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## 'Gloom to Boom' a guide for turning risk into opportunity



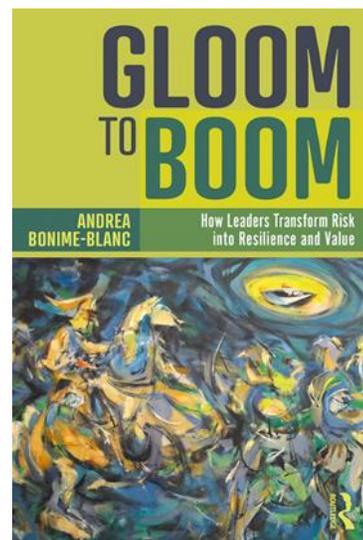
By [Richard Bistrong](#) | Thu, Jun 25, 2020 1:12 PM

Since starting “My Compliance Library,” most of my book reviews have *not* been about works written specifically for the risk, compliance, and governance communities. Rather, I favored authors who addressed diverse issues with respect to social psychology, branding, and the challenges of working in complex cultural environments, among other topics.

However, after reading Dr. Andrea Bonime-Blanc’s book “The Reputation Risk Handbook: Surviving and Thriving in the Age of Hyper-Transparency,” which I thought an essential compliance read when it was published in 2015, it was wonderful to see Dr. Bonime-Blanc once again sharing her deep experience in our compliance, legal, and governance world with the recent publication of “**Gloom to Boom: How Leaders Transform Risk into Resilience and Value**”. As such, I could not help diving in and adding it to “My Compliance Library.”

But the problem in reviewing it is the depth of the work, which, as described in the forward by [Andrew Weissmann](#) (who also has a resume that speaks for itself), “provides all business leaders with an important perspective and tools to understand how ethics and compliance promote good governance, model leadership and a healthy work environment.” The book, as Dr. Bonime-Blanc shares, is a roadmap to help us understand how to turn “risk into opportunity and value,” through a well-organized chapter-by-chapter guide in navigating the challenges of “ESGT” issues (environmental, social, governance, and technology).

It’s not your typical “ethics and compliance” book, as it delves much deeper into how, as Dr. Bonime-Blanc describes, we can “create positive change in this very turbulent,



confusing and, dare I say, increasingly dangerous world.” And note, this book was released before the turbulence of the coronavirus pandemic entered our world, which in my opinion, makes it all the more a critical read.

The book opens with a wonderful “speed-dating” journey on how to “tackle change favorably and in such a way that protects and preserves stakeholders and existing value and, indeed, creates new value.” However, even after “speed dating,” I was still stuck with how to review such a meaningful treatise in a way which would effectively illustrate the variables that Dr. Bonime-Blanc elevates in bringing us “from a place of turbulence to a place of constructive empowerment and resilience.”

So, perhaps it's fitting that the recently revised **Evaluation of Corporate Compliance Programs**, as issued by the U.S. Department of Justice, and which was initially issued in 2017 during Mr. Weissmann's leadership at the DOJ, might be a good pivot point. I found the overlay between the expectations of the regulators, Dr. Bonime-Blanc's work, and our current crisis environment to be the most time-sensitive approach to share her work and to hopefully inspire readers to add “Gloom to Boom” to their compliance library. So, with thanks to Dr. Bonime-Blanc, here is a Q&A I had with her about issues raised in the DOJ document and which I thought relevant to our current “ESGT” challenges (An additional thanks to Richard Cassin, editor-at-large at The FCPA Blog, for publishing a marked version comparing the 2020 release to the prior version in 2019):

**Q. Dr. Bonime-Blanc, thank you for sharing your experience and perspective with us. Pivoting between your book and how the regulators might evaluate governance, ethics, and compliance, a few questions. The 2020 DOJ “Evaluation” document queries, “Has the Company evaluated the extent to which the (compliance) training has had an impact on employee behavior?” Dr. Bonime-Blanc, this seems to be a never-ending debate in our compliance discourse. If we are going to join your journey from “Gloom to Boom,” we need to be impacted by ESGT initiatives and training, but can inspiration and impact be measured? As you share, culture, for example, “isn't (and never was) a soft issue—it's a ‘hard’ issue in that it is ‘complex’ and requires focus and expertise.” Thus, is training also a “hard” issue, and if so, how can its effectiveness be measured?**

**Dr. Bonime-Blanc:** Training is definitely a hard issue in two senses of the word. First, it is “hard” to do effective training—i.e., training that actually has an impact on people, is memorable, and helps to mold and maybe even change behaviors to more desirable ones. The best practice, in my opinion, is for organizations to have a mix of training and communications tools and content that change over time; are customized to their

employee population needs; and that are offered in modules, smaller bites and regularly through the year, not just once a year.

Second, as you infer from your question, training is also “hard” because it’s difficult to measure something that is largely qualitative and, as we all know, especially in business, you can’t manage what you can’t measure ... supposedly.

Yet, in my humble opinion, there are ways to subject training and communications to at least some form of metrics. For example, metrics can be designed to show a snapshot in time—how many people took an online module, how many folks opened a communications email, etc. You can also show trends over time—measuring those snapshots quarterly and annually, by location, employee category, etc. And finally, there are more qualitative analyses that can be done from culture surveys asking about the training, asking it to be rated, etc.

Such measurements and analyses can be very valuable not only to the ethics and compliance function but to management and the board, and can also be used to inform performance metrics, affecting compensation packages in the form of bonus payments and more. Bottom line: There are quantitative and qualitative metrics that can be deployed to measure training effectiveness—people just have to be creative and thoughtful about this.

**Q. The 2020 DOJ document addresses the importance of a company creating and fostering a culture of ethics and compliance “at all levels of the company.” It’s no longer just “conduct at the top,” but now the “middle and the top.” Why do you think the “middle” had to be added?**

**Dr. Bonime-Blanc:** Having experienced all manner of leaders in my corporate career—from the very good and good to the bad, the worse, and the ugly—I am of the fervent opinion that the CEO has an outsized role in determining the culture of his/her organization (since we mere humans often take our cues from our leaders for better and for worse). That said, there are many forms of leadership, and that includes mid-level managers as well as more junior, less experienced leaders who may have small teams they manage or supervise. And each of us (as I repeatedly learned throughout my own experience) can do a lot with the influence—even when limited—that we might have.

The bottom line is this: First, that top leaders should set the right tone from the top to begin with for all other leaders throughout the organization. However, if that critical piece of the puzzle is absent, other leaders—high- and mid-level—need to step up to the plate

and find ways through influence, diplomacy, and seeking out allies to ensure that the organizational culture doesn't go south and become toxic (if it isn't there already). I have been in places like that, and I have experienced the small victories of influences and alliances with culturally like-minded colleagues and that can offer at least temporary relief. But, as I often say, if all else doesn't work and you have mobility, you can always vote with your feet and leave a toxic environment. And I have done that, too.

This is all to say that the DOJ suddenly being interested in the tone from the middle is not surprising and is a good thing because a lot can be gleaned from that part of an organization.

**Q. The DOJ asks, “What are the reasons for the structural (compliance) choices the company has made?” That’s a very wide question—why do you think the regulators care about “structural choices?”**

**Dr. Bonime-Blanc:** While I cannot peer into the minds of the regulators, this statement definitely resonates with me. I believe that a strong, sustainable, and ethical organization rests on at least two major foundations: (1) having the right internal structures in place (programs, functions, processes) and (2) covering the substantive waterfront necessary to run a business holistically, strategically, and with integrity, meaning that you know what your ESGT risks are, including ethics and compliance.

My book provides a leadership roadmap for creating the structures and the substantive focus by offering early on a chapter on ethical leadership (and what that means in contrast to hubristic and sociopathic leadership). Then the core of the book is a journey through the most important ESGT risks and opportunities businesses confront and then ends with two chapters focusing on how to build the structures of organizational resilience and value creation.

**Q. As a closing remark, we live in very turbulent times right now. We all want our organizations to be “humming along on all cylinders with the mission, vision, strategy, and culture all pretty much aligned and moving on a positive and constructive path,” but that’s not easy, especially now. So, from your perspective, what does this mean in the real world and in today’s “real world”?**

**Dr. Bonime-Blanc:** Though this might sound a little myopic and self-serving (because it's what I'm writing about now for my next book), I believe that the key to surviving and thriving sustainably over time, including through these super-turbulent moments, is having organizational resilience. I devote a chapter in “Gloom to Boom” to this topic,

offering an eight-element organizational resilience lifecycle model which, depending on how robust and prepared your organization is, can range from a terribly dysfunctional “Vicious Resilience Lifecycle” to a highly finetuned and super-effective “Virtuous Resilience Lifecycle.”

Ethics and compliance professionals should peruse this model, as they have a role to play in every one of the eight elements (which range from governance and culture to strategy and performance, with a few others in between). In fact, I've done a number of workshops with CECOs, and it has opened up their minds as to where they can be helpful going forward in these turbulent times, integrating more seamlessly with their businesses and long-term strategy.

And there's more to come on this structural front—a previous publisher of mine has just asked me to write a new book focusing exclusively on the topic of how to build organizational resilience in turbulent times. And being the glutton for punishment that I am (and despite swearing that I wasn't going to write another book after the 481 pages of “Gloom to Boom”), I said yes—so, all things being equal, look for it in mid-2021. And we can have another conversation!