

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.

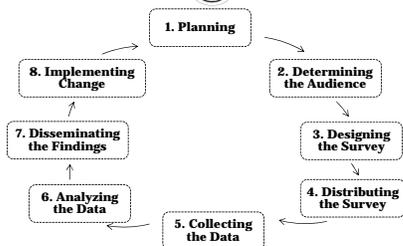
Deciding to Conduct a Survey

- 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

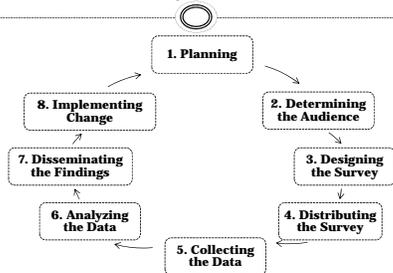
Compliance Program

- 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

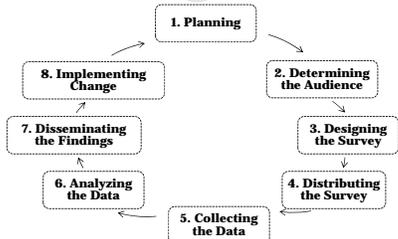
• It is important to pre-test the questions to help check your survey before you distribute it

- 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



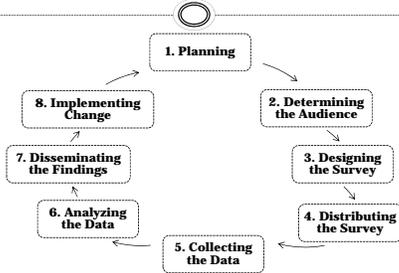
Distributing the Survey

- 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



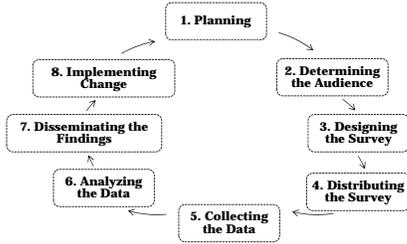
Collecting the Data

- 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



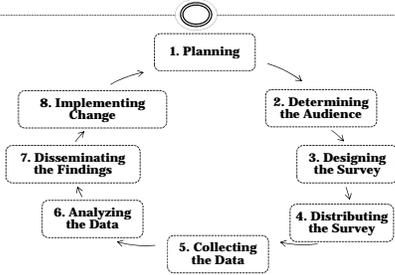
Analyzing the Data

- 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

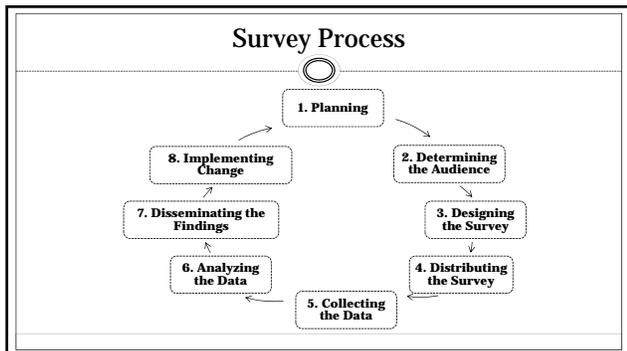
- Depending on what your objectives were, you may want to view your data from different viewpoints
 - How many individuals responded Y or N to a specific question
 - ✦ Broken up by department
 - ✦ Broken up by clinical vs. non-clinical
 - ✦ Broken up by management vs. frontline staff
 - May shed light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



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:
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