

CEP Magazine – March 2018

Evaluating your program: A misunderstood key to compliance program success

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In 2004, the U.S. Sentencing Commission amended the compliance program standards to make one of its most important improvements: It required companies to “evaluate periodically the effectiveness” of their programs. Other standard setters have followed. Sadly, I still see commentators mistakenly confusing this with auditing and monitoring or ignoring it completely. But evaluation is the key to having a program that works.

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