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### If you build it, they will come—unless it's a policy or procedure

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By Eric M. Baim

We've all been there. Whether due to your organization's evolving needs, changes to the external regulatory environment, or just an opportunity to evolve and improve, you've proudly launched a new policy or procedure. You've previewed it with leadership and engaged business owners in drafting. It is aligned with business needs, and you're confident it will help everyone do their jobs with higher integrity.

Instead, the policy or procedure falls flat. Despite numerous touch points along the way, internal stakeholders are surprised to see it and say they did not know it was issued, revised, or even existed. Stakeholders raise after-the-fact objections you had long thought were resolved or identified issues you wish they had shared much earlier.

We like to think that if we put in the effort, believe in the objective, and keep everyone informed, new written standards will fall into place. Unfortunately, that isn't always the case. What are some common pitfalls when compliance professionals launch new written standards, whether a single policy, a stand-alone procedure, or an extensive code of conduct or policy manual?

1. **Transparency instead of engagement.** While the impending written standards are “socialized,” stakeholders are not actively engaged, involved, or leveraged to drive the change.
2. **Going it alone.** The project does not include a diverse coalition of stakeholders from across the organization who could actively contribute and bring their own perspectives and organizational insights.
3. **Complacent end users.** The end users—those charged with adhering to the new written standards—don't understand the need or urgency for the new or updated written standards, so they are disengaged.
4. **Declaring victory too soon.** The project is communicated as “complete” once the written standards are signed off on and acknowledged as “read and understood” by the end users.

So, how can compliance professionals approach developing and revising written standards in a way that lends itself to a more lasting change? Various change management methodologies offer research-based approaches to help organizations through the steps and capabilities necessary to plan, implement, and sustain meaningful change, such as John Kotter's eight-step process for leading change,<sup>[1]</sup> the Prosci ADKAR (awareness, desire, knowledge, ability, reinforcement) Model,<sup>[2]</sup> and Kurt Lewin's seminal work on organizational change.<sup>[3]</sup> Although the specific steps (and labels for those steps) vary between models, there are commonalities. As part of a planning phase, organizations are focused on making the case for change—what is changing and why—and mapping out and communicating how it will be accomplished and what to expect. The change then goes through

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an implementation period, ensuring all the right organizational stakeholders are engaged appropriately. Finally, to maintain progress, there is a focus on sustaining the change with appropriate education, reinforcement, and dialogue.

While these methodologies often focus on organization-wide transformations, their thinking does inform how compliance professionals can manage similar people and process issues that arise when trying to get new written standards to stick. Reflecting on some common pitfalls and keeping change principles in mind, some key steps across these phases can help ensure success.

## **Phase I: Planning the project**

First and foremost is being disciplined about project management and ensuring the right people are involved in the right amount. Consider all the pivotal roles that must be involved. The executive sponsors, written standard drafters, adjacent functions (e.g., legal), and end-user adopters all have an essential role. Communications should be tailored to each critical role and at each step.

When discussing the new written standards, think through ways to engage the players beyond merely providing visibility into what changes and when. What is in it for them? Explain why these written standards are being changed now and how this affects their departments, functions, or teams.

Finally, set clear expectations around where the organization will end up once these written standards are embraced and followed. What is true success, and how will that change be sustained?

## **Phase II: Drafting and implementation**

Regardless of who “owns” the written standards, they involve not only those most invested in the outcome but diverse participants in levels, functions, and tenure. You can drive better engagement by giving multiple parties a meaningful opportunity to contribute. Because creating new or updating existing written standards challenges legacy norms, identify and address those potential barriers and obstacles head-on before implementation. For example, if one function is typically only a final reviewer (e.g., quality, operations, legal) of a written standard, include them in the upfront drafting discussions.

One often missed opportunity is how participants are acknowledged. While a “thank you” lunch at the project's end is nice, rewarding and recognizing participants for their contributions along the way can drive personal and professional investment in the success. Moreover, this helps demonstrate that implementing written standards is a journey and that mere “approval” of the written standards is not the end goal.

Even once drafting and implementation start, remain attuned to other “noise” in the organization due to other parallel projects and activities. Knowing how your project can complement, may conflict with, or get drowned out by other initiatives will help you manage those opportunities or challenges. To that end, be disciplined about providing accurate, ongoing, and timely updates on progress to the larger audience. Tie your discussion of any risks not simply on completion timelines but on the vision and motivations you articulated at the start.

## **Phase III: Sustaining progress**

As noted earlier, it is premature to suggest that the implementation of written standards is “done” when they are approved or posted. Users need opportunities to learn and adjust to sustain those gains. Training should not merely recite what is different but also how this written standard will improve their ways of working.

Although compliance professionals recognize the importance of auditing and monitoring adherence to written standards, there is an interim step that is sometimes overlooked. Consider building into your project plan and

implementation timeline a check-in with users and stakeholders to evaluate how well it is being adopted. Use the information gleaned from those meetings to identify needs for additional training or minor updates on the written standards themselves to make improvements. More formal auditing and monitoring can be used later—after a reasonable implementation period—to help monitor compliance.

Finally, communicate the successes. Circle back to the management sponsors, functional leads, and others to share the improvements.

## Conclusion

A new policy or procedure won't be the most significant change your organization will endure, but there are still headwinds to overcome. Steering clear of some of the identified pitfalls—and adopting some change management techniques—can help drive lasting results.

## Takeaways

- There are several common pitfalls that make it difficult for compliance professionals to successfully launch new or updated policies and procedures.
- Insights from organizational change management models suggest how best to manage people and process issues when drafting and implementing written standards.
- Plan the activity with disciplined project management and communications that focus on not just what is changing but why.
- To drive engagement, drafting and implementation should involve not only those most invested in the outcome but also diverse participants in terms of levels, functions, and tenure.
- Sustain the successes by looking past the written standard sign-off to training and rapid interim updates in addition to long-term auditing and monitoring.

<sup>1</sup> John P. Kotter, *Leading Change* (Boston: Harvard Business Review Press, 2012).

<sup>2</sup> Prosci, "The Prosci ADKAR Model," last accessed December 19, 2023, <https://www.prosci.com/methodology/adkar>.

<sup>3</sup> Kurt Lewin, "Frontiers in Group Dynamics: Concept, Method and Reality in Social Science; Social Equilibria and Social Change," *Human Relations* 1, no. 1 (1947), <https://journals.sagepub.com/doi/10.1177/001872674700100103>.

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