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# Aligning Culture & Compliance

## **Challenges and Opportunities**

Michael Furman, SPHR, SHRM-SCP

Principal Consultant, HR ReSolve

# My background

- Over 35 years of Human Resources experience at leading global companies, including senior positions at Teva Pharmaceuticals, PricewaterhouseCoopers, and Bankers Trust Company, after starting at GlaxoSmithKline and Pfizer.
- Consultant on fair employment and compensation practices with a focus on how a company's words and actions align with their policies. Using the context of fairness and compliance, provide perspective and HR practices that are effective, practical, and inclusive.
- Chair of the Philadelphia Industry Liaison Group (ILG) chapter which focuses on compliance requirements of federal contractors.
- Speaker at recent event with Dept. of Labor and EEOC regarding pay equity, at a monthly meeting of the Tri-State HRMA regarding the challenges of employment of individuals with disabilities, and at 2 SHRM regional conferences on HR M&A Practices.
- Bachelor's Degree - Cornell University School of Industrial and Labor Relations.

# Industry Liaison Group (ILG)



The Philadelphia Liberty Industry Liaison Group (*Liberty ILG*) is a regional professional organization in the Philadelphia, Pennsylvania area established under the guidance of the National Industry Liaison Group (NILG).

*Its primary purpose is to develop positive partnerships between industry and the Office of Federal Contract Compliance Programs (OFCCP) of the U.S. Department of Labor.*

**Quarterly meetings – February, May, August, November**

**Chapter Website [libertyILG.homestead.com](http://libertyILG.homestead.com)**

# Agenda - Three Legs of the Stool

- ▣ Compliance activities (“What we HAVE to do”)
  - ▣ Federal , State, or Local regulations
  - ▣ Company policies
  
- ▣ Culture (“Who we want to BE”)
  - ▣ Words
  - ▣ Actions
  - ▣ Reputation
  
- ▣ Practices (“What we actually DO”)
  - ▣ How do our actions align?

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## 2 Questions

- ▣ Why is compliance hard?
- ▣ What is the penalty for non-compliance?
  - ▣ Personally
  - ▣ Organizationally

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# Compliance Words

- ▣ Required
- ▣ Reported
- ▣ Tracked
- ▣ Audited
- ▣ Must / Mandatory
- ▣ “To meet the requirements”
- ▣ “Complete the form”

# Myriad of Laws

- ▣ EO 11246
- ▣ Section 503
- ▣ VEVRAA
- ▣ USERRA
- ▣ FMLA
- ▣ ADA / ADAA
- ▣ IRCA - I-9s / e-verify
- ▣ FLSA
- ▣ ADEA
- ▣ HIPAA
- ▣ GINA
- ▣ Title VII
- ▣ Pregnancy Discrimination Act
- ▣ Ban the Box

# There are rules for...

- ▣ Employment authorization
- ▣ Tracking and reporting of protected groups
- ▣ Access to facilities
- ▣ Candidate tracking
- ▣ Pay transparency
- ▣ Leave of absence
- ▣ Job accommodations
- ▣ Protection from discrimination and retaliation
- ▣ Privacy of medical / health information



# Impact of HR Compliance on other functions

- ▣ Facilities
  - ▣ Building access
  - ▣ Bathroom accommodation for wheelchairs
  - ▣ Lactation rooms
  - ▣ Gender neutral bathrooms
  - ▣ Lobby bulletin boards
  
- ▣ Security
  - ▣ Background checks
  
- ▣ IT
  - ▣ Assistive technology

# What does complying mean?

- ▣ Rules – letter of the law
  - ▣ Follow the rules
  - ▣ Meet the requirements
  - ▣ No more, no less
  - ▣ Conflicting, confusing, overlapping
  
- ▣ Actions – spirit of the law
  - ▣ Surpass rules to do the right thing
  - ▣ Rules don't cover all situations

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# Culture

- ▣ Values
- ▣ Drives behavior /actions
- ▣ Sometimes unspoken

[ There may be differences or inconsistencies between “culture” and “values”]

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# Culture Words

- ▣ Fairness
- ▣ Aligned
- ▣ Driven
- ▣ Caring
- ▣ Innovative
- ▣ Leading
- ▣ “Do the right thing”
- ▣ “Consistent with our values”
- ▣ “The \_\_\_\_\_ Way”

# Where is it in words?

- ▣ Employee Handbook
- ▣ HR Policies
- ▣ Bulletin boards
- ▣ Company intranet
- ▣ LOA letters
- ▣ Master Service Agreements
- ▣ Company's external website
- ▣ Job postings
- ▣ Offer letters
- ▣ Recruiting brochures
- ▣ Job Fair materials

# Where is it in pictures?



- ▣ Company's external website
- ▣ Company intranet
- ▣ Recruiting brochures
- ▣ Video clips
- ▣ Commercials

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# Where is it spoken?

- ▣ Talking to candidates
- ▣ New employee orientation / onboarding
- ▣ Disability administration

# Included in training?

- ▣ Interviewer training
- ▣ Supervisory training
- ▣ Performance evaluation and feedback

Effective compliance training content must  
impact everyday behavior



# Seek and Align

	Employee Handbook	HR Policies	Bulletin Boards	Company Intranet	LOA Letters	Master Service Agreements	External Company Website
List of Protected Groups							
Complaint Procedure							
Job Accommodation							
Religious Accommodation							
Disciplinary Action							
Confidentiality							
Definition of Supervisor							
Performance and Feedback							

# Look at: Diversity Recruiting

## Is Diversity Recruiting:

- ▣ A function?
  - ▣ (A group acknowledges ownership)
- ▣ A person?
  - ▣ (A 'go-to' person is identified)
- ▣ A responsibility?
  - ▣ (Something done without fanfare)
- ▣ An idea?
  - ▣ (It should be done but no one takes it)

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## Look at: Employee Resource Groups

- ▣ Do they help achieve compliance?

- ▣ How?

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# Summary and Challenges

- ▣ Culture and values are a philosophy but they need practices to reinforce them
- ▣ Compliance by itself will always be a struggle
- ▣ Align the need to comply with your cultural approach to business

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# Contact Information

**Michael Furman**  
[furmanme@gmail.com](mailto:furmanme@gmail.com)

**ILG Chapter Website**  
[libertyILG.homestead.com](http://libertyILG.homestead.com)