

CEP Magazine – August 2021 Use Corporate Compliance & Ethics Week to train and encourage

By Deena King, MEd, MS, CCEP, CISA

Deena King (deenaking@uttyler.edu) is the author of Compliance in One Page and Chief Compliance Officer at The University of Texas at Tyler in Tyler, Texas, USA.

One of the well-known seven elements of the U.S. Sentencing Commission's *Guidelines Manual* on effective compliance and ethics programs relates to education and training:

The organization shall take reasonable steps to communicate periodically and in a practical manner its standards and procedures, and other aspects of the compliance and ethics program...by conducting effective training programs and otherwise disseminating information appropriate to such individuals' respective roles and responsibilities.^[1]

Upon closer inspection of this paragraph, we see, “and otherwise disseminating information.” So although training programs are critical to an effective compliance program, training is only *one* facet of an effective compliance communication program.

Elsewhere in the Federal Sentencing Guidelines, we read, “an organization shall...promote an organizational culture that encourages ethical conduct and a commitment to compliance with the law,”^[2] and “the organization’s compliance and ethics program shall be promoted and enforced consistently throughout the organization.”^[3]

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