems.

The point of all this is that everyone needs to be involved in compliance. Historically there has been a lack of an individual (or spider)

Everyone should be involved in compliance, but one person should be there to help make sure that those who caught the problem get assistance to make sure that the problem is resolved and corrective action is taken, including the implementation of controls, discipline, and occasionally, reporting.

with accountability, responsibility, and authority to fix a problem. Everyone should be involved in compliance, but one person should be there to help make sure that those who caught the problem get assistance to make sure that the problem is resolved and corrective action is taken, including the implementation of controls, discipline, and occasionally, reporting.

The web is a unique analogy to be sure. However, I often hear about departments who think the compliance or ethics officer is overreaching. I hear from compliance and ethics officers that some department is overreaching. Conversely, I sometimes hear that departments or compliance professionals are not doing enough. This analogy helps visually describe the collaboration and complementary duties that can occur. Most importantly, it helps people see what role everyone is playing, and that each role is important. ■