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GRANITE GRC

Effective Training with Limited Time and on a Limited Budget

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Our presenters



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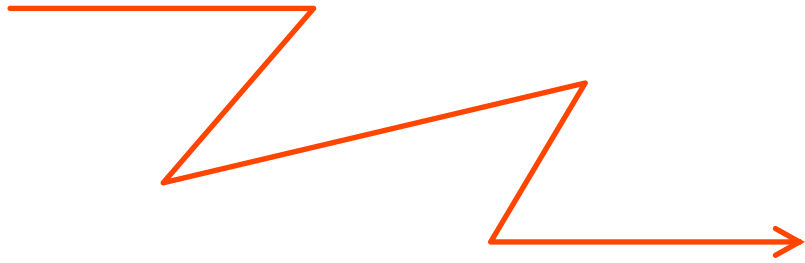
Granite GRC



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Agenda



- DOJ guidance on education and training
- Quality over quantity for effective training
- Compliance crisis: a communication case study
- Group activity and discussion
- Conclusion

DOJ of education and training

U.S. Department of Justice Evaluation of Corporate Compliance Program

Section C. Training and Communication

“Another hallmark of a well-designed compliance program is appropriately tailored training and communications.

Prosecutors should assess the steps taken by the company to ensure that **policies and procedures have been integrated into the organization, including through periodic training and certification** for all directors, officers, relevant employees, and, where appropriate, agents and business partners.

Prosecutors should also assess whether the company has relayed information in a manner **tailored to the audience’s size, sophistication, or subject matter expertise.**

Some companies, for instance, give employees **practical advice or case studies to address real-life scenarios**, and/or **guidance on how to obtain ethics advice** on a case-by-case basis as needs arise.”

A challenge every organization faces

Check-the-box v. effective education and training

- Integrate policies and procedures through into the periodic training and certification for all directors, officers, relevant employees, and, where appropriate, agents and business partners
- Tailor the training to the audience's size, sophistication, and subject matter expertise
- Provide practical advice or case studies to address real-life scenarios, and guidance on how to obtain ethics advice on a case-by-case basis

What does a training plan look like in practice?

A Centralized Multiyear Education Plan Sample

Risk	Course	Audience	Schedule								
			Year One				Year Two				
			Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
High	Ethics & Code of Conduct (ECOC)	All Employees	35					ML			
High	Workplace Harassment (WPH)	All Employees				60					60
Med	Conflicts of Interest (COI)	All Employees			25					ML	
Low	Ethical Leadership	All Managers		25		ML					
Low	Financial Integrity	All Managers						ML			
		All Employees in Finance		25				ML			
Low	Social Media	All Employees					25				
Med	Cyber Security	All Employees			ML			25			
Med	Bribery and Corruption	Limited Audience	25					ML			
Low	Standards of Conduct for Third Parties	Limited Audience			25					25	
Total Training by Quarter (up to mins)			60	50	55	65	30	35	30	60	
Total Training by Year (up to mins)			230				155				

31%

Say they either don't have an R&C training plan (21%) or don't know if they have one (10%)

47%

Say “training employees on policies”
is a top policy management
challenge

1. Optimizing training and impact

Effective training: quality over quantity

- Prioritize focus areas
 - General training; risk-based training
- Good training considers:
 - Relevance
 - Learner life experience
 - Varied content
 - Job applicability
- Focus on training effectiveness, not just completion time
- Apply adult learning principles to create engaging, relevant training
- Diverse workforce needs require varied training approaches

How well are we doing with E&C training?

2024 survey conducted by NAVEX and The Harris Poll

70%

Say they are at least “good”
at testing employees on what
they’ve learned in their E&C
training

74%

Say they are at least “good”
at offering a process by which
employees can ask questions
arising out of the trainings

1. Optimizing training impact
2. Microlearning

Use microlearning: bite-sized training for a busy workforce

- Microlearning delivers engaging, focused training modules
- Ideal for busy schedules, remote, hybrid and onsite environments
- Addresses specific compliance needs and patient safety protocols

Top training topics

2024 survey conducted by NAVEX and The Harris Poll

64%

Ethics and code of
conduct

62%

Cybersecurity

59%

Data privacy

1. Optimizing training impact

2. Microlearning

3. Beating training burnout

Engaging training: beating burnout and boosting retention

- Interactive experiences promote active participation and knowledge retention
- Real-world scenarios make training relevant and engaging
- Beat training burnout with a variety of engaging training methods

Education and training to avoid crises

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Hello, [REDACTED]
>> What happened

Important files on your network was ENCRYPTED and now they have grp3smk extension.
In order to recover your files you need to follow instructions below.

>> Sensitive Data

Sensitive data on your network was DOWNLOADED.
If you DON'T WANT your sensitive data to be PUBLISHED you have to act quickly.

Data includes:
- MICROS DATABASE, Accounting, Drawings
- Check Copies, Engineering, HR, Banking Information
- Payroll Scan, Sales and Marketing, Financia
- And more...

>> CAUTION

DO NOT MODIFY ENCRYPTED FILES YOURSELF.
DO NOT USE THIRD PARTY SOFTWARE TO RESTORE YOUR DATA.
YOU MAY DAMAGE YOUR FILES, IT WILL RESULT IN PERMANENT DATA LOSS.

>> What should I do next

1) Download and install Tor Browser from: https://torproject.org/
2) Navigate to: http://d751tpgjffe2ys2qivqplbvmw3yyx7o5e4ppt2esi[REDACTED].onion/?access-key=${ACCESS_KEY}
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- When phishing attacks or social engineering attacks strike your organization, does your team know to respond?
- What about ransomware? Does your IT, cybersecurity and compliance team have a plan in place to address this attack?
- Education and training inform your team so they don't inadvertently let bad actors in through an open door.

What happened?

Change Healthcare was hacked using stolen Citrix account

- Breached by the BlackCat ransomware gang using stolen credentials to log into the company's Citrix remote access service
 - Access to the company's network for 10 days before deploying encryptors; during this time they spread through the network and stole corporate and patient data that would be used in their extortion attempts
- Severe operational disruptions on Change Healthcare platform
- Caused financial damages estimated at \$872 million
- Paid ransom of \$22 million

The saying “any press is good press” does not apply here.

Some of the headlines that ensued for Change Healthcare after the cyberattack:

- Change Healthcare cyberattack causes dire billing crisis
- Congress Urged to Help Hospitals Impacted by Change Healthcare Cyberattack
- Federal Scrutiny Growing Over Change Healthcare Breach
- Change Healthcare roundup: UHG pays out \$2B, while feds mull cyber compliance rules
- Second Cyber Extortion Attack on Change Healthcare Follows Rumored \$22 Million Payment, May Involve Former BlackCat/ALPHV Hackers
- Government Launches Probe Into Change Healthcare Data Breach
- White House Meets with Healthcare Community to Discuss Change Healthcare Ransomware Attack
- Change Healthcare cyberattack having ‘far-reaching’ effects on providers
- Change Healthcare cyberattack: Lawsuits emerge, and more are coming
- Change Healthcare’s drawn-out recovery catches flak from cyber experts

Compliance crisis: Given limitations in time and budget, what would you do?

What is your potential “Change Healthcare” and how can you educate and train to avoid it?



PICK YOUR
POTENTIAL CRISIS



STRATEGIZE WITH
YOUR TABLE GROUP



READ OUT

Your training scenario

- The issue crosses multiple areas / departments
 - Successful phishing attack resulting in a ransom demand
 - IT and critical systems outage due to an unsuccessful patch/update
- Board of directors and leadership plus 12,000 employees and 100 third party contractors and vendors
- 25 locations across 5 states plus remotely working colleagues (all within the US)
- English and Spanish languages
- No more than 1 hour of training for each colleague, completion within 120 days, budget: \$75,000

- Two scenarios:
 - LMS is available for training, testing and certification
 - LMS **not** available
- Post-audit to grade effectiveness under DOJ criteria
 - Integrate policies and procedures into operations
 - Tailor training to the audience's size, sophistication, and subject matter expertise
 - Provide practical advice or case studies

For additional resources

Download our toolkit using the QR code below



Thank you!

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