

CEP Magazine – August 2020 Learning from actual cases

By Joe Murphy, CCEP

Joe Murphy (jemurphy5730@gmail.com) is a Senior Advisor at Compliance Strategists, SCCE's Director of Public Policy, and Editor-in-Chief of CEP Magazine.

Back when I was in-house, we used the then-pending Federal Sentencing Guidelines as a springboard to improve our compliance efforts. We knew these were good, challenging standards, and we wanted to be sure we covered all the points. Our target date was November 1, 1991, when the guidelines took effect.

One issue was how to reach employees on an ongoing basis. Back then, before email and the internet, the tool for doing this was a company publication. We thought about asking the existing company publication to include an occasional piece about compliance but decided that was inadequate. So we decided to do our own publication.

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