



Compliance - TODAY

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A portrait of Susan Gillin, a woman with short brown hair, smiling. She is wearing a dark blue blazer over a dark top and a necklace with blue, white, and gold beads. The background is a blurred image of a large, classical building with a dome, likely the U.S. Capitol.

A window into compliance efforts in the real world

an interview with Susan Gillin

Chief of the Administrative and Civil Remedies Branch
Office of Counsel to the Inspector General
U.S. Department of Health and Human Services

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by Nancy J. Beckley

Facebook – Too big to ignore

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Are you on Facebook? Even if you aren't on Facebook, it is likely as a compliance professional that you have a policy on social media, and it may very well be centered around Facebook as the



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most popular and widely used social media platform. It has to be obvious that the Connectivity column hasn't done much of a dive into Facebook. It seems that the time has come, because Facebook is too big to ignore in 2017.

Facebook's Mission Statement:

"Founded in 2004, Facebook's mission is to give people the power to build community and bring the world closer together. People use Facebook to stay connected with friends and family, to discover what's going on in the world, and to share and express what matters to them." In 13 short years, the statistics are staggering: there are 2 billion users and more than 85% live outside the U.S. and Canada.

Facebook self-defines their culture as a "hacker culture - an environment that rewards creative problem solving and rapid decision making." The phrase "this journey is 1% finished" is posted on their walls, along with another poster declaring, "Fail harder."

Having been on Facebook (personal) for nearly 10 years, I originally found it a place

to find childhood, high school, and college friends. Over the years, I've "liked" pages, and just as quickly "unliked" pages when I caught on that Facebook took my "likes" (lemon meringue pie recipe) and bombarded my feed with similar sites. Now I only like professional associations, such as HCCA's Facebook page, and the experience is more pleasant. You can change how items appear in your feed and stop ads you don't like, don't interest you, or that you find offensive.

I found a tip helpful to all—What happens when a family member dies and you have to close down social media accounts that you don't have access to and you don't have access to emails or passwords? If the person did not set up a legacy contact, there are challenges. Facebook will allow an account to be memorialized so that friends can share memories according to privacy settings. Be sure to set up a legacy contact in your profile, and encourage others to do so.

From the compliance perspective, take a look at Facebook's Code of Conduct. The Facebook Code includes conflicts of interests, harassment, communications, public disclosures, financial integrity, as well as compliance with laws, reporting violations, and a policy prohibiting retaliation. Sound familiar? Many of you may have Facebook in your investment portfolio. Catch up with Facebook Investor Relations and review it all at <https://investor.fb.com>.

If you went to grade school or high school with me, let's get connected! How are you connected on Facebook? ☺