

The Map is Not the Territory

Written by Nick Sanders

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I'm working on this theory about compliance. I'm not saying it's fully baked yet, but I thought I'd share some thoughts. Your feedback is welcome.

First, the title of this article. It comes from “General Semantics”—an early-to-mid-century philosophical movement. Although General Semantics aimed at changing human thoughts and behaviors, what interests me about it was how it later impacted research into human perceptions and communication. The [Institute of General Semantics](#) continues to probe these areas. Although I'm in no way any kind of expert in the area, my layperson's understanding is that a foundational precept was the notion of *abstraction*

. The title is based on a General Semantics axiom that the description of a thing is not the thing itself. You can describe an object or a feeling, but that description is limited by your language and my internal language (how I process what you are describing). Neither of us is actually sensing the true object (or feeling). Another General Semantics saying is “the word is not the thing.” You get the idea.

Anybody who has ever relied solely on GPS directions and, as a result, has made a wrong turn or gotten lost, understands this concept. The GPS model on which the directions are based may not, in fact, be an accurate representation of the environment in which you are driving.

How does this all relate to compliance?

It seems to me that a compliance plan is like a map. It is the abstraction of compliance. It is not compliance. It's useful—as maps are useful—as a guide or limited description; but it is subject to limitations (like our GPS directions) and thus should not be relied upon as being the entire compliance universe.

Compliance is the thing. Compliance is people—individual people—complying with rules and guidelines. Those people are making decisions in the moment. Those decisions lead to actions that are (or are not) compliant with the rules and guidance the organization has determined it wants to follow.

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Right away it becomes apparent that there are abstract rules and regulations and laws. The “organization” (another abstraction) reviews those abstract things and decides, based on the review, what behaviors and actions constitute “compliance.” The first step (and the most abstract step) is having knowledgeable people within the organization review the various rules, regulations, and laws in order to determine which ones are applicable to the organization and then what compliant behavior and actions look like. The result of this review is a set of parameters that guide individual behavior.

Another complication is that the laws, regulations, and rules change—so the review must be performed fairly frequently.

The review output is a set of parameters. Individual actions and behaviors that fall within the parameters are “compliant;” whereas those that fall outside the parameters are non-compliant and require correction.

The next step is to translate the parameters into written guidance. Policies, procedures, practices. Command media, each piece of which has a topic and an associated behavioral parameter. This is compliant behavior, this is not compliant behavior. The documents are another abstraction. Somebody has to decide what to communicate and how to communicate. The end goal is to effectively communicate in such a way that an individual faced with a decision—a choice—can use the document as an aid. The better the document, the more likely the individual will be to make a decision that leads to behavior within the desired parameters—compliant behavior and compliant actions.

When complete, the command media must be explained. Individuals must be trained. People need to understand (1) where to find the guidance, and (2) where to find within the guidance the decision aid they are seeking. Many times, organizations opt to create Computer Based Training (CBT) for such interaction; but note that the creation of CBT itself involves choices and decisions about what content to teach and what content not to teach. Even if the training is instructor-led, the communication is almost wholly dependent on the instructor’s competence—not only in the subject matter but also in effectively communicating the subject matter. Finally, regardless of the training modality, the student’s mindset is critical. Students on the phone listening (on mute) to a conference call while simultaneously watching a CBT are likely not paying sufficient attention to *either* task. (As we’ve asserted [before](#), multi-tasking is a detrimental myth.) Accordingly, effective communication is not being achieved, regardless of the effort put into the training by those who created the CBT or the instructor.

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At this point, to create a decision that leads to compliant behavior or action, we have had to navigate multiple levels of abstraction. Each level has required choices, and those choices have reduced the full and complete “reality” of the thing. We don’t use the full text of an applicable statute; we abstract it and summarize. We don’t publish the full summary; we piece it into parts and create documents that explain it and apply it to organizational functions and activities. That step involves many choices. Finally, we train individuals; but we don’t train them in the entire command media document(s); we pick and choose the parts we think are important for the individuals to know.

It’s conventional wisdom that when you have communicated expectations to employees and trained them in those expectations, you are now positioned to enforce discipline. You may in fairness reward compliant behavior and penalize noncompliant behavior. But in order to get here you have had to make so many abstractions, so many choices, so many compromises! Can you truly be said to have effectively communicated both the parameter and the consequences?

I’m not sure you have. But the conundrum is that communicating the actual thing--the compliance driver--is literally impossible. The map is not the territory. If you made a map that was 100 percent in fidelity with the territory, then you would be recreating the territory. You would have a map that had a 1:1 scale: one mile would equal one mile. It would be accurate; but it would also be unusable. If you drafted a policy or procedure that was 100 percent the law or regulation or rule itself, then you would be simply recreating the statute or regulation or rule, instead of creating a useful aid for individual decision-making.

Some thoughts for you to consider as you create your compliance plans.