

CEP Magazine – August 2019 Sure, our CECO reports to the board!

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It's a question you repeatedly see in surveys: To whom does your chief ethics and compliance officer (CECO) report? But how much do you really know when you see the answer to this question? Probably not much.

First, you still have to find out who the CECO is. Often the general counsel grabs the title, even though they do nothing in the actual program. The real compliance people are below the general counsel and are never going to have time in front of the audit committee. So in reality, this is fake reporting. Although the language in the U.S. Sentencing Guidelines calls for reporting by the person with day-to-day responsibility, that is simply not happening.

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