Ethics and Compliance
Training from A to Z: 2016

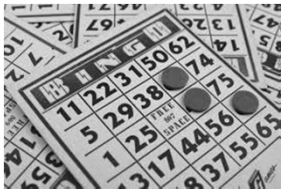
- Taking Flight with the SCCE in Chicago

The Chicago Agenda

- I. Elements of E&C programs
- II. 2016 Updates
- III. Takeaways

Presenter: Greg Walters

This Training Will be Gamified ☺



Kahoot!

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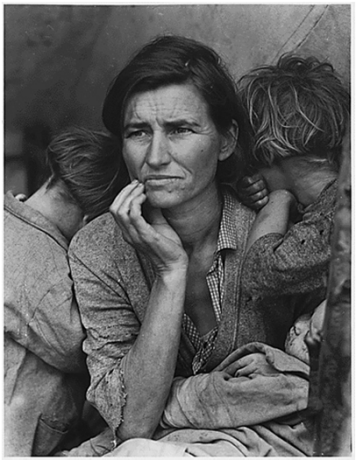
My Philosophy

- **Fun First**
- Cannot bore employees into compliance
- **E and C professionals are the ultimate team members of any organization**

Mission Critical

- Life Saving & Life Changing

Don’t Lecture Me on Ethics



My Story

- From Ethics Hell to Heaven

32,000 Feet

3 Big Themes

- (1) E & C Risks (identify, measure, control)
- (2) Ethics Culture - visible, c-suite, local, international – how to communicate Q&As?
- (3) E & C Programs (designing programs to address 1&2) - measuring effectiveness, whistle blowing, how we fix problems?

What is Ethics?

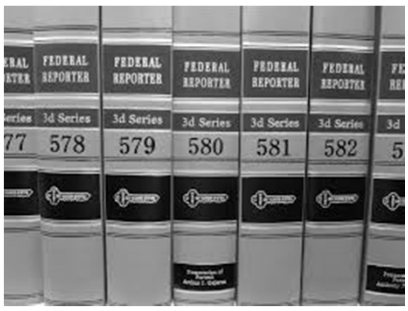
What is Compliance?

Ethics is Critical to Compliance

- Research shows the following:
- Compliance programs work best when tied to ethics programs and issues.
- Strong ethics enforcement make people feel good about their decisions and feel better about their jobs. MORALE BOOST.

Prima Facie Elements of an Outstanding E&C Program

- **Prima Facie** denotes evidence that, unless rebutted, would be sufficient to prove a particular proposition or fact.



Ethics and Compliance Programs

- Element 1 - Plan (id risks, laws, goals, culture, etc.)
- Element 2 - Supervisor/Management Commitment
- Element 3 - Written Standards – Policy - Rules
- Element 4 - Training
- Element 5 - Auditing
- Element 6 - Enforcement

- NEED ALL 6 elements to make the case !!!

Foreign Corrupt Practices Act

Procurement Integrity Act

TELEDYNE TECHNOLOGIES INCORPORATED

Federal Sentencing Guidelines for Organizations

CFTC

- Early Days of Federal Ethics (1990s)

DoD

- Know the threats – seek feedback
- Be an insider – walk the halls
- Explain advice in terms of cost/benefit to agency
- Put in writing

DoD – Action Required

- Preventive Action (or)
- Remedial Action

HUD

- Lifecycle of employee from job advertisement to post-employment guidance
- Program Specific Training
- Law Specific Training
- Supervisor/Management Training

Mindset Today: Ethics is Everything

- E & C employees are an important part of virtually every program in the organization.
- How you do something is as important as what you do.
- Ethical considerations are always running in the back of the minds of employees.

Most Important: Ethical Culture

- "Culture, more than rule books, determines how an organization behaves." Warren Buffet

Goals and Challenges

Speak to Your Audience's Listening

- Anticipate your audiences thoughts
- Speak to them

Objections

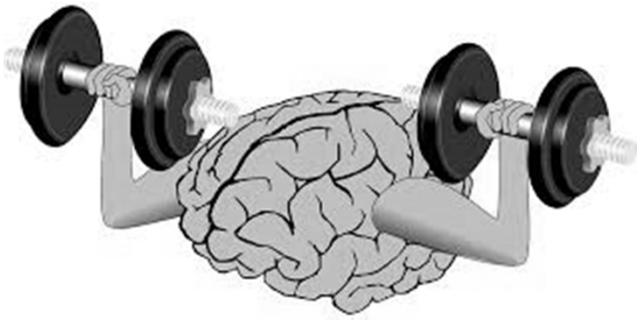
- No time
- Don’t care
- Not relevant
- Boss doesn’t care – why should I?

Challenges and Responses

- Ethics doesn’t change. Boredom.
- E & C are not part of the bottom line.
- I’m a good person, I don’t need ethics.
- We all know ethics is not enforced.
- I am lazy and this might require effort.

The Pace of the Nonstop Brain

- 70,000 thoughts per day
- 35-48 thoughts per minute



Our World

- Average adult has an 8 second attention span. Source -- 2015 Microsoft Study.
- “No longer can we boast about 12 seconds of coherent thought” Time Magazine (referring to attention span in 2000).
- Goldfish has a 9 second attention span.

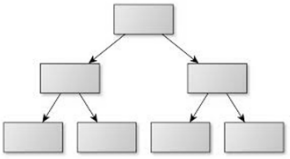
Ha Ha

Name the Risks (Harms)

- You need to name it to claim it.

Top Down Buy In

- Everybody follows the rules



Where can Employees go to complain?

- See something, say something

We Will Fix it

- How?
- How do you communicate that you will fix ethical problems?

Training

Elements of Training

- Presentation must be entertaining
- Have meaningful content
- Contain an invitation – **ACTION REQUIRED**

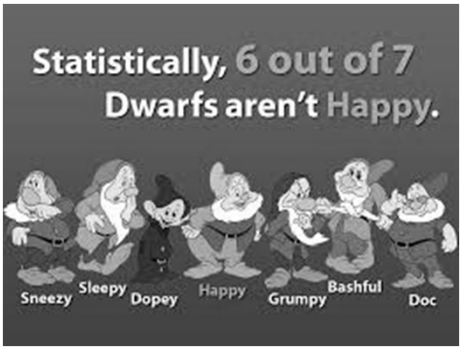
When a Program Works…

- Employees Bring Questions to you.
- They Create Training Materials!
- They take ownership of the program!

What Makes E & C Training Different?

Remember

- "All models are wrong, some are useful."
- George Box, British Statistician

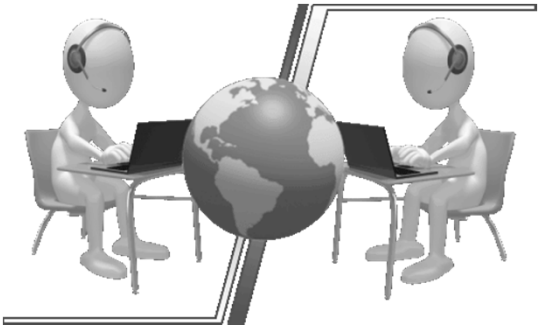


10

- Mandatory

9

- Hard to do remotely (with software)



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- Emotional Content

7

- Government (Federal, State and Local) has a role…

6

- Training Involves Abstractions Too!

5

- Individuals and their conduct

4

- Topical

3

- An ongoing relationship with the audience

2

- You will be back... More than once

1. Mastery

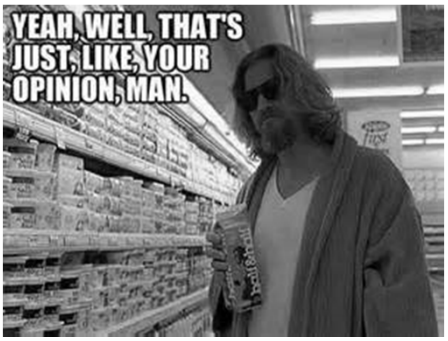
E and C Focus

- **Focus (Repeat Message) with top (KEY) E & C concerns/behaviors/problems and insist on 100% compliance.**
- IOW (in other words) -- Don't spread yourself too thin. – Pick your battles and win them repeatedly.

But wait there is more

Bonus

- Everyone has an opinion about what is right and wrong and they bring that to E and C



What Works? (Takeaways)

Audience is KEY

- Why are they in front of you?
- What are their needs?
- How long do you have to reach them?

EYE

3 Categories of Training Advice

- "Dumb" Stuff. (check room, use bathroom, bring water, be healthy, etc…)
- Homework. (prepare & follow the communication rules)
- Practice. real or imagined (in your head). Visualize your story and your success.

Six Second Rule

Get Real Rule

- If you can get about 80 per cent of your audience interested and attentive in your presentation – you are doing as best as humanly possible.

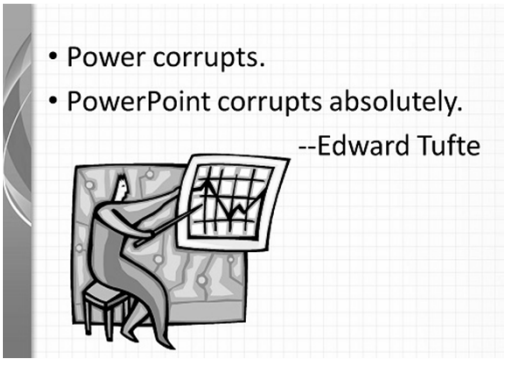
20 Minutes

- Limit of Attention Span
- Break Presentation into 20 Minute segments
- Refocus attention every 20 Minutes

Honor Your Style

- Many Slides Can Work Well or Not!

Warning!



Written In Stone

- SPECIFIC rules for using PowerPoint

Three Second Rule

- Slides are like Billboards

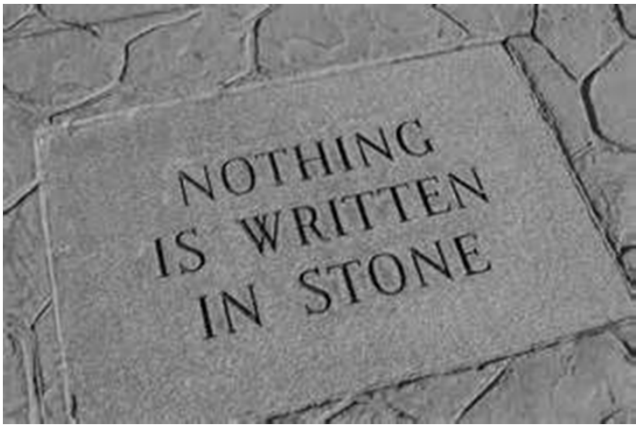
Rules of Thumb

- Use Large Font (30 size or more)
- 6 words or so per slides.
- Use images deliberately.
- Refer to handout.

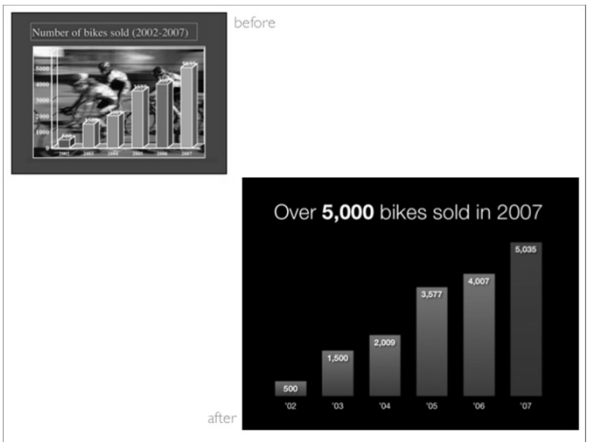
Can You Back that up?

- When presenting Data or Research Results – be sure you have cites.

Remember



Compare



DANGER!!!

HUD Integrated Acquisition Management System

What is HIAMS?

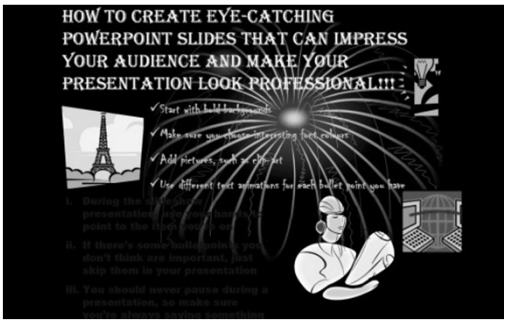
- One of HUD's Transformation Initiatives
- **Replaces HPS and SPS with a system that provides much more functionality**
- **Web based system,** which is accessible remotely, as long as user has access to the HUD network
- **Automates almost all phases of HUD's Acquisition process.** Spans planning, requisitioning, solicitations, awards, closeout, and post-award processes.
- **Moves HUD towards a paperless process.**
- **Automates and streamlines processses.** Reduces redundant data entry and automates routing and approvals. *Eliminates excessive approval signatures.*
- **Integrates with HUDCAPS financial system. In the future, will also integrate with ICFS and SAMS**
- **Increases accountability**, through capturing decisions/approvals and keeping audit trail
- **Keeps HUD compliant with regulations**
- **Institutionalizes importance of Acquisition Planning**

What does it mean to me?

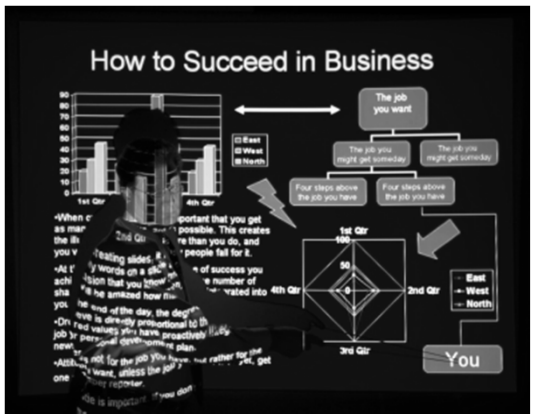
- The way you do business will change
  - Planned Actions will be created and routed for approval in HIAMS
  - GTRs and GTMs will build the RCS, including SOWs and other supporting documents in HIAMS
  - Budget Officials (or others responsible for entering funding lines) will enter funding information in HIAMS
  - Requests will be routed electronically to Approvers and Reviewers
  - HUDCAPS Funds Reservation/Commitment will automatically take place through an interface with HIAMS
  - Users will be able to view status of invoices and payments
  - Users can run and review reports in HIAMS
  - Electronically routes to OGC and OSDBU
  - Provides easy access to an electronic 'contract file' containing documents associated with a transaction
  - Users can check status of your request(s) in HIAMS
  - Users will receive status notifications through Outlook as well as HIAMS
- Completion of end-to-end Acquisition miilestones are tracked in HIAMS
- Users can set proxies, who can take your responsibilities if you are out of the office
- Users can access HIAMS remotely, as long as they have access to the HUD network
- All people accessing HIAMS need to know how to use it

70

Plenty of Badness



PowerPoint in Hell



Bullets can be Fatal

- Bullets
  - Sub Bullets
    --Sub-sub Bullets
    - Small font
    - Smaller font
    - Tiny dancer font
    - Betcha cant read this!!!!!
    - Ultra small font - illegal in most jurisdictions
    - Oh say can you see, by the dawn's early light, what so proudly we hail, by the dawn's early light, oh say can you see that star spangled banner yeah away, for the land of the free and the home of the brave……
    - Extremely critical point . More fine print. Subject to change without notice. If you can read me, you are too close..

No

- Outline
- Request for questions at end of presentation
- Contact information
- Need to print slides
- Handout larger than 1 page

Yes

Tell Me A Story

IMPORTANT: Credit For Trying (even if nothing happens)

How to Teach These People?

- 22 percent of employees – just showing up for work is a priority ('presenteeism") (source – ComPsych Corp. Survey 2012)
- 66 percent of employees – money is primary driver for staying at current job and 50 percent said they felt overwhelmed and undervalued (2012 study from rogenSI Consulting)

Maybe Your Audience?

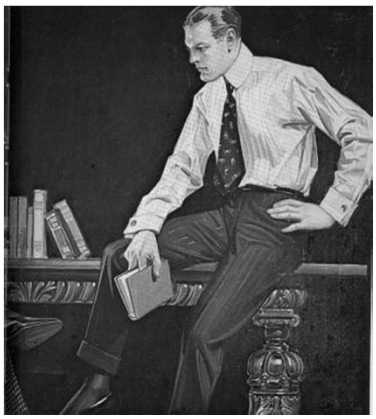
- Between 28-56 percent of employees want to leave their jobs (2012 Mercer Consulting Global Employee study)
- 81 percent of employees are ready to bail (Monster.com 2013 survey)
- About 7 out of 10 workers have checked out at work (Gallup 2012 poll)

Question

- What is the average attention span of an Adult? (Federal adult or otherwise)

Answer

- 20 minutes (if they are at all interested!)



How do you increase attention span?

- Answer: refocus attention every twenty minutes, either voluntarily or otherwise.
- Variety: Q and A, memes, cartoons, bingo, stretching exercises, etc…
- Use humor to take a break.

Another Question 4U

- During a typical office day, how often are office workers interrupted (either by emails or other requests for meetings, actions, etc. or self-interrupted by looking at Facebook or LinkedIn, etc..)?

Answer

- Every 3 minutes (Source 12/11/12 issue of The Wall Street Journal "Workplace Distractions: Here's Why You Won't Finish This Article.")

Follow-up Questions

- Once off-track, how long does it take for an employee's attention span to resume to the original task?
- Is there a chance that it never returns to the original task?
- Does your answer change if the employee is near mealtime?

Answers

- 23 minutes according to Gloria Mark, professor of "Informatics" at University of California. Wall Street Journal, supra.
- Result: As a rule, employees don't think deeply and fight during the day to get any work done. supra
- Food is always an issue. (no citation needed)

Online Resources

- Print-Bingo.com
- Meme Generator -- quickmeme.com
- Classtools.net

GOVERNMENT RESOURCES

- Use Current U.S. Government Scandals as examples of what NOT to do:
- GSA
- U.S. Department of the Interior
- MESSAGE: One person spoke up and EXPOSED THESE PROBLEMS!

But Don't Offend

VOKI Story

- Working with your Computer Security (IT) Department

How does it work with your IT program?

- Basic Copyright Law
- Service Agreements
- What to ask your legal department?

There are no problems -- only solutions

- Ask for suggestions: What can I use?

Quiz

Question

- Please name two goals of ethics/compliance training.

RESULTS of TRAINING

- Inform
- Invite

Use Google Alerts

- Google Search Terms such as:
- Ethics Training
- Public Speaking

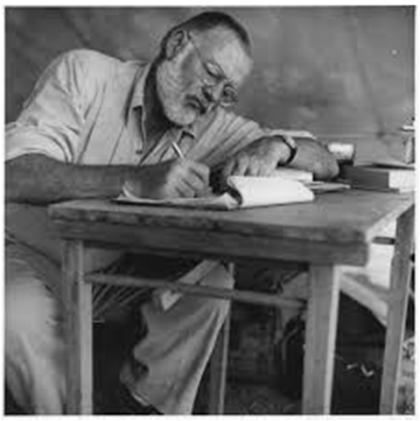
AM

- Best time for Ethics

Shake Weight

Firewalk

Detector



Pundits

- AMY CUDDY

Scientific Overreach

- http://www.slate.com/articles/health_and_science/science/2016/01/amy_cuddy_s_power_pose_research_is_the_latest_example_of_scientific_overreach.html

U.S. Office of Government Ethics

- Goal: Make Ethics Training Less Scary
- Use of certain questions that increases audience participation.
- Model for OGE in future trainings.
- THIS IS NOT A SHAKE WEIGHT!!

3 Part Questions

- General (Not Scary)
- More Specific (Less Scary)
- Very Specific (Scary)

Model

- Intuition
- Principle
- Rule

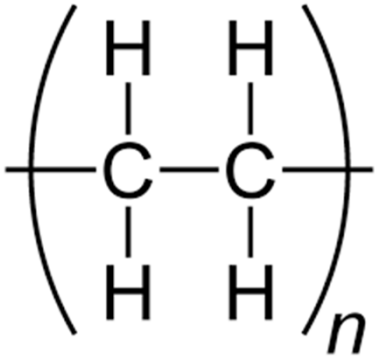
Possible Responses

- Serious Problem?
- Caution Warranted?
- No Problem?

More Questions

- Are there any ethics principles that might help us?
- Are there any specific laws or regulations that might be implicated?
- What is the correct law or regulation?

Repetition



The Science of Pauses

- 1 second where you would place a comma.
- 2 seconds where you would place a sentence.
- 3 seconds where you would place a paragraph

Your Motif

Pareto Principle (80-20 Rule)

- 80% of your results come from 20% of your efforts.
- Which 20% of effort works?
- What do you know will work?
- Don't Stress – Everything does not need to be perfect for you to communicate

What is New?

I think of it as, What's the thing that's not in the world that should be in the world?

Pokémon Go

More Big Bureaucratic Organizations

- Globalization
- Digitalization
- Social Responsibility
- More positions – Chief (fill in blank e.g. happiness) Officer -- is this trend good or bad?

What is the problem with silos?

Gamification 2.0

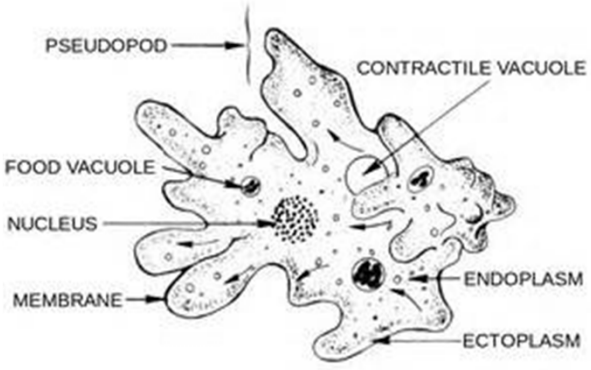
White Chocolate Mousse Cake

118

Supermarket Check Out

119

AMOEBA



120

More Data, More Problems

Targeting of Training

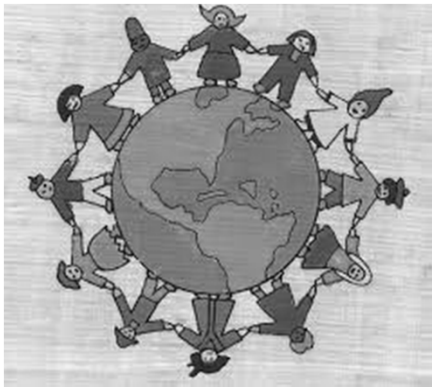
- Identify new risks (based on more data)
- Create new training (smaller groups, in person, more frequent)
- Use new metrics to analyze and benchmark training.

Deep Dive

Demographics

Compliance Function Grows

Multicultural Workforce



Case Study: SCCE in 2016

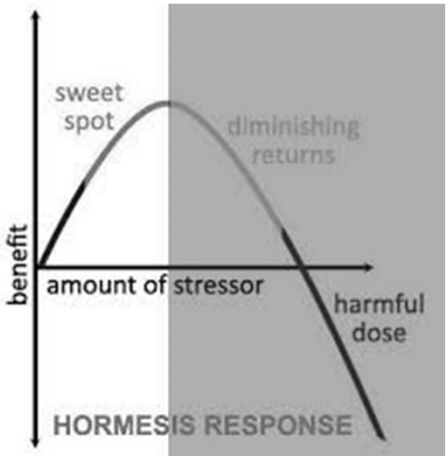
- Tweet-up
- Videos
- Speed networking
- Prizes

Ethics and Compliance Programs

- Element 1 - Plan (id risks, laws, goals, culture, etc.)
- Element 2 - Management/Supervisor Buy-in
- Element 3 - Written Standards - Policy (gifts, etc.)
- Element 4 - Training (online, live, small group)
- Element 5 - Auditing
- Element 6 - Enforcement

- NEED ALL 6 elements to make the case !!!

Hormesis



129

Questions?

- Tip: Always ask for questions prior to ending a presentation – about 5 minutes before.
- Strong Beginning, Strong Ending

Gratitude

Rest of Institute

- Meet new people with no preconceptions of what you do/are. What is your best self? Here is a chance to live it.
- Chance to be very inspired by others.
- Introduce yourself -- everyone has something to contribute!

Please Note

- Live Training/Webinars
- Running Ethics & Compliance Programs
- Presentation/Communication Skills
- Gamification
- Federal Laws
- Free

Thank You!

- Let's stay in touch:
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134