

CEP Magazine - October 2018 Is your program at least as good as industry practice?

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Do you know what "industry practice" is? Does it matter in your compliance program? We know that the Sentencing Guidelines set a baseline for compliance programs, and people assume they know what this standard requires. Yet often people do not fully apply the guidance it provides.

One of the most commonly ignored provisions is the "industry practice" one from the Commentary:

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