

# Compliance & Ethics *Professional*<sup>®</sup>

March  
2017

A PUBLICATION OF THE SOCIETY OF CORPORATE COMPLIANCE AND ETHICS

[www.corporatecompliance.org](http://www.corporatecompliance.org)

A portrait of Ryan Meade, a middle-aged man with short, light-colored hair, wearing a dark suit jacket, a light blue dress shirt, and a patterned tie. He is smiling slightly and looking directly at the camera. The background is a blurred interior space with a wooden railing and some framed pictures or artwork on the wall.

## Meet Ryan Meade

Director, Center for Compliance Studies  
Loyola University Chicago School of Law

See page 16

**29**

**11 tips for engaging middle managers on compliance**

Craig Thomas and  
Monica Locklear

**39**

**Five tactics to dramatically improve your Code of Conduct**

Kirsten Liston and  
Meghan Daniels

**45**

**Product integrity: Some compliance principles for engineering organizations**

Laurie Burgett

**51**

**Behavioral ethics: From nudges to norms**

Scott Killingsworth

by Roy Snell, CHC, CCEP-F

# The FBI arrested a compliance professional???

*Please don't hesitate to call me about anything any time.*

+1 612 709 6012 Cell • +1 952 933 8009 Direct

[roy.snell@corporatecompliance.org](mailto:roy.snell@corporatecompliance.org)

[@RoySnellSCCE](https://twitter.com/RoySnellSCCE) [in /in/roysnell](https://www.linkedin.com/company/roy/snell)

I was told by someone that I might get a call from a reporter because the FBI just arrested a compliance professional from VW relating to the emissions scandal. I said...

I hope I get a call. I will ask what evidence they have that this is an organizational compliance professional and not someone who was in operations that had the word compliance



Snell

in their title. I see no evidence that he has had any education or experience in the operation of a compliance program. This compliance title gets tossed around like candy. Some dog catchers are called a compliance officer. No disrespect, I love those who serve and keep us safe, but the two jobs have nothing in common. People who fill out forms in the finance industry to comply with government regulations are called compliance professionals. They have no

responsibility for using the seven elements of a compliance program to prevent, find, and fix compliance and ethics issues, which is what the organizational compliance professional does. In fact, like those who make attestations to the government, such as those who file taxes, they should be reviewed by the Compliance department, not in the Compliance department. Otherwise it's a clear conflict of interest. So, don't tell me you put an organizational compliance professional in jail unless you can prove this guy had a role in running a compliance program. You should say you put a guy in jail who has the word compliance in his title. If you have no training in running a compliance program, no experience in helping run a compliance program, and you haven't networked with and learned best practices from other organizational compliance professionals, you just might not be an organizational compliance professional. \*

People who fill out forms in the finance industry to comply with government regulations are called compliance professionals.

responsibility for using the seven elements of a compliance program to prevent, find, and fix compliance and ethics issues, which is what the organizational compliance professional does. In fact, like those who make attestations

to the government, such as those who file taxes, they should be reviewed by the Compliance department, not in the Compliance department. Otherwise it's a clear conflict of interest. So, don't tell me you put an organizational compliance professional in jail unless you can prove this guy had a

role in running a compliance program. You should say you put a guy in jail who has the word compliance in his title. If you have no training in running a compliance program, no experience in helping run a compliance program, and you haven't networked with and learned best practices from other organizational compliance professionals, you just might not be an organizational compliance professional. \*