

DOJ Creates New Burden for Compliance Officers

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[In this article](#), James Tillen, Ann Sultan, and Brittany Neihardt* discuss updates to the Department of Justice's (DOJ's) "Evaluation of Corporate Compliance Programs" and its impact on compliance officers. "Among the many changes made to the Guidance ... is new language that will create a new responsibility for compliance officers to document the evolution of the company's compliance program," the authors wrote. They state that compliance programs can change for various reasons making it difficult to comply with this new requirement. While it is an additional responsibility, the authors note that "[t]racking and documenting the evolution of a compliance program ultimately has the potential to save companies from harsh treatment for reasonable changes to its compliance program if the company can adequately explain why the changes were made. Failing to document these changes or being unable to offer a reasonable explanation for the change could have the opposite effect."

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