

# Detailed Content Outline

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

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

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

**Answer key for page 19**

<b>1.C</b>	<b>2.A</b>	<b>3.D</b>	<b>4.A</b>	<b>5.B</b>
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