

Detailed Content Outline

	Cognitive Levels			TOTAL
	Recall	Application	Analysis	
1. Standards, Policies, and Procedures	3	10	3	16
<ul style="list-style-type: none"> A. Assure compliance and ethics policies and procedures exist (e.g., non-retaliation, record management, conflict of interest, privacy, security, and confidentiality) B. Maintain compliance and ethics policies and procedures C. Consult with appropriate subject matter resources (e.g., legal, HR, finance) D. Assure alignment among the organization's mission, vision, values, and the code(s) of conduct E. Assure alignment of the compliance and ethics strategic plan is consistent with overall business objectives F. Maintain a code of conduct G. Ensure organizational value statements reflect a commitment to a culture of integrity H. Assure policies and procedures address regulatory and legal requirements I. Assure policies address interactions with third parties (e.g., vendors, business partners, and competitors) J. Assure that compliance and ethics standards are included in contractual agreements with third parties (e.g., vendors, business partners, agents) K. Document the compliance and ethics program (e.g., compliance manual/plan) L. Assure policies and procedures around specifically identified risk areas are maintained M. Assure governance policies for the compliance and ethics program are maintained 				
2. Compliance and Ethics Program Administration	3	9	6	18
<ul style="list-style-type: none"> A. Report compliance and ethics activity to the internal governing body (e.g., board of directors, audit committee) B. Report compliance and ethics activity to the senior business leader (e.g., CEO, CFO) C. Coordinate operational aspects of a compliance and ethics program with management (e.g., oversight committee, senior management) D. Collaborate internally and externally with others to institute best practices (e.g., benchmarking) E. Ensure that the goals and objectives of the compliance and ethics oversight committee are achieved F. Maintain knowledge of relevant laws and regulations G. Apply relevant laws and regulations to the needs of the organization H. Assure the credibility and integrity of the compliance program I. Recognize the need for outside expertise J. Verify that the governing board understands its responsibilities related to the compliance and ethics program and culture K. Ensure that the role of counsel in the compliance and ethics process has been defined L. Manage resources for the compliance and ethics program (e.g., financial, personnel) M. Integrate the compliance and ethics program into the business N. Develop an annual compliance and ethics work plan O. Ensure the organization has processes in place to manage identified risk areas (e.g. conflicts of interest, privacy, anti-corruption and anti-bribery) P. Ensure background checks and screenings are conducted (e.g., new hires, substantial authority personnel, third parties, government lists) Q. Verify the organization has defined the authority of the compliance and ethics professional 				

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3. Communication, Education, and Training	3	11	3	17
<ul style="list-style-type: none"> A. Disseminate relevant information on emerging risk areas B. Communicate compliance and ethics information throughout the organization C. Develop targeted compliance and ethics training for applicable individuals (e.g., risk specific, orientation, remedial) D. Evaluate the effectiveness of compliance and ethics training E. Assure that employees are aware of their obligation to report misconduct F. Assure that employees are aware of their compliance and ethics aspects of their specific job responsibilities G. Promote a culture of compliance and ethics throughout the organization H. Encourage employees to seek guidance and clarification <ul style="list-style-type: none"> I. Ensure that compliance and ethics personnel participate in continuing education to maintain professional competence J. Track participation in ongoing compliance and ethics training programs K. Ensure compliance and ethics training is provided for all board members, employees, vendors, and other agents L. Train those who respond to questions and concerns from employees and others on how to identify potential compliance and ethics issues M. Manage a compliance and ethics education program N. Ensure training delivery methods are appropriate for the audience 				
4. Monitoring, Auditing, and Internal Reporting Systems	3	9	4	16
<ul style="list-style-type: none"> A. Protect anonymity and confidentiality within legal and practical limits for those reporting B. Publicize the reporting system to employees, vendors, and third parties C. Monitor for organizational misconduct (e.g., violations of applicable laws, regulations, policies and procedures) D. Ensure systems exist to enable employees, vendors, and third parties to report any noncompliance and seek advice (e.g., hotline) E. Assure processes exist to respond to compliance and ethics concerns expressed through internal reporting F. Monitor compliance and ethics related activities (e.g., hotline calls, training, and investigations) G. Analyze compliance and ethics audit results (e.g., track, trend, evaluate, benchmark) H. Ensure audit results from external entities (e.g., outside counsel, government, consultants) are addressed <ul style="list-style-type: none"> I. Audit compliance and ethics related risks J. Monitor compliance and ethics related risks K. Evaluate the effectiveness of the compliance and ethics program on an ongoing basis L. Include compliance and ethics questions in exit interviews M. Develop a periodic risk-based audit compliance plan N. Assess the existing risk-based audit compliance plan to address dynamic changes in risk priorities 				

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5. Investigation and Response, Discipline and Incentives	3	5	10	18
<ul style="list-style-type: none"> A. Assure that discipline is proportionate to violation and consistent across the organization B. Assure that discipline is fair and consistent with the organization's disciplinary policies and procedures C. Assure recommended disciplinary action is documented D. Encourage incentives for compliant and ethical behavior E. Recommend compliance and ethical metrics for incorporation into performance evaluations F. Assure compliance with the organization's non-retaliation policy G. Respond to compliance and ethics escalations H. Report validated instances of noncompliance through appropriate channels within the organization <ul style="list-style-type: none"> I. Assure management develops corrective action plans in response to noncompliance J. Monitor the effectiveness of corrective action plans K. Engage qualified resources to address investigation needs L. Initiate program enhancements to respond to identified problems or weaknesses in the program M. Conduct internal investigations N. Respond to government inquiries and investigations O. Maintain records on compliance investigations P. Assure there is coordination of voluntary disclosures to regulatory agencies Q. Coordinate investigations to preserve applicable privileges (e.g., attorney client privilege) R. Participate in the development of internal controls aimed at preventing misconduct (e.g., requiring dual sign-offs on certain conduct) 				
6. Risk Assessment	2	4	9	15
<ul style="list-style-type: none"> A. Assure the risk assessment methodology is scalable and timely for the organization B. Assure periodic compliance and ethics risk assessments are conducted across the organization C. Facilitate the integration of compliance and ethics risk assessments across all parts of the business (e.g., processes and business units) D. Prioritize organizational compliance risks E. Assure management action plans are developed and executed based on risk assessment findings F. Assure management implements changes to reduce risk G. Communicate the results of risk assessment findings to the board and management H. Assure due diligence is performed on third parties <ul style="list-style-type: none"> I. Assure management is involved in the risk assessment process 				
Totals	17	48	35	100

Answer key for page 19				
1.C	2.D	3.A	4.C	5.C