

Updated DOJ guidance underscores importance of implementing a truly effective corporate compliance program

03 May 2019

New guidance issued by the U.S. Department of Justice (DOJ) is the latest confirmation of the importance of implementing a robust compliance program that is not simply well-designed, but also effective.

Issued on April 30, 2019, and titled “Evaluation of Corporate Compliance Programs,” DOJ’s latest guidance for its Criminal Division builds on prior guidance that encouraged prosecutors to assess the adequacy of corporate compliance programs with respect to charging, sentencing, and plea and settlement decisions.

The new guidance reiterates three “fundamental questions” a prosecutor should ask:

1. “Is the corporation’s compliance program well designed?”
2. “Is the program being applied earnestly and in good faith?” In other words, is the program being implemented effectively?
3. “Does the corporation’s compliance program work” in practice?

Read more: [Updated DOJ guidance underscores importance of implementing a truly effective corporate compliance program](#)

Contacts



Gejaa T.
Gobena

Partner



Lillian S.
Hardy

Partner



Matthew C.
Sullivan

Partner

> [Read the full article online](#)