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Meet Raul G. Ordonez III: Serving patients through compliance

by Raul G. Ordonez III and Gabriel L. Imperato, Esq.

GI: Where did you start your journey, and what factors attracted you to the compliance profession?

RO: My journey into compliance began almost serendipitously. Although I had taken a health law course in law school where we covered the basics of Stark Law, Anti-Kickback Statute (AKS), and HIPAA, it was not until I found a job with a health system that I was able to appreciate compliance as a unique profession. I had been working in our research office for a little over a year negotiating clinical trial agreements when our leadership made the decision to have my role absorbed into the compliance department. We had a new chief compliance officer (CCO) at the time—an experienced healthcare attorney by background—and I believe they thought I would make a good fit in their new organization. As such, the decision to pursue compliance was somewhat determined for me; however, I was excited about the move. Early on, what fueled my interest was the opportunity to continue to learn and develop expertise in a unique and growing area of the law. Prior to joining the compliance department, I did not have anyone in my network who worked in healthcare compliance, which was a plus for me as a young, recent law graduate looking to differentiate myself. In addition, during those early years, healthcare was often in the news and commonly described as an ever-growing industry, and the more time I spent learning about compliance, it became clear that the compliance profession was very much growing with it. I was excited to try to understand these different rules and regulations that kept coming up (Stark, AKS, HIPAA, etc.) and felt that by doing so, I could be a good asset to the organization.

GI: Tell us about your different experiences in the healthcare industry.

RO: My first role in healthcare involved negotiating clinical trials for the health system. The negotiations typically involved an industry sponsor like a pharmaceutical or medical device company and our academic partner, the University of Miami, which employed the researchers. I really enjoyed learning about novel, innovative therapies and having the opportunity to assist in the process of making them available to our patients. Not too long after, I transitioned into compliance, where I have worked ever since, primarily as a hospital compliance officer until March 2022, when I became CCO for the health system. As a compliance officer, I had some unique healthcare experiences outside my traditional compliance function. I frequently rounded on hospital floors as part of various patient experience initiatives and assisted with Joint Commission accreditation preparation, arriving at hospital floors, performing walk-throughs of the environment of care, as well as conducting patient tracers. In addition, I had a memorable experience of staying at the hospital during Hurricane Irma to assist the facility's leadership team as an extra set of hands, helping administer sleeping cots for employees staying the night, rounding on patient floors to ensure staff had everything they needed, and

anything else our leaders needed. I was also fortunate to attend the University of Miami's Executive MBA program in Health Management and Policy, an experience I greatly enjoyed due to the exposure it provided in areas outside my areas of expertise in fields like healthcare policy, finance, marketing, operations, strategy, and more.

GI: Tell us about your different roles as a compliance professional in the healthcare industry.

RO: When I first transitioned into compliance, I was still responsible for reviewing and negotiating clinical trial agreements. Fortunately for me, my CCO at the time was happy to include me in as many of the general compliance activities as I was willing to take on. As such, in addition to my prior duties, I was assigned various compliance issues to research and was able to tag along on various investigations, work plan projects, and other departmental discussions. My next role involved serving as compliance officer at Jackson South Medical Center, one of our acute care hospitals in Miami-Dade County. This role provided a memorable opportunity because the facility had just earned its Level II Trauma designation, and there was a lot of excitement and preparation involved due to the facility's imminent growth at the time. I subsequently transitioned to serving as the compliance officer for the health system's flagship hospital, Jackson Memorial Hospital, which included a Level I Trauma Center, a transplant center, an inpatient rehab facility, and a children's hospital, among other services and facilities. As the compliance officer, I was responsible for managing the compliance program by providing education and training, conducting investigations, chairing the compliance committees, and providing guidance to the leaders, among other activities. In addition to my formal compliance duties, I greatly enjoyed the opportunity to attend operational and strategic meetings at each facility and gain insight into their goals and objectives regarding patient experience, quality and safety, length of stay, employee satisfaction, and more. When I was named CCO for the entire health system, I was fortunate to inherit the program from my predecessor, Judy Ringholz, who mentored me for the role prior to her retirement. As such, thanks to her, I inherited a strong program with a fantastic team. Since then, our team has been concentrating on identifying enhanced auditing and monitoring opportunities based on a risk-based approach. Serving as the CCO has been a tremendous honor, given Jackson's mission to build the health of the community by providing a single, high standard of quality care for the residents of Miami-Dade County. Born and raised in Miami, I always identified Jackson both as a center of academic medical innovation but also as the health system that provided care to those who could not access it elsewhere in our community. I am proud to serve that mission through the compliance function.

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