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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.[1]

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 Pellafone 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."[2] 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.

Training under pressure

It usually goes something like this: A new employee starts at a company and immediately is assigned a long list of training to be completed. The training curriculum is defined by the required processes and practices for them to perform their tasks. Their manager, keen to use their services, encourages them to complete the training as soon as possible. After all, how can they start their job without the appropriate training?

The employee is immediately under pressure. They must absorb as much training in as short a time as possible so they can start their job. Take too long and they have an unhappy boss. At the end, the company produces a sheet that indicates their successful completion. We continue the process throughout the life of the employee and force-feed them every time there is a revision to a process or procedure or at some pre-determined point in time mandated for retraining. This is often based on the expectation that they will reread and understand the process or procedure with little thought as to what is the most effective or efficient way to do this.

The new theory

Industry has developed three bad training habits. First, it is much easier to just deploy all training en masse to employees rather than determine by an effective risk assessment who requires the training and to what level of detail. Second, it is easier to simply provide a procedure for an employee to read and understand than to develop more structured thoughtful training that explains some of the principles behind the process and then train specifically on the take-away messages. Third, companies blindly hide behind statistical sheets of training completed, assuming this means training is effective. It is not.

What we end up with is a group of employees who have lost faith in the idea of being effectively trained (or educated) and simply want the training assignment to go away as quickly as possible. They have training foie gras! We also end up with a company that is living the illusion that they have effectively trained their employees. A deep dive by any savvy auditor or inspector would quickly expose the statistical ruse.

There are solutions. Over the past couple of years, we have been trying some alternate training modalities as several alternatives to educate and train employees. The theory is that:

- An initial, intense training exercise of asking an employee to read and understand a process or procedure serves little purpose other than to generate a tick in a box to satisfy the requirement that employees must be trained.
- A more effective process is to provide structured training that addresses the underlying principles of the process, and that repeated enlightenment on how to use the knowledge is more effective than a one-off training, so called "training in the moment."
- By effectively using different modalities of training that are shorter and sharper in delivery and that are provided on a rolling basis, more effective training (learning) will result. To quote Jan Carlzon, "Like all good loyalty programs, the attention of the customer is retained by the element of surprise; give people what they don't expect."[3]

Alternative training methods

In a series of articles to follow, several of these alternatives to training will be showcased. In general, they have appealed to audiences because they do not overload them in their otherwise busy days. Responses indicate that employees are provided with key information they can use, rather than training assignments that satisfy a regulatory requirement but little else, including being effective training. Some of these include:

- **Moments of truth**: Single challenges associated with policy and/or procedure where the employee is given a practical scenario and asked to comment on it.
- **Sound "bytes," training shots, and memory joggers:** Short reminders about a policy principle, an educational quote, or some other aspect of education.
- **"If I do, I remember" training:** Face-to-face training where employees perform a task rather than just read about it from an online deployment platform.
- **Making it personal:** Wherever possible, the use of real-life examples that employees can relate to will

enhance any form of training. In the compliance world, people love to hear about the bad news of other companies, and this can be a valuable teaching tool.

- **Playing to the inner child:** Most people love a competition or fun quiz. These can also be used to remind employees of terms and definitions. At the very least they provide an opportunity to make compliance fun!

Conclusion

The standard formula that involves blanket assignments to everyone and then assumes it is their responsibility needs to change. There are times when everyone does need to be assigned training, for example, with a code of business conduct. However, adding some spice to training by offering other modalities such as those listed above can not only relieve the boredom faced by employees, but can also provide key facts that you want the employee to retain succinctly and much more effectively. Training can be fun, and especially with compliance training, we need to be creative to make it work.

Takeaways

- Many companies overload employees with poorly designed training.
- “Read and understand” training can breed noncompliance.
- Ineffective training design places employees under pressure and negates positive learning.
- Ineffective training may satisfy a regulatory requirement but can also jeopardize the company compliance standing by creating a false sense of security.
- Consideration should be given to novel methods that deliver training in the moment to avoid training overload.

1 HCCA-OIG Compliance Effectiveness Roundtable, “Measuring Compliance Program Effectiveness: A Resource Guide,” March 27, 2017, http://bit.ly/2V8dajN
2 Ricardo Pellafone, “What is ‘Compliance Training,’ Anyway? A Simple Explanation of What it is—and isn’t,” *The Compliance & Ethics Blog*, March, 2019, http://bit.ly/2LhCO11
3 Bob Thompson, “What Business Leaders Can Learn From ‘Moments of Truth’: An Interview with Former SAS CEO Jan Carlzon,” Customer Think, March 6, 2006,http://bit.ly/2J6FdsJ