The Accidental Compliance Professional: Lessons Learned from 23 Years in the Industry
Roy J. Snell, 2019, 175 pages, SCCE, $35.95
Review by Norman M. Goldfarb

The Accidental Compliance Professional: Lessons Learned from 23 Years in the Industry presents 17 essential lessons the author has learned during his career in compliance and leading the Health Care Compliance Association and the Society of Corporate Compliance and Ethics.

The following excerpt illustrates the accessible and autobiographical manner in which the lessons are presented:

LESSON 2
FILL EVERY HOLE THAT THE RATS MIGHT GET THROUGH

I once walked into work with a belt and suspenders on. Marc said, “So you are a belt and suspenders kind of guy?” I really didn't get the point/joke he was making. Later I figured out that if you have suspenders on, you don't need a belt. He was giving me the business in a fun-loving way; but as I write this, I realize he was wrong, very wrong. The fact that I was wearing a belt and suspenders was brilliant. In fact, I should have also had rope, some glue, and duct tape holding up my pants. I should have responded, “What? Are you kidding? You taught me to do this.” You see, Marc always threw the kitchen sink at a high-risk area.

This lesson eventually became one of the keys to the success of our compliance program. We threw many solutions at a problem at the same time. Marc’s solution to potential high-risk problems involved carpet bombing, just like the enforcement communities carpet-bombed organizations with settlements and corporate integrity agreements. He talked with people who went through what he was about to go through. He didn't just take the best of the good ideas; he simultaneously implemented all the good ideas he could find. He surrounded high-risk potential problems with many solutions. He filled every hole that the rats might get through.

The book also presents 10 fundamental principles for compliance professionals:

1. Implement all elements of a compliance program.
2. Respond to concerns and complaints related to ethical and legal violations.
3. Never compromise when faced with resistance to fixing a serious problem, and don't overreact to small problems.
4. Remain unbiased, un-conflicted and neutral during problem investigation and resolution.
5. Have independence, authority and responsibility for finding and fixing legal and ethical issues.
6. Report resistance to resolving significant issues and impediments to implementing a compliance program.
7. Ensure compliance problems are fixed, rather than just advise they be fixed.
8. Delegate to other departments elements of a compliance program without giving up authority to ensure compliance-related tasks are completed.
9. Facilitate support for the compliance program from leadership and communicate that support to employees.
10. Collaborate with leadership to resolve problems in as positive a manner as possible.

The book includes 19 chapters:
- Introduction. One Sentence Changed Everything
- Lesson 1. How to Handle “The Big One”
- Lesson 2. Fill Every Hole That the Rats Might Get Through
- Lesson 3. Study Your Failures to Find a Better Way
- Lesson 4. College Pranks Gone Wrong
- Lesson 5. Hit the Compliance Bullseye with Expert Help
- Lesson 6. Building Compliance Ambassadors through Influence
- Lesson 7. Compliance Activism Belongs in a Rodeo
- Lesson 8. Get into the Soul of the Machine
- Lesson 9. That’s What I’m Talking About!
- Lesson 10. Sowing Seeds of Compliance around the World
- Lesson 11. Nightmare on the Papaonga River
- Lesson 12. The Dangers of Rationalization
- Lesson 13. Victoria and the Falsified Logs
- Lesson 14. The Possibility of Being Too Ethical
- Lesson 16. Fighting Groupthink with Diversity
- Lesson 17. Independence: Why It’s Critical
- Conclusion. Thank YOU for Your Service

Reviewer
Norman M. Goldfarb is chairman of MAGI and chief collaboration officer of WCG Clinical. Contact him at 1.650.465.0119 or ngoldfarb@magniworld.org.