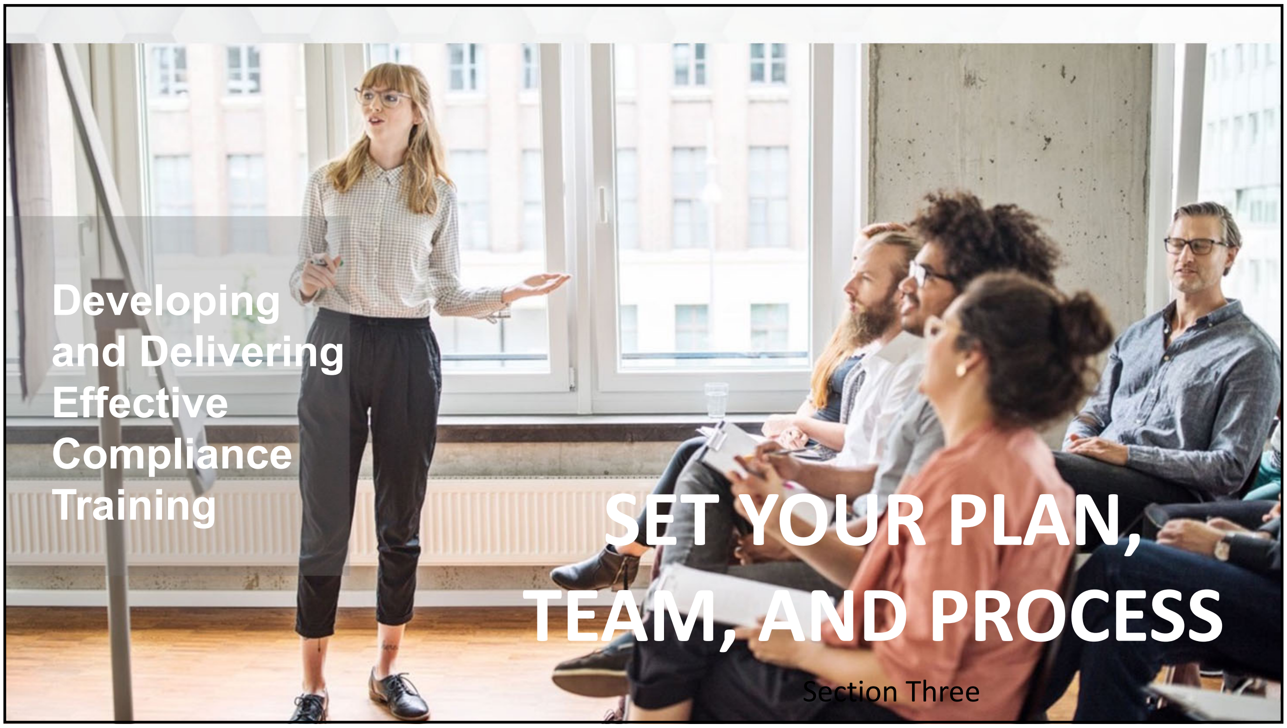


Developing and Delivering Effective Compliance Training

SET YOUR PLAN, TEAM, AND PROCESS

Section Three

1

In This Section

- Planning a multi-year program
- Decision: Buy vs build
- Assembling your team
- Setting a process and timeline
- Rollout logistics
  - Global/regional considerations
  - QA/testing, translations, and rollout

SCCE Society of Corporate Compliance and Ethics
HCCA Health Care Compliance Association

2

Planning Multi-Year Programs

- UK Serious Fraud office: “Effective training is continuous, and regularly monitored and evaluated.”
- Consider overall employee time available (avg 1-3 hrs)

It will not be possible to hit all of your risks each year!

- A well-thought-out program can cover your risks in priority order, with full coverage over several years.
- Consider a specific plan for high-risk audiences (re: DOJ guidance)

3

Use multiple years to build a program that addresses the full range of your risks and audiences

Topic	Year 1	Year 2	Year 3
Code	Full course with certification (20 min)	Short refresher with attestation (5-7 Min); extra module for supervisors	Shorter course highlighting COI; Code attestation + COI disclosure (8-12 min)
Bribery	Foundational course to full population (20 min)	Live course to high-risk population; follow up test (1 hr)	Shorter refresher course to full population (8-12 min)
Respect	Short video (3-5 min)	CA/multi-state harassment (1-2 hrs)	Shorter refresher course
Privacy	Targeted training for people in high-risk roles (1 hr)	Shorter “basics” course to full population (7-12 min)	Foundational course to full population (20-30 mins)
Elective 1 (targeted)	Export controls	Insider trading	Gifts & entertainment
Elective 2 (targeted)	Antitrust	Contact with competitors	Records management
Communication campaigns	• Speak up/helpline	• Ethical decision-making	• Why we have a Code

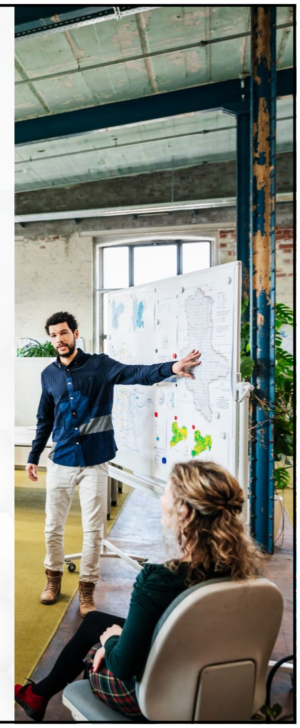
SCCE Society of Corporate Compliance and Ethics
HCCA Health Care Compliance Association

4

Build vs. Buy: Build

When to **BUILD**

- When you have budget constraints
  - DIY content: Storyline (or similar) online course software; video animation license (Go Animate, etc.); iPhone video shoot
  - Your knowledge of your audience & company is a huge asset!
  - Can produce the entire program or supplement professional/vendor pieces
- When you have a generous budget
  - You can afford high-quality professional creative work
  - The right vendor will understand your goals, deeply understand your audience & culture, and produce a highly polished piece



SCCE Society of Corporate Compliance and Ethics HCCA Health Care Compliance Association

5

Build vs. Buy: Buy

When to **BUY**

- Multiple training and comms pieces
  - You want to deploy a number of items in your annual program
- Enough budget that you don't have to trade your time
  - Custom content is time intensive!
- Standard topic coverage
  - A library course that covers common concepts will cover most of what you need to teach
  - You can address specific scenarios etc. through customization
- Many languages
  - Being able to leverage a vendor's library of translations can be cost- and time-efficient

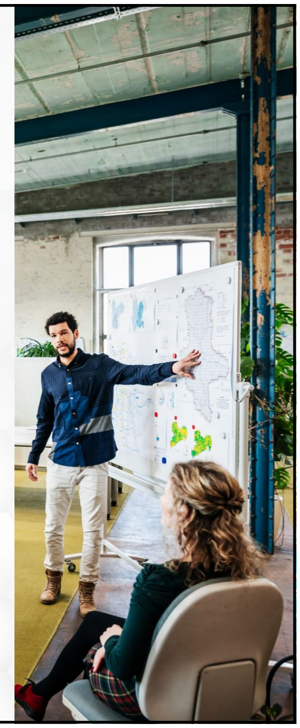
SCCE Society of Corporate Compliance and Ethics HCCA Health Care Compliance Association

6

Build vs. Buy: Both!

When to **BUILD AND BUY:**

- Build when:
  - You know the topic well
  - You have access to good tools or formats (even webinars) and you know how to use them
  - Your knowledge of your company and similar specificity is key (customization of an existing course might be extensive)
  - You need to move fast
- Buy when:
  - You need the outside expertise
  - You're tight on time and want someone to handle it for you
  - You need access to a large pool of languages



SCCE Society of Corporate Compliance and Ethics HCCA Health Care Compliance Association

7

Training Development is Highly Collaborative

In most cases: Review & stakeholder management > writing time

Small companies can (sometimes) move fast.

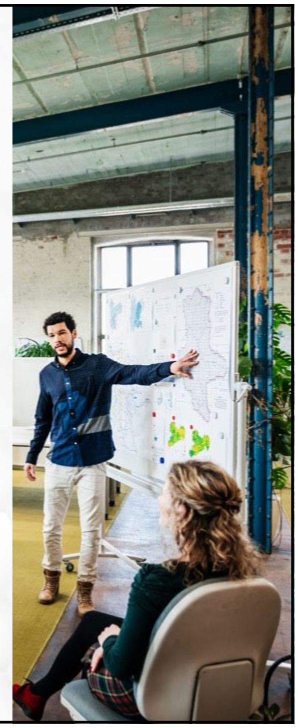
Larger/complex companies should plan for lots of stakeholder review and management.

SCCE Society of Corporate Compliance and Ethics HCCA Health Care Compliance Association

8

Assembling Your Team

Who	What	When
Core project team (you + 1-2 colleagues)	• Do the creative work • Own the outcome • Manage people and processes	Involved at every step Primary drivers of project
Key leaders (your boss, GC, etc.)	• High-level buy-in	Informed throughout Approve final content
Branding/Comms	• Own company visuals	Involve in kickoff Show initial build Show final build
Subject matter experts	• Provide ground-level detail and subject matter expertise	Involve in kickoff Review full draft of content Review edited drafts Approve final content
Vendor (if applicable)	• Library of material • Hands-on writing or design work • Project management	Involved at every step



SCCE Society of Corporate Compliance and Ethics HCCA Health Care Compliance Association

9

Tips for a Smooth Process

Input now means buy-in later — if needed, practice "death by inclusion."

- Expect stakeholder review to take longer and require more rework than you initially expect.
- If possible, invite ALL stakeholders to the kickoff call.
- Keep high-level stakeholders informed throughout.
- When you need stakeholder review, schedule a call to collect feedback — don't just distribute drafts.
- Anticipate difficult stakeholders? Involve them at every step and assign them work.

SCCE Society of Corporate Compliance and Ethics HCCA Health Care Compliance Association

10

Setting A Process and Timeline

Here's a high-level schedule for a typical creative project.

One goal: Provide enough time for review and buy-in—but avoid getting pulled into endless rounds of edits!

Step	Involve
Kickoff call	Core project team SMEs, Branding/Comms Any key stakeholder
Outline/course plan/design plan	Core project team SMEs, Branding/Comms Any key stakeholder
Draft 1	Core project team reviews — this is your chance to get it ready to circulate
Draft 2	Circulate to all stakeholders (Tip: Schedule calls to collect buy-in)
Draft 3	Circulate to all stakeholders for final blessing (Tip: Avoid excess rounds of review)
Final	Test, QA, launch

11

Translations

- Leave plenty of time for translations! (But finish the English course before you start.)
- Most global companies translate courses widely
  - Code course is often the greatest # of languages
- For efficiency (cost and time), most translate text and subtitle media
- Do an analysis: 80/20 rule
  - One company, 6 languages covered 80% of audience, and remaining 20% included 22 languages

12

Translation Process Overview

Process	Ownership	Notes
Step 1: Create or Share Glossary (then translate/review/finalize)	You/translation company	While not strictly necessary, it can help to identify key terms and get those translated first, then checked and approved by in-country reviewers. This adds a step but can cut down on the volume of edits required.
Step 2: Send entire course for translations	Translation company	Typically the content is extracted from the format it is in and placed into a format where you can see the English side by side with the translation.
Step 3: In-country review	You	These initial translations are sent to you to distribute to in country reviewers. Their role is to change the vernacular or identify any issues with the translations. Again, this adds time to the process but helps a lot with the quality of the finished product.
Step 4: Edits applied	Translation company	The translation company will apply the edits suggested by the in-country reviewers. If they receive instructions that are confusing or seem to be wrong, they will send questions back to resolve the issue.
Step 5: Online build	Translation company	Typically the content is now flowed back into the original format.
Step 6: Translation approval	You	You approve the translations of the online build in each language, typically with the help of your in-country reviewers.
Step 7: Package for launch	Translation company	Once approved, the course is packaged for launch. In some cases, the languages will be bundled into a single file with a language selector.

SCCE Society of Corporate Compliance and Ethics
HCCA Health Care Compliance Association

13

Launch Planning & Rollout

- Will you launch to the entire audience base at once or stagger it?
- Centralized launch or administered by the regions?
- Who will handle the LMS administration?
- Who will respond to support tickets?

SCCE Society of Corporate Compliance and Ethics
HCCA Health Care Compliance Association

14

LMS & HRIS (Learning Management System, HR Data)

- Once your course is done, you need to deploy it
  - Learning management systems (LMS) have global reach and built-in compliance workflow
  - Own LMS vs vendor LMS—pros and cons
  - Closing the gap if you have incomplete LMS coverage
- Good HRIS data is critical
  - Some companies have a single, integrated database
  - Others draw from multiple inputs; some have to reconcile duplicate information shared by different users
  - Good HRIS data allows for targeted learning—can also be done in courseware

SCCE Society of Corporate Compliance and Ethics HCCA Health Care Compliance Association

15

QA/Testing

- QA the content and course functionality thoroughly before translations (you do not want 40,000 support tickets)
- Once English course is built, test thoroughly on LMS, potentially through pilot rollout (test browsers, devices, etc.)
- Carefully consider the links you include (to policies, company resources, etc.) — are they likely to change?

SCCE Society of Corporate Compliance and Ethics HCCA Health Care Compliance Association

16