

## **When Assuming a Compliance Officer Position a Due Diligence Review is Advisable**

**Richard P. Kusserow | March 2023**

### **Tips to get started on the “right foot”:**

- **When assuming responsibility for anything, “taking stock” of it should be a priority.**
- **As with any other business deal, a due diligence review is advisable.**
- **Moving quickly is important while the “blush is on the rose,” before problems arise.**

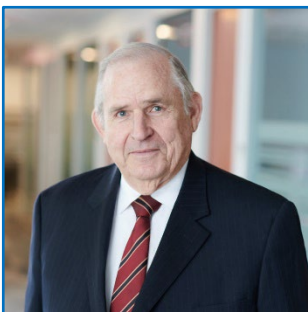
As with any business deal, a standard procedure is to conduct a due diligence review to identify problems before engaging in a business relationship. It is highly advisable for a Compliance Officer moving to a new organization to do a similar type of due diligence to scout out problems, working conditions and management relations, and learn quickly what you are inheriting (good and bad). The best method for doing this involves having something analogous to an inventory audit and culture assessment or, in this case, an [independent compliance program effectiveness evaluation](#). An in-depth review should identify (a) strengths and weaknesses in the program, (b) where there are opportunities for improvement, (c) means by which the program can be enhanced, and (d) intelligence on the leadership and personality issues that may impact job effectiveness. Such a review should go beyond a document review and include interviews with executive leaders and program managers, along with focus group sessions with staff level employees. The results of this 360-degree evaluation could also benefit the incoming Compliance Officer on any hidden “mine fields,” structural problems, and personality issues left over by the predecessor. It may also shed light on any hidden reasons for the creation of the vacancy to be filled. The results should provide a “road map” for a smoother transition and avenues for enhancing Compliance Program effectiveness. The advantage of having outside experts doing this work is that their recommendations would have greater credibility and weight than from the new Compliance Officer who may be viewed as making self-serving and unsupportable recommendations.

It is reasonable for a new Compliance Officer to request such a review at the onset of an engagement, but it should be made quickly while ownership of any problems belong to the outgoing party. Other suggestions when assuming the Compliance Officer responsibility would be to:

1. Do a lot of homework on the organization, including its history and leadership.
2. Memorize the organization chart.
3. Orient oneself to the location of offices and operations.
4. Make a list of executive leadership and program managers.
5. Make the rounds with everyone on the list to introduce yourself.
6. Decide upon what questions to ask and to whom.
7. Listen more, speak less.
8. Ask for advice and suggestions.
9. Inquire about issues that individuals find troubling.
10. Look for potential friends and allies.
11. Focus on getting to know your team, review their history and spend time with them.
12. Decide how to organize your calendar and manage time.
13. Create a short-term and long-range “to-do” list.

For answers to compliance FAQs, see <https://www.compliance.com/faqs/>.

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### **About the Author**

Richard P. Kusserow established Strategic Management Services, LLC, after retiring from being the DHHS Inspector General, and has assisted over 2,000 health care organizations and entities in developing, implementing and assessing compliance programs.