

## Report on Medicare Compliance Volume 28, Number 39. November 04, 2019

### With Some Acquisitions, CCOs Start From Scratch, 'Integrate' Culture

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By Nina Youngstrom

When Lynn McGivern, chief compliance officer at US Radiology Specialists in Raleigh, North Carolina, tells people she has the largest department in the company, they look at her “like I have three heads.” How is that possible? She only has five direct reports. McGivern’s response: “Compliance is an enterprise-wide responsibility,” she says. “I have learned that if you lock arms with operations and partner with them on appropriate things, including coding, billing and documentation, that’s when you get the best bang for your buck.”

McGivern finds it helpful to partner with operations as she brings or scales compliance programs to companies acquired by the parent, US Radiology Specialists, which owns radiology practices and imaging centers. “The interesting thing is trying to understand the level of maturity of the compliance program and the culture of entities we have recently acquired and integrate them into the culture of the parent company,” she says. “We are trying to create a brand and compliance program and culture at the top level that gets integrated down to the companies we are owning and operating.”

Some acquisitions have been late to the compliance game. McGivern is now faced with a study in contrasts: the parent has acquired a company that owns two same-size outpatient imaging centers that compete in the community, one with a mature compliance program and one without a compliance program. “Merging them is really challenging,” she says. While it’s hard for her to fathom a company not having a compliance program in 2019, she has to tread carefully. The executives may be resistant, because they think they’ve gotten along fine without one, and she wants to be sensitive to the fact they have to get used to the new owner. “We are buying large platform companies with good will, and their own brand is respected in that geographical space, so you have to respect that legacy brand. The process takes longer,” McGivern says. “We socialize the fact the company has been purchased. We had a nice integration party.”

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