

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

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A portrait of Joseph Suich, a man with short brown hair and blue eyes, wearing a blue and white plaid blazer over a dark sweater and a light blue collared shirt. He is looking slightly to the right of the camera with a neutral expression. The background is a blurred outdoor setting with trees.

## Meet Joseph Suich

Chief Compliance Officer  
GE Power  
Schenectady, NY

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by Joe Murphy, CCEP, CCEP-I

# Tools for evaluating your compliance program



Murphy

One of the most challenging issues for compliance and ethics professionals is how to evaluate a compliance program. There is quite a bit that has been said and written on the topic. Often there is reference to surveys as a key tool, but experienced professionals know that surveys are not enough. Depending on the risk area and function being evaluated, and the purpose of the evaluation, there are a number of possible tools. In this column, I offer a simple list of possibilities.

- ▶ **Desk audits.** This is a review of the program design—does it meet applicable standards? This can be done sitting at your desk, looking at the design of your program, and comparing it to the Sentencing Guidelines and other standards.
- ▶ **Counting inputs and outputs.** Some results can be counted (e.g., billing errors in healthcare, numbers of helpline calls, etc). Similarly, inputs such as numbers of training sessions and numbers of audits can be counted. Benchmarking allows you to compare your results with peer companies.
- ▶ **Focus groups.** These give intensive insights on what is happening in the business.
- ▶ **Individual interviews.** Interviewing a cross section of individuals gives an even deeper, more intensive picture.
- ▶ **Audits.** A traditional tool that can help in evaluations.
- ▶ **Tests.** Testing out systems, such as placing test calls to the helpline.
- ▶ **Statistical analysis.** Analyzing key figures for possible red flags. For example, in EEO compliance, checking the status of protected groups (e.g., numbers promoted).
- ▶ **Exit interviews.** Asking exiting employees what they saw and heard while they were here.
- ▶ **Deep dives.** Using several of the tools focused on one business unit, such as on-site audits, focus groups, and interviews.
- ▶ **Self-assessments.** Having managers do their own program assessments in their own units. This is not independent, but it can help engage the managers.
- ▶ **Test runs.** Doing a mock presentation to an in-house, skeptical lawyer to see if you can tell a convincing narrative about your program. This will quickly highlight gaps in the program.
- ▶ **Surveys.** People usually think of these as a tool to see what employees think. But they are only as good as the survey tool used and the manner of its implementation, and the results can be misleading.
- ▶ **Peer reviews.** Having a team of compliance professionals from comparable companies (but there are antitrust risks if they are competitors) review your program.

This list is offered to provide food for thought. Each item could take its own column to explore, but this list can provide a starting inventory. \*

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