We Supercharged Our Learning & Development Program: You Can Too!

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01
Part I: Why compliance officers need to place greater emphasis on learning and development

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Part II: What specific strategies we used to implement a compliance Learning and Development Program at our organization

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Part III: How to deliver multifaceted training using limited resources

To have an effective compliance program, an organization must establish and maintain an organizational culture that “encourages ethical conduct and a commitment to compliance with the law.”
-U.S. Sentencing Guidelines §8B2.1(a)(2)

ELEMENTS OF AN EFFECTIVE COMPLIANCE & ETHICS PROGRAM
1. Standards of Conduct/Policies and Procedures
2. Compliance Officer/Committee Oversight
3. Education and Training
4. Monitoring and Auditing
5. Reporting and Investigating
6. Enforcement, Discipline and Incentives
7. Response and Prevention
Training and Education

Take reasonable and practical steps to disseminate information about your organization’s compliance program and its policies and processes.

Establish a compliance and ethics training and education program that effectively communicates your organization’s standards and procedures to all employees and disseminate publications that explain in clear language WHAT is required.

The Role of The Chief Compliance Officer

Provide ongoing guidance, advice, and/or training and educational programs, to improve the organization’s understanding of related laws and regulatory requirements.
The Key to Building an Effective Compliance Program: Tone at The Top

Ongoing Guidance, Advice, and Training and Educational Programs

- Direct training on compliance & ethics
- New hire orientation
- National Compliance & Ethics Week
Strategies for Implementing an Effective Compliance and Ethics Learning & Development Program

1. Develop a well-rounded team
2. Support other business areas
3. Capitalize on pre-existing data
4. Build strategic partnerships
5. Market & brand your program

Develop a Well-Rounded Team

- Energetic “brand” ambassadors
- Team players
- Technical competence
- Leadership
- Project management
- Diversity

The Office of Compliance Services
There will never be enough people or financial resources

Training Support in Other Business Areas

- Legal
- Audit
- External Relations
- **Human Resources**
- Finance
- Information Technology Services
- Technology Transfer
- Sponsored Programs
- Other enterprise-wide training initiatives
Capitalize on Pre-existing Data

AUDIT REPORTS  RISK ASSESSMENTS  INVESTIGATORY FINDINGS  EMPLOYEE ENGAGEMENT SURVEY DATA  TRAINING SURVEY RESULTS

Strategic Partners

• Legal
• Audit
• HR
• Focus Groups
Delivering Multifaceted Training with Limited Resources

“...a small organization may meet the requirements of this guideline with less formality and fewer resources than would be expected of large organizations.”

Delivering Multifaceted Training: Form

- Brown bag lunch
- Webinars
- Individual counseling
- Group training
- Self-directed
Delivering Multifaceted Training: Substance

- Core values
- General ethics
- Key risk areas
Delivering Multifaceted Training: Style

- Innovative
- Engaging
- Interactive
- Relevant
- Culturally sensitive
- Relatable

Beware of Conflicts of Interest
No “One Size Fits All” Approach

ANOTHER ALL DAY TRAINING WORKSHOP...  SURE, I'D LOVE TO READ ANOTHER TRAINING MANUAL.

No “One Size Fits All” Approach

WHEN YOU HAVE TO WATCH ANOTHER TRAINING MODULE
Delivering Multifaceted Training: Active Learning

Passive Learning
You Can’t Please Everyone

Leveraging Technology:
Tools and Resources