

Compliance Program Metric Ideas

1. Policy & Procedure

- a. Code of Conduct access - # of attestations of receipt vs number of employees
- b. # of policies due for renewal vs number reviewed/revise

2. Program Administration

- a. Culture Survey questions; Do you know who your compliance team is, how to reach them & what to report.
- b. Compliance Committee attendance rate

3. Screening of employees, vendors, 3rd party contractors

- a. Review COI process
- b. Audit results of screens - # checked for exclusion vs # doing business with
- c. Tracer process of exclusion checking process

4. Communication and Training

- a. High risk compliance training completion rates – Benchmark available
- b. Training post questions; What training helpful for the work you do? Was your instructor knowledgeable in the topic
- c. Volume of New Provider & New Leaders trained vs new those hires

5. Audit, Monitoring and Internal Reports

- a. Survey/track & trend do employees know how to report concerns.
- b. Track/trend volume of reports, anonymous, & substantiation – Benchmark available
- c. Track & trend days to resolve investigations
- d. Track & trend action plans implemented and completed

6. Discipline for non-compliance

- a. Track Compliance Committee review and measure of fairness and consistency of non-compliance sanctions

7. Investigations and Remediation

- a. Mock anonymous report on different issues to test process.