

The ACR Brief

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Last week, we published the [first](#) of a three-part series on measuring compliance programs. I started working on this series almost a year ago, inspired by the insightful suggestions on developing key performance indicators and tracking metrics in Jonathan Drimmer and Matthew Herrington's guest [article series](#) on the topic. They followed that with a second series that gave specific suggestions on [using the then-brand-new ISO 37001 standards to generate KPIs](#).

While KPIs can be very helpful for companies, they are not the only means by which a company can measure the robustness of its compliance program. I wanted to give practitioners a broader view of how they can think about metrics and other ways of quantifying the unquantifiable goals of building an ethical and compliant culture at a company. It proved to be a difficult topic, requiring months of research.

The main tension, which will be discussed in upcoming articles, is between whether to focus on quantitative or qualitative measures. Quantitative measures, such as the number of trainings or the number of dollars spent on compliance, are easy to collect but do not necessarily paint a clear picture of the effectiveness of a compliance program. More qualitative measures, such as employee interviews and outside assessments, may more accurately represent the health of a program, but are much more expensive and also difficult to present to a board of directors or, in the event of an investigation, the SEC or DOJ.

After discussions with incredibly knowledgeable and thoughtful practitioners from a wide variety of backgrounds – including former DOJ compliance counsel Hui Chen – I am excited to share this series with you. I hope you find it helpful and would love to hear more about the challenges you face measuring compliance in your practice.

Warmly,

Megan Zwiebel

Senior Editor