

CEP Magazine – July 2023



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Why you need a compliance PMO

By Lindsay Bernsen Wardlaw

Program management offices (PMOs) are usually the domain of engineering and other specialties where efficiency and planning come at a premium; however, they can also add considerable value to your compliance organization.

As a compliance leader, you likely have the technical expertise necessary to implement your strategic plan for your organization's compliance program. In fact, you probably did this kind of implementation earlier in your career, at least some of the time—drafting policies and procedures, work instructions, surveys, and other informational resources; training on them; and auditing or otherwise monitoring the results. Now, however, when trying to manage the whole program, you do not have the time to handle each of these tasks yourself, especially while also juggling daily inquiries and crises.

You have likely empowered some of your team members to work on issues of programmatic importance as a growth opportunity or part-time responsibility. Some tasks, like auditing and informal monitoring, may even be the full-time responsibility of one or more team members. But do you have a single individual—a deputy or trusted team member—who is well-positioned to see how the results of each of these efforts fit into your master plan? Do you have a partner who can help ensure your program evolves cohesively over time?

Maybe you are interested in reviewing the lessons learned from each close call or active mishap to create a systemic solution. Perhaps you would like to use the results of your audits to consider updates to your policies, procedures, and training materials that reduce the likelihood of nonconforming behavior in the future or to identify when a particular process simply cannot work the way you initially envisioned. Or maybe you would like to spend more time talking with your colleagues in other functions to see where and how they most need your help with risk mitigation, or, conversely, where and how your efforts could be softened to avoid unnecessary costs to the business.

Whatever your passion or particular perspective on how best to lead a program, you have probably found there simply is not enough time to implement all of the best practices that you have read about, and there is nobody else with your bird's-eye view of the program to help you get it done and keep it all straight.

If this hits too close to home, consider establishing a compliance PMO.

Structure of a PMO

Organizationally, the leader of your PMO should sit one tier below you—at the same level as your other deputies or directors, able to participate in major departmental meetings as a peer, and empowered to send deliverables to

and request deliverables from their counterparts in alignment with your strategic plan.

It is critical that you include the PMO leader in your strategic planning for the organization, or else they will not know how to help you meet your goals and may not be able to see improvements to be made, efficiencies to be gained, or hurdles to be overcome.

When hiring a PMO leader, look for someone proactive, efficient, and competent. Consider filtering on project management certifications or a history of process improvement and excellent subject-matter expertise. Good writing and people skills are also important.

Though a good PMO leader may quickly become your team's go-to problem-solver and will feel like a natural delegate for much of your work, do *not* allow your PMO leader to become involved in day-to-day transactional questions—except to help provide coverage when you are out of the office. The job of the PMO is to strategically implement your vision, and the office will not be effective if it is bogged down with daily fire drills.

Benefits of a PMO

A PMO can help you keep track of all the loose threads of your program management and improvement efforts and to consider how these efforts affect one another and existing program features.

In building your program, you may have come across this dilemma: You need to put out a document but, to publish it, you need to cross-reference other documents that either haven't yet been drafted or haven't yet been revised. And when you edit those documents, they also need to point to resources that haven't been developed or modified. A similar problem can arise when you have made a significant revision to one part of your program, only to realize that it results in flow-down changes to many other program elements.

A PMO can help with this governance issue by managing the order of various projects and cross-checking their impacts on existing or pending program elements. For example, the PMO can manage document publication in stages. In the first stage, publications can reference a concept or a reserved link rather than a pending document. Then in the second stage, when that document has been published, updating references to the concept or reserved link everywhere your program has laid that foundation. This kind of iterative improvement makes a program crisp and clear, gives the business forewarning of pending compliance initiatives, and avoids compliance mishaps caused by miscommunication, but it can be challenging without a dedicated resource.

A PMO can run, organize, or simply help you keep track of the results of compliance audits, informal monitoring, and voluntary feedback over time. The PMO can then recommend and deploy corresponding short-term fixes and long-term improvements, such as potential automations or tools.

Where you might currently only have time to resolve the exact issues that were raised to you in an audit, putting concerns about analogous problems elsewhere in the organization on the back burner, your PMO can be asked to investigate and address the root causes of any issues and to consider other areas of the organization where the same problems are likely to be present. Then the PMO can apply any fixes consistently across your entire program. The PMO can also proactively recommend program improvements and special initiatives based on its own observations.

A PMO can help you prioritize and forge relationships with other departments, and it can help get cross-functional buy-in for your program's goals.

It can be hard to convince leaders in other parts of your organization that compliance isn't just a cost center or a source of additional restrictions. A properly empowered PMO can bridge this gap by making the time to fully listen to each function's needs and processes and to discuss possible risk areas. Then the PMO can offer to

operationalize your compliance requirements directly into the other function's workflows.

When you have the chance to engage the business in this kind of mutual learning opportunity, and when you make implementing compliance requirements easy, your compliance organization may come away with some surprising champions!

A PMO also gives your crisis management team a focal point when regulations change and can provide leadership through mergers, acquisitions, or divestitures.

In the wake of big legal changes, like sanctions cutting off major markets, the PMO can organize a cross-functional evaluation of which parts of your organization are affected and which procedures—published by the compliance team or any other function—need to be created, reviewed, or revised.

Likewise, if your organization becomes the subject of a merger or acquisition, the PMO is well-positioned to understand the structure of your compliance program and its resources, manage documentary responses, and lead the compliance integration. The PMO can manage similar compliance coordination when your company is acquiring or divesting a business.

A PMO can help you communicate with your team, legal, and the business regarding upcoming obligations, existing compliance requirements, and new resources.

This includes drafting department-wide newsletters, company-wide intranet or internet pages, and one-pagers or desk references for compliance staff. It also includes creating communication plans, training materials, and campaigns for new initiatives or upcoming changes.

Finally—and not to be overlooked— you can use a PMO to train young compliance professionals for roles as compliance leaders.

Putting a promising junior or mid-level employee under the PMO's direction trains them to think strategically. PMO team members have insight into every aspect of program management, and even junior PMO team members have the chance to supervise individual projects, form relationships across the company, and make recommendations for program efficacy and cost savings. Depending on the needs of your program, they may also be able to join you or the PMO leader in audits and training, learning from the example you set.

What an unparalleled opportunity to shape a future compliance leader!

A real example

As a former junior PMO team member turned PMO leader myself, I know that when a well-run PMO is included in program planning and given authority, it can do all these things and more, even on a lean staff.

Done right, a PMO is a powerful tool for rapid program transformation.

In the span of three years, our two-person trade compliance PMO:

- Made key contacts all over the company;
- Wrote and revised over 100 trade compliance or business processes and procedures;
- Managed the long-term corporate communication plan and stakeholder engagement for a totally redeveloped program;
- Created all manner of trade compliance communication resources;

- Ran audits and managed corresponding resolutions;
- Tracked vital statistics on program success;
- Spearheaded responsive program changes to regulatory updates; and
- Recommended process improvements that made our program better, stronger, and in some cases more cost-effective.

Our program leader gave us the insight and discretion to innovate in thoughtful, consistent ways. In return, we gave our program leader the time to handle both the big-picture, visionary thinking she was hired for and the daily emergencies and near-misses that come with compliance leadership.

A PMO could offer your team similar benefits. Try it and see the transformation for yourself!

Takeaways

- You are too busy to do everything yourself, and your team members are likely already allocated to specific tasks. A program management office (PMO) can be the partner you need to execute your compliance program priorities.
- A PMO is an especially powerful tool for keeping your program organized as it expands or changes. This includes when your program shifts rapidly in response to new regulatory requirements, corporate management, or corporate structure.
- A PMO can generate and drive improvements, automations, and special initiatives in response to your overarching vision, a specific direction you've shared, or particular audit findings or monitoring results.
- A PMO can cement partnerships with other departments by training them on trade compliance priorities, identifying trade compliance risks in their day-to-day work, and addressing them collaboratively and efficiently.
- Big picture: A PMO can be as flexible as you need it to be, and it has the potential to do anything you need it to—as long as it doesn't become co-opted dealing with transactional matters.

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