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Learning analytics: A business intelligence approach to compliance training metrics

By John Peebles

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One of the most persistent, enigmatic, and far-reaching issues that is top of mind for leaders in learning and development is the challenge of insightful data and analytics. As the CEO of a training operations platform, I have a lot of conversations with training professionals who are seeking to serve a number of internal stakeholders, including compliance. Serving those stakeholders is often a challenge for these training professionals because of the lack of insightful data and analytics.

It's not hard to understand why. Across business functions, data and analytics are crucial to reporting on success, aligning results to organizational key performance indicators, and making data-driven decisions. Most importantly, data-driven decision-making relies heavily on accurate, reportable analytics that support agility and flexibility in the face of change.

As a compliance professional, none of this is new to you. Regulatory stakes continue to rise, and getting the right value out of your data, with real-time analysis, is paramount to risk management as new or changing regulations occur. This is especially true when considered alongside the 2020 Department of Justice (DOJ) guidance to ensure compliance programs have "sufficient direct or indirect access to relevant sources of data to allow for timely and effective monitoring and/or testing of policies [and] controls."[1]

Recently, our friend Christopher Annand, the director of operations for ethics and compliance at Cargill, shared with us what Cargill faced as it adapted to the recent DOJ guidance:

> In response to earlier guidance issued from the DOJ and in support of growing expectations from Cargill's Board of Directors, there was a clear need for our compliance training to rapidly mature, through the implementation of a standardized curriculum and effectiveness metrics that position the program to be more predictive and offer actionable data to the business.
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> The enhancement to our training was scoped to include some measure of performance data that would:
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> - Aid compliance in determining areas of knowledge strength and weakness, so the curriculum could be adapted to address the areas where employees were struggling.
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> - Identify where the lack of understanding with a compliance topic would suggest the potential for a future compliance failure, allowing compliance to provide that information to the business shortly after the training took place.

- Feed itself into the development of Action Plans for the business to perform with the assistance of targeted compliance resources offered to them and inform other steps to be taken with overall compliance program maturity.

In scenarios like this, for training professionals, the process of capturing actionable compliance-related data has historically been a tenuous one, at best. It's likely you've experienced this challenge during audits, as well. This is because learning tech generally exists as a point solution that produces "learner activity" data with a focus on tackling narrow goals or specific use cases rather than aggregating data from critical systems in one place. This narrow focus can, of course, limit the intelligence capability for your compliance program as well as other critical business functions.

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