Chapter One

l Knew l Had Made It When...

Mary says...

Compliance seems to attract a certain type of person. We value fairness, justice and doing the right thing. As Beth Colling points out elsewhere in the book, we are often natural rule followers.

Another characteristic typical of compliance folk is that we have different interpretations of "making it," depending on who we are and what we value. What success looks like depends on your vantage point. Success doesn't necessarily mean standing at the highest point of the ladder, though of course that's the measurement of "making it" for some.

It is, therefore, unsurprising that the following stories highlight a sense of self-achievement when these Great Women in Compliance followed their instincts, contributed to their communities, and came to understand the role they play as a key cog within a larger machine serving a wider purpose.

Sometimes, knowing you've made it just means that you feel you're on the right track—even though the final destination may remain unknown. We celebrate the contributors in this chapter for their commitment to ethical workplaces and the compliance community. Had Lisa Fine not actively reached out, as she describes below, in an effort to build her network, the Great Women in Compliance Podcast would never have been born.

To you who are inspired by these stories, we say: Keep making the most of your abilities and you will continue to reinvent "making it" for a long time to come.

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Courage Under Fire

As **Marcy Maslov** notes, being successful in ethics and compliance sometimes requires courage.

"I've faced the wrong end of the barrel of a gun for cleaning up unethical and illegal behavior," she says. "I did not feel great after most of these experiences, I can tell you."

In her long career she has stared down supervisors, CEOs, colleagues, and even friends. She recalls being the lone voice brave enough to label an action as unethical and refusing to participate in an activity, knowing it might cost her the job.

"The light bulb finally came on the day I learned my efforts had helped turn around a manufacturing plant from the worst to the best in productivity, and that the girls in this facility now light a candle for me every Christmas in gratitude for my saving them from being raped.

I thought I'd failed in that job. There was nothing in the corporate handbook guiding me on what to do, so I followed my own standards. I stood up for my ethical values and put my career with the company at risk to protect these girls and "do the right thing." I ended up leaving that job because I could no longer trust the people I worked with and for. It was my first real-life lesson that not everyone has the same standards that I do, and it set me on my path to entering the ethics and compliance world many years later. I was just living my life and being true to myself. It took many years after I'd left this job to truly recognize the value of my effort. A simple phone call from a colleague helped me see the true impact of my efforts. And it keeps me going even in the face of extreme pressure today."

-Marcy Maslov, Chief Integrity Builder

Meeting People Where They Are

Extreme pressure is part of the job description, whether in the trenches in the office or when representing an employer abroad. **Gwendolyn Hassan** knows a thing or two about international travel, having been an exchange student in her school days and later, as a young lawyer, when she looked for every opportunity to immerse herself in the traditions, foods, and dialects of other countries. She eagerly raised her hand for every project or deal that would land her on foreign soil and give her the opportunity to combine her compliance practice with her love of languages and cultures.

"A company I once worked for had a particular location in South America that was a proverbial "black hole." We had never received a helpline report from the location and had no regular dialogue with local management. I pitched the idea of doing a short local "residency," spending a week on-site with no specific agenda while working alongside the local team each day and making myself available.

While my management wasn't entirely convinced of the value of such a residency (I believe the term "boondoggle" was mentioned

at one point), I successfully "sold" the idea based on my ability to speak the local language and my fervent belief that only by spending time with the local team could we really gain insight into why the culture there appeared to be so closed.

I made the trip, set myself up in a small conference room, and walked around introducing myself to everyone I could. I ate local cuisine in the employee cafeteria, and I literally hung around the company water cooler and looked for every opportunity to get to know people. I was approachable and available, and on my fourth day there, an employee stopped by and asked if I had time to go for a walk.

The employee had heard through the grapevine that "a friendly woman from compliance" was here for the week and that I spoke the local language.

We walked around the grounds of our facility and chatted for almost an hour in Spanish. They described a facility culture of silence, where employees were discouraged from speaking up, instructed not to use the helpline in order to hide issues from the corporate office, and where employees had a very real fear of retaliation. The employee provided details of multiple significant potential compliance issues along with the names of other employees who wanted to speak with me while I was on-site. In fact, the employee told me they had been "waiting" for someone they could talk to who wasn't beholden to local leadership.

I spent the rest of that day and all of the next talking in Spanish with other employees who voiced the same concerns. As a result of my week in residency, the company not only discovered and resolved what could have been multiple costly compliance issues, but was also able to implement a number of local culture initiatives, including specific interventions to incentivize helpline reporting and address the fear of retaliation.

By "being there" on-site, speaking the local language, and simply being available to listen, I had "made it." It was when I first realized that the highest use of my talents lay in combining my passions and that doing so was of great value not only to me, but also to the companies I work for."

> -Gwendolyn Lee Hassan, Director & Managing Counsel, Global Compliance

"Developing an ethical culture in any organization is really no different from what is required to build a house. You need a strong foundation to ensure the integrity of the structure. Key foundational pillars that are often overlooked are emotional intelligence and empathy; they help open doors to building trust, create open lines of communication, and aid in eliciting candor and honesty.

I have learned that connecting on a personal level before focusing on compliance-related issues or concerns is critical in forming a bond of trust. I make it a point to learn more about a person's cultural values and personal interests. There is something to be said about putting yourself in someone else's shoes, connecting with them on a deeper level, and effectively communicating and resolving conflicting viewpoints without tension or resistance. In this way, stakeholders are more likely to consult with me to resolve an ethical dilemma and act with integrity. It is at this point I know with confidence that the house I built is sound."

-**Tiffany Archer,** Regional Ethics & Compliance Officer / Corporate Counsel (Americas/Europe)

A Seat at the Table

Margarita Derelanko says "the smallest fleeting moment at work can not only confirm you've chosen the right path, but also "shape your mission and your professional *why*."

Here's the story of her moment.

"It was a Thursday morning meeting in which cross-functional leadership came together, post-merger, to demo a new electronic health record vendor. At this point of the organizational cycle, the compliance department had been established and well-known after a few years of compliance awareness and engagement campaigns. Merger partners had also had opportunities to engage with us, their compliance teammates, and learn about the mission and elements of the program. I knew that the proactive culture of compliance had been firmly infused into operations and co-workers' minds, pre-merger, and that it had also been making its way toward those less familiar with our compliance department, post-merger.

In that meeting, I made a conscious decision to observe and note whether someone from the leadership team would ask compliance-related questions from the vendor (and if you are reading this book, you may very well know that this decision does not come easy to us compliance practitioners).

By then, the compliance department had been receiving a steady stream of inquiries from both leadership and front-line teammates who did not shy away from using PHI, BAA, and other compliance acronyms in their correspondence. I had also been told that compliance was discussed during meetings even when the compliance team was not in the room. So I decided to let it unfold.

Minutes into the demo, someone behind me raised a question: "Is this platform HIPAA-compliant? Is it secure?" Later, another voice asked, "What about segregation of records?" Compliance questions continued on. The voices were familiar to me, as they were program managers and mid-managers that my department had been partnering with for years.

I smiled. I was filled with pride, knowing that compliance was important to those leaders and that they felt comfortable asking difficult questions and using compliance terminology.

In that moment, I realized that I want to be remembered professionally for helping organizations integrate compliance into the work and minds of teammates by making it attainable, operational, and engaging. I felt that I had made a difference and helped leadership and their programs be better versions of themselves, using compliance as a tool. That was the beginning of my beautiful journey of fully discovering my professional *why*, which brought me to doing what I love with my new work family.

You know you've "made it" when compliance is on your co-workers' minds and when they think of you as a business partner and resource.

How often do you let your colleagues "speak compliance" on your behalf? Have you ever observed what happens when you let someone else speak up? You may be surprised!

How you get to this feeling that your compliance program "made it" (even on a small scale) may differ. However, I bet that if you establish your compliance brand, focus on training, and genuinely engage your gatekeepers and front-line teammates, over time, you will nurture compliance advocates in your organization who may be just as comfortable saying, "We need a BAA because there is PHI," making you feel so proud...

-Margarita Derelanko, Director of Compliance

"I knew I made it when... I was the only woman in the room discussing an urgent client situation with our CEO and several top executives. I quickly realized that not only did I understand what had led to the urgent situation, I knew how to solve it. I explained the problem and solution. When the CEO agreed and asked "who is the best person to deliver the message?," I did not hesitate to say it was me. I remember walking out of the small office and thinking that the resolution of this issue could make or break my career. Luckily, it all worked out–I met with the client, resolved their concerns, and gained the trust of our leaders."

-Michelle Beistle, Chief Ethics, Compliance & Privacy Officer

Now, to Pay it Forward

Lisa says...

When I started in my first non-law-firm corporate role, I felt fortunate to get the opportunity to work in HR compliance. I remember a steep learning curve, but soon realized I had found a "home" in the ethics and compliance area.

Not only was I completely engaged with the subject matter, I loved the opportunity to work with people in all areas of the business and all over the world to make sure they thought about ethical decisions and regulations.

Although sometimes compliance can be a lonely profession, I soon realized that while it could feel lonely at an organization, there is a community of ethics and professionals out there. I just had to find them.

My first conference was in Chicago. Not only was I thrilled to meet so many people who were excited about things I wanted to do, I also met Mary Shirley. After hearing one of her presentations, I knew she was fantastic, but I did not know how much our paths would cross.

This was the beginning of me building my compliance network.

Fast forward a few years: Suddenly, talking about things like Department of Justice Guidelines, GDPR, and so many compliance-related acronyms was second nature, and I was in a new job. When I was meeting new people at work and working on new projects, I realized I was also building a network of resources through this group of people who were now friends as well as colleagues.

Over the past year, people I've met have said they listen to the podcast or they've heard me speak, and it makes me feel like I'm making an impact. Even better, I'm now in the position of bringing people into my network and can help others as people have done for me—all while doing substantive work with great people in my job.

I don't know if that means "I made it," because there is always more to do. But these accomplishments have helped me grow and continue to evolve as an ethics and compliance professional. "Making it," in my opinion, is what you "make of it." Being able to become a leader, keep learning, and pay it forward seems like as good a definition of success as anything.

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