

COMPLIANCE: PUTTING THE PIECES TOGETHER

Consider compliance a means of first educating the field, rather than disciplining them.
- DH

Compliance departments should have a focus of continuous improvement and ongoing progress.
- HC

Compliance should be embraced by the C suite.
- HC

Maintain evidence that a significant percentage of rewards are generated from sales to “real” consumers.
- BK

Don’t overly emphasize the purchase of higher priced enrollment bundles by new consultants.
- BK

Pay attention to new guidance, and modify policies as it comes out.
- DH

A Compliance Dept needs to be independent; it can’t be told to treat high volume/high ranking field members as exceptions.
- GS

Remember that Truth in Advertising (TINA) is a consumer advocacy group that communicates with the FTC, but they don’t make or enforce law.
- GS

Compliance cannot be a separate department; it needs to be integrated into everything that we do.
- HC

Remove structures and language in the compensation plan that can be construed as incentivizing recruiting over selling.
- BK

Don’t impose minimum purchase requirements.
- BK

Compliance departments should be visible, internally.
- HC

Monitoring software generates lots of “hits” to investigate but helps establish that you’re being proactive.
- JS

Look at the totality of a claim, including words, images and context – even include other social media posts to determine what that net impression is.
- PCM

Determine what risk levels your company accepts for each category, such as images published by the field or product claims backed by studies.
- HC & JS