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# Kumbaya Compliance is not good enough

When I was in Girl Scouts, we used to sing “Kumbaya” around the campfire. Fast forward to 2013, where Kumbaya is now defined in the Urban Dictionary as “blandly pious and naively optimistic.” Still, Kumbaya is what I flashback to



Boehme

when I see some CEOs breathlessly announcing “new values” and others bragging about their latest award for “most ethical company in the universe.”

This is what I call “Kumbaya Compliance.” The CEO issues an edict, maybe a press release, and everyone in the company holds hands in a sing-along to make the company ethical and compliant, just like magic. If this works, why do we even need compliance officers and programs? Shouldn’t the Federal Sentencing Guidelines be shortened to just four elements? Let’s review: (1) management edict, (2) campfire, (3) marshmallows, and (4) Kumbaya.

I am ever amazed at otherwise smart executives who know that anything worth doing in business requires a strong leader, resources, mandate, monitoring, and incentives, but when it comes to compliance and ethics, think that “tone from the top” means “tone from my mouth.” Ethical leadership is not only an important business endeavor; it’s *the* important business endeavor, because it’s the foundation of all enduring success.

Which makes me wonder if CCOs are falling down on the job with their CEOs and boards. Could it be we are overselling the successes of our hard-fought-for programs and forgetting to engage senior management in the tough conversations about what’s really

required of them? Until companies truly understand that Compliance is the designer, overseer, and subject matter expert, but that the *business itself* is the implementer and owner, progress will continue to be excruciatingly slow.

Sometimes I just wish CEOs would just shut up and “do.” What should they do? Imagine that a CEO spoke at a town hall like this: “Hey people, this is what I’ve *done*: I’ve appointed an independent CCO who reports to me, and has a seat at all important meetings, resources, a clear mandate, and unfiltered sessions with the board. I’ve broken down all silos, so everyone doing compliance is in the CCO’s line of sight. Your performance evaluations, promotions, and bonus compensation will be tied directly to how well you support compliance. And your bosses will be monitoring all of this.”

Too ambitious? Well, then how about a CEO who makes a random phone call to all his business heads to say, “How is your compliance training going?” or asking them to name a priority risk and report what they are doing about it. How about a CEO who asks to see periodic metrics on ethical leadership among top leaders, or who makes an unannounced “safety visit” through the factory floor? Duplicate this through all the layers of management and imagine the ripple effect.

Granted, all that stuff is hard work. It’s much easier and less “disruptive” to just talk about it. So this is where we are, Corporate America. It’s time to “do.” Or, we can just sing another round of Kumbaya. \*

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