Conducting an Internal Compliance Program Survey

AHMED SALIM, JD, CHC, CHPC
REGIONAL COMPLIANCE OFFICER
PRESENCE HEALTH

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.

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?
  o Federal Sentencing Guidelines’ seven elements to an effective compliance program

- What are your goals of conducting a survey?
  o 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.)
  o 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

- Is conducting a survey feasible and/or necessary?
  o 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.
  o Time
  o Staff
  o Money
    - Can you afford to make the survey mandatory?
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

- 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

### 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

1. Planning
   - Choosing survey type
   - Who will conduct survey?
2. Determining the Audience
3. Designing the Survey
4. Distributing the Survey
5. Collecting the Data
6. Analyzing the Data
7. Disseminating the Findings
8. Implementing Change
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

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

1. Planning
   - Choosing survey type
   - Who will conduct survey?

2. Determining the Audience

3. Designing the Survey

4. Distributing the Survey

5. Collecting the Data

6. Analyzing the Data

7. Disseminating the Findings

8. Implementing Change

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:
    o Audience engagement
    o Good questions
    o Follow-up
    o Visibility

Designing the Survey

• Getting “your foot in the door”
  o 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
  o Introduction will help engage staff and also orient them to what it is you are trying to accomplish
Designing the Survey

- Designing good questions:
  - 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

- 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

1. Planning
   - Choosing survey type
   - Who will conduct survey?

2. Determining the Audience

3. Designing the Survey

4. 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

5. Collecting the Data

6. Analyzing the Data

7. Disseminating the Findings

8. Implementing Change
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

1. Planning
   - Choosing survey type
   - Who will conduct survey?
2. Determining the Audience
3. Designing the Survey
4. Distributing the Survey
5. Collecting the Data
6. Analyzing the Data
7. Disseminating the Findings
8. Implementing Change
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

- 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

1. Planning
   • Choosing survey type
   • Who will conduct survey?

2. Determining the Audience

3. Designing the Survey

4. Distributing the Survey

5. Collecting the Data

6. Analyzing the Data

7. Disseminating the Findings

8. Implementing Change

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

1. Planning
   - Choosing survey type
   - Who will conduct survey?

2. Determining the Audience

3. Designing the Survey

4. Distributing the Survey

5. Collecting the Data

6. Analyzing the Data

7. Disseminating the Findings

8. Implementing Change
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

1. Planning
   - Choosing survey type
   - Who will conduct survey?

2. Determining the Audience

3. Designing the Survey

4. Distributing the Survey

5. Collecting the Data

6. Analyzing the Data

7. Disseminating the Findings

8. Implementing Change
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

References

Questions?