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### Training foie gras: Problems with modern-day training

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The process of producing *foie gras* (a French term meaning “fatty liver”) is not particularly attractive. In essence, it requires forcing a goose to ingest as much food as it can in the shortest possible time, in order to produce a very fatty liver. The bigger the fatty liver, the better the foie gras. In many cases, processes like this have been adopted with training requirements, particularly in regulated industries.

In most areas of business, training is viewed as a necessary evil. An employee who looks forward to training, or honestly says they enjoy it, is more of a rarity than the norm. Regulatory agencies require documented evidence from companies that they have provided training to their employees, enabling them to effectively perform their assigned duties. Those companies associated with the Food and Drug Administration or other equivalent regulatory agencies governing Good Clinical Practice, Good Distribution Practice, or Good Manufacturing Practices (GxPs) are examples.

Compliance requirements for the Department of Justice, Securities and Exchange Commission, and Office of Inspector General (OIG) also include expectations that employees will be trained on key matters of compliance and how a company establishes the required standards (policies) and operationalizes them (processes and procedures). For example, the HCCA-OIG Measuring Compliance Program Effectiveness guide lists training as part of its fourth element of compliance.<sup>[1]</sup>

In the quest to satisfy these demands, companies however often lose the initial context of why the training was performed in the first place. As Ricardo Pellacone has recently and aptly put it, “In one sentence, compliance training is (1) a tool (2) that you use to drive behavior (3) of willing people (4) by helping them make decisions.”<sup>[2]</sup> Instead it can become an exercise in gaining enough statistical evidence to demonstrate that all the training boxes can be ticked, without consideration of how effective it has been—training foie gras. Companies can also quickly lose track of the other element of compliance understanding, which does not relate to training *per se*; rather, it is more focused on knowledge and education. The latter is often more suited to “learning in the moment” where information is conveyed in smaller bite-sized chunks but on a more frequent basis.

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