

CEP Magazine – May 2021 Who lives, who dies, who tells your compliance story?

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Will the compliance program you built from scratch be sustained after you leave, like the Washington Monument? Or, like with Alexander Hamilton's death, will it come to an abrupt halt with your departure? And will the compliance initiative fade away with a permanent reputation stain, just like the stain on Aaron Burr?

Though you cannot control how others tell your story—your compliance legacy—you can embed into your compliance program sufficient controls to ensure its sustainability for long after you have retired and are sipping wine, watching the popular Broadway hit *Hamilton*.^[1]

Let us explore specific steps that you can take to help ensure long-term sustainability of your compliance initiative and the continuation of the narrative.

Step 1: Embed into the culture, design the narrative.

Efforts fail when the culture rejects the concept. If your entity had no compliance program and then an initiative was suddenly thrust upon the employees with no employee input and a “just get it done” check-the-box mentality, is it really a surprise that the effort fails once the “pusher” is gone? It is inevitable.

Instead, when you are developing your compliance initiative, consider how previous initiatives have been received by the employees and the entity itself. Did the initiative flourish because of a top-down push or a grassroots endeavor or a combination of both? Did the initiative succeed due to a well-developed marketing campaign promoting the positive aspects of the program and the expected benefits to the employee for their participation? Perhaps the marketing included incentives for employees to participate, or the marketing materials exuded a warm and fuzzy approach to the program encouraging employees to participate.

Identify what worked best for your entity in terms of encouraging participation in a new initiative and consider using those techniques. Involve your marketing department early and often to develop an easy-to-use website to describe and promote the compliance initiative, and make sure your top administrators are fully vested in the development and sustainability of the compliance program. Their constant reminders of the importance of the initiative are important.

No one method is perfect for all entities. It is a customized approach. Trying to develop, implement, and nurture a compliance program that does not embrace your firm's culture will likely result in a short-term gain and a long-term failure of the initiative that will end when you leave.

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