

COMPLIANCE SURVEY FACT SHEET

Background:

Development of the Ethics-Compliance Survey began in 1986, with the validated instrument first administered in 1988. Our goal from the outset was to allow organizations to assess their own compliance environments and generally, to identify best compliance practices. It took two years (1986 – 1988) to validate the survey and establish the database. Since that time, the survey has undergone continuous refinement. The most recent refinement is introduction of a scale focusing on employee commitment to maintaining the privacy of protected information. Survey results have been published by the U.S. Sentencing Commission, the Bureau of National Affairs (various publications), and the Federal Ethics Report, among others.

Survey Capabilities:

Survey administration allows you (at your option) to compare your organization to all healthcare organizations in the database and to all providers or plans in the database. You can also compare locations and functions within the organization and assess differences among employees by level of responsibility and experience. The survey also allows you to track a number of other factors (responsiveness to HR, awareness of the code of conduct, attitude toward the “hotline”, etc.) of potential interest. We work with you to specify topics of interest.

Specifically, in all administrations the survey allows assessment of the:

- responsiveness of employees to written policies and procedures, including those with which they disagree
- responsiveness of employees to values and ethical principles in circumstances in which written policies and procedures may not resolve an issue
- whether employees understand and accept the code of conduct
- the level of risk (by location, employee tenure, function) that employees will use external reporting mechanisms such as *qui tams*
- confidence of employees in the commitment to ethics and compliance by
 - their immediate supervisors
 - higher level managers and leadership
 - the organization as a whole
- level of fear of retaliation for reporting legitimate concerns
- perception that ethical and legal conduct is appropriately recognized and rewarded
- employee commitment to protecting private health information
- employee belief that there is a common standard of conduct for all members of the organization
- the adequacy of policies including policies in specialized, compliance sensitive areas.

Survey Applications:

A common use of the survey is to establish a **baseline assessment** of the organization's compliance environment. Many organizations also use the survey on a "**test-retest**" basis to assess the progress of the compliance program. Survey results help focus compliance program resources where needs and risks are greatest. If there have been changes in the compliance program, such as training updates or new policies, the survey allows you to determine the impact of these changes.

The survey is normally administered via a paper form which takes less than 12 minutes to complete. The survey is also administered in an **on line format** at no additional charge. We encourage distribution to all employees. Employees enjoy participating in the survey and respond in unusually high numbers.

We tailor the survey to each organization. In addition to validated scales, "back page" items allow you to explore key issues in depth. A comment page helps identify employee input absent from other reporting channels. We assess all back and comment pages and organize them by function/location, topic and acuity of concern.

Outcomes:

The product of the survey is a written report consisting of an executive summary, detailed survey findings, and recommendations. We can also provide an additional in-person presentation of results to executive management and/or compliance program staff. This creates an opportunity to discuss interpretation of the results and informal conclusions.

Additional Information:

For further information about the survey, sample survey items, and sample survey reports, write or call:

Mark Pastin, PhD, President
Council of Ethical Organizations /Compliance Resource Group, Inc.
214 South Payne Street
Alexandria, VA 22314
Tel: 703-683-7916 • E-mail: councile@aol.com • Fax: 703-299-8836