

Compliance Today – May 2021 Meet Steve Schoenly: Incentivizing compliance

Steve Schoenly, Chief Compliance and Privacy Officer at Refresh Mental Health, Jacksonville, FL

This interview with Steve Schoenly (sschoenly@refreshmentalhealth.com) was conducted early in the first quarter of 2021 by Adam Turteltaub (adam.turteltaub@corporatecompliance.org), Chief Engagement & Strategy Officer, SCCE & HCCA.

AT: I'm really looking forward to having a discussion with you about incentives in compliance programs, but before we get there, I think it's worth talking about your experience. You have a bachelor's degree in mathematics and a master's in accountancy. That's obviously a great background for the auditing and monitoring part of a compliance program. Any surprising ways it's helped you with the rest of the elements?

SS: Thanks, Adam, I appreciate the opportunity to share my thoughts! I did take a roundabout way to end up in compliance, since I started out doing the traditional accountant's journey. I completed a numbers-related degree before going into accountancy and then heading into the Big Four^[1] for a career in public accounting and then in internal audit. The most surprising way my accounting and mathematics education has helped me has been in documentation. In accounting, for example, you learn the pain of reconciling accounts that are off, which means that meticulous record keeping as you go along really pays off. But even before that, when I was studying mathematics, missing one element of an equation could completely muddy the solution. I think that focus on completeness, and thinking in terms of solutions, has a surprising applicability to compliance. Chaos theory taught me that even within complex systems you can find patterns and organization, and anyone who has worked in compliance knows that chaos is often present. Pulling order out of that chaos is a key skill for a compliance officer.

AT: You came to compliance after a long and wide career in accounting. You worked both in the US and in Russia. Your career has also spanned several industries in addition to healthcare. There has to be a lot of lessons from that breadth and depth. What are some of the lessons from outside of healthcare that you think proved the most helpful for you in managing healthcare compliance programs?

SS: In the mid-90s I had a tremendous opportunity to live and work in Moscow for a few years. The mid-90s were a chaotic time in the former Soviet Union, but I loved the people and culture. Most professionals I worked with were in the midst of transitioning from the command economy they had always known to one in which the market ruled. Part of my job while there was to make sure I bridged the gap between what my clients had always known and introducing them to new concepts and new ways of doing things. I think I used that experience to understand much better how to introduce new processes and new ways of thinking to colleagues during my career.

After leaving Russia, I spent time in New York working in financial services Sarbanes-Oxley Act compliance, and the lesson that I have carried with me from that time is that compliance has a danger of being for show. Financial services firms spend vast amounts and employ substantial numbers of people working on compliance, only to have spectacular compliance failures, one after another. My time spent working there really made me focus on making sure that compliance was neither perceived as nor designed to be for show. Compliance programs should be aimed toward making real changes in the culture and in individual employees' behavior.

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