



Model Programs for Ethics and Compliance

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March 30, 2006

What Makes a Model Program?

Why have a program?

Ethics, compliance, or both?

Who runs it?

Who owns it?

Essential Program Tools

Business-oriented staff

Understand business environment, goals and challenges

Proactive, creative, practical

Want the business to succeed

Rules That Make Sense

Clear, simple language

- No legalese, please

User-friendly procedures

- Intuitive, streamlined
- Part of existing business processes

Fast and handy support resources

Make the right way the easiest way to get through the system

Effective Training

How does the business do it?

- Celebrate good news, learn from bad news
- Tailor to the audience
- Mix of vehicles
- Repeat, refresh

Use regular business channels

Monitoring and Auditing

Self-checks for the business

Real-time review

Oversight

Auditing

Two-Way Communication

Use business vehicle

Provide multiple paths

The personal touch

Why Have a Program?

CIAs and other catalysts

Peer pressure

BOD demands

Company culture vs. problem avoidance

Ethics, Compliance, or Both?

Compliance alone

- Bright lines
- Technicalities

Ethics alone

- Good intentions

Ethics and compliance

- *Why*
- *How*

Who Runs the Program?

Too specialized vs. too diffuse

Checks and balances

Links to business

Expertise

- Subject matter
- Process
- Communication
- Partnership

Who Owns the Program?

Too specialized vs. too diffuse

Management:

- Setting expectations
- Leading by example
- Demonstrating commitment

Employees:

- Personal integrity, pride
- Empowerment
- Responsibility

Signs of a Successful Program

Past the basics

People

Time

Money

Goals

Day-to-day