

CEP Magazine – May 2018 We're supposed to "monitor"? What does that mean?

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As part of another recent project, the question came up, "What does it mean to do monitoring in a compliance program?" Under the Sentencing Guidelines, we are supposed to engage in "monitoring and auditing to detect criminal conduct." So starting with basic logic, if it says "monitoring and auditing," then they must mean something different.

If you research what "auditing" means, you will find plenty. But "monitoring"? Not so much.

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