



# ELLEN M. HUNT, JD

Principal Consultant & Advisor



SPARK COMPLIANCE  
CONSULTING

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**AARP honored as a World's Most Ethical Companies by Ethisphere**



**Named 2021 Mentor of the Year by Compliance Week**



**2019 Compliance Officer of the Year - Not for Profit**



**Trust Across America 2019 Top Thought Leaders Lifetime Achievement Award Honoree**



**Named a 2016 Top Mind by Compliance Week**

**AREAS OF EXPERTISE**

Ellen is a lawyer, ethics & compliance professional, audit executive, and chief privacy officer. She has expertise in identifying, evaluating, and mitigating risks as an advisor to the Board of Directors and senior management. She has over 20 years of management experience in various industries including health care, food service, and not-for-profit associations in creating, designing, implementing, and operating world-class ethics and compliance programs including board governance and reporting, designing instructor-led and online ethics education, creating policy management frameworks, managing enterprise and compliance risk processes as well as handling investigations and regulatory agency inquiries.

She joined Spark Compliance Consulting as a Principal Consultant & Adviser to share her expertise and experience with Boards and Compliance professionals from around the world. Ellen serves as the Board expert for a healthcare organization subject to a Corporate Integrity Agreement. She advises on compliance risk, compliance program assessments, best practices, obtaining ISO 37001 certification for anti-bribery management systems, establishing policy management frameworks, and applying for and being named a World's Most Ethical Company.

Before joining Spark, Ellen served as the Vice President, Compliance Program Operations and Chief Privacy Officer for Lifepoint Health, a national healthcare network with 60,000 employees in over 80 hospitals, post-acute services, and outpatient centers operating in 28 states. At Lifepoint she was responsible for all aspects of the Privacy Program, established an annual conflict of interest process, managed the policy review committee, and designed Code of Conduct education. Prior to that she served as the Senior Vice President ~ Audit, Ethics & Compliance Officer for AARP, a 38-million-member not-for-profit association that advocates for the 50+ to choose how they live as they age. There she set the strategic direction for both the Internal Audit and the Ethics & Compliance functions with a team of seven and a budget of over \$1 million. Ellen created the first Code of Conduct and Code of Ethics for the AARP Boards and established an ethics and compliance program from seven-page conflict of interest policy. AARP was honored as a World's Most Ethical Company in 2019, 2020, and 2021.

Ellen led the day-to-day compliance program operations for the second largest food distributor in the United States, U.S. Foodservice, Inc., where she managed a staff of six and reported to senior management and the Board. She served as the Vice President – Compliance Operations for Health Care Service Corporation dba Blue Cross and Blue Shield of Illinois, Texas, New Mexico and Oklahoma and was the designated Compliance Officer for all government contracts including Medicare C and D, Medicaid, Federal Employees Program, CHAMPUS, and other federal, state and local government customers.

She is an adjunct professor at the Fordham University School of Law, Program for Corporate Ethics and Compliance and at Loyola University Chicago, School of Law, co-teaching the Compliance and Culture course.

Ellen serves on the Advisory Boards for the Notre Dame Deloitte Center for Ethical Leadership, Compliance Week, and the Quorum Initiative. She is the co-founder of The Seven Elements Book Club, a book club devoted to ethics and compliance authors and winner of the 2022 award for "Best New Idea" by Great Women in Compliance podcast. She is a co-host of the Great Women in Compliance podcast roundtable series.

## EDUCATION

- The McDonough School of Business - Georgetown University Executive Education, AARP AgL Leadership Program
- UIC John Marshall Law School, Juris Doctor
- Hope College, Bachelor of Arts

## BAR ADMISSION

Illinois

## PROFESSIONAL ACTIVITIES

### Society of Corporate Compliance & Ethics 2024

- Chair of Chicago Regional Conference

### 2020-2023

- Co-Chair for Professional Development track for annual Ethics & Compliance Institute

### Chicago Regional Business Ethics Network

2005 to Present ~ founding member and member of the steering committee

## INVITED LECTURES



2024 ~ Law 794 Organizational Compliance, *Human Risk Management and Board Oversight.*

2023 ~Law 794 Organizational Compliance, *Board Oversight and Risk Assessment.*



2022 & 2021 ~ M.J. Neeley School of Business, BUSI 30383, *Global Business with an Ethical Lens.*



2021 ~ The Berges Lecture Series in Business Ethics. *Culture Clash: When Corporate Values and Actions Collide*



2021 ~ The Fifth Annual Loyola Journal of Regulatory Compliance Symposium. *Work in the Time of COVID-19: Polarities, Variants & Mutations of Employment Law.* Remarks available [here](#).

## EXPERIENCE

### Principal Consultant & Advisor

October 2021 to Present



- Advises and educates public and private company Boards on their fiduciary duty of oversight for the ethics and compliance program as well as designs dashboards and other Board reporting to demonstrate the effectiveness of ethics and compliance programs.
- Performs compliance risk and program assessment with recommendation roadmaps for implementation of best practices.
- Prepares clients for ISO 37001 certification for anti-bribery management systems and advises on third-party due diligence processes and systems including human rights.
- Drafts policies and procedures including policy management frameworks.
- Educates on investigative protocols
- Develops annual compliance plans and key performance indicators.

### Vice President, Compliance Program Operations & Chief Privacy Officer



January 2021 to October 2021

Responsible for Privacy Compliance Program including education, investigation, remediation, and reporting of unauthorized disclosures to the Office of Civil Rights and state regulatory agencies. Coordinated with the CISO regarding incident response and reporting. Designed and drafted Board materials. Created annual conflict of interest process and managed the policy governance process including the policy review committee.

### Senior Vice President - Audit, Chief Ethics & Compliance Officer



November 2017 to January 2021

### Interim Vice President - Internal Audit

April 2016 to November 2017

### Vice President - Chief Ethics & Compliance Officer

May 2015 to November 2017

### Ethics & Compliance Program Director

January 2011 to May 2015

Hired into new position to establish an effective ethics and compliance program pursuant to the United States Federal Sentencing Guidelines for Organizations with responsibility for all elements of the ethics and compliance program including reporting to the Audit Committees of the Boards. Promoted to Chief Audit Executive to revamp Internal Audit Department and improve service delivery in accordance with the International Standards for the Professional Practice of Internal Auditing. As head of both departments, was responsible for annual strategic planning, operational excellence, budgeting, and staffing. Notable accomplishments include:

- Transformed the Ethics Policy into a Code of Conduct that includes a Board of Directors Code of Ethics which can be found on [www.aarp.org](http://www.aarp.org);
- Improved Board and employee annual conflict of interest process which resulted in a 40% increase in disclosures and established process to monitor mitigation plans;
- Designed first annual report and quarterly dashboards of key performance metrics to assist Audit Committees with their oversight responsibilities;
- Implemented third party hotline along with communication plan to increase awareness;
- Established protocols that governs how & who will handle certain types of investigations;
- Created and conducted annual enterprise and compliance risk assessment process;
- Established policy management framework and vendor compliance program; and
- Created and deployed first and then annual customized Code of Conduct training courses and implemented program for new employee training.

## 2024 PRESENTATIONS

~ Society of Corporate Compliance & Ethics 18th European Compliance Ethics Institute. **All Together Now: Post Acquisition Compliance Program Integration.**

~ Practising Law Institute Compliance & Ethics Essentials. **The Evolving Role and Responsibilities of the Chief Compliance Officer.**

~ Compliance Week National Conference. **Women in Compliance Brunch N' Learn Rising the Ranks – All the Way to the Boardroom and Meaningful Ways to Convey the Compliance Department's Value**

## PUBLICATIONS

2024

~ Practising Law Institute Compliance & Ethics Essentials. **Does Your Ethics & Compliance Program have a Net Promoter Score?**

2023

~ Corporate Compliance Insights. **Ethics & Compliance Blue Zones: Do You Live In One?**

~ **So Long, Farewell, Au Revoir, Auf Weidersehen, Goodbye.**

2020

Compliance & Ethics Professionals Magazine published by the Society of Corporate Compliance & Ethics. Coauthor of **Best Friends Forever: Nurturing the Compliance/Board Relationship.**

2019

International Review of Compliance, ***Rising Tide: The Board's Role in Oversight of Ethics & Compliance Programs***, pages 39-40.

2018

Information Systems Audit & Control Association, News Blog. **When Everything Old is New Again: How to Audit Artificial Intelligence for Racial Bias.**

2016

Corporate Compliance Insights. Coauthored **Lie to Win or Be Honest and Lose.**

## EXPERIENCE

### Vice President Ethics & Compliance

June 2009 to January 2011



Led day-to-day operations of compliance program with six staff for food distributor with 250,000 customers, including restaurants, healthcare facilities, and educational institutions and 25,000 employees. Responsible for oversight of corporate compliance program including ensuring state of the art compliance practices, FCPA due diligence and compliance, design and development of ethics education and communication as well as serving as a resource on regulatory compliance matters. Responsibilities included:

- Managed all investigations, operating the Hotline, and providing advice and guidance on ethical concerns to executives and staff;
- Reported to senior management and the Audit Committee regarding the effective operation of the compliance program and emerging ethics and compliance trends;
- Led the business and compliance risk assessment process;
- Drafted policies for international activities including compliance with the Foreign Corrupt Practices Act; and
- Conducted annual conflict of interest and Code of Conduct certification process.

Accomplishments included simplifying the Code of Conduct, deployment of computer-based training to the transportation workforce (approximately 9,000 employees) to ensure the integrity of training records and to obtain an upgrade in regulatory audit findings, and providing weekly ethics messages to leadership that they in turn cascaded to their teams.

### Vice President - Compliance Operations

July 2004 to May 2009



BlueCross BlueShield of Illinois

### Associate General Counsel

January 1998 to July 2004

Responsible for all aspects of the award-winning compliance program with direct reporting relationship to Chief Compliance Officer and Audit Committee. Managed staff of 22 people in multiple locations. Appointed in March of 2005 by Board as Compliance Officer of wholly owned subsidiary with Medicare Part C and D, Medicaid and other government contracts. Responsible for all aspects of compliance for these government health programs with direct reporting relationship to the Board and Chief Executive Officer. Areas of responsibility included:

- Providing ethics education to every employee every year (approximately 18,000) on the corporation's Code of Conduct and disseminating messages regarding ethics;
- Managing investigations, operating the Hotline, and providing advice and guidance on ethical concerns;
- Monitoring and oversight of government programs for compliance with contract terms, regulations, and guidance;
- Advising on corporate governance matters and supported General Counsel in drafting Board minutes, committee charters, and other Board reports; and
- Obtained settlement with Center for Medicare and Medicaid Services regarding company's termination and transition of Medicare Part B contracts.

Accomplishment under my leadership include winning the following awards:

- 2009 "Best of Blue" Award from the Blue Cross & Blue Shield Association for Ethics Education Program.
- 2007 Best Practice Award from the Health Ethics Trust for the development of sub-contractor self-assessment tool for Medicare Part D.
- 2005 Illinois Better Business Bureau Torch Award.