



SOCIETY OF  
RESEARCH  
ADMINISTRATORS  
INTERNATIONAL

# Compliance

## Gaps Aren't Accidental

**CODE™** in Action: Understanding Why Compliance Failures Repeat

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# WHY DO THE SAME COMPLIANCE ISSUES KEEP HAPPENING?

**4 INEFFECTIVE IMPLEMENTATION & COMMUNICATION**  
(Policy gap, poor oversight, behavior persists)

**1 RECURRING COMPLIANCE BREACH / INCIDENT OCCURS**

**3 LACK OF ROOT CAUSE ANALYSIS & FOLLOW-THROUGH**  
(Systemic weaknesses remain, poor training)

**2 REACTIVE RESPONSE & FIX**  
(Ad-hoc patches, siloed actions, no RCA)



# The **Default** Explanation

- Human **error**
- **Lack** of training
- Staff **oversight**



# The *Reality* Shift

**PATTERNS ARE NOT ACCIDENTAL.  
THEY ARE PRODUCED.**

INITIAL  
IMPULSE

SYSTEM  
DESIGN

REPEATED  
PROCESS

FEEDBACK  
LOOP

SYSTEMATIZED  
ACTION

PATTERN FORMATION (System Outcome)

COORDINATED ACTIONS → VISIBLE PATTERN

EMERGENT DESIGN

AESTHETIC SYSTEM DB-H-013

# The CODE™ Framework



When CODE™ is strong, compliance is defensible.



# What a Compliance Gap Really Is

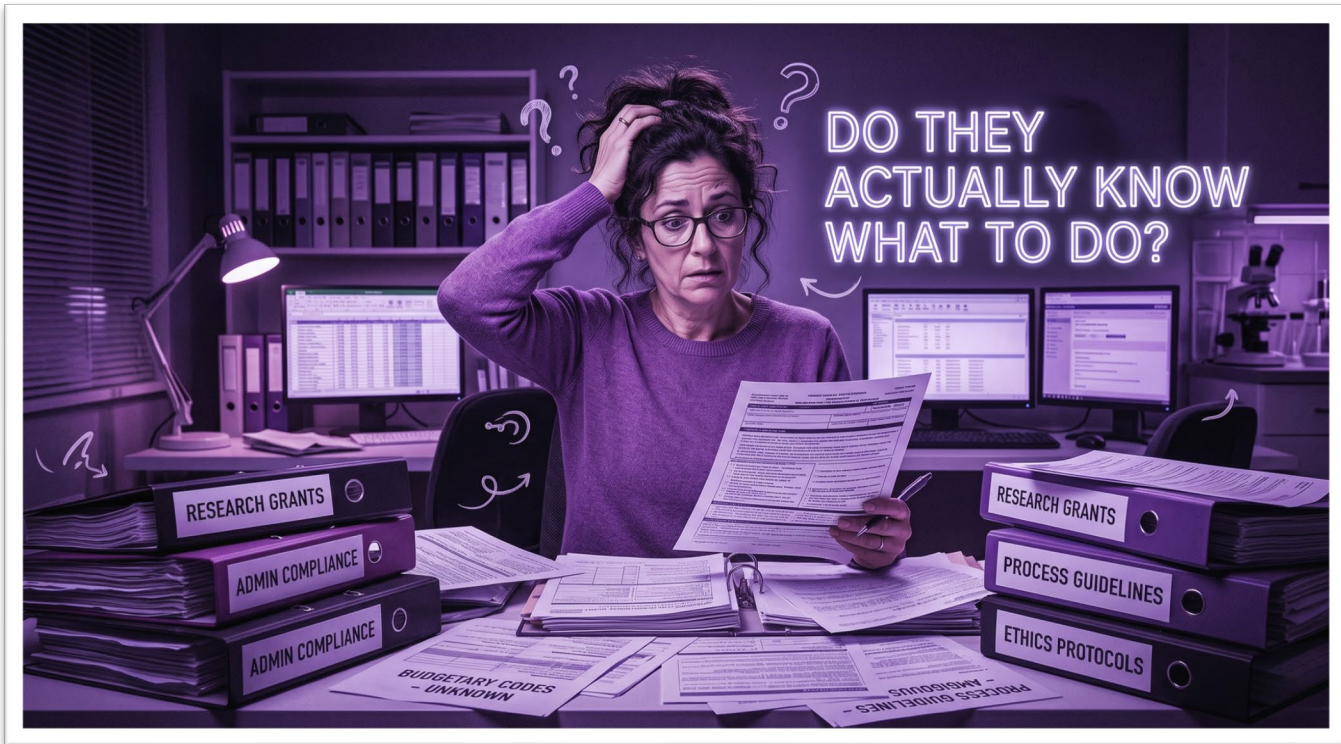


A signal of breakdown in:

- Competence
- Oversight
- Documentation
- Execution

# CODE™ Breakdown

(Competence Failure)



# CODE™ Breakdown

(Oversight Failure)



# CODE™ Breakdown

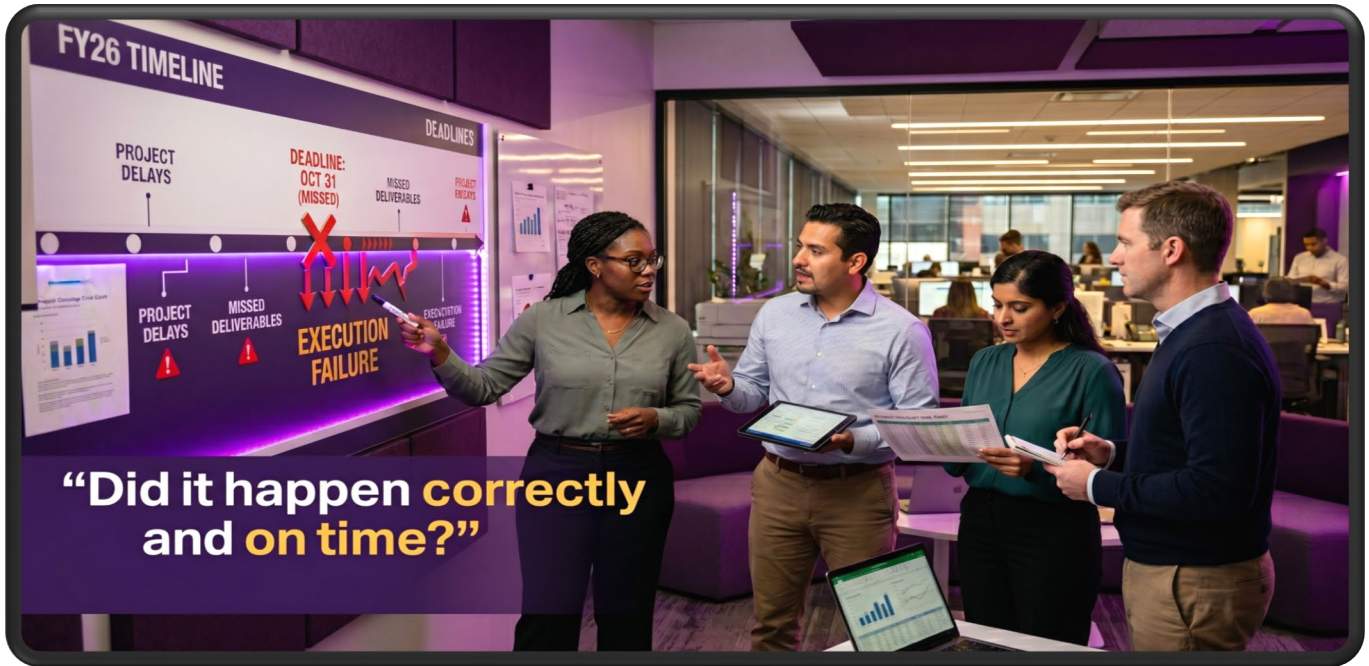
(Documentation Failure)

## CAN WE PROVE IT?



# CODE™ Breakdown

(Execution Failure)



# POST-AWARD EQUIPMENT PURCHASE



# CASE BREAKDOWN USING CODE™

C	O	D	E
COMPETENCE	OVERSIGHT	DOCUMENTATION	EXECUTION
Staff Qualifications & Training	Monitoring Compliance	Detailed Record Keeping	Efficient Process Flow
Expertise in Regulations	Process Reviews	Maintaining Protocols	Meeting Deliverables
Skill Development	Accountability Structures	Audit Trails	Timely Reporting



# The Pattern



## WHY TRAINING FAILS

Training Is Not Enough

- Training ≠ Oversight
- Training ≠ Execution
- Training ≠ Documentation

# Application

## Applying CODE™

- Identify recurring issue
- Map across CODE™
- Redesign process



“If it keeps  
happening,  
If it vestem  
the system  
allows it.”



**COMPLIANCE GAPS  
ARE NOT ACCIDENTAL.  
THEY ARE PRODUCED BY BROKEN CODE™.**



**Remember.....**

*Thank you!*



**Dr. Rashonda Harris**  
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