

Measuring Compliance Training Effectiveness

“Since at least 2017, the Department of Justice (DOJ) has emphasized the need for a determination of compliance training effectiveness. In the 2020 Update, it stated under the section entitled ‘Form/Content/Effectiveness of Training’ the following questions, How has the company measured the effectiveness of the training? Have employees been tested on what they have learned? How has the company addressed employees who fail all or a portion of the testing? Has the company evaluated the extent to which the training has an impact on employee behavior or operations?” posted FCPA Compliance & Ethics in their *blog*.

“No company executive would ever say a company does not need to conduct compliance training. However, compliance training is just one part of the overall compliance program. It is not the entire program. The compliance program is designed to (1) prevent compliance violations and (2) protect the company when a compliance issue occurs.”

Read the article.