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Meet Gerald Roy: Mission-focused and mission-driven compliance

by Gerald Roy, CHC, CRHC, CHPS; and Gerry Zack

Note: At the time of the interview, Gerald Roy was Vice President, Chief Compliance Officer, Office of Business Integrity, at Phoenix Children's, Phoenix, AZ. Gerald is now Organizational Integrity System Vice President at PeaceHealth, Vancouver, WA.

GZ: You began your career conducting investigations with the U.S. Department of Treasury. What career aspirations did you have growing up, and at what point did you find yourself determined to become an investigator?

GR: I was a history major at the University of California and became interested in governance and legal systems of societies. That influenced my career choice. You mention the word “determined,” and indeed, determination was key in the late 1980s and early 1990s. For several years, the federal government had a hiring freeze in place. Job announcements were very rare and very competitive. At one point, I was hired by the predecessor agency of Immigration and Customs Enforcement, only to have the announcement canceled several weeks before I was to report to the academy. I was fortunate to land the job with the U.S. Treasury Department in Los Angeles a year later. But the work I did at the Treasury Department was pivotal and would shape my leadership style and emphasis on ethics and mission for the entirety of my career. I was assigned investigations involving fraud and the collapse of savings and loan institutions. If you will recall, we were in the midst of the savings and loan crisis in the early '90s, where we witnessed about 32% of these institutions fail. While the criminal cases dominated the headlines, there was a larger, underlying theme that facilitated the crisis. Executive leadership and board of directors often had little training, lacked experience, and were easily influenced by the past success of risky investment practices. There were no compliance programs, no ethics training, and little oversight. Poor leadership, lack of subject matter expertise, and a roll-the-dice mentality were far more common facilitators of collapse than sophisticated, well-designed schemes to defraud.

In 1995, I was offered the opportunity to join the U.S. Department of Health and Human Services (HHS) Office of Inspector General (OIG). By then, I was well entrenched in the realm of white-collar crime investigations. And healthcare fraud brought things to a new level. No two cases were the same, and the adverse impact on our nation's healthcare system was burgeoning. There was also the added function of cabinet-level protective operations that interested me. I took the opportunity as a field agent in San Diego, and OIG became my home for the next 20-plus years.

GZ: You spent 26 years with the federal government and in law enforcement prior to becoming a compliance

officer. How did that experience shape how you approach your role as a compliance and privacy officer?

GR: My colleagues at OIG were very mission-focused and mission-driven. Our mission was to ensure the solvency of this nation's largest public programs that provide healthcare to our most vulnerable populations, Medicare, Medicaid, and approximately 300 other programs. It is a noble mission. That's why our national health expenditures account for 18% of the gross domestic product. At the senior management and executive leadership levels, I emphasized that mission to everyone. That included our agents, other federal, state, and even local law enforcement, members of Congress, and congressional committees of jurisdiction.

I approach my role as chief compliance and privacy officer with the same mindset. As one of the largest pediatric health systems in the nation, our mission at Phoenix Children's is to advance hope, healing, and the best healthcare for children and their families. Part of my job is to ensure that every member of our organization understands that remaining in good standing with our payers, federal and state regulators, and the community that supports us is what facilitates the furtherance of our mission. That's why I personally show up at every new hire orientation, new provider orientation, and new leadership orientation to talk about mission, culture, transparency, and doing the right thing. No matter what our role is at Phoenix Children's, we are all mission-focused.

Also, I welcome government regulators. The way I see it, we share the same mission. At Phoenix Children's, our patients are primarily insured by the state Medicaid program. Making sure that we are effectively and efficiently using state resources stretches them further, and we can treat more patients and provide better services. Everyone wins. I understand that's easy for me to say considering my background, but I also see our regulators breaking down the silos. Our state Medicaid Inspector General has developed a rapport with healthcare compliance professionals across Arizona by holding and attending compliance events and answering questions. She also sits on advisory boards that are driving compliance education at the undergraduate and graduate levels. By doing so, she ultimately gets buy-in from the compliance community and decreases the potential for fraud, waste, and abuse in the programs she oversees.

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