



2020 DOJ Compliance Guidance Self-Assessment Tool

Do you have questions on how the recent changes to the U.S. Department of Justice’s Evaluation of Corporate Compliance Programs will impact your compliance program? Use this self-assessment tool to determine how well your current compliance program aligns with the new DOJ guidance as well as see NAVEX Global’s recommendations on how to keep your program compliant.

Compliance Topic	New DOJ Evaluation Questions	NAVEX Global Recommendations
<p>Risk Assessments</p>	<p>Section 1 (A): Does your company have a process for tracking and incorporating lessons from your own issues or from other companies into your own risk assessment process?</p>	<p>Your organization should have processes in place to measure your compliance program effectiveness and should have access to reporting tools that help your company detect problems and analyze trends.</p> <p>Your organization should also have visibility into industry-level data to evaluate and benchmark your compliance program against your peers – allowing you to identify where your program is succeeding and where it can be improved.</p>
<p>Policies and Procedures</p>	<p>Section I (B): Are your organization’s policies and procedures published in a searchable format for easy reference?</p> <p>Section I (B): Does your organization track access to various policies and procedures to understand what policies are attracting more attention from relevant employees?</p>	<p>Your policies and procedures management system should have extensive search capabilities, allowing users to search by title, keyword, full text, or reference number.</p> <p>Your system needs to be able to track how many times a policy has been viewed, who has viewed it, what version was viewed, and who has attested to the policy.</p>

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Training and Communications	Section 1 (C): What is the interactive nature of your training? Does it provide opportunities to ask questions?	Your training courses should be interactive and provide learners with access to your organization’s policies, as well as information on how to ask questions or make a report. These interactive resources should always be available to learners throughout a training course.
	Section 1 (C): Can you accurately measure the impact of your training and how it affects employee behavior or operations?	Your Learning Management System (LMS) should deploy, track and report on compliance training programs, including metrics that measure progress toward goals. Program administrators should also be able to validate course completions and overall program health through dashboards and audit-ready reporting.
Confidential Reporting Structure and Investigation Process	Section 1 (D): Can your company confirm employee awareness of your hotline?	As part of your organization’s hotline and investigation management system , you should have a selection of awareness materials including posters, brochures and wallet cards.
	Section 1 (D): Are you periodically testing the effectiveness of your hotline (e.g. by tracking reports)?	To accurately test and measure the effectiveness of your hotline, your organization should have access to reporting tools that help detect problems and analyze trends. Reporting should also include details about the status, volume and resolution of your investigations.
Third-Party Management	Section 1 (E): Are your risk assessments of third parties done throughout the life span of the relationship, or just during the onboarding process?	Your third-party risk management solution should allow you to not only screen, but continuously monitor third parties against adverse media, sanctions lists, politically exposed persons and more via our always-on screening and monitoring solution. You also need real-time reputation alerts when a third party’s status changes, enabling updated due diligence where appropriate.

Get a personalized audit of your compliance program to ensure it meets the new DOJ requirements

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NAVEX Global is the worldwide leader in integrated risk and compliance management software and services. Trusted by more than 14,500 customers, our solutions help organizations manage risk, address complex regulatory compliance requirements and foster an ethical, highly productive workplace culture. For more information, visit www.navexglobal.com.