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A three-year mapping effort: Focus on compliance

» Compliance programs are subject to mission drift.
» Having a clear 3-year plan will focus your limited resources on your highest priorities.
» Use the planning effort to stretch your goals for success.
» Once set, with metrics for success in place, use the plan for day-to-day operations, as well as for clear reporting.
» The plan provides a focus when new ideas or new opportunities arise.

A "compliance program," especially when combined with ethics, can be all-encompassing and can fall victim to mission creep. Most in our field—by their nature—are engaged, dedicated people of action who are willing to pitch in and help as needed. But that inclination can lead to a lack of focus. Similarly, a newly formed ethics and compliance program can suffer from lack of engagement and understanding: "What exactly do you do?" Finally, many of us are interested in expanding our skills and adding value, but when do we say yes, and when do we say no? Having a 3-year plan can set the guardrails for mission creep, provide a quick response to that question, and clarify where your "next value add" should fall. A plan can push you to stretch your objectives. A plan can help you take your program to higher levels of achievement and help ensure that you, as a compliance professional, remain engaged and learning. Finally, the execution of the plan leads to efficiency in measuring success and reporting.


Young

This article provides a road map for this planning process, starting with the beginning brainstorming through to the planning, metric setting, and execution. It provides tips on how to maintain and manage to the plan, using simple table tools in Word, with examples for clarification. This basic planning process can be adapted (such as for a 5-year plan) as needed to meet programmatic needs.

Start with the big picture and brainstorm

The beginning point is to start with an open mind and the "big picture." This really works best if you take a retreat with your team, or if you are an office of one, block out at least several hours to focus. This is your opportunity to think outside of the box. Ask open-ended questions. Where do we personally want to be in three years? Where do we want this program to be in three years? Where is our industry moving in terms of change? Where is this organization moving? What are we doing well? What are we not doing well? What are we having fun doing? Where can we make the most impact with the least amount of effort? What can we scale? As with any brainstorming session,

keep the ideas flowing. This is perfect for whiteboarding (to coin a verb). Keep the results at hand as you move into the next phase of planning.

Clarify your mission

Put the brainstorming aside for a bit. Now is the time for laser focus: your mission. Your organization probably has a mission, but this is the mission for your Compliance Office. In 30 words or fewer, what are you trying to achieve? Here is an example:

> **Mission:** To be(come) a known and trusted resource throughout the organization, with full awareness by all employees.

Set the 3-year objectives

Once you are comfortable with your mission, draft your 3-year objectives. Plan to have 4-6 objectives. Start with what your program already does—such as training, policy and procedures, or investigations. Are these the right focus? Do you want to add more? One place to start is to review the benchmarks for our industry, such as the U.S. Federal Sentencing Guidelines. Especially for a new program, the Guidelines provide a great start that is defensible and explainable.

Your 4-6 objectives should be aspirational. What can you do to stretch/change/keep what you do best? For example, if training is one of your core responsibilities, your objective could be "Provide relevant and stimulating training that is retainable," not just "Provide training." The objectives should aspire to take your primary roles to a higher level of success.

Another example: "Responding quickly to emails" is not an objective, although it could be an action (see below) to achieve an objective. "Providing accurate and reliable responses to inquiries to build trust and reliance" could be an objective.

Once you have your 4-6 objectives, look back at the brainstorming session. Are you picking up what you need? Are your objectives reflecting your industry and its legal and operational needs? Your strengths, your weaknesses, your passions? This is the point of escalation: Ensure that you are pushing your objectives and your program up to a higher level of challenge and relevance.

> **Mission:** To be(come) a known and trusted resource throughout the organization, with full awareness by all employees.
>
> 1. Provide relevant and stimulating training that is retainable.

(For anyone who is challenged by tables in Word: Add a row and use the Split Cells function, increasing the number of rows.)

Set the actions

You have your 4-6 objectives—now for the courses of action. How will you achieve those objectives? This stage of the planning requires you to determine exactly what you will do over the 3-year period to achieve those objectives in pursuit of your stated mission. For each objective, you should have 2-5 actions. Keep in mind that this is a 3-year plan. Planning the timing is last, but this should be a significant amount of work. Here is where the creativity needs to be applied. Part of the action plan is to assess your past successes and failures.

In our training example, how will you provide that relevant and stimulating training? What will you do differently

to stretch and achieve a higher level of success? Do you migrate from in-person to online training, or vice versa? What can you do to test "relevant" and "stimulating"? Remember, your chosen mission is to become a known and trusted resource; perhaps that means you need deeper staff involvement in planning and executing your training. Do you improve how you communicate about the training by using Twitter, or introducing games or contests or videos?

In our example, here are some action ideas.

Mission: To be(come) a known and trusted resource throughout the organization, with full awareness by all employees.

1. Provide relevant and stimulating training that is highly retainable.
   a. Establish a Compliance Training Committee to better inform content and obtain new ideas for engagement.
   b. Make a detailed communications plan, incorporating at least one new communication method per year.
   c. Migrate to interactive, scenario-based training to increase adult learning and engagement.

Establish the metrics

The final planning task is setting measurements for success. This can be the most difficult part; measuring success in our industry is the topic of much discussion and hand-wringing. Stay away from measurements of performance (such as number of people trained) in favor of measurements of engagement and learning. For example, you can send an email to all 5,000 staff, but the measure is not the 5,000. The measure is how many staff responded, signed up, opened the email, or became engaged in the topic.

You may not be able to find a measurement for every course of action. Focus on measurements for the objectives, not necessarily the actions, as often as possible. You should have one or two measurements for each objective. You also should have measurements for every year of the 3-year plan. They can increase over the 3-year plan, such as 20% Year One, 50% Year Two, etc.

Mission: To be(come) a known and trusted resource throughout the organization, with full awareness by all employees.

1. Provide relevant and stimulating training that is highly retainable.
   a. Establish a Compliance Training Committee to better inform content and obtain new ideas for engagement.
      i. Conduct x meetings of new Committee
      ii. 1 new communication method
      iii. X clicks for new web-based communications
      iv. Survey for level 4 out of 5 engagement after training
   b. Make a detailed communications plan, incorporating at least one new communication method per year.
   c. Migrate to interactive, scenario-based training to increase adult learning and engagement.

Review and assess

By now you should have a page or two with the mission, the 4-6 objectives, and your actions and metrics. Go back again to your brainstorming exercise. Does this meet your intentions? Are you stretching your program to higher levels of success?

If this is typical for your program, you can share this as a draft with others to receive their input and, of course, buy-in. If you report to the general counsel, for example, get his/her input. Assess your resources—does all this work fit into your budget? Does your current staffing meet these needs?

Annual execution

Once you have your 3-year plan in place, you need to determine what can be done in each year. Take your courses of action and spread them across the three years, making sure that you don't front load and that you leave some actions for later years. Revise your metrics to accommodate the timing. Space and prioritize so it all makes sense. For example, you might start a new communications plan in the same year that you revise your website home page, or you might prefer to stagger those efforts. If you are revamping all your policies and procedures, have your web page revamp at the end of that effort. If one of your goals is to conduct a self-assessment or have an external assessment, do you want to do that at the end or the beginning of the three years? Think about how your program will be viewed, and ensure that the strategy is clear—remember that mission.

Mission: To be(come) a known and trusted resource throughout the organization, with full awareness by all employees.

1. Provide relevant and stimulating training that is highly retainable.	a. Establish a Compliance Training Committee to better inform content and obtain new ideas for engagement.	FY18
	b. Make a detailed communications plan, incorporating at least one new communication method per year.	FY19
	c. Migrate to interactive, scenario-based training to increase adult learning and engagement.	FY19
2. [second objective]		FY20

Measurements of success

1. Training	FY18 – Conduct x meetings of Committee and assess feedback
	FY19 – One new communication method; X clicks for each new communication; 4 of 5 surveyed positively respond to new training
	FY20 – Z clicks for each communication; in-depth assessment of training results through interviews of Y staff
2. [second objective]	

Operationalize

Now you have your 3-year plan and your fiscal year plan for this year. You can create a short document with just the mission and the objectives, which can serve as a high-level

document to explain your program. It can be used as a reporting tool—as a one-page document to show your priorities and focus—for the board, your C-suite colleagues, or even the public. Post it on your home page to show accountability.

To operationalize the plan, take your plan for this fiscal year and create a second, much more detailed document. Include the goals and the courses of action for this year, and create the steps that you will take to change the course of action and when they will be done, by quarter. This is your primary working document that enables you to focus on tracking your plan. Meet at least quarterly (monthly preferred) with staff on the plan (or, if alone, schedule to review it monthly). If you have several people on staff, consider assigning each member an objective to lead and drive. Make sure that you weave your metrics into your annual plan and keep an eye on them.

Mission: To be(come) a known and trusted resource throughout the organization, with full awareness by all employees.

1. Provide relevant and stimulating training that is highly retainable.
   a. Establish a Compliance Training Committee to better inform content and obtain new ideas for engagement.
      i. Survey all potential participants—Q1
      ii. Invite participants—Q2
      iii. Commence planning and monthly meetings—Q3–4
      iv. Assess training needs for next FY based on Committee input—Q3–4
2. [second objective]

Conclusion

Congratulations! You have a clear road map for your next three years. Any modifications needed can be accomplished with the larger plan in place. For example, if you add a program (say, a new regulation that needs addressing), you can weave the new program into a new objective but ensure complementary activities around the new objective (such as that new communications plan).

At the end of the year, you have your accomplishments, and hopefully, your measures of success were met. Use your high-level plan (the one pager) to help draft your regular reports to the board or management, making your objectives separate headings in the report. Use the plan as a basis for your next year's budget, as a tool for recruiting or interviewing recruits, to explain your focus and work to newcomers during orientations, or as a basis for your performance objectives. The more detailed plan will help you review your work for the year at performance evaluation time, or if you need to request more resources. Use the process to guide annual retreats and to assess new ideas and programs—does this fit? You will find the many benefits from clear planning help focus you, your staff, and your resources to achieve the next level of your compliance program ⊕

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