

# We Supercharged Our Learning & Development Program: You Can Too!

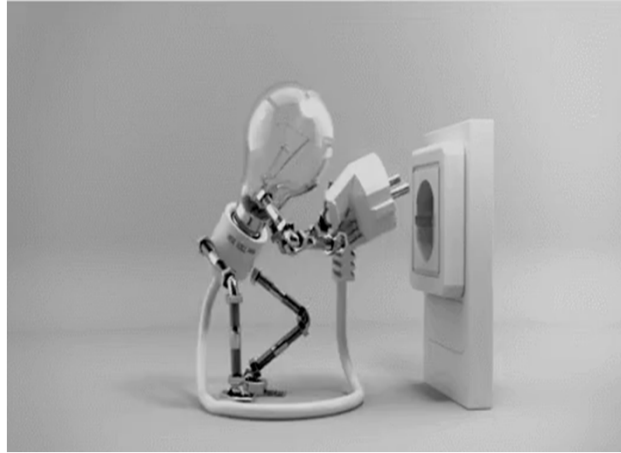
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- and -

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*Deputy Compliance Officer*



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## The Ethical Matrix

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# 01

Part I: **Why** compliance officers need to place greater emphasis on learning and development

# 02

Part II: **What** specific strategies we used to implement a compliance Learning and Development Program at our organization

# 03

Part III: **How** to deliver multifaceted training using limited resources

## Agenda

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To have an effective compliance program, an organization must establish and maintain an organizational culture that **“encourages ethical conduct and a commitment to compliance with the law.”**

-U.S. Sentencing Guidelines §8B2.1(a)(2)

## ELEMENTS OF AN EFFECTIVE COMPLIANCE & ETHICS PROGRAM

1. Standards of Conduct/Policies and Procedures
2. Compliance Officer/Committee Oversight
- 3. Education and Training**
4. Monitoring and Auditing
5. Reporting and Investigating
6. Enforcement, Discipline and Incentives
7. Response and Prevention

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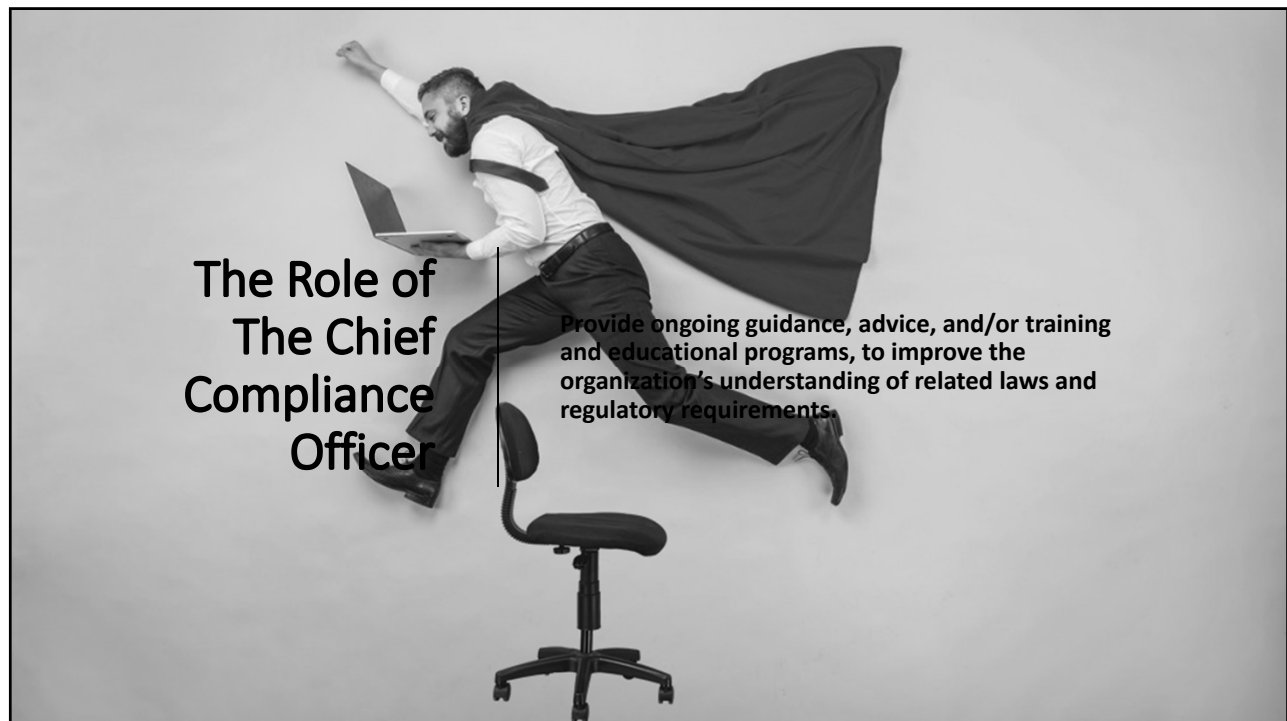
Take reasonable and practical steps to disseminate information about your organization's compliance program and its policies and processes.



Establish a compliance and ethics training and education program that effectively communicates your organization's standards and procedures to all employees and disseminate publications that explain in clear language WHAT is required.

## Training and Education

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## The Role of The Chief Compliance Officer

Provide ongoing guidance, advice, and/or training and educational programs, to improve the organization's understanding of related laws and regulatory requirements.

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SERVANT LEADERSHIP



"SAYING 'NO' TO  
POWER"



LEADING PEOPLE  
RESPONSIBLY

The Key to Building an Effective Compliance  
Program: Tone at The Top

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Ongoing  
Guidance,  
Advice, and  
Training and  
Educational  
Programs

- Direct training on compliance & ethics
- New hire orientation
- National Compliance & Ethics Week

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## Strategies for Implementing an Effective Compliance and Ethics Learning & Development Program

1. Develop a well-rounded team
2. Support other business areas
3. Capitalize on pre-existing data
4. Build strategic partnerships
5. Market & brand your program

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## Develop a Well-Rounded Team

- Energetic “brand” ambassadors
- Team players
- Technical competence
- Leadership
- Project management
- Diversity



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There will never be enough  
people or financial  
resources

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## Training Support in Other Business Areas

- Legal
- Audit
- External Relations
- **Human Resources**
- Finance
- Information Technology Services
- Technology Transfer
- Sponsored Programs
- Other enterprise-wide training initiatives

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## Capitalize on Pre-existing Data



AUDIT REPORTS



RISK ASSESSMENTS



INVESTIGATORY  
FINDINGS



EMPLOYEE  
ENGAGEMENT  
SURVEY DATA



TRAINING SURVEY  
RESULTS

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## Strategic Partners

- Legal
- Audit
- HR
- Focus Groups



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## Delivering Multifaceted Training with Limited Resources

***"...a small organization may meet the requirements of this guideline with less formality and fewer resources than would be expected of large organizations."***

-Federal Sentencing Guidelines  
Manual, Effective Compliance  
Programs Guidelines Commentary

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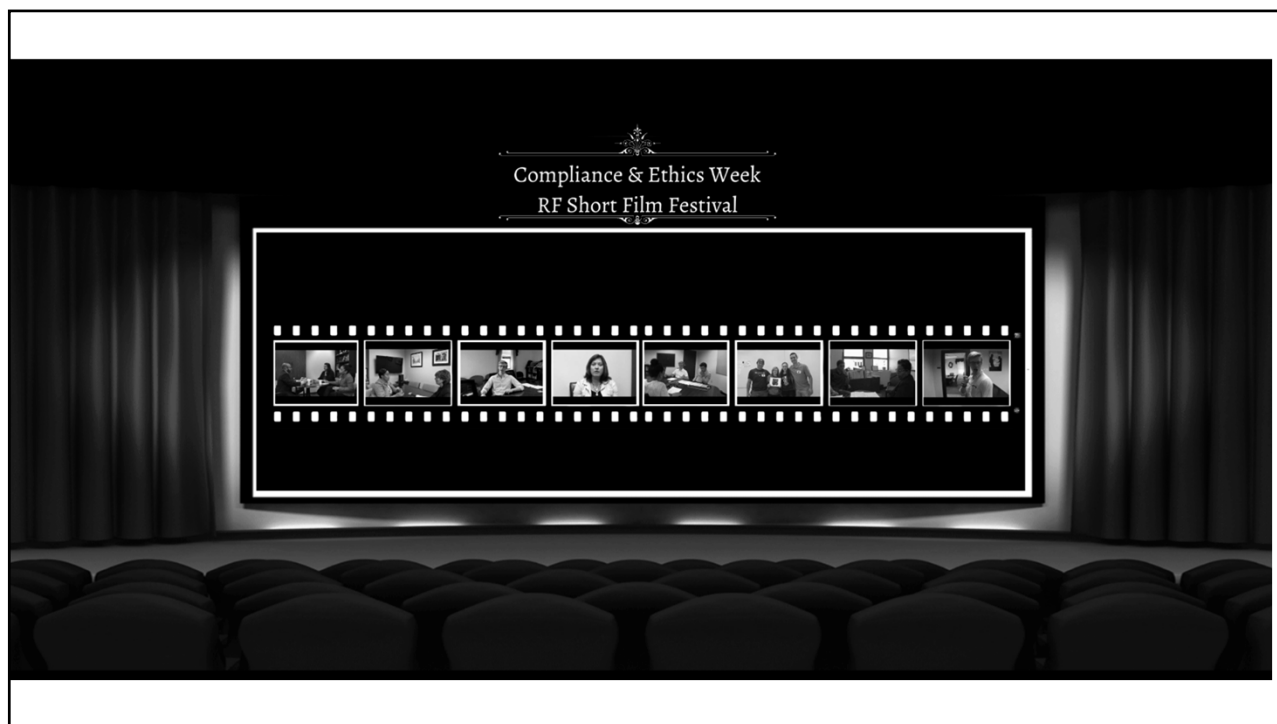




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<ul style="list-style-type: none"><li>• Brown bag lunch</li><li>• Webinars</li><li>• Individual counseling</li><li>• Group training</li><li>• Self-directed</li></ul>	<h2>Delivering Multifaceted Training: Form</h2>
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- Core values
- General ethics
- Key risk areas

## Delivering Multifaceted Training: Substance

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- Innovative
- Engaging
- Interactive
- Relevant
- Culturally sensitive
- Relatable

## Delivering Multifaceted Training: Style

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### Beware of Conflicts of Interest



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## No “One Size Fits All” Approach

**ANOTHER ALL DAY TRAINING WORKSHOP...**



**SURE, I'D LOVE TO READ  
ANOTHER TRAINING MANUAL.**



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## No “One Size Fits All” Approach

**WHEN YOU HAVE TO WATCH  
ANOTHER TRAINING MODULE**

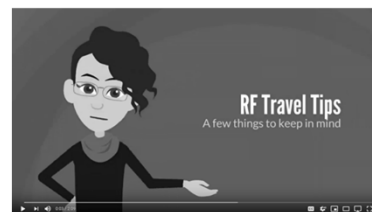


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## Delivering Multifaceted Training: Active Learning



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Passive Learning

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## You Can't Please Everyone



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## Leveraging Technology: Tools and Resources



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