



From Detecting to Preventing:

An Interactive Workshop on the Full Monitoring Lifecycle

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Introductions



Jon Wilkenfeld
President
Potomac River Partners

PRESENTER



Adam Oakley
Director
Potomac River Partners

PRESENTER



Rachel Bunting
Director
Potomac River Partners

FACILITATOR



John McCrossan
Manager
Potomac River Partners

FACILITATOR

Why Conduct Auditing & Monitoring?



Identify Gaps

Accountability

Improvement

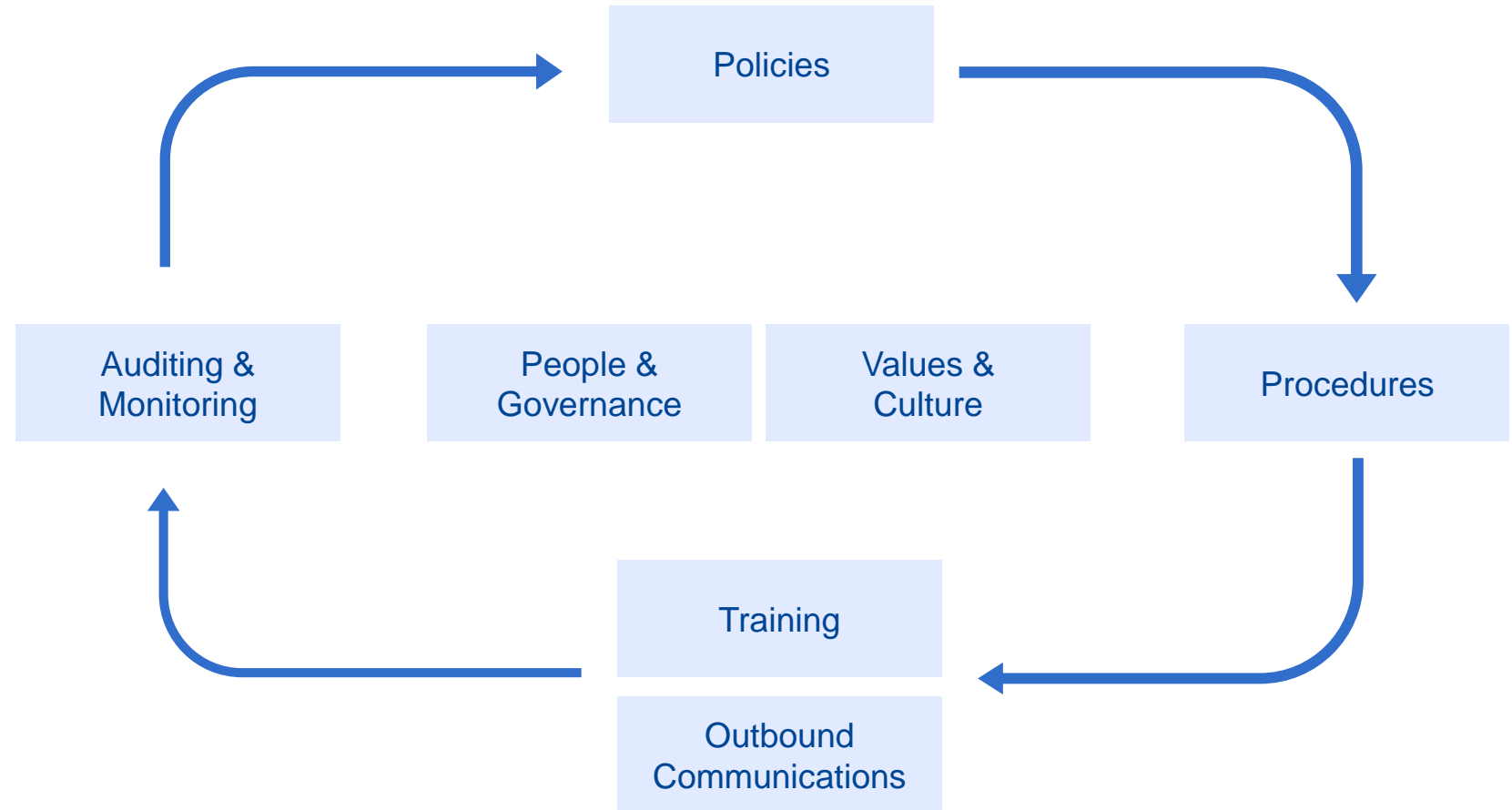
A woman with long dark hair tied back, wearing a red and blue plaid shirt and jeans, is working in a field of green plants. She is leaning forward, looking down at the plants. The background is a blurred landscape with trees and a body of water under a cloudy sky.

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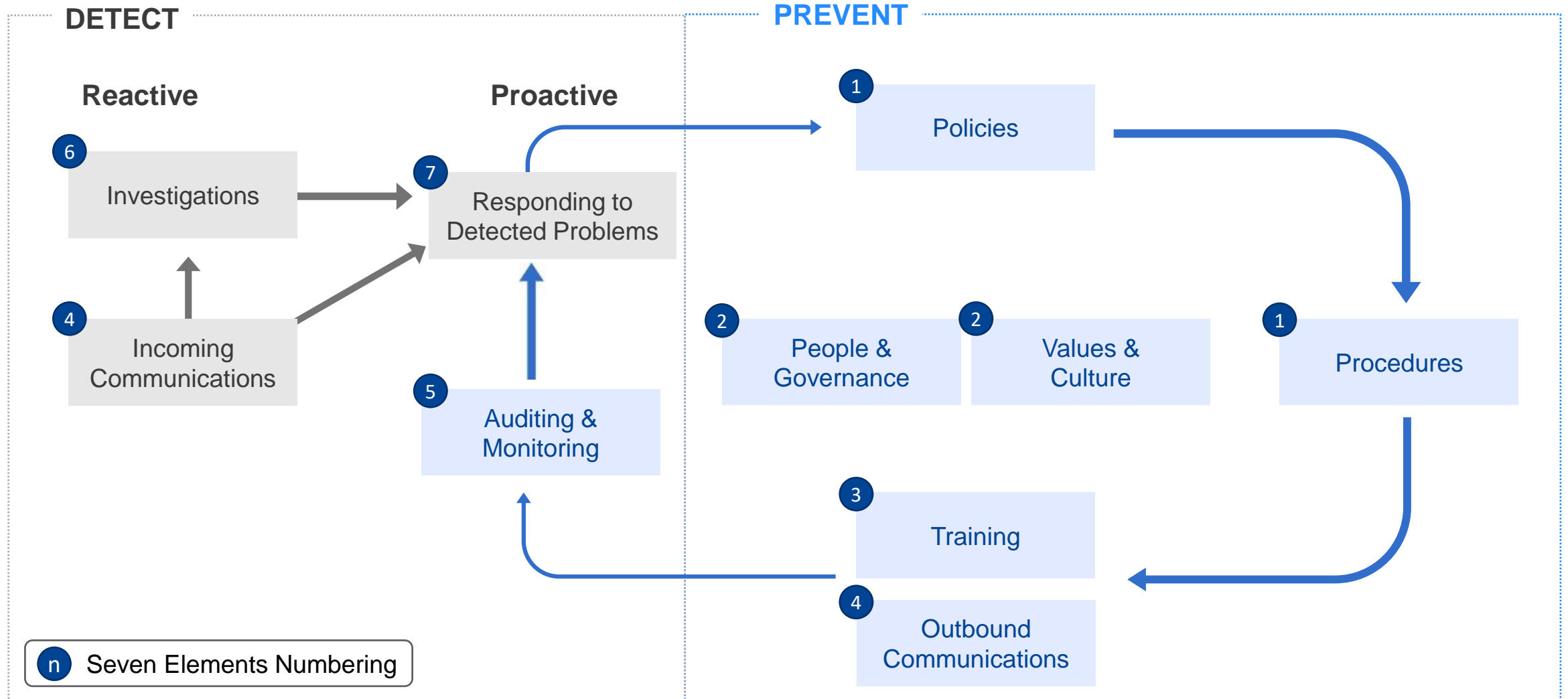
We want to see evidence that the compliance program is **working in practice**. We look at whether the company is **continuously testing** the effectiveness of its compliance program, and **improving and updating the program** to ensure that it is sustainable.

Assistant Attorney General Ken Polite

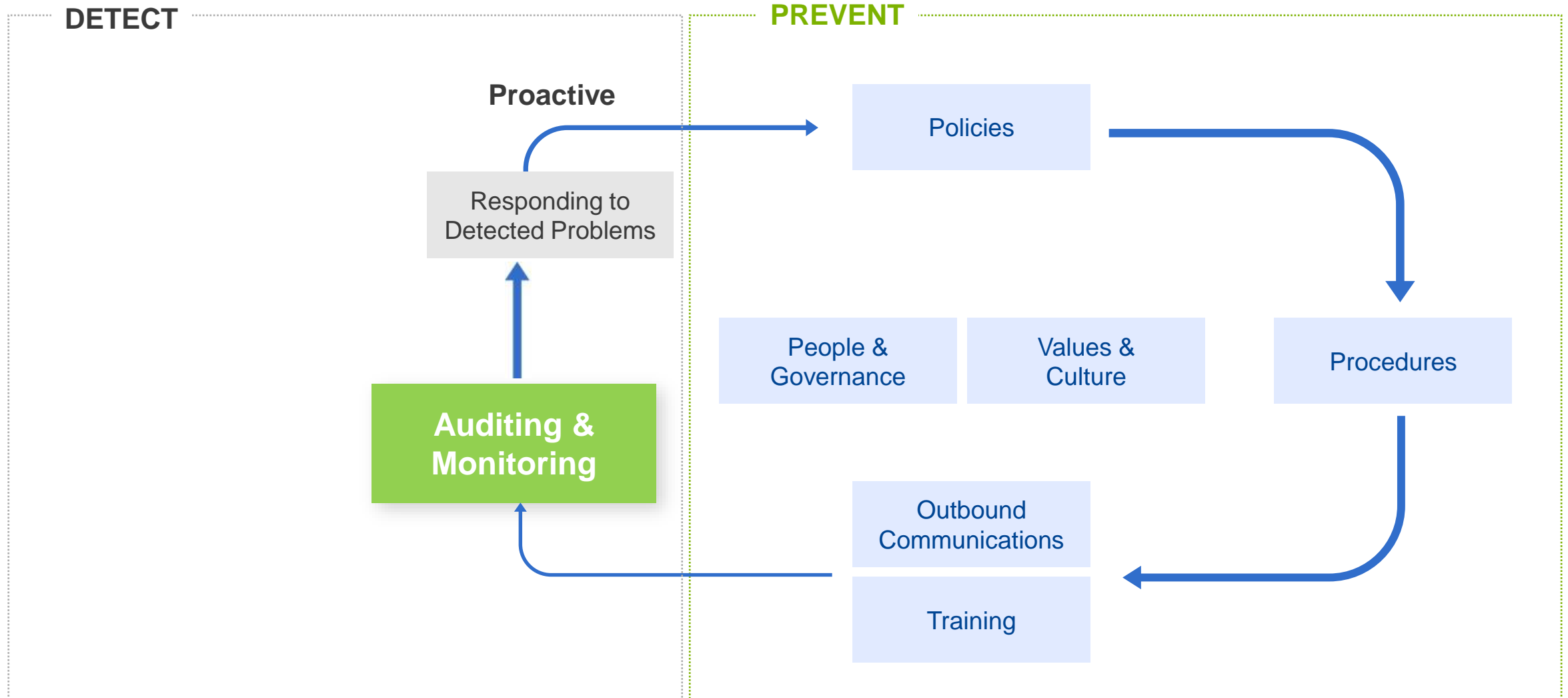
Compliance Lifecycle



Compliance Lifecycle



Compliance Lifecycle



Approach to Monitoring



Approach to Monitoring



Developing Monitoring Plan

Factors to Consider

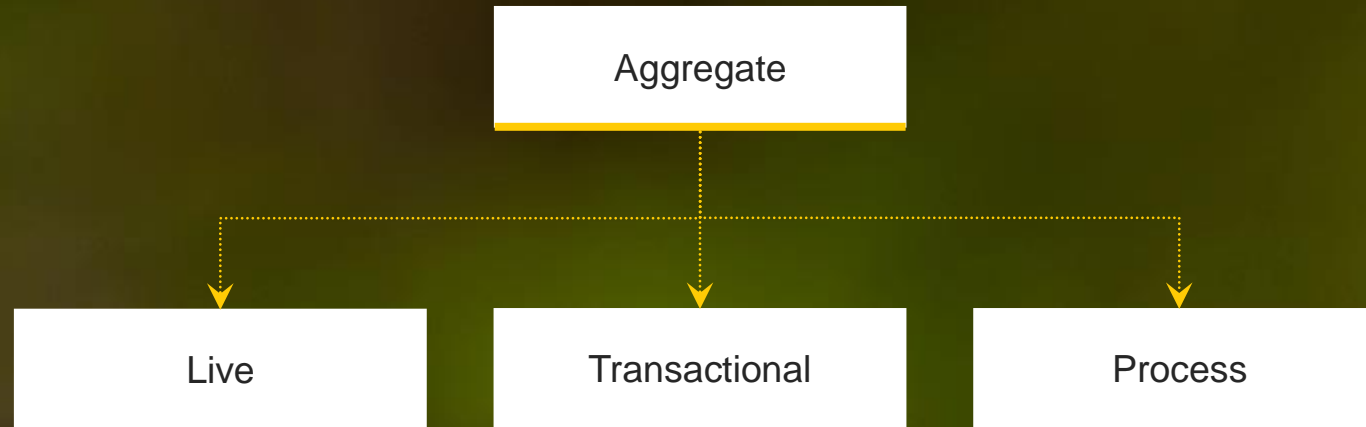
Risk Assessment / Control Effectiveness

Quantity of the Activity

Resource Availability

Developing Monitoring Plan

Types of Monitoring



Conduct Monitoring

Key Considerations

Appropriately resource monitoring

- Different by monitoring type
- Qualifications, skills, & training

Good observations lead to good findings

- Appropriate tools & resources

Review, Prioritize, & Communicate Results

Observations vs. Findings

- Observations: Results identified by monitor
- Findings: Confirmed violations of policy or law

Mechanisms for Prioritization

- Violation of law vs. policy
- Presumed intent
- Individual/unique issues vs. systemic issue

Identify appropriate audience



Implement CAPA

**Corrective and
Preventative Action
(CAPA)**

- **Corrective Action (PA)**
Fix the identified problem
- **Preventative Action (PA)**
Develop recommendations to
fix root cause

Implement CAPA

Root Cause Analysis

Why?

Identify
weaknesses in
controls

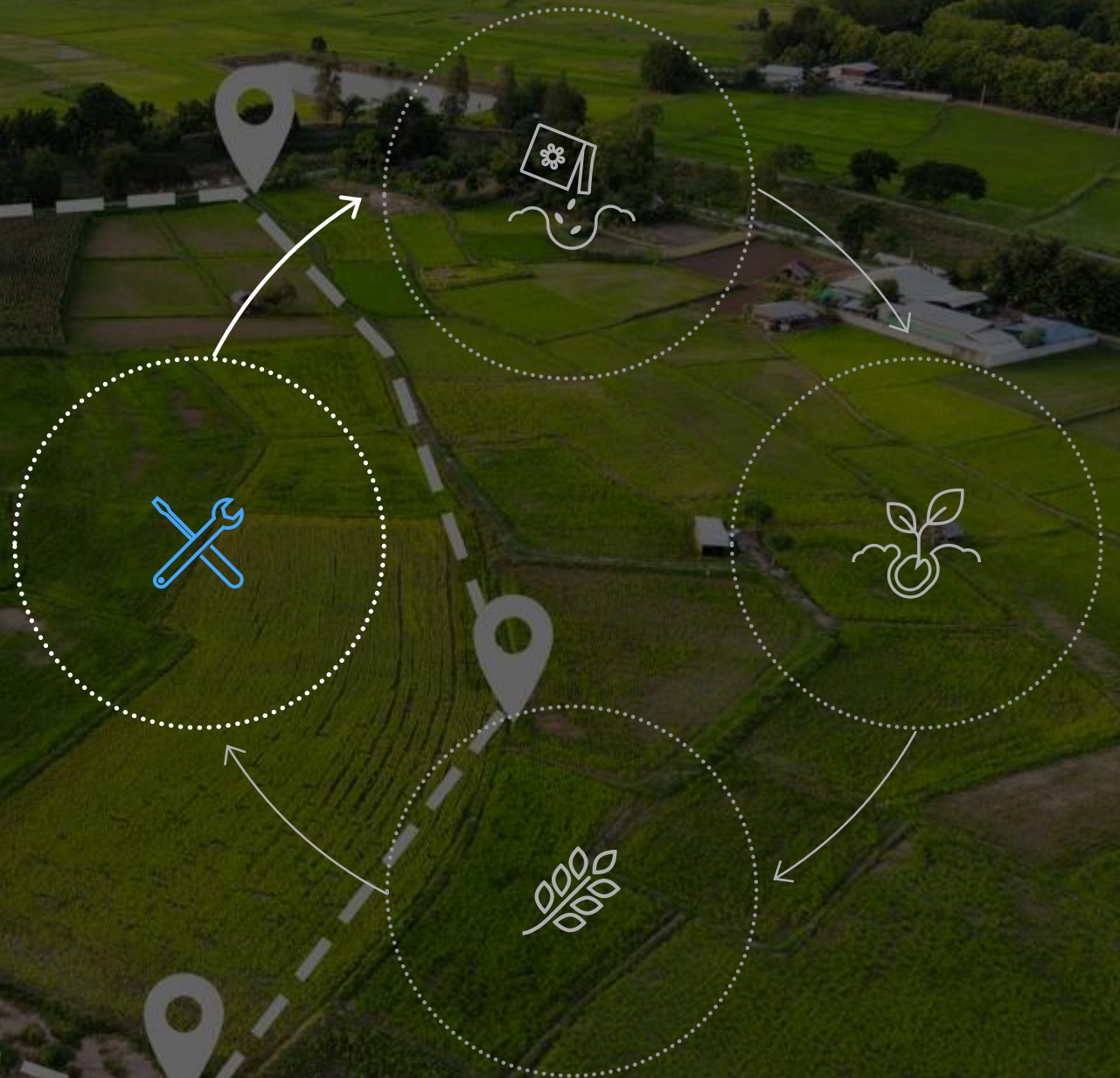
How?

Hypothesize,
then confirm
underlying cause

Implement CAPA

Return to the beginning of the cycle

Create, Edit, Update, Re-train, Remind, Fix
Plan future Auditing & Monitoring





For more information, contact us at:
ContactUs@potomacriverpartners.com

or Jon Wilkenfeld, President, at:
jwilkenfeld@potomacriverpartners.com
(703) 430-5944