The Seven Habits of an Effective Compliance & Ethics Professional

HCCA Minneapolis Regional Compliance Conference Minneapolis, MN

Daniel R. Roach, JD Chief Compliance Officer, Optum360 September 14, 2018

The Challenge

- It's a complicated world
- Skewed Incentives
- Boards & Management don't know what to do
- "We have good people"
- Effectiveness requires courage and hard work

OPTUM360°°

HCCA Minneapolis Regional Compliance Conference

2

1. Study Human Behavior	
Ethics	
- Perception:	
- Reality	
Cheating	
Resumes	
Stealing	
Reporting	
 Culture: the impact of authority and systems 	
<u>A</u>	
HCCA Minneapolis Regional Compliance Conference	3

2. Life-long Learning

- Study/work hard
- Observe successful people
- Read the newspaper
- View every challenge/mistake as a learning opportunity
- Solicit constructive feedback

OPTUM360°°

HCCA Minneapolis Regional Compliance Conference

4

3. Position Yourself for Succes	S	
 Who/What am I? 		
 Why am I here? 		
 The authority dilemma 		
Leverage		
Don't take yourself too seriously		
 Share credit/hoard criticism 		
OPTUM 360°°	HCCA Minneapolis Regional Compliance Conference	

4. Problem Solve	
 Solutions or obstacles? 	
 Understand the problem 	
Keep it simple	
• Hire people!	and
OPTUM 360°*	HCCA Minneapolis Regional Compliance Conference

5. Align Incentives	
Problem: Incentives are skewed	
Solution: Specific, measurable objecti Link to compensation Transparency Culture matters 	ves
Beware of the non-solution:	
OPTUM 360°*	HCCA Minneapolis Regional Compliance Conference 7

6. Be Courageous

- <u>Practice</u> difficult/courageous conversations
- Listen carefully
- Think before you speak (send)
- Attack the problem, not the person

OPTUM360°°

HCCA Minneapolis Regional Compliance Conference

8

7. Be a Role Model	
 Talk and walk the talk 	
Accept responsibility	
 Stay calm (particularly in a crisis) 	
 Admit mistakes – the two most disarming words in the English language are "" 	
HCCA Minneapolis Regional Compliance Conference	9

Resources	
Why It's Hard to Be Good, Al Gini, Rutledge 2006	
The Lucifer Effect: Understanding How Good People Turn	
Evil, Philip Zimbardo, Random House 2008	
Reebok Rules, John B. ("Jack") Douglass III, ACCA Docket, 199	02.
The Seven Signs of Ethical Collapse: How to Spot Moral	
Meltdowns in Companies Before It's Too Late,	
Marianne M. Jennings, J.D., St. Martin's Press 2006	
How to Pad Your Expense Report And Get Away with It,	
Employee X, Easy Money Press 2005	
Crucial Conversations: Tools for Talking When Stakes are	
High, Kerry Patterson et. al., McGraw-Hill, 2002	
Difficult Conversations: How to Discuss What Matters Most,	
Douglas Stone et. al., Penguin Books 1999	
OPTUM 360°*	HCCA Minneapolis Regional Compliance Conference

Resources

2013 Federal Sentencing Guidelines, Organizations. <u>Chapter 8 – Part B. Remedying Harm from Criminal</u> <u>Conduct, and Effective Compliance And Ethics</u> <u>Programs</u>.

> http://www.ussc.gov/guidelines-manual/2013/ 2013-index-0

Building a Career in Compliance and Ethics. Joseph E. Murphy, Joshua H. Leet, Society of Corporate Compliance and Ethics, 2007.

OPTUM360°*

HCCA Minneapolis Regional Compliance Conference

11

 Questions