The Accidental Compliance Professional

Foreword

I may know Roy Snell better than anyone, except his closest family members. We have worked closely together professionally for more than 20 years. We both share an obsession with rusty old tools and machines, which has meant hundreds of hours together at estate sales, swap meets, auctions, or old farms trying to score real or perceived treasures. Moreover, we both share a passion for the wilderness, which led to a personal partnership for the past 10 years—together we own a remote northern Ontario lake property 50 miles from the nearest pavement or power pole, 12 miles from the end of the road, and 18 miles from the nearest private property. On a good day it is a 12-hour trip to get to the place. We’ve talked about everything under the sun in the hundreds of hours we spend together each year, but more than anything else, we’ve talked about compliance.

I had the good fortune as a young lawyer to stumble into compliance in the early 1990s. After having spent a year helping defend against a significant government investigation, in 1993 I was handed the task of implementing the first compliance program ever imposed by the federal government on a healthcare provider. Ultimately, I participated nearly 50 times in the defense of my organization’s DOJ, FBI, or OIG investigations. Not long after setting up the compliance program in Minnesota, I was recruited to California to set up the compliance program for one of the largest healthcare systems in the country. It was about that time that Roy called asking if I would consider joining the Health Care Compliance Association . . . he had me hooked in about three minutes.

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