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.

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

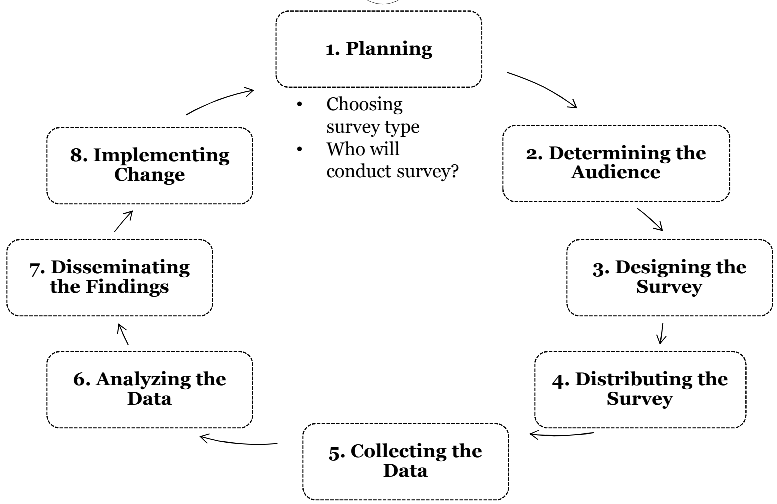
Why Conduct a Survey

- 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

- Is conducing 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

- 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

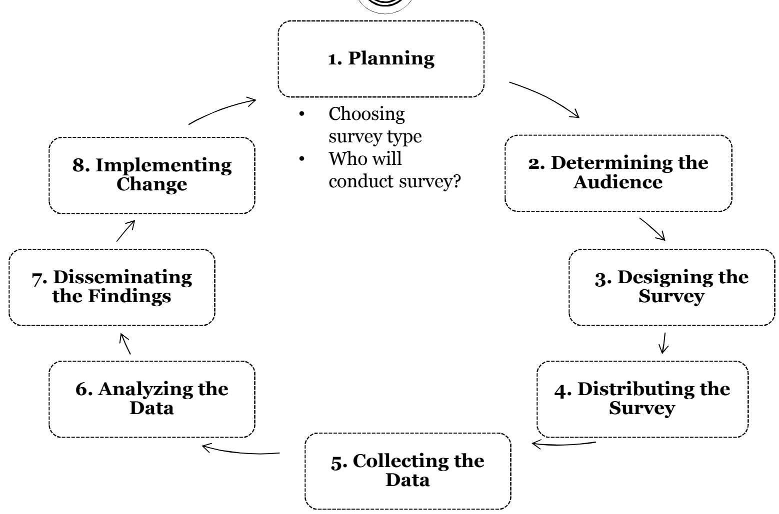
CONS

- 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



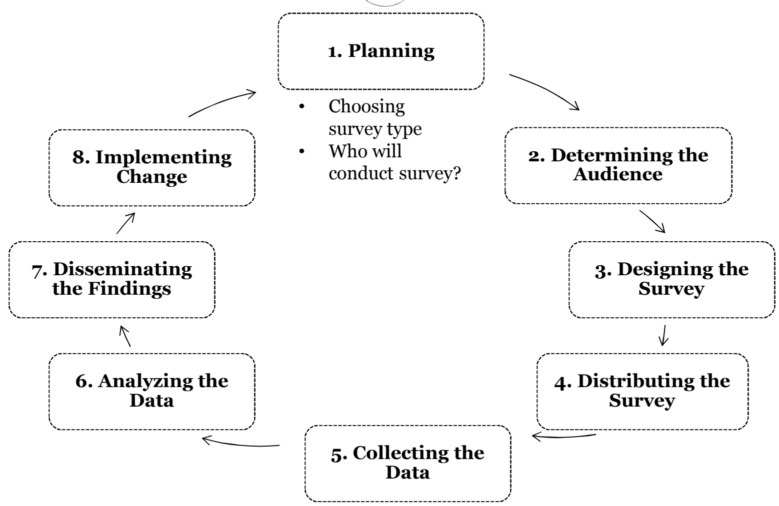
Determining Your Audience

- 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 <u>introduction</u>
    - 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

- 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

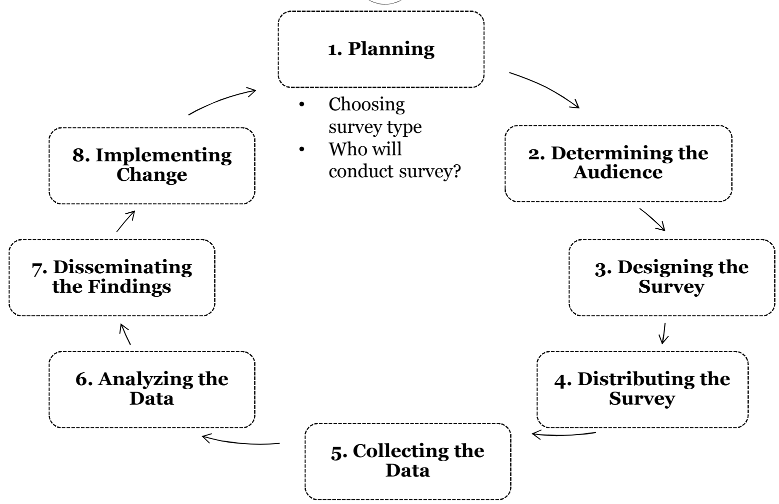
- Questions can be formatted in any of the following ways:
  - Agree/Disagree
    - Can also be scaled (1-5 or strongly agree, agree, etc)
  - True/False
  - Yes/No
  - Multiple choice
  - Open response (hardest to analyze)
  - Anything that solicits a clear and appropriate response

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



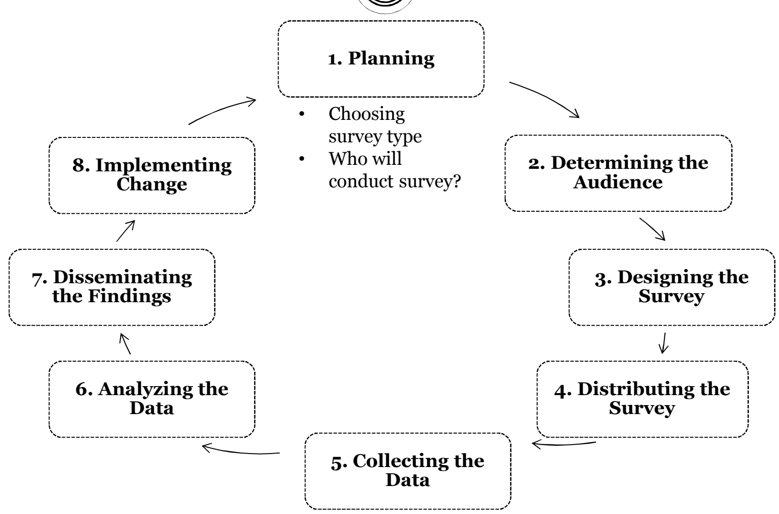
Distributing the Survey

- 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



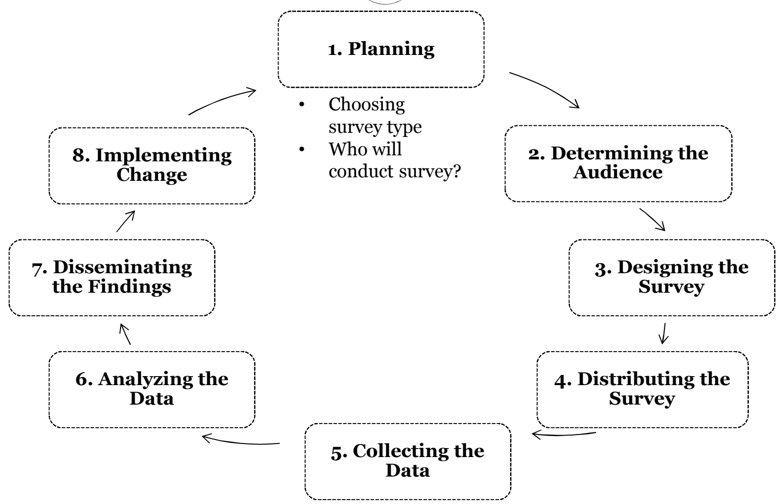
Collecting the Data

- 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
- 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



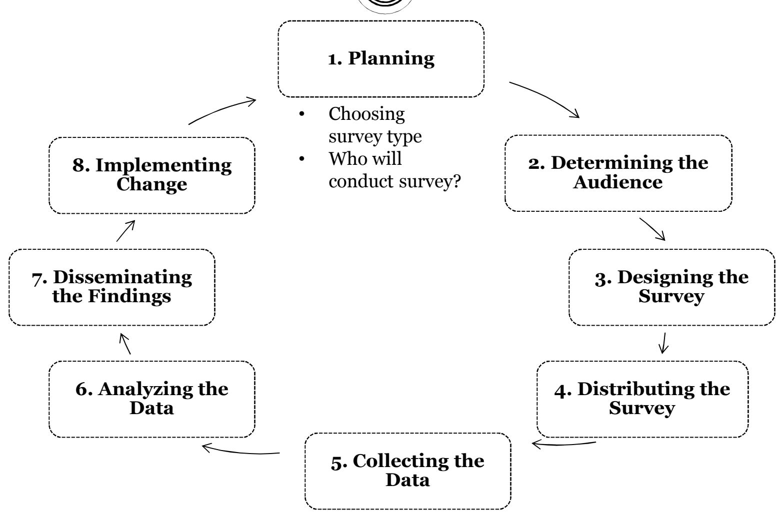
Analyzing the Data

- 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

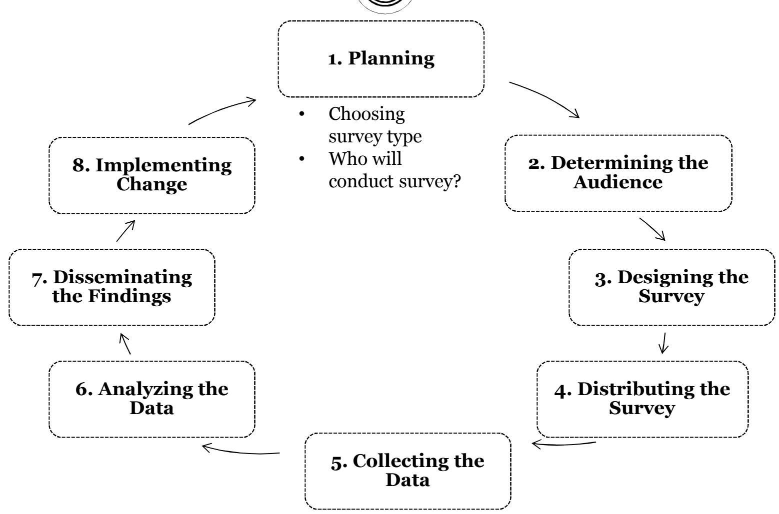
Survey Process



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

References

- Fairfax County, (2012 August). *Common Pitfalls in Conducting a Survey. Retrieved from*http://www.fairfaxcounty.gov/demogrph/pdf/pitfalls.pdf
- Survey Monkey, (2015). *Surveys* 101.Retreived fromhttps://www.surveymonkey.com/mp/survey-guidelines/
- Section on Survey Research Methods. (1997). How to Collect Survey Data [Pamphlet] Waksberg, Joseph
- Section on Survey Research Methods. (1997). How to Plan a Survey [Pamphlet] Waksberg, Joseph
- Wholey, J., Hatry, H., Newcomer, K. (2010). Handbook of Practical Program Evaluation. Using Surveys, Pgs. 262-297. San Francisco: Jossey Bass.

Q & A

Questions?