

Ongoing Monitoring vs. Ongoing Auditing

Key Points

- The terms “monitoring” and “auditing” are not interchangeable
- The terms relate to different governing parties and types of results produced
- Ongoing Monitoring is a process review that primarily results in outputs
- Ongoing Auditing, when focusing on validation, leads to outcome results
- Effectiveness is not measured in outputs but relates to value created or outcome

Compliance guidance documents from the Department of Health and Human Services Office of Inspector General call for ongoing monitoring and auditing of programs and operations, including Compliance Departments. However, there is little information provided to differentiate between these two ongoing efforts. It is clear from national surveys that many providers don’t fully understand the differences between the terms.

Ongoing Monitoring is the responsibility of the program manager, not the Compliance Officer. It includes keeping current with changes in rules, regulations, and applicable laws; developing internal controls, policies, and procedures to comply with them; training staff on these rules; and taking active steps in monitoring or verifying compliance with these new guidelines. Monitoring techniques may include sampling protocols that permit program managers to identify and review variations from an established baseline. Results from this process are often measured numerically as outputs.

Ongoing Auditing, by definition, must be performed by parties independent of the areas being reviewed. One primary objective is reviewing the Ongoing Monitoring by program managers to verify they are meeting their monitoring obligations, validate they are functioning as they were intended, and identify weaknesses in the program that need to be addressed. This validation of the results of Ongoing Monitoring moves from measuring output to outcome.

To learn more about ongoing monitoring and auditing to evidence compliance program effectiveness, registration is open now for a complimentary SAI Global Webinar on “Evidencing Compliance Program Effectiveness,” on August 16, 2022, at 2 PM, Eastern.

For more information on this or other compliance-related concerns, contact Richard Kusserow at rkusserow@strategicm.com.

Keep up to date with Strategic Management Services by following us on [LinkedIn](#).