

## CEP Magazine – October 2019 Practical knowledge management strategies for compliance teams

---

By Doug Horner

**Doug Horner** ([dhorner@pedaids.org](mailto:dhorner@pedaids.org)) is Vice President, Awards, Compliance & International Operations at the Elizabeth Glaser Pediatric AIDS Foundation in Washington, DC, USA.

Do you ever wonder what would happen to your organization’s compliance program if you, or your senior compliance staff, were hit by a bus? (God forbid!) Would essential knowledge—the facts, information, and skills acquired by people through experience or education—be immediately missing and expensive to recover? I hope not, but as compliance professionals, we know that hope is not a strategy. I’d like to share a few practical strategies for you to consider in knowledge and information management to help your important business knowledge endure in the company over time and for it to be accessible to the right people when they need it (Hint: this could be while you are sleeping).

For some brief context on our compliance environment, my not-for-profit company is an international nongovernmental organization funded primarily by the federal government through cooperative agreements. As such, we are heavily regulated and subjected to multiple levels of scrutiny and audits to help ensure that our public and private resources are being well stewarded and that we are in compliance with laws, regulations, terms and conditions, and our policies.

The primary federal regulation we must adhere to is familiar to many nonprofits and universities: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards,<sup>[1]</sup> which was an attempt to reduce and harmonize all of the federal government’s assistance regulations into a “Uniform Guidance.” It runs 155 pages. Furthermore, the government allowed the Department of Health and Human Services (HHS) to codify its nearly identical (but not identical) assistance regulations at a different location in the Code of Federal Regulations,<sup>[2]</sup> which created additional complexity for those organizations, like ours, which are funded by HHS and other agencies. In addition, the departments and agencies have additional compliance documents that we must, or may, adhere to, including agency supplements to the Uniform Guidance, grantee handbooks, standard and unique award terms and conditions, and preferences that must be tracked, interpreted, and negotiated (where possible). Does any of this compliance and operational complexity sound familiar?

This document is only available to members. Please [log in](#) or [become a member](#).

[Become a Member Login](#)