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Sent via electronic mail

[Registered Entity Name]

NERC ID: NCRXXXXX

Internal Compliance Program Questionnaire



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INTERNAL COMPLIANCE PROGRAM QUESTIONNAIRE

This questionnaire is applicable to internal compliance programs related to Reliability Standards approved by the applicable regulatory authorities. Reliability Standards are developed by the North American Electric Reliability Corporation (NERC). **Please provide a response for each question below.**

Registered Entity Information

Entity Information	
Entity Name	
NERC Registry ID	
Primary Compliance Contact Information	
Name	
Title	
Office Phone	
Cell Phone	
Email Address	
Alternate Compliance Contact Information	
Name	
Title	
Office Phone	
Cell Phone	
Email Address	



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Compliance Program Information

1. Does your organization have a formalized (i.e. written) internal compliance program with regard to Reliability Standards?

☐

Yes

☐

No

If yes, please explain the scope of the internal compliance program which addresses the NERC Reliability Standards.

Add Response Here

2. Please state the extent to which the internal compliance program is distributed within your organization (please include information on training, workshops, newsletters, mailings, and other relevant information which demonstrate effective communications and/or measurements of compliance). For example, does your internal compliance program include a “whistle blowing” procedure?

Add Response Here

3. Please identify the person(s) and title(s) of who is responsible for compliance with Reliability Standards (e.g. Compliance Manager, Corporate Compliance Officer or other position).

Compliance Contact Name:	
Compliance Contact Title:	

4. Please provide an organization chart which includes supervision levels (i.e. “chain of command”) and responsibilities, and provide a detailed explanation of the supervision and decision-making structure related to internal compliance program.

Add Response Here

5. Please explain the relative independence of the compliance responsibilities within the organization from operations. For example, do those with compliance responsibilities have direct access to senior-level executives (e.g. including the Chief Executive Officer, President) and/or Board of Directors? Please provide sufficient details in your response.

Add Response Here



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- 6. Please state whether the internal compliance program is operated and managed in a manner that is independent from departments responsible for performance to the Reliability Standards. Please explain your response.**

Add Response Here

- 7. Please state the resources (in terms of full time equivalents, positions, or budgets), dedicated to the internal compliance program. Are there unfilled positions related to the internal compliance program or, in your opinion, are there sufficient resources dedicated to the internal compliance program? Please explain.**

Add Response Here

- 8. Please explain senior management's role in the internal compliance program. Is there active, regular participation? Is there senior executive sponsorship of the internal compliance program? Please explain.**

Add Response Here

- 9. Please explain the review frequency of your internal compliance program. Who initiates the review of the internal compliance program? Please explain.**

Add Response Here

- 10. How does your internal compliance program ensure that employees understand the appropriate Reliability Standards that apply to their jobs? Please explain.**

Add Response Here

- 11. Please explain the frequency of self-audits and self-assessments within your internal compliance program. Who performs self-audits and self-assessments related to the internal compliance program?**

Add Response Here

- 12. Please provide details on corrective action plans when a potential violation of a Reliability Standard(s) is discovered, including disciplinary procedures for applicable employees.**

Add Response Here

- 13. Please explain the controls in place to prevent the re-occurrence of the violation in your internal compliance program.**

Add Response Here



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14. Please provide any additional information which may demonstrate the effectiveness of your internal compliance program which was not addressed in this questionnaire.

Add Response Here

Personal Information

I have completed this questionnaire and to the best of my knowledge, the responses to this questionnaire are true and correct.

Questionnaire was completed by:	
Title:	
Date:	
Signature:	

I have reviewed the questionnaire responses, and to the best of my knowledge, the responses to this questionnaire are true and correct.

Authorized Company Officer:	
Title:	
Date:	
Signature:	

Please complete this questionnaire, please upload it via the MRO Enhanced File Transfer FTP2 site based on the timeframe outlined in the request e-mail.

Thank you for taking the time to fill out this questionnaire.

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