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Meet

Martin T. Biegelman
Director, Financial Integrity Unit,
Microsoft Corporation and

Daniel R. Biegelman
Attorney-at-Law and Author
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Letter from the CEO



Who should chair the Compliance Oversight Committee?

In this article I discuss the “operations” Compliance Committee, not the Compliance Committee of the Board. Most people will tell you that the compliance officer (CO) should be the chair of the Compliance Committee. If you want to take the safe route, I would follow their advice. Personally, I would not do that. When I was the CO at the University of Wisconsin, we chose a respected person from leadership to be the chair. Everyone says it’s important to get leadership’s commitment and involvement in compliance. I can’t think of a more perfect opportunity to get leadership involved. In fact, I think there are few real substantive opportunities to get leadership involved and show their commitment. I wouldn’t pass up this opportunity.

The trick is to get someone who has the time, is respected, can handle pressure, doesn’t back down when necessary, and will follow your lead. I would make the CO the administrator/secretary for the committee. The CO would help set the agenda and prepare the chair for agenda items that are likely to create some excitement. The CO must be in complete charge of the agenda.

The right committee chair will help the committee look at each issue that affects the staff from the staff’s perspective.

This also puts a different face on Compliance. It helps show that this is not the CO’s compliance program, but rather the organization’s compliance program. Leaders often have to do things related to compliance that they may not like. In those

cases, they want to see their peers involved with and supporting the difficult things that need to be done. When I was in administration at the Mayo Clinic, we had several hundred committees. Almost all of the committees were led by powerful people who relied on the committee secretary to “run or orchestrate” both the committee and the operational area related to the committee. My experience with this approach has been very favorable.

Most of all, the right committee chair will help the committee look at each issue that affects the staff from the staff’s perspective. They will advise you and the committee of ways to get things done that will include the perspective of the people you affect. I can’t tell you how many times our chair helped us present difficult issues to the staff in a more effective and empathetic way. This is not just a superficial effort to gain support. A “lay chair” can make some very substantive contributions. ■