

## Compliance training

# Overcoming the Pitfalls of Traditional Compliance Training for Sales Professionals

By Wendy Heckelman, PhD and Christina Garofano, PhD

Since 2007, more than 30 bio-pharmaceutical companies have been fined over \$13 billion for sales and marketing compliance violations. All of these companies had compliance training programs in place to meet the 2003 OIG Compliance Program Guidance for Pharmaceutical Manufacturers.<sup>1</sup> Yet, these training programs were not sufficient to prevent the violations and fines. *Why?* They didn't focus enough on ensuring that training changed actual behavior in the field.

Most compliance training programs are online modules that provide knowledge of compliance regulations and tell field representatives what *not to do*. This makes them unpopular with the sales organization. This training is also isolated from other training and development efforts (like POA meetings or ongoing coaching), so there is no reinforcement of the learning.

In contrast, adult-learning best practices tell us that in order to change behavior, you need behavioral skills training.<sup>2</sup> This means giving the learner examples of what they *should do*, opportunities to practice what they are learning, feedback on how they are doing, and reinforcing them for doing the right thing.<sup>3</sup> Not only does this help the learner remember what they learned, it also supports their ability to apply their knowledge in the real world.

In addition, if you want to change behavior you need to address the strong cultural influences that affect behavior in the organization. Is there an organizational culture of compliance or is there

pressure to drive sales results at all costs? Reward and recognition practices can also reinforce the organizational culture of compliance. What explicit and implicit messages are leaders reinforcing with regard to compliance? What are field representatives rewarded for doing?

An analysis of major compliance failures found that the top cause of failures was improper conduct (36%), yet the second leading cause was a systematic culture of pressure and fear (21%).<sup>4</sup> To enable and reinforce behavior change, compliance training should also target the organizational culture of compliance.

Traditional compliance training, with its focus on knowledge of compliance regulations, does not teach behavioral skills. It also does little to change cultural attitudes towards compliance.

To summarize the pitfalls of traditional compliance training:

- It focuses on providing knowledge of compliance regulations and telling sales representatives what not to do.
- It is isolated from other training and development efforts.
- It does not address the organizational culture of compliance.

To overcome these pitfalls and keep your company in compliance, training should be designed to:

1. Focus on changing behavior by teaching behavioral skills. For example, train sales representatives on what they can do to sell in a compliant fashion. This means that compliance training should be as specific as possible to enable field representatives to apply what they learn to real life situations.
2. Provide opportunities for practice, feedback, and reinforcement. This can be done



by combining compliance training with other sales training that normally contains these components, e.g., POA meetings. This provides the added bonus of getting sales and compliance to work together. It also helps change negative perceptions of compliance training. Compliance can be part of the team that helps field representatives perform their role effectively in an increasingly restrictive environment.

3. Link training efforts to ongoing monitoring to sustain learning and reinforce the importance of compliance in the organization. This also helps your company voluntarily comply with the field force monitoring requirements of many recent Corporate Integrity Agreements.
4. Address cultural influences of behavior. For example, to help establish a positive culture of compliance, training should be cascaded to the entire sales organization. It can even be co-facilitated by senior leaders.

#### **About WLH Consulting, Inc**

WLH Consulting, Inc. has over 20 years of experience providing custom consulting solutions to bio-pharmaceutical clients. WLH specializes in behavioral-based learning designs that change culture in the organization and conduct in the field.

WLH developed the I GLASS Method™ for defining, training, monitoring, and reporting compliant sales excellence. The I GLASS Method™ contains custom behavioral-based training at the product level to give sales professionals the skills and confidence to drive product growth in a compliant fashion.

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<sup>1</sup> OIG Compliance Program Guidance for Pharmaceutical Manufacturers. HHS – OIG. April 18, 2003. <http://www.oig.hhs.gov/authorities/docs/03/050503FRCPGPharmac.pdf>

<sup>2</sup> Gagne.&Driscoll (1988). Essentials of Learning for Instruction.

<sup>3</sup> Ajzen, I. (1991). The Theory of Planned Behavior; Bandura, A. (1977). Social Learning Theory; Baldwin, T.T. & Ford, J.K. (1988). Transfer of Training.

<sup>4</sup> Compliance and Ethics Leadership Council (2006). Key Findings of Compliance Failure Analysis. Corporate Executive Board. [www.celc.exexecutiveboard.com](http://www.celc.exexecutiveboard.com)

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