Reexamine your compliance program now

By Chris Moussally

Chris Moussally (chris.moussally@adp.com) is Managing Senior Counsel, ADP LLC, in Alpharetta, Georgia, USA, and leads the compliance function for the HR Outsourcing Solutions business unit.

Call it reexamination, rebranding, or disruption, as compliance professionals, we owe it to the businesses we support to take a fresh look at our compliance program from time to time to ensure our processes, practices, and even the way in which we communicate with the business remain practical and relevant. The suggestions below are not a substitute for a thorough assessment of compliance program effectiveness. Rather, these are table-stakes principles and recommendations that can be used to help assess how your program may be viewed by the business you support.

Don't let FORM-ality triumph over substance

We can fall victim to complacency—finding comfort in our forms, processes, and other routines that appear to represent what we believe to be tried and true best practices. Don't get me wrong; there are certain processes that must be followed to comply with the law or clearly reduce risk. However, beyond the obvious requirements, we must make it a point to ask ourselves why we require our stakeholders, for example, to complete those forms and why we are following specific "compliance" processes. What is the value to the business? Can we show that these processes clearly reduce risk? Is there a clear and objective return on investment when compared to the time and effort put in by the compliance function and the business it supports? If the answer is "no," then it's time to reexamine your processes, rationalize your approach, and simplify whenever possible.

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