Program Effectiveness: Designing and Planning a Program Assessment

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Survey Question 1

How many employees make up your ethics team (or compliance and ethics if combined)?

a) 1-5
b) 5-25
c) 25-100
d) >100
Survey Question 2

How do you currently measure the effectiveness of your program?
   a) Don’t currently
   b) Company-wide survey
   c) We work with a vendor
   d) Other

“The organization shall take reasonable steps . . . to evaluate periodically the effectiveness of the organization’s compliance and ethics program . . .”

- USSG §8B2.1(5)(B)
How we think about effectiveness

Is our program:

– tailored to our organization?
– advancing our strategic plan and core values?
– engaging employees and changing behavior in ways that:
  • Prevent misconduct
  • Increase ability/willingness to report misconduct
  • Enhance ethical decision-making
– responsive to changing environments and stakeholder expectations?

Who we are

U.S. Bancorp is the fifth largest commercial bank in the country, chartered in 1863

Approximately 75,000 employees serve more than 18 million customers through four major business lines

We are a regional retail bank with 3,018 banking offices in 25 states

Some operations extend nationwide and internationally
A stand-alone ethics function

- Ensuring that tone from the top matches actions throughout the organization
- Ensuring employees’ ethical concerns are appropriately investigated and resolved, and that root causes of unethical behavior are identified and addressed
- Maintaining the Bank’s Code of Ethics and Business Conduct, and providing effective training and guidance on ethical business practices
- Serving as ethics ambassadors to guide employees to sound decision making through innovative education and awareness activities.
- Providing analysis and reporting to the Board and executive leadership on the “ethical health” of the organization’s culture.
- Regulatory liaison for ethics: interface with industry groups and other ethics organizations to stay on top of emerging issues and best practices.

Building a program assessment

- Government guidance
- General guidance
- Industry-specific guidance
  - Regulatory guidance
  - Examination manuals
Building a process

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Survey Question 3

What is your program modeled after?
  a) Federal Sentencing Guidelines
  b) Benchmarking from other companies
  c) A structure we inherited
  d) What does this question even mean?

What measuring effectiveness won’t do . . .

• Tell you how to fix problems
• Tell you if people will act unethically
• Tell you how employees feel
• Guarantee success
A model beginning

Measuring effectiveness requires something to start from. That something should be some kind of plan or model.

Traditional model; tell the employee and expect them to act

Our approach

We’re applying a new model – rooted in public health practice and behavioral science

ecological model; population based, drives awareness across all spheres in which individuals interact
How we are implementing

World's Most Ethical Company
LinkedIn
Business Ethics Resource Center

ECI/SCCE Professional Assoc.

Public
Industry
Company
Networks
Individual

Ethics Q & A, Video
Code of Ethics Certification
Training Online platform

Development Network
Site visits
Group/Department presentations
Meeting in a box

Toolkit
Quick Test
Open Door
Talent Acquisition
Managing Committee Meetings

Metrics

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<th>Good</th>
<th>Better</th>
<th>Next</th>
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<td>Training completion</td>
<td>Training assessment</td>
<td>Feedback (see next slide)</td>
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<td>Hotline volume</td>
<td>Substantiation and anonymity rates</td>
<td>Trends in usage resulting from awareness efforts</td>
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<td>Most used links and policies within the Code</td>
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<tr>
<td>Engagement/ethics survey results</td>
<td>Exit survey results</td>
<td>Focus group results</td>
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Training Feedback
What our employees are saying

"It was so nice to take a training that was informative and offered learning through situations that we face all the time."

"I really appreciated the new format as not only engaging and thought provoking, but honest and true to reality."

"I hope all managers take the time to slow down and recognize the importance of this content to their daily interactions."

"I thought it was fun! That's something I've never said about a required training class before!"

Program Effectiveness
A conversation about what’s next