

Office of Compliance & Ethics

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COMPLIANCE TRAINING CHECKLIST

This checklist* provides general guidance on creating effective compliance trainings. Welldesigned and effective compliance trainings should be appropriately tailored to the audience's size, sophistication, and subject expertise. This checklist is not an exact formula but rather a set of questions to consider when designing, implementing, and evaluating a compliance training program. Compliance trainings should be risk-based and thoughtfully designed considering the form, content, and effectiveness of the training.

RISK-BASED TRAINING
What training have employees in relevant control functions received?
Has your unit provided tailored training for high-risk and control employees, including training that addresses risks in the area where misconduct is most likely to occur?
Have supervisors received different or supplementary training?
Does your unit undertake analysis to determine who should be trained and on what subjects?

FORM/CONTENT/EFFECTIVENESS OF TRAINING

Has the training been offered in the form appropriate for the audience?

Is the training provided online or in-person (or both) and what is the rationale for this choice?

Has the training addressed lessons learned from prior compliance incidents?

Is there a process by which employees can ask questions during or after the training?

How is the effectiveness of the training measured?
Are employees tested on what they have learned?
If employees fail all or a portion of the training, how is that addressed?
Has the unit evaluated the extent to which the training has an impact on employee behavior or operations?

*Based on content from the <u>U.S. Dept. of Justice, Evaluation of Corporate Compliance Programs (Updated</u> <u>March 2023)</u>