

Infographic

Building Your Internal Case for Compliance Analytics: Insights from the Latest Amendments to DOJ's ECCP

Introduction

The latest updates to the DOJ's Evaluation of Corporate Compliance Programs (ECCP) take a more direct approach, emphasizing the need for companies to adopt real-time compliance analytics. These amendments introduce new questions and expectations to assess a company's compliance programs, focusing on data access, technology, and proactive risk management.

Key Amendments

● **New Section Calls for Proactive Identification of Misconduct or Issues "At The Earliest Stage Possible":**

"To what extent does the company have access to data and information to identify potential misconduct or deficiencies in its compliance program? Can the company demonstrate that it is proactively identifying either misconduct or issues with its compliance program at the earliest stage possible?"

● **New Expectations Around Data Analytics Tools & Machine Learning:**

"Is the company appropriately leveraging data analytics tools to create efficiencies in compliance operations and measure the effectiveness of components of compliance programs? How is the company managing the quality of its data sources? How is the company measuring the accuracy, precision, or recall of any data analytics models it is using?"

● **New Section Asks Whether Compliance Has the Same Level of Technology as Commercial Functions:**

"How do the assets, resources, and technology available to compliance and risk management compare to those available elsewhere in the company? Is there an imbalance between the technology and resources used by the company to identify and capture market opportunities and the technology and resources used to detect and mitigate risks?"



Meeting DOJ Expectations with Advanced Compliance Analytics

By leveraging advanced data analytics, companies can meet the new DOJ expectations by ensuring real-time insights, continuous vendor risk management, and proactive compliance measures. This shift towards data-driven decision making in compliance is critical for meeting the latest DOJ expectations.

● **New Factor for Whether a Program “Works in Practice” Speaks to Data Informing Effectiveness Analysis:**

“Prosecutors should also assess how the company has leveraged its data to gain insights into the effectiveness of its compliance program ...”

● **New Expectation for the Use of Data in Ongoing Vendor Risk Management:**

“How is the company leveraging available data to evaluate vendor risk during the course of the relationship with the vendor?”

● **New Question Asks Whether Risk Is Managed Proactively:**

“Is the company’s approach to risk management proactive or reactive?”

● **New Expectations Around AI, Including the Use of AI in Compliance:**

“What is the company’s approach to governance regarding the use of new technologies such as AI in its commercial business and in its compliance program? ... If the company is using new technologies such as AI in its commercial operations or compliance program, is the company monitoring and testing the technologies so that it can evaluate whether they are functioning as intended and consistent with the company’s code of conduct? ...”

About Case IQ

Case IQ offers an end-to-end compliance and case management solution that consolidates compliance monitoring, whistleblower solutions, third-party risk oversight, investigative case management and compliance approval and disclosures workflows. Lextegrity was acquired by Case IQ in 2025 and is now offered as an end-to-end suite of compliance tools.

Case IQ’s software has been before enforcement agencies globally in 12 separate company engagements and was even cited by the SEC as a remediation factor in a client’s FCPA resolution. It has been chosen by several companies after the appointment of compliance monitors or after the start of an investigation and has been a factor in resolving those matters, including helping to secure a DOJ declination.

Learn how Case IQ can help you achieve end-to-end compliance with confidence.

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