One important measure of success for compliance teams is an “effective” compliance program as prescribed by the U.S. Foreign Corrupt Practices Act; and other domestic and international standards. The DOJ-SEC Resource Guide, specifically: 1) is it the company’s compliance program well designed? 2) is it being applied in good faith? 3) Does it work? Taking into account the guidance of the U.S. Sentencing Commission, DOJ and SEC on the importance of continually improving a compliance program, we’ve added that, as a fourth basic area to consider.

A Pragmatic Approach to Compliance: Four Key Questions to Consider

1. **Is it well designed?**
   - Design, implement and regularly review and modify compliance standards and procedures to address new risks, including periodic risk assessments.
   - Leaders understand the business, operate the business, and test internal controls.
   - “Is the program broken?”

2. **Applied in good faith?**
   - Monitor annually to ensure adherence to the program's standards.
   - “Are the policies and procedures being consistently and defensibly applied?”

3. **Does it work?**
   - Periodically measure program effectiveness and report results in the context of incident and where necessary.
   - Continuous improvement.

4. **Continuous Improvement?**
   - Conduct periodic risk assessments and update necessary standards and procedures.
   - “Can you demonstrate continuous improvement?”

Integrated compliance management solutions allow compliance teams to centralize and automate compliance functions across key risk areas, while equipping them with a uniquely contextual and holistic perspective of their program’s performance. In addition to bringing efficacy and efficiency to the compliance office, integrated compliance program management enables organizations to demonstrate with ease and confidence that their program is well designed, applied in good faith and it works—and facilitates continuous improvement. Through the cohesive responses associated with an effective compliance program, compliance management solutions help ensure your organization remains in compliance—and avoid reputational and financial harm to your company generally to prevent violations, detect those that do occur, and remediate them promptly and appropriately.”

Effective compliance programs are tailored to the company’s specific business and to the risks associated with that business. As markets change, it is necessary to make adjustments to an effective compliance program and build an ethical culture. Monitoring and auditing to detect criminal conduct are important parts of the government’s assessment of whether a violation occurred, and if so, what action should be taken.

**Easy. Efficient. And (Most Importantly) Effective.**

In addition to bringing efficacy and efficiency to the compliance office, integrated compliance program management enables organizations to demonstrate with ease and confidence that their program is well designed, applied in good faith and that it works—and facilitates continuous improvement. Through the cohesive responses associated with an effective compliance program, compliance management solutions help ensure your organization remains in compliance—and avoid reputational and financial harm to your company generally to prevent violations, detect those that do occur, and remediate them promptly and appropriately.”

Effective compliance programs are tailored to the company’s specific business and to the risks associated with that business. As markets change, it is necessary to make adjustments to an effective compliance program and build an ethical culture. Monitoring and auditing to detect criminal conduct are important parts of the government’s assessment of whether a violation occurred, and if so, what action should be taken.

**Easy. Efficient. And (Most Importantly) Effective.**

In addition to bringing efficacy and efficiency to the compliance office, integrated compliance program management enables organizations to demonstrate with ease and confidence that their program is well designed, applied in good faith and that it works—and facilitates continuous improvement. Through the cohesive responses associated with an effective compliance program, compliance management solutions help ensure your organization remains in compliance—and avoid reputational and financial harm to your company generally to prevent violations, detect those that do occur, and remediate them promptly and appropriately.”

A Pragmatic Approach to Compliance: Four Key Questions to Consider

1. **Is it well designed?**
   - Design, implement and regularly review and modify compliance standards and procedures to address new risks, including periodic risk assessments.
   - Leaders understand the business, operate the business, and test internal controls.
   - “Is the program broken?”

2. **Applied in good faith?**
   - Monitor annually to ensure adherence to the program's standards.
   - “Are the policies and procedures being consistently and defensibly applied?”

3. **Does it work?**
   - Periodically measure program effectiveness and report results in the context of incident and where necessary.
   - Continuous improvement.

4. **Continuous Improvement?**
   - Conduct periodic risk assessments and update necessary standards and procedures.
   - “Can you demonstrate continuous improvement?”

Integrated compliance management solutions allow compliance teams to centralize and automate compliance functions across key risk areas, while equipping them with a uniquely contextual and holistic perspective of their program’s performance.