

# Conducting an Internal Compliance Program Survey



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## Disclaimer



- The opinions expressed in this presentation and on the following slides are solely those of the presenter and not those of any entity.

**Meet the Speaker**



- Ahmed Salim serves as the Regional Compliance Officer for Presence Health in Chicago, IL. Prior to joining Presence Health, Ahmed served as a Compliance Officer for Sutter Health in Northern California.
- Ahmed earned his Juris Doctor degree from Western Michigan Cooley Law School.

**Meet the Speaker**



- Sumeera Arshad is a Compliance and Quality Assurance Analyst at Solano County Health and Human Services. Previously Sumeera worked at Molina Healthcare in Compliance.
- Sumeera has a master's degree in Healthcare Administration from California State University Long Beach.

## Objectives



- Importance of conducting a comprehensive and effective compliance survey
- Implementing the survey within the organization and analyzing the results
- Using the findings from the survey to drive process and outcome improvements

## Why Conduct a Survey



- What information are you trying to gain?
  - Federal Sentencing Guidelines' seven elements to an effective compliance program
- What are your goals of conducting a survey?
  - Trying to improve your program
    - ✦ Not every Compliance Program (CP) is the same
    - ✦ Each CP will require different questions
    - ✦ Preventing violations (False Claims, Stark, etc.)
  - Understanding areas of weakness within your program
    - ✦ What do you want to do make sure staff is knowledgeable on?
    - ✦ Target areas of concern within your program
- Must keep the purpose of your survey in mind throughout the entire survey process.

## Deciding to Conduct a Survey



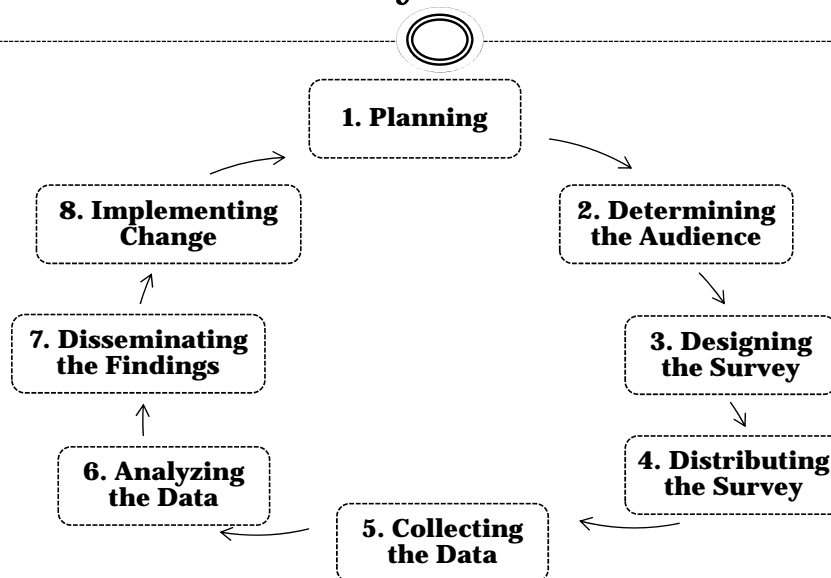
- **Understand the time commitment required for conducting a successful survey**
  1. **Planning survey**
  2. **Preparing survey content**
  3. **Gathering data**
  4. **Analyzing data**
  5. **Distributing information**

## Deciding to Conduct a Survey



- **Is conducting a survey feasible and/or necessary?**
  - It may not need to be done if the information can be found elsewhere
- **What resources does your CP have? Your CP may not be able to properly conduct a survey if it doesn't have the necessary resources.**
  - Time
  - Staff
  - Money
    - ✦ Can you afford to make the survey mandatory?

## Survey Process



## Planning

- A very critical step!
- Successful surveys require a lot of planning and preparation at the beginning
- Laying a stable foundation for your survey will help you in the long run
  - You don't want to find out mid-survey process that you forgot something or weren't clear with your questions because it will be too late at that point
  - Know what type of survey you want to create ( Exit Survey, Risk Assessment, etc.)

## Beginning Stages of Planning

- **What is the primary purpose of your survey?**
  - Have a specific focus and cater all questions to that
    - ✦ All questions that you ask should go back to your main objectives
  - Not every Compliance Program (CP) is the same, so each CP will require different objectives and related questions
  
- **Avoid adding in unrelated but “interesting” questions**
  - Takes away focus from your main objective



## Beginning Stages of Planning

- **Common reasons to conduct a compliance survey:**
  - Evaluate your current compliance program
  - Identify weaknesses and deficits
  - Measure effectiveness of specific processes & practices

## Beginning Stages of Planning

- **Support from Senior Leadership**
  - Having the backing of your CEO, CAO, etc. from the beginning is very important as you progress through the survey process
  - Important to have leadership buy-in
  
- **Support from Management**
  - Management should understand the goals and objectives of the survey so they can inform their staff and disseminate that information

## What Type of Survey Fits Your Needs?



- You will need to decide on what method you want to use to collect your data:
  - Mail
  - Internet
  - Telephone
  - In person
  - Mixed-mode
  
- Each organization must decide what method will best suit their organization, depending on cost and time.
  
- Evaluate pros and cons to each method

## Mail Surveys



- Ability to locate respondents: HIGH
- Response rates: LOW-MEDIUM
- Question complexity: LOW
- Number of questions asked: LOW
- How quickly data can be analyzed: LOW
- Time required for preparation: LOW
- Time required for collection: HIGH
- Costs per survey: LOW

## Internet Surveys

- Ability to locate respondents: LOW
- Response rates: LOW-MEDIUM
- Question complexity: MEDIUM
- Number of questions asked: LOW-MEDIUM
- How quickly data can be analyzed: HIGH
- Time required for preparation: MEDIUM
- Time required for collection: LOW
- Costs per survey: LOW





## Telephone Surveys

- Ability to locate respondents: **LOW**
- Response rates: **MEDIUM**
- Question complexity: **MEDIUM**
- Number of questions asked: **MEDIUM**
- How quickly data can be analyzed: **MEDIUM-HIGH**
- Time required for preparation: **HIGH**
- Time required for collection: **MEDIUM**
- Costs per survey: **MEDIUM-HIGH**



## In-person Surveys

- Ability to locate respondents: **HIGH**
- Response rates: **HIGH**
- Question complexity: **HIGH**
- Number of questions asked: **HIGH**
- How quickly data can be analyzed: **LOW**
- Time required for preparation: **HIGH**
- Time required for collection: **HIGH**
- Costs per survey: **HIGH**



## Mixed-Mode Surveys



### PROS

- Ability to offer several different ways for an individual to complete a survey
- Depends on staff preference
- Depends on staff resources
  - Not everyone may have a computer

### CONS

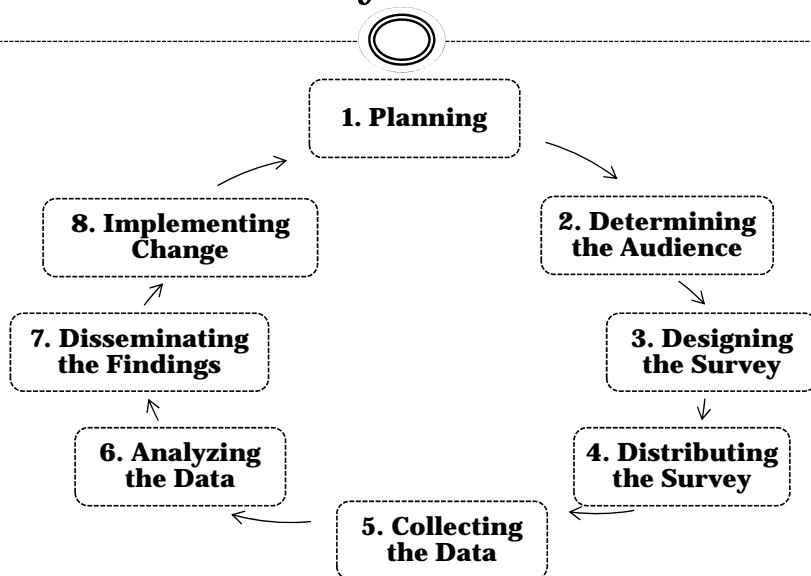
- Can cost more money
- Must be careful in collecting data not to influence results

## Who Will Conduct the Survey



- **Compliance Program**
  - May save the CP money
  - Things to think about:
    - ✦ Does your staff have the expertise to design a survey?
    - ✦ Can staff properly analyze data collected?
      - This will depend on what you are trying to get out of it → main objective
- **Contract/Outside Party**
  - May be more expensive
  - May cause reluctance on part of the employees
  - Things to think about:
    - ✦ Do they have healthcare perspective?
    - ✦ Will they create a survey and analyze the data?
    - ✦ What will the timeline be like?

## Survey Process



## Determining Your Audience

- You will need to identify who will fill out your survey
  - Physicians/Physician Assistants
  - Clinical Staff
  - Administration
  - Students
  - Volunteers
  - Anyone in your organization that may come in contact with the compliance issue you are trying to evaluate
- This may be different for every survey – it will depend on the focus of your survey and main objective

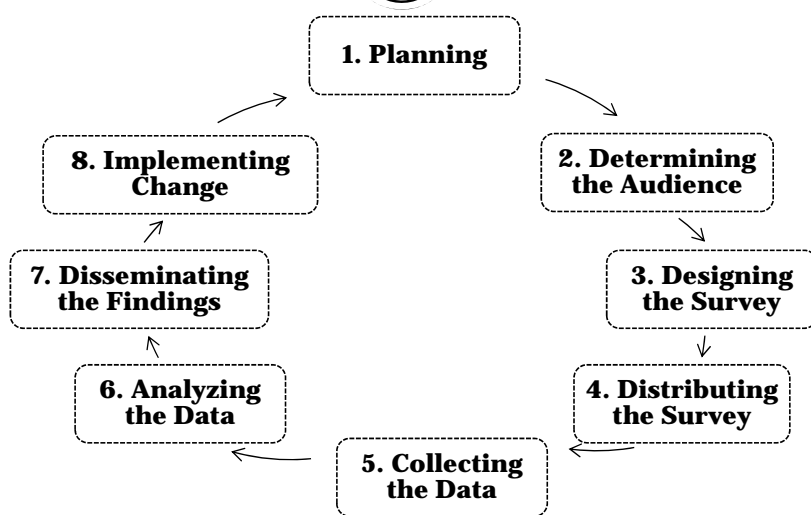
## Determining Your Audience

- **Remember:**

- Survey questions should be catered to these individuals
- Know your audience and design your survey with them in mind



## Survey Process



## Designing the Survey



- **Determining the sample size**
  - Do you want to survey every single person?
    - ✦ Expensive
    - ✦ Time consuming
    - ✦ May be able to get to the same result by sampling a portion of your entire group you're interested in
  - Sample size will depend on different types of individuals being surveyed
    - ✦ Want to ensure that you have representation from each group you have determined to be your audience

## Designing the Survey



- **Goal of survey is to have a high response rate and useful data to analyze**
- **This can be accomplished by:**
  - Audience engagement
  - Good questions
  - Follow-up
  - Visibility

## Designing the Survey



- **Getting “your foot in the door”**
  - Survey should have an introduction
    - ✦ Important for staff to understand the purpose of the survey and the benefits of answering to the CP and organization
    - ✦ Strong introduction will increase participation
    - ✦ Management should be able to articulate your introduction to their staff
  - Introduction will help *engage* staff and also *orient* them to what it is you are trying to accomplish

## Designing the Survey



- **Design questions with target respondents in mind**
  - How much does the audience know about compliance?
- **Use clear and simple language**
  - Be careful not to use specialized lingo that might not be understood by everyone
    - ✦ Survey may reach many different departments with different educational and knowledge levels
- **Do not make questions complex or hard to follow**
  - It is better to have two short questions than one longer question that could be misinterpreted
- **Ensure everybody can answer every question**
  - Including “I don’t know”, “No opinion”, “N/A” or open text fields as answer options when appropriate

## Designing the Survey



- **When first developing questions, ask yourself what it is you're looking to answer**
  - This ties back in with your main objectives that you outlined
  
- **Determine how many questions are needed for your survey**
  - Too many questions will hurt the response rate

## Designing the Survey



- **Questions can be formatted in any of the following ways:**
  - Agree/Disagree
    - ✦ Can also be scaled (1-5 or strongly agree, agree, etc)
  - True/False
  - Yes/No
  - Multiple choice
  - Open response (hardest to analyze)
  - Anything that solicits a clear and appropriate response

## Designing the Survey



- **Sample T/F, Agree/Disagree, Y/N Questions:**
  - I am familiar with the organization's Compliance Program.
  - I am familiar with the organization's policies and procedures related to the Code of Ethics.
  - I know the organization has a Compliance Officer.

## Designing the Survey



- **Sample Multiple Choice Questions:**
  - Have you encountered a situation that may have led to misconduct?
  - Have you felt pressure to compromise ethics to get your job done?
  - If a compliance concern comes to my attention, I would feel comfortable reporting it to:



## Designing the Survey



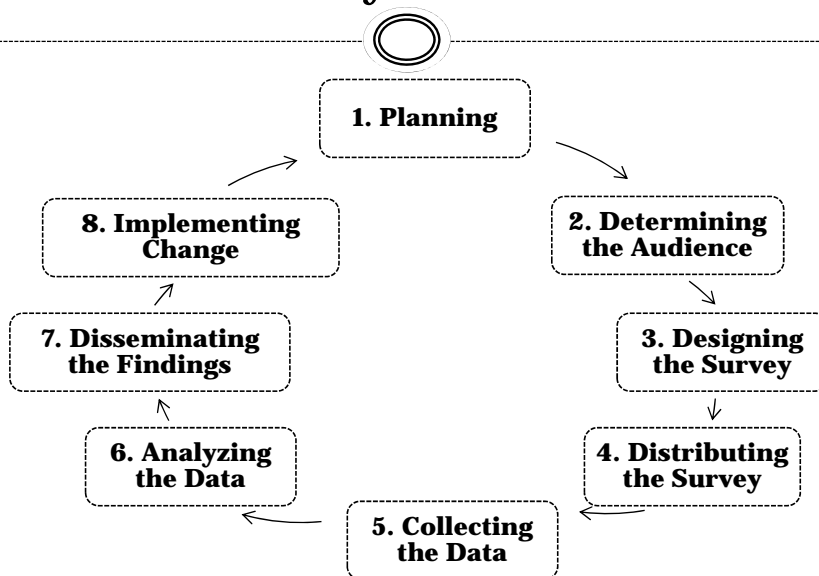
- **Because we are writing the questions, we will naturally understand them**
  
- **It is important to pre-test the questions to help check your survey before you distribute it**
  - Questions should be asked prior to actual survey going out
  - Will help ensure quality and clarity of questions
  - Gives you an opportunity to test your survey
  - Allows you to get feedback and use it to enhance your survey

## Designing the Survey



- **Don't forget to ask a few demographic questions**
  - Age range, job type, years of experience
  
- **These questions will help you see if there are trends in certain groups**
  - Ex: clinical vs. non-clinical, experienced staff vs. new staff

## Survey Process



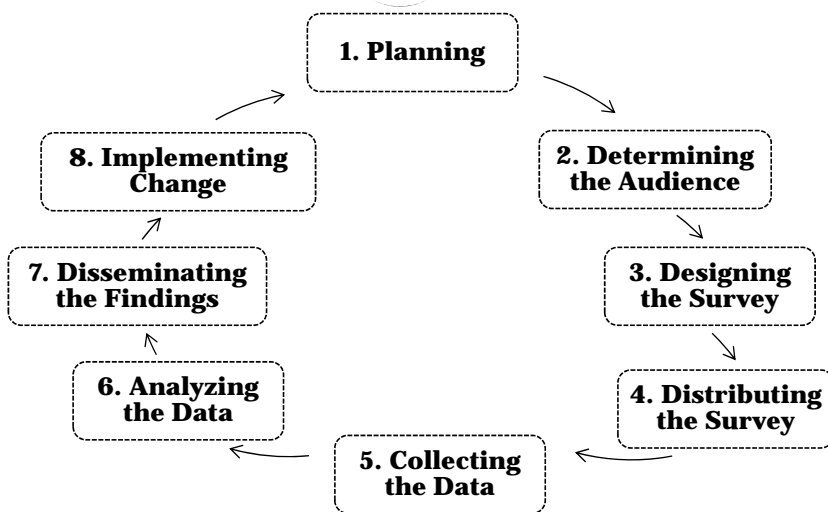
## Distributing the Survey

- **Timing of distribution is important!**
- **Conduct surveys when it is the most convenient for staff**
  - Low census
  - End of the year, so data can be used for the following year's Compliance Plan
- **Give enough warning to respondents so they know deadlines and can meet them**
- **Don't rush the survey process to fit into schedules**

## Distributing the Survey

- Allow plenty of time for surveys to be completed
- Provide education in-person to departments
  - Go to staff meetings and answer questions about the survey
  - Ensure staff feel comfortable taking the survey
  - Important to break the “fear” associated with Compliance
- Provide friendly reminders periodically to help boost the response rate
  - Don't want to send out too many reminders and overwhelm staff
- Provide the survey in multiple languages if necessary and able

## Survey Process



## Collecting the Data



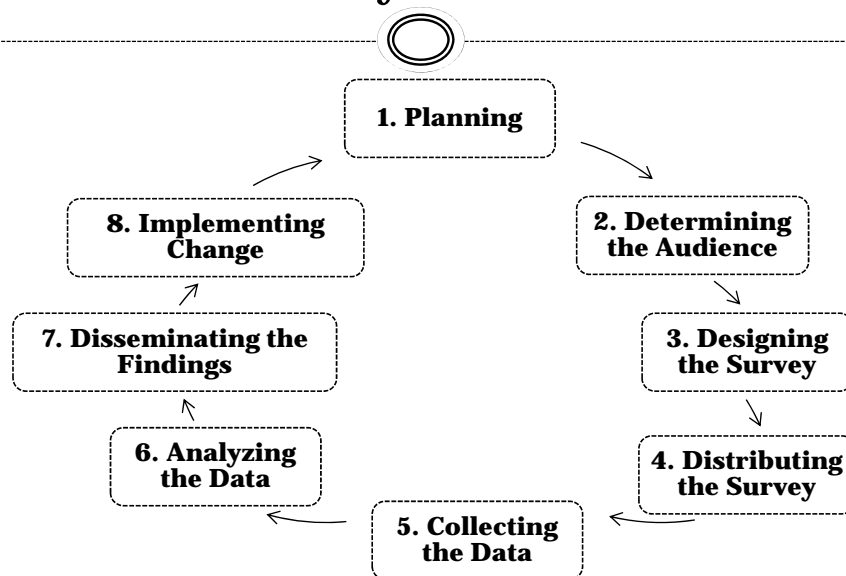
- **Response Rate:**
  - Getting staff to complete the survey should be a main goal
  - The lower the response rate, the less value the survey will have
  - A response rate of 70% or higher is considered high-quality
- **If having difficulty attaining a higher response rate, assess what may be serving as an obstacle**
  - Do staff have time to complete the survey?
    - ✦ Consider reducing the length/number of questions
  - Do staff have the means to complete it?
    - ✦ Consider providing other means, ex: paper vs internet

## Collecting the Data



- **Try to compile data in a timely manner so that you don't get backlogged**
- **If entering data by hand, ensure it is done accurately**
- **If using an electronic source, ensure you know how to export the data into a usable format ahead of when you will actually have to do it**

## Survey Process



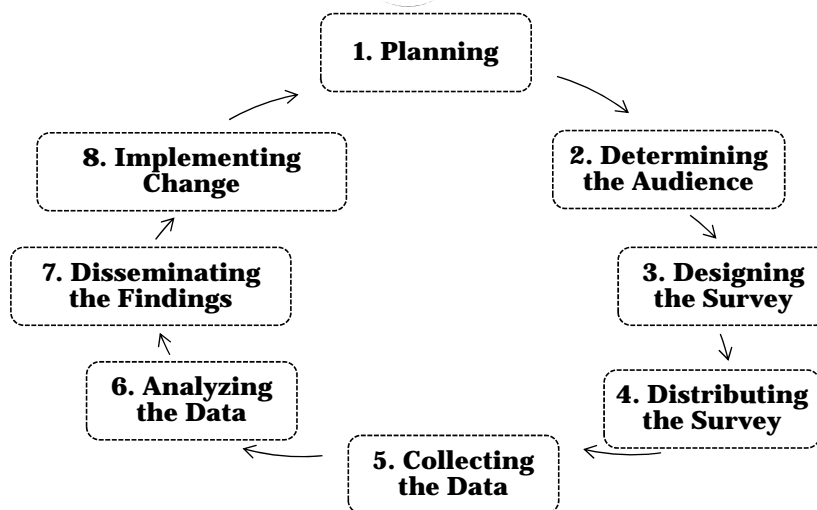
## Analyzing the Data

- How you analyze the data will depend on what your main objectives were and what questions you asked
  - If you use an internet-based platform, the analysis may be already done for you (one of the perks!)
  - If you conducted the survey on paper, how clear you were in your data collection process will make a big difference now
- Most data analysis for the purposes of a CP survey can be conducted using a calculator
  - If your main objectives required finding statistical significance, software catered towards statistical analysis may be required

## Analyzing the Data

- Depending on what your objectives were, you may want to view your data from different viewpoints
  - How many individuals responded Y or N to a specific question
    - ✦ Broken up by department
    - ✦ Broken up by clinical vs. non-clinical
    - ✦ Broken up by management vs. frontline staff
  - May shed light on problems on certain organizational levels

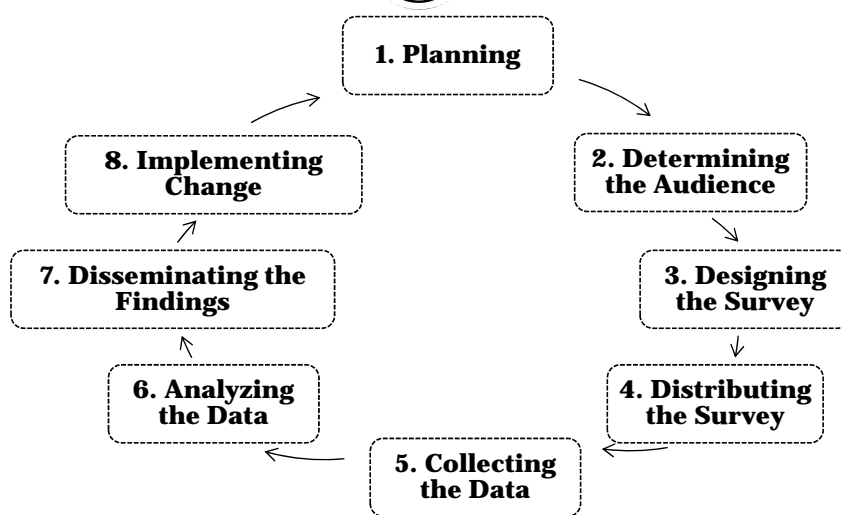
## Survey Process



## Disseminating the Findings

- After analysis is complete, it is important to share your findings
  - Show your stakeholders and supporters what you found
    - ✦ ie: organization leadership and management
  - Can be shared at Compliance Committee with committee members
  - Findings may bring to light other issues that will require more than the Compliance Department to solve and address
- Not all of the data is important to your audience – cater the data you are presenting to each group
- Present findings in an easy to understand format
  - Bar graphs, pie charts, etc.

## Survey Process



## Implementing Change



- Now that you have the data, what are you going to do with it?
  - Why did you administer the survey to begin with?
  - What was your main objective?
  
- Use collected data to help:
  - Identify strengths and weaknesses
  - Address gaps in your CP
  - Guide your CP goals and annual plan
  - Create a stronger culture of corporate compliance

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Q & A



# Questions?

- For a sample survey, please contact Ahmed Salim at:  
[Ahmed.Salim@complyguys.com](mailto:Ahmed.Salim@complyguys.com)