



# TOP TAKEAWAYS

from the 8th Annual Compliance Congress West

During the **8th Annual Compliance Congress West** in San Francisco, government representatives, industry professionals, and vendors offered the latest in best practices and suggestions for building and maintaining a stronger compliance program.

## Here are our top takeaways:

### Regulatory Focus

- Anti-kickback violations have not gone away and the Yates memo is still a focus.
- Be alert for repeat attendees at speaker programs.
- Don't use a third-party vendor to do what the company can do directly.
- Dig into the data. Use analytics to identify potential risk areas.
- Opioid abuse is in the news and on the minds of legislators and enforcement teams.



### Privacy and Data

- Privacy laws in the U.S. are segmented and not comprehensive
- Privacy is an explicit right in the European Union.
- All personal data is subject to consent, which may be rescinded at any time.



### Compliance Program Management

- Make the case for the right compliance resources with risk assessments.
- Make sure you are dedicating enough resources to compliance.
- Utilize non-compliance/non-legal professionals from the commercial side.
- Use Health Care Compliance Association and Health and Human Services, Office of Inspector General resource guides on how to measure a compliance training program.
- Simplify the policies.
- Make training more engaging.
- Sales representatives need help with the gray areas.
- Department of Justice Corporate Compliance Evaluation document explains the agency's expectations for a successful compliance program.



### Concepts to Keep in Mind

- Compliance challenges are leadership challenges.
- Beware the tension between pressure to succeed and pressure to comply.
- Don't let corruption as the norm be an excuse.
- Don't be fooled into thinking that unethical conduct that happens to benefit others is acceptable.



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