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# The importance of monitoring compliance and ethics programs

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By Jeffrey M. Kaplan, JD

The connections and relationships between relevant compliance and ethics (C&E) “checking” categories can be confusing.

1. Auditing can overlap with both program assessment and risk assessment.
2. There can also be an “underlap” between the three functions.
3. The line between auditing and investigations is not always well-marked. Often what starts as the former can morph into the latter.
4. Monitoring can overlap with C&E program governance and management.
5. Metrics are generally part of monitoring but are sometimes discussed separately.
6. Encouraging reports of suspected violations can be seen as a form of monitoring—but is generally treated as a different animal altogether.
7. Metrics are generally part of monitoring but are sometimes treated separately.
8. Other types of internal controls (e.g., pre-approvals) can also be viewed as a form of monitoring—but typically serve different functions.

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