

Corporate Compliance Forms and Tools

Compliance Program Documentation RACI Chart

While corporate compliance programs certainly need to be “living” programs that are not limited to just words on paper, it is still important to document your program. Below is a RACI chart with suggested roles related to the effort of creating such documentation. A RACI chart is a project management tool describing levels of involvement in a project as **Responsible**, **Accountable**, **Consulted**, and **Informed**.

Table 1 indicates suggested parties for each category. These can and should be customized and changed to fit the needs and practices of your own specific organization.

Task	Responsible	Accountable	Consulted	Informed
Maintaining an updated written description of the structure, staffing, reporting lines, and different elements of the compliance program, including the logic and rationale for each	Compliance officer	Compliance committee	Compliance staff	Senior management
Maintaining the minutes from all board meetings during which compliance issues were raised	Corporate secretary	Board of directors	Compliance officer	
Documentation of audit plans, reports, and deficiency mitigation plans	Audit officer	Audit committee	Audit staff	Senior management
Records of all compliance education provided (both live and computer based), including attendee and completion data	Compliance officer	Compliance committee	Compliance staff	Senior management
Records of all competitor contact, including industry association participation	Compliance officer	Compliance committee	Legal officer and subject matter experts	Senior management

Records of all reported actual or apparent conflicts of interest	Compliance officer	Compliance committee	Human Resources	Senior management and the audit committee of the board
Records of all helpline reports of any kind	Compliance officer	Compliance committee	Subject matter experts for each issue type	Senior management and the audit committee of the board
Records of all internal investigations of potential compliance issues, including investigation reports, findings, root cause analysis, and remediation steps taken (e.g., any employee discipline)	Compliance officer	Compliance committee	Compliance, Human Resources and Investigations staff	Senior management and audit committee of the board
Record of any request or visit from a regulator or government representative	Compliance officer	Compliance committee	Subject matter experts	Senior management
Record of any guidance or advice received from a regulator or oversight agency affecting the organization	Legal officer	Compliance committee	Compliance officer	Senior management
Document all conversations and correspondence with legal counsel relating to advice and recommendations for compliance-related issues	Legal officer	Compliance officer	Legal and Compliance staff	Senior management and compliance committee
Record of any fines, penalties, or assessments by a regulator for an alleged compliance violation	Compliance officer	Compliance committee	Legal officer	Senior management and audit committee of the board

Maintain a record of all policy and code revisions and updates	Compliance officer	Compliance committee	All policy owners	All employees affected by changes
Maintain a record of all policy and code certifications or attestations	Compliance officer	Compliance committee	Human Resources	Senior management
Maintain a record of all third-party due diligence activities, including all third parties not chosen or later terminated as a result of diligence findings	Compliance officer	Compliance committee	All third-party sponsors and relationship managers	Senior management
Maintain a record of all gifts and entertainment paid for by the organization above a de minimis amount	Compliance officer	Compliance committee	Travel and expense administrator	Senior management
Maintain a record of all gifts accepted by any employee of the organization above a de minimis amount	Compliance officer	Compliance committee	Human Resources	Senior management
Documentation of all cultural assessments or surveys performed by the organization	Compliance officer	Compliance committee	Human Resources	Senior management and the audit committee of the board
Documentation of all program assessments (self-assessments or assessments by an outside third party)	Compliance officer	Compliance committee	Legal officer	Senior management and the audit committee of the board
Documentation of all licenses and permits required for the organization's operation	Compliance officer	Compliance committee	Subject matter experts	Senior management

Documentation of compliance with all specific regulatory compliance areas of the organization (e.g., environmental health and safety, REACH, conflict minerals, Anti-Kickback Statute, human trafficking prevention, data privacy, trade compliance)	Compliance officer	Compliance committee	Subject matter experts	Senior management
Documentation of all incentive programs in the organization	Compliance officer	Compliance committee	Human Resources and subject matter experts	Senior management
Documentation of all compliance monitoring activities (e.g., trend analysis, data analytics)	Compliance officer	Compliance committee	Compliance staff	Senior management and audit committee of the board
Documentation of all compliance risk assessments, results, and risk mitigation activities	Compliance officer	Compliance committee	Compliance and Risk Management staff	Senior management and audit committee of the board

Table 1: RACI Chart

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