

There is about 1 min 30 sec to answer each question!



Hi, it's DJTEach with some brain teasers for the CCEP candidates taking the exam soon .....

So you think you're ready??? Well, let's see. Here's an exercise **on Risk Analysis vs. Gap Analysis** - Can you tell the difference?

- A. \_\_\_\_ tells you if the information you need in order to decide what internal controls to implement First?
- B. \_\_\_\_ is the tool to assist you to conduct a comprehensive evaluation to identify the vulnerabilities to a business?
- C. Conducting \_\_\_\_ assists in the identification and the implementation of internal controls that ensure integrity of business processes.
- D. \_\_\_\_ is a narrowed examination of a business to assess whether certain internal controls have been implemented.
- E. \_\_\_\_ provides a high level overview of how a business internal controls are implemented and show what is incomplete.
- F. \_\_\_\_ provides a comprehensive enterprise wide view of business processes.

Next, how does the DOJ perform *Evaluation of Corporate Compliance Programs*? As taken from the *Federal Sentencing Guidelines*...



**QUESTIONS TO ANSWER PERFECTLY... ARE YOU READY...?? WHAT DO THESE "KEY WORDS" MEAN TO YOU??**

1. Why does the governing body say the "BOD takes responsibility for oversight of the compliance programs"?
2. Who and what "examines the "minimum standards" that companies need to prove whether their program was designed to be effective" and are applied as evaluation standards in the context of a criminal investigation?
3. If the DOJ comes knocking at the door, the company has the burden of proof to satisfy that they met the basic obligations

at a “*minimum or maximum?*” in order to demonstrate the program was effective?



4. How is the performance of the compliance manager explained by the words “autonomy” and “empowerment”?

5. Questions about “methodology, metrics, integrated processes” are used when?

6. Questions about “vendor management”, “payment systems”, “financial transactions” are discussed to evaluate what?

7. When is “effectiveness of reporting mechanism” looked at?

8. Where does it state that reports from the Compliance officer are required to document program activities, corrective actions, and challenges to the BOD?

9. What does it mean to “demonstrate a shared commitment from the top management?”

10. In the case of “conflicting and competing interests in the reporting structure” of the compliance officer, often times the compliance officer is not given a direct voice to the BOD or the CEO to report misconduct. What governing body says this is not good?

IF THESE ARE HELPFUL, LET ME KNOW..... GOOD LUCK ON THE EXAM.

*Exercise A.risk, B.risk, C.risk, D.gap, E.gap, F.risk, taken from [April 2018 OCR Cybersecurity Newsletter \(hhs.gov\)](#)*

*Answer Key 1. FSG element 2 and OIG 2. FSG element 2- as outlined in the duties of the compliance manager 3. The DOJ’s FSG 7 elements are the minimum standard. 4. FSG element 2- autonomy empowerment meaning the real and perceived level of authority of the compliance manager, whether the position operated objectively, independently, free will without undue influence or backlash. 5. FSG element 3- 3<sup>rd</sup> party mgmt. Risk- based processes, asked to analyze risks to give incite to decision making process. 6. FSG element 1- these terms demonstrate additional controls in place to prevent misconduct such as stealing, money laundering. 7. FSG element 5- is used to analyze audit, monitoring and reporting for program. 8. FSG element 2- as outlined in the duties of the compliance manager 9. FSG element 2- shared commitment refers to top management actions required to demonstrate that the compliance function was adopted, supported and funded by top management. 10. FSG element 2- mentions reporting structure conflicts. FSG says this is not the best – they want NO conflicts for the compliance officer.*