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Adding International CO Is Response to Risks from Export Control Rules, Foreign Support

By Nina Youngstrom

In the thick of the National Institutes of Health (NIH) review of foreign support for researchers at institutions across the country, Moffitt Cancer Center in Tampa, Florida, adopted an international travel policy. It requires approval before employees can travel abroad to ensure they don't violate export control regulations and put the organization at risk of penalties—not to mention opening the door to potential exploitation by China, Iran and other countries the federal government considers a threat.

"It was an initial corrective action," said Chief Compliance Officer Donnetta Horseman. But as time went on, it became apparent that a more comprehensive approach was necessary to address global risks and ensure compliance with regulations that may not roll off the typical compliance officer's tongue. That's when Moffitt decided to establish an international compliance program run by an international compliance officer.

"It's a whole new area of compliance, and we realized it's not something we could add on to someone else's job in the compliance department," Horseman explained.

When Horseman joined Moffitt, she didn't consider it to be a global company. But after launching a foreign influence investigation of its own, which led to the departure of six faculty members, including Moffitt's then-CEO,^[1] "we started looking more closely at everything we do from an international perspective," she said. "This opened our eyes to other compliance rules." They include treating patients and marketing Moffitt's services abroad, collaborating with researchers from other countries, shipping outside the United States when export control requirements are implicated, and visa applications for incoming foreign nationals.

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