



Compliance

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by Roy Snell, CHC, CCEP-F

Compliance relationships with other departments

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On occasion I get asked by compliance professionals to help them with a problem related to other departments like Internal Audit, Legal, Human Resources, Risk, etc., who are “encroaching” on their role. I tell them I cannot help them, because I believe



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that that anyone who wanted to do my job should get my blessing. Using other departments’ resources is easier than arguing for more resources. It’s also much easier to get along if you are not defensive about your turf. I don’t really care if I get compliance done, I just care that compliance gets done.

There is a big caveat though. If the department that “wants to do my job” does not have the skills, resources, or authority to do my job effectively, then I may have to step in at some point. As long as they are progressing well, I will let it go. I would keep a watchful eye on it. Enron, HealthSouth, Penn State University—all had problems for a long time that several people knew about but they did not fix. If I had been in that environment and allowed another department to “do my compliance work,” I would have taken it out of their hands when it was clear they could not effectively complete my job.

The seven elements of a compliance program are not new. They have been around for years and many other departments have the skills

to execute them. The reason the Compliance profession was created was because the seven elements were siloed, and no one had the authority and responsibility to orchestrate a compliance project to completion. Other people can do your work, but when they fail to finish... you must step in.

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I was once told by someone that people who built radio-controlled planes would let anyone fly their plane. When I asked why they would risk their plane in the hands of a rookie, they said, “I will put you up high enough for three mistakes to be made. After your first mistake my planes controller will no longer be in your hands. That will leave me two mistakes from the ground to land the plane. You could not crash my plane if you wanted to.”

That is how I feel about other departments doing “my” compliance work. So long as they hand control back to me after the first mistake, I have no problem with them doing my work. ☺