

## Compliance Today – December 2018 Thank you, Roy Snell!

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an interview by Odell Guyton, CCEP, CCEP-I

This interview with Roy Snell ([roy.snell@corporatecompliance.org](mailto:roy.snell@corporatecompliance.org)) was conducted in October 2018 by SCCE & HCCA board member Odell Guyton ([guytonlaw1@msn.com](mailto:guytonlaw1@msn.com)), CCEP, CCEP-I, and Co-Founder of SCCE.

**OG:** What were your earliest experiences in compliance and what were your motivations for entering/staying in the field of compliance?

**RS:** My earliest experience was walking down the hall with my CEO, who was reading a significant settlement the University of Pennsylvania had just agreed to in 1995. The settlement related to False Claims Act violations, involved a multi-million dollar fine, and mandated that they hire a compliance officer. He said, “Maybe we should hire a compliance officer before the enforcement folks come visit?” I told him that it sounded like a good idea. He turned to me and said, “Why don’t you be our compliance officer?” Technically speaking, I wasn’t “motivated” to come into the compliance field; I was asked.

I was motivated to help my greatest mentor, Marc Dettmann, in any way I could. Marc had a Harvard law degree and MBA from Wharton. Marc was a regular guy with incredible insight. Once I got into the compliance and ethics profession, I was motivated to stay for many reasons. My best guess is that my interest stemmed from the fact that my parents were into honesty and integrity. I also got to play an interesting role in the field, because I got there early and was able to help start a professional association for the compliance and ethics profession. There are great people in the compliance profession, and that was a motivation to stay. You are who you hang around with all day. I am a way better person because of the people I have worked with in this profession.

**OG:** How would you differentiate the compliance professional’s role from that of internal and external audit professionals?

**RS:** Internal and external audit focus on issues that are found in the accounting. The compliance profession focuses on all risk areas. Internal audit focuses on auditing and investigations. Compliance uses those tools, but also deals with other issues, such as education, implementing and maintaining a hotline, policies for all risk areas, building an ethical culture, working with leadership to set the tone at the top, etc.

**OG:** There is now talk of Compliance being one of the second or third lines of defenses in a corporation. What are your thoughts on that topic?

**RS:** I don’t know that I have ever heard of this concept. It sounds to me like, “consultant speak.” Maybe it has come from another profession that wants to be more relevant. It doesn’t matter what the logic behind this statement is — it’s bad advice for leadership. Any CEO who doesn’t see that their compliance and ethics program is their first line of defense is risking their career like John Stumpf at Wells Fargo.

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