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Director, Drummond March & Company, London

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by Donna Boehme

Compliance officers need a plan

I wish someone could settle once and for all who first uttered one of my all-time favorite quotes: “A vision without a plan is just a hallucination.” Depending on whom you ask, it’s usually Thomas Edison, Will Rogers, or Benjamin Franklin. Regardless, it’s timeless

advice, tailor-made for the chief compliance officer (CCO).

Every CCO needs a plan, both long term and short term. It can be as simple as a timeline with who, what, where, and when, or more elaborate with additional bells and whistles. Which brings me to another great quote, this one from Woody

Allen: “If you want to make God laugh, tell Him your plans.” That’s why any respectable plan is subject to periodic review and revision against current developments, priorities, and budget.

There are some telltale signs of a CCO without a plan. I am reminded of some spot-on advice my husband and I received when we made our first pilgrimage to Disney World (The Happiest Place on Earth) with our two small daughters, then ages 4 and 6. This advice came direct from a book called *The Unofficial Guide to Walt Disney World*,¹ which posed a single question for first-time visitors, that went something like this (and I’m paraphrasing):

Imagine that there you are, clustered at the opening gate with your bright-eyed children, trembling with anticipation, together with hundreds of other identically Disney-crazed families. The frenzy is palpable and barely restrained, 11 minutes to go. When that gate opens, what kind of parent do you want to be: (A) the “deer in the headlights” parent, rushing headlong

with glazed eyes into the vast beyond, wondering what kingdom to tackle first? Or (B) the smug, confident parent walking briskly, but calmly, with a plan?

The CCO without a plan is the deer-in-the-headlight CCO, running from crisis to crisis and fixing the squeaky wheel, always running out of hours in the day to develop the longer-term elements of the program. The CCO without a plan squanders resources, making unnecessary mistakes and detours. Without a plan, life is more mercurial; work may be conducted without reference to a broader set of prioritized goals, conditions precedent, and strategy. A plan helps to keep the eye on the prize in the best Stephen Covey “begin with the end in mind” tradition.

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Every CCO needs a plan, so that fresh out of the gate, they know where they are going, and when. It may not add hours to the day, or days to the week, and it is by no means a guarantee of success. But a well-constructed strategic plan, at a minimum, gives the vision of compliance a fighting chance to become more than a hallucination. *

Donna Boehme (dboehme@compliancestrategists.com) is Principal of Compliance Strategists LLC and former Chief Compliance and Ethics Officer for two leading multinationals. She was named by ComplianceX to its list of “Who Compliance Professionals Should Follow on Twitter in 2013,” so follow her on Twitter @DonnaCBoehme.

1. Bob Sehlinger’s *The Unofficial Guide to Walt Disney World*



Boehme