Introduction

The 10th Annual Survey – 2008 Profile of Health Care Compliance Officers is another important service provided by the Health Care Compliance Association. The information contained in this report represents the most complete, accurate and up-to-date information on compliance training, budget, staff, staff education, and compensation.

Survey Methodology

As in past years, the survey instrument was reviewed and changes were made to reflect the current issues in health care compliance. In November 2007, an e-mail containing a link to the online survey form was sent to HCCA members. By late January 2008, a total of 697 completed survey forms were received, representing a 19% response rate. All completed survey forms were sent anonymously to Industry Insights, Inc., a third-party research vendor that specializes in these types of studies. All data items were checked by a specially designed computer editing process. The results were tabulated in March 2008.

Compliance Training

The vast majority (96%) of respondents reported that compliance training was mandatory. Ninety-one percent of this year’s respondents conduct regular compliance update training beyond the initial training provided. Three-fourths of the respondents report that the typical employee receives compliance training annually and half report that, on average, an employee spends between one and three hours a year in compliance training. Nearly two-thirds (61%) of the respondents reported that compliance training is conducted for non-employees.

More than half of the respondents (59%) report that compliance training is being maintained, and 39% report that it is being expanded. Only 3% of the respondents report that compliance training is being downsized.

The most common methods of compliance awareness training were computer-based/Web-based training (72%), instructor-led classroom training with the compliance officer as instructor (65%), and instructor-led classroom training with other instructors (41%). The most common methods of topic-specific or in-depth training were instructor-led classroom training with the compliance officer as the instructor, instructor-led classroom training with other instructors, and computer-based/web-based training (around 60% each).

One-third of the respondents reported having a line item in the compliance budget for the direct costs of training. Seventy-two percent reported that the direct cost for compliance training gets absorbed by departmental budgets other than compliance.

Compliance Program

Nearly 90% of the respondents indicated that the compliance program was comprehensive for the entire organization. The three most common areas included in the compliance program are: privacy, information security (85%); conflict of interest (85%) and coding and billing (84%). During the next three years, the most common goals for the compliance program are: monitoring/auditing (82%), education/training (75%), and conduct effectiveness evaluations of the compliance program (69%). More than half of the respondents (58%) measure the effectiveness of their compliance program.

Two-thirds (68%) reported that their compliance office was a stand-alone department with budgetary responsibilities and staff. The typical compliance office reported that three full-time equivalent (FTE) employees were paid out of the compliance department budget.
Chief Compliance Officer
More than half of the respondents (57%) best described the chief compliance officer as part of the senior management team. More than one-quarter (29%) reported that the chief compliance officer was an officer of the company. Only 25% of the responding chief compliance officers reported having an employment contract.

Half of the respondents report that an annual incentive program is part of the chief compliance officer’s compensation. Of those with an annual incentive program, the most common criteria were company year-end financials (73%), individual goals (66%) and annual performance review (65%).

Compliance Officer
Over two-thirds of the reporting organizations had a female compliance officer (72%). The typical compliance officer is 50 years old and has been compliance officer at the organization for 4 years. Nearly half (46%) reported that the compliance officer reports directly to the CEO/president.

Two-thirds of the reporting compliance officers have assumed responsibility for HIPAA compliance. Of those, the aspect of HIPAA they are most likely responsible for is privacy (97%). Ninety-four percent of the responding organizations reported having a compliance committee. Of those, 74% reported that the compliance committee was chaired by the compliance officer.

Compensation
The average salary reported for chief compliance officer, compliance officer and other compliance department staff are shown below. The projected salary increase for chief compliance officers and compliance officers in the coming year is 3% to 5%.

<table>
<thead>
<tr>
<th>Title</th>
<th>Average Salary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief Compliance Officer</td>
<td>$147,843</td>
</tr>
<tr>
<td>Compliance Officer</td>
<td>$  99,261</td>
</tr>
<tr>
<td>Assistant Compliance Officer</td>
<td>$  72,034</td>
</tr>
<tr>
<td>Compliance Auditor</td>
<td>$  57,612</td>
</tr>
<tr>
<td>Coders</td>
<td>$  51,801</td>
</tr>
<tr>
<td>Coders</td>
<td>$  59,068</td>
</tr>
<tr>
<td>Compliance Generalists</td>
<td>$  58,924</td>
</tr>
<tr>
<td>Attorneys on Compliance Staff</td>
<td>$120,135</td>
</tr>
</tbody>
</table>
Profile by regions

<table>
<thead>
<tr>
<th>Region</th>
<th>Median Revenue</th>
<th>Median Size (by Number of Employees)</th>
<th>Mean # of Full-Time Compliance Employees</th>
<th>Mean Compliance Budget</th>
<th>Mean Chief Compliance Officer Base Salary</th>
<th>Mean Compliance Officer Base Salary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>$300 M</td>
<td>2,250</td>
<td>4.05</td>
<td>$437 K</td>
<td>$147,843</td>
<td>$ 99,261</td>
</tr>
<tr>
<td>Northeast</td>
<td>$250 M</td>
<td>2,000</td>
<td>4.10</td>
<td>$394 K</td>
<td>$153,054</td>
<td>$105,822</td>
</tr>
<tr>
<td>South</td>
<td>$350 M</td>
<td>2,500</td>
<td>4.29</td>
<td>$469 K</td>
<td>$140,166</td>
<td>$ 98,014</td>
</tr>
<tr>
<td>Midwest</td>
<td>$250 M</td>
<td>2,000</td>
<td>3.77</td>
<td>$358 K</td>
<td>$150,313</td>
<td>$ 94,449</td>
</tr>
<tr>
<td>West</td>
<td>$400 M</td>
<td>2,500</td>
<td>4.00</td>
<td>$515 K</td>
<td>$157,286</td>
<td>$102,585</td>
</tr>
</tbody>
</table>

Please note that median revenue and median number of employees figures are an estimate based on the survey responses which were given in ranges.

1: In what region of the country is your headquarters?

<table>
<thead>
<tr>
<th>Region</th>
<th>Percentage</th>
<th>Region</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alaska, Guam, Hawaii, or Puerto Rico</td>
<td>2%</td>
<td>New England: CT, MA, ME, NH, RI, VT</td>
<td>6%</td>
</tr>
<tr>
<td>East North Central: IL, IN, MI, OH, WI</td>
<td>16%</td>
<td>Pacific: CA, NV, OR, WA</td>
<td>14%</td>
</tr>
<tr>
<td>East South Central: AL, FL, GA, MS, SC, TN</td>
<td>16%</td>
<td>South Atlantic: DE, DC, MD, KY, NC, VA, WV</td>
<td>10%</td>
</tr>
<tr>
<td>Middle Atlantic: NY, NJ, PA</td>
<td>13%</td>
<td>West North Central: IA, KS, MN, MO, NE, ND, SD</td>
<td>8%</td>
</tr>
<tr>
<td>Mountain: AZ, CO, ID, MT, NM, UT, WY</td>
<td>6%</td>
<td>West South Central: AR, LA, OK, TX</td>
<td>9%</td>
</tr>
</tbody>
</table>

*Note: Results total more than 100% due to rounding to the nearest number.

2: What type of health care entity do you work for?

<table>
<thead>
<tr>
<th>Entity</th>
<th>Percentage</th>
<th>Other</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Health System-Teaching</td>
<td>19%</td>
<td></td>
<td>9%</td>
</tr>
<tr>
<td>Health System-Nonteaching</td>
<td>15%</td>
<td></td>
<td>0%</td>
</tr>
<tr>
<td>Hospital-Teaching</td>
<td>10%</td>
<td></td>
<td>0%</td>
</tr>
<tr>
<td>Hospital-Nonteaching</td>
<td>15%</td>
<td></td>
<td>0%</td>
</tr>
<tr>
<td>Health Plan</td>
<td>7%</td>
<td></td>
<td>0%</td>
</tr>
<tr>
<td>Durable Medical Equipment Supplier</td>
<td>1%</td>
<td></td>
<td>0%</td>
</tr>
<tr>
<td>Laboratory</td>
<td>0%</td>
<td></td>
<td>0%</td>
</tr>
<tr>
<td>Medical Billing Company</td>
<td>2%</td>
<td></td>
<td>1%</td>
</tr>
<tr>
<td>Ambulance/Transportation</td>
<td>0%</td>
<td></td>
<td>1%</td>
</tr>
<tr>
<td>Integrated Delivery System</td>
<td>4%</td>
<td></td>
<td>3%</td>
</tr>
<tr>
<td>Physician Practice</td>
<td>6%</td>
<td></td>
<td>3%</td>
</tr>
<tr>
<td>Home Health Agency</td>
<td>1%</td>
<td></td>
<td>9%</td>
</tr>
</tbody>
</table>
3: What is the total revenue of your health care organization?

- Less than $10 million: 6%
- $10 million - $24 million: 6%
- $25 million - $49 million: 7%
- $50 million - $99 million: 7%
- $100 million - $149 million: 5%
- $150 million - $199 million: 3%
- $200 million - $299 million: 7%
- $300 million - $399 million: 5%
- $400 million - $499 million: 4%
- $500 million - $599 million: 6%
- $600 million - $699 million: 2%
- $700 million - $799 million: 2%
- $800 million - $899 million: 2%
- $900 million - $999 million: 2%
- $1 billion - $1.99 billion: 10%
- $2 billion - $3.99 billion: 4%
- $4 billion - $9.99 billion: 3%
- $10 billion +: 2%
- Don't know: 16%

4: How many employees does your health care organization have?

- Less than 100: 4%
- 100 - 249: 6%
- 250 - 500: 10%
- 501 - 1,000: 11%
- 1,001 - 1,500: 8%
- 1,501 - 2,000: 8%
- 2,001 - 3,000: 12%
- 3,001 - 4,000: 7%
- 4,001 - 5,000: 7%
- 5,001 - 10,000: 13%
- 10,001 - 15,000: 5%
- 15,001 - 20,000: 1%
- 20,001 - 30,000: 3%
- 30,001 - 50,000: 1%
- 50,001 - 75,000: 2%
- 75,001 +: 1%
- Don't know: 2%
5: What is the corporate structure of your organization?

For-profit 21%  Non-profit 79%

6: Which best describes your compliance program?

- 2008
- 2007
- 2006
- 2005
- 2004
- 2002
- 2001
- 2000
- 1999

- No formal program planned at this time
- Program being planned, not yet in development
- Program now under development
- Active program in place

7: Is the compliance program being…?

- Downsized 3%
- Expanded 39%
- Maintained 59%
8: Is compliance training mandatory?

Yes 96%
No 4%

9: Beyond the initial formal compliance training and that for new employees, is regular compliance update training provided?

Yes 91%
No 9%

10: On average, how much time does an employee spend in compliance training each year?

- One hour or less: 33%
- One to three hours: 52%
- Three to six hours: 11%
- Six hours or more: 2%
- Don't know: 1%
11: How frequently does the typical employee receive compliance update training?

- Annually: 75%
- Every other year: 3%
- Quarterly: 4%
- Every other month: 1%
- Monthly: 2%
- Other: 5%
- Don't know: 3%
- Twice annually: 8%

12: What methods of training are used by your organization for compliance awareness training?*

- Instructor-led classroom training - Compliance Officer as instructor: 65%
- Instructor-led classroom training - other instructors: 41%
- Computer-based/Web-based training: 72%
- Video training: 30%
- Self-study module: 31%
- Other: 11%

*Note: Results total more than 100% because respondents selected more than one answer.

13: What methods of training are used by your organization for topic-specific training?*

- Instructor-led classroom training - Compliance Officer as instructor: 60%
- Instructor-led classroom training - other instructors: 59%
- Computer-based/Web-based training: 60%
- Video training: 25%
- Self-study module: 26%
- Other: 14%

*Note: Results total more than 100% because respondents selected more than one answer.
14: Do you have a budgeted line item in your compliance budget for the direct costs of training?

- Yes 34%
- No 66%

15: If No to question 14, does the direct cost for compliance training get absorbed by departmental budgets other than compliance?

- Yes 72%
- No 28%

16: Do you conduct compliance training for non-employees?

- Yes, mandatory 41%
- Yes, optional 20%
- No 38%

17: Do you measure the effectiveness of your compliance program?

- Yes 58%
- No 42%

18: If “Yes” what do you measure?

**Top 5 Measurables:**

- Hotline calls
- Employee awareness - education and training
- Internal audits and results
- External audits
- Monitoring of risks and results

19: What method(s) do you use to measure your program’s effectiveness?

**Top 5 Methods used:**

- Self Assessment - Developed at corporate level and performed within business units
- Surveys - Measure employee awareness and training effectiveness
- Scorecard - Measure overall compliance effectiveness
- Education and Training - Test awareness and track results
- Organization Trending and Industry Benchmarking - Analysis of issues and results to determine areas for additional scrutiny
20a: What is the estimated 2008 compliance training budget for your organization?

20b: What is the estimated 2008 compliance training budget for your organization? (by total revenue of organization)

<table>
<thead>
<tr>
<th>Training Budget</th>
<th>Total Revenue</th>
<th>&lt;$100 Mil.</th>
<th>$100 to $299 Mil.</th>
<th>$300 to $599 Mil.</th>
<th>&gt;$600 Mil.</th>
</tr>
</thead>
<tbody>
<tr>
<td>$0 - $4,999</td>
<td>615 100%</td>
<td>157 100%</td>
<td>98 100%</td>
<td>89 100%</td>
<td>158 100%</td>
</tr>
<tr>
<td>$5,000 - $14,999</td>
<td>189 31%</td>
<td>90 57%</td>
<td>40 41%</td>
<td>24 27%</td>
<td>16 10%</td>
</tr>
<tr>
<td>$15,000 - $29,999</td>
<td>83 13%</td>
<td>25 16%</td>
<td>13 13%</td>
<td>16 18%</td>
<td>17 11%</td>
</tr>
<tr>
<td>$30,000 - $54,999</td>
<td>42 7%</td>
<td>6 4%</td>
<td>9 9%</td>
<td>6 7%</td>
<td>17 11%</td>
</tr>
<tr>
<td>$55,000 - $99,999</td>
<td>33 5%</td>
<td>5 3%</td>
<td>5 5%</td>
<td>6 7%</td>
<td>14 9%</td>
</tr>
<tr>
<td>$100,000 - $199,999</td>
<td>29 5%</td>
<td>5 3%</td>
<td>8 9%</td>
<td>3 3%</td>
<td>8 5%</td>
</tr>
<tr>
<td>$200,000 +</td>
<td>15 2%</td>
<td>1 1%</td>
<td>1 1%</td>
<td>4 4%</td>
<td>14 9%</td>
</tr>
<tr>
<td>Don't know</td>
<td>202 33%</td>
<td>27 17%</td>
<td>24 24%</td>
<td>22 25%</td>
<td>63 40%</td>
</tr>
</tbody>
</table>

20c: What is the estimated 2008 compliance training budget for your organization? (by size of organization--number of employees)

<table>
<thead>
<tr>
<th>Training Budget</th>
<th>Total</th>
<th>1,000 or Less</th>
<th>1,001 to 3,000</th>
<th>3,001 to 5,000</th>
<th>5,001 or More</th>
</tr>
</thead>
<tbody>
<tr>
<td>$0 - $4,999</td>
<td>615 100%</td>
<td>166 100%</td>
<td>87 100%</td>
<td>159 100%</td>
<td></td>
</tr>
<tr>
<td>$5,000 - $14,999</td>
<td>189 31%</td>
<td>30 16%</td>
<td>8 5%</td>
<td>16 10%</td>
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</tr>
<tr>
<td>$15,000 - $29,999</td>
<td>83 13%</td>
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<tr>
<td>$55,000 - $99,999</td>
<td>33 5%</td>
<td>4 2%</td>
<td>3 2%</td>
<td>1 1%</td>
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<tr>
<td>$100,000 - $199,999</td>
<td>29 5%</td>
<td>2 1%</td>
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<td>4 5%</td>
<td></td>
</tr>
<tr>
<td>$200,000 +</td>
<td>15 2%</td>
<td>1 1%</td>
<td>2 1%</td>
<td>4 5%</td>
<td></td>
</tr>
<tr>
<td>Don't know</td>
<td>202 33%</td>
<td>44 24%</td>
<td>48 29%</td>
<td>30 34%</td>
<td>69 43%</td>
</tr>
</tbody>
</table>
### 21a: What is the estimated annual budget of your Compliance Department?

<table>
<thead>
<tr>
<th>Annual Budget</th>
<th>All Respondents</th>
<th>&lt;$100 Mil.</th>
<th>$100 to $299 Mil.</th>
<th>$300 to $449 Mil.</th>
<th>$450 to $599 Mil.</th>
<th>$600 to $749 Mil.</th>
<th>$750 to $899 Mil.</th>
<th>$900 to $1,049 Mil.</th>
<th>$1,050 to $1,299 Mil.</th>
<th>$1,300 to $1,449 Mil.</th>
<th>$1,450,000 +</th>
<th>Don't know</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than $100,000</td>
<td>620 100%</td>
<td>158 100%</td>
<td>99 100%</td>
<td>84 100%</td>
<td>164 100%</td>
<td>121 20%</td>
<td>76 48%</td>
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<td>15 11%</td>
<td>11 13%</td>
<td>15 11%</td>
<td>123 20%</td>
</tr>
<tr>
<td>$100,000 - $149,999</td>
<td>55 9%</td>
<td>20 13%</td>
<td>10 10%</td>
<td>9 11%</td>
<td>5 3%</td>
<td>76 48%</td>
<td>22 13%</td>
<td>11 13%</td>
<td>6 4%</td>
<td>2 2%</td>
<td>13 15%</td>
<td>15 11%</td>
</tr>
<tr>
<td>$150,000 - $299,999</td>
<td>90 15%</td>
<td>21 13%</td>
<td>21 21%</td>
<td>13 15%</td>
<td>22 13%</td>
<td>21 13%</td>
<td>11 11%</td>
<td>5 6%</td>
<td>17 10%</td>
<td>16 10%</td>
<td>5 6%</td>
<td>11 11%</td>
</tr>
<tr>
<td>$300,000 - $449,999</td>
<td>71 11%</td>
<td>16 10%</td>
<td>15 15%</td>
<td>17 20%</td>
<td>16 10%</td>
<td>3 2%</td>
<td>11 11%</td>
<td>5 6%</td>
<td>17 10%</td>
<td>16 10%</td>
<td>5 6%</td>
<td>11 11%</td>
</tr>
<tr>
<td>$450,000 - $599,999</td>
<td>39 6%</td>
<td>3 2%</td>
<td>3 3%</td>
<td>4 5%</td>
<td>8 5%</td>
<td>1 1%</td>
<td>3 3%</td>
<td>4 5%</td>
<td>8 5%</td>
<td>10 6%</td>
<td>6 4%</td>
<td>3 2%</td>
</tr>
<tr>
<td>$600,000 - $749,999</td>
<td>30 5%</td>
<td>2 1%</td>
<td>3 3%</td>
<td>4 5%</td>
<td>8 5%</td>
<td>1 1%</td>
<td>3 3%</td>
<td>4 5%</td>
<td>8 5%</td>
<td>10 6%</td>
<td>6 4%</td>
<td>3 2%</td>
</tr>
<tr>
<td>$750,000 - $899,999</td>
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<td>1 1%</td>
<td>0 0%</td>
<td>2 2%</td>
<td>1 1%</td>
<td>0 0%</td>
<td>1 1%</td>
<td>1 1%</td>
<td>1 1%</td>
<td>1 1%</td>
<td>1 1%</td>
<td>6 4%</td>
</tr>
<tr>
<td>$900,000 - $1,049,999</td>
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<td>0 0%</td>
<td>0 0%</td>
<td>2 2%</td>
<td>1 1%</td>
<td>0 0%</td>
<td>1 1%</td>
<td>1 1%</td>
<td>1 1%</td>
<td>1 1%</td>
<td>1 1%</td>
<td>6 4%</td>
</tr>
<tr>
<td>$1,050,000 - $1,299,999</td>
<td>10 2%</td>
<td>0 0%</td>
<td>0 0%</td>
<td>2 2%</td>
<td>1 1%</td>
<td>0 0%</td>
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<td>1 1%</td>
<td>1 1%</td>
<td>1 1%</td>
<td>6 4%</td>
</tr>
<tr>
<td>$1,300,000 - $1,449,999</td>
<td>23 4%</td>
<td>0 0%</td>
<td>0 0%</td>
<td>2 2%</td>
<td>1 1%</td>
<td>0 0%</td>
<td>1 1%</td>
<td>1 1%</td>
<td>1 1%</td>
<td>1 1%</td>
<td>1 1%</td>
<td>6 4%</td>
</tr>
<tr>
<td>$1,450,000 +</td>
<td>123 20%</td>
<td>18 11%</td>
<td>10 10%</td>
<td>14 17%</td>
<td>23 14%</td>
<td>121 20%</td>
<td>76 48%</td>
<td>22 13%</td>
<td>11 13%</td>
<td>6 4%</td>
<td>2 2%</td>
<td>13 15%</td>
</tr>
<tr>
<td>Don't know</td>
<td>123 20%</td>
<td>18 11%</td>
<td>10 10%</td>
<td>14 17%</td>
<td>23 14%</td>
<td>121 20%</td>
<td>76 48%</td>
<td>22 13%</td>
<td>11 13%</td>
<td>6 4%</td>
<td>2 2%</td>
<td>13 15%</td>
</tr>
</tbody>
</table>
21c: What is the estimated annual budget of your Compliance Department? (by number of employees)

<table>
<thead>
<tr>
<th>Annual Budget</th>
<th>Total</th>
<th>Number of Employees</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>All Respondents</td>
<td>1,000 or Less</td>
</tr>
<tr>
<td></td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>Less than $100,000</td>
<td>121</td>
<td>20%</td>
</tr>
<tr>
<td>$100,000 - $149,999</td>
<td>55</td>
<td>9%</td>
</tr>
<tr>
<td>$150,000 - $299,999</td>
<td>90</td>
<td>15%</td>
</tr>
<tr>
<td>$300,000 - $449,999</td>
<td>71</td>
<td>11%</td>
</tr>
<tr>
<td>$450,000 - $599,999</td>
<td>39</td>
<td>6%</td>
</tr>
<tr>
<td>$600,000 - $749,999</td>
<td>30</td>
<td>5%</td>
</tr>
<tr>
<td>$750,000 - $999,999</td>
<td>19</td>
<td>3%</td>
</tr>
<tr>
<td>$900,000 - $1,049,999</td>
<td>19</td>
<td>3%</td>
</tr>
<tr>
<td>$1,050,000 - $1,299,999</td>
<td>20</td>
<td>3%</td>
</tr>
<tr>
<td>$1,300,000 - $1,449,999</td>
<td>10</td>
<td>2%</td>
</tr>
<tr>
<td>$1,450,000 +</td>
<td>23</td>
<td>4%</td>
</tr>
<tr>
<td>Don't know</td>
<td>123</td>
<td>20%</td>
</tr>
</tbody>
</table>

22: What percent (%) of your compliance budget is spent on the following (please give an estimate that totals 100%):
23: What specific goals do you hope to achieve with your compliance program in the next three years?

<table>
<thead>
<tr>
<th>Goal</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monitoring/auditing</td>
<td>82%</td>
</tr>
<tr>
<td>Education/training</td>
<td>75%</td>
</tr>
<tr>
<td>Conduct effectiveness evaluations of the compliance program</td>
<td>69%</td>
</tr>
<tr>
<td>New/revised policies/procedures</td>
<td>64%</td>
</tr>
<tr>
<td>Employee awareness</td>
<td>62%</td>
</tr>
<tr>
<td>Risk assessment</td>
<td>57%</td>
</tr>
<tr>
<td>Conduct benchmarking exercises</td>
<td>37%</td>
</tr>
<tr>
<td>HIPAA regulation compliance</td>
<td>34%</td>
</tr>
<tr>
<td>Privacy</td>
<td>29%</td>
</tr>
<tr>
<td>Security</td>
<td>28%</td>
</tr>
<tr>
<td>Reporting mechanisms</td>
<td>27%</td>
</tr>
<tr>
<td>Transition to e-health records</td>
<td>26%</td>
</tr>
<tr>
<td>Finish developing/implementing the compliance program</td>
<td>25%</td>
</tr>
<tr>
<td>Integrate components of the Sarbanes-Oxley Act</td>
<td>15%</td>
</tr>
<tr>
<td>Transactions and code sets</td>
<td>9%</td>
</tr>
<tr>
<td>Other</td>
<td>6%</td>
</tr>
</tbody>
</table>

Note: Results total more than 100% because respondents selected more than one answer.

24: Do all of the major constituencies of your compliance program (including senior management, physicians, department directors, and board members) have a basic understanding of compliance?

<table>
<thead>
<tr>
<th>Year</th>
<th>1999</th>
<th>2000</th>
<th>2001</th>
<th>2002</th>
<th>2003</th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Everyone understands</td>
<td>38%</td>
<td>43%</td>
<td>44%</td>
<td>33%</td>
<td>42%</td>
<td>38%</td>
<td>39%</td>
<td>41%</td>
<td>37%</td>
<td>40%</td>
</tr>
<tr>
<td>Most understand</td>
<td>42%</td>
<td>43%</td>
<td>43%</td>
<td>39%</td>
<td>41%</td>
<td>39%</td>
<td>37%</td>
<td>40%</td>
<td>43%</td>
<td>44%</td>
</tr>
<tr>
<td>Many understand</td>
<td>49%</td>
<td>49%</td>
<td>49%</td>
<td>43%</td>
<td>49%</td>
<td>44%</td>
<td>49%</td>
<td>43%</td>
<td>44%</td>
<td>44%</td>
</tr>
<tr>
<td>Few understand</td>
<td>18%</td>
<td>18%</td>
<td>18%</td>
<td>18%</td>
<td>18%</td>
<td>18%</td>
<td>18%</td>
<td>18%</td>
<td>18%</td>
<td>18%</td>
</tr>
</tbody>
</table>

Note: Results total more than 100% because respondents selected more than one answer.
25: Is the compliance program comprehensive for your entire organization?

Yes 88%
No 12%

26: Which areas of compliance do you include in your program?

- Privacy, information security 85%
- Conflict of interest 85%
- Coding and billing 84%
- Stark, Anti-kickback 77%
- Excluded Persons, Specially Designated Nationals 60%
- Contract management 56%
- EMTALA 53%
- Quality of care 52%
- Employment issues 49%
- Cost reporting 42%
- Clinical research 39%
- Antitrust 36%
- Sarbanes-Oxley Act 31%
- JCAHO 27%
- Transition to e-health records 27%
- Environmental issues 24%
- Tax issues 22%
- Fair Drug Marketing Act 10%
- Foreign Corrupt Practices Act 4%
- Foreign regulations (e.g., EU Privacy Directive) 3%

Note: Results total more than 100% because respondents selected more than one answer.

27: Does or did JCAHO (Joint Commission on Accreditation of Health Care Organizations) accreditation and/or compliance with JCAHO standards play a role in helping you develop or implement your compliance program?

- Yes, helps in developing a compliance program 8%
- Yes, helps with implementing a compliance program 7%
- Yes, is considered when doing the compliance audit 19%
- No, none of the above applies 56%
- Don't know 10%
28: If No to question 27, COULD JCAHO accreditation and/or standards play a role in these activities?

| Yes 21% | No 40% | Not sure 39% |

29: If Yes to question 27 or 28, in what way is JCAHO accreditation helpful?

Note: Responses to question 29 are too varied; answers to Q 29 are available on the HCCA Web site: www.hcca-info.org

30: Does your organization have

| One Compliance Officer 56% | Chief Compliance Officer and Compliance Officer 44% |

CHIEF COMPLIANCE OFFICER

The following definitions for the Chief Compliance Officer and Compliance Officer definitions were used in conducting this survey.

CHIEF COMPLIANCE OFFICER—The person responsible for the general oversight of the program. He or she supervises a compliance program manager/administrator who handles the daily operation of the compliance program. This is an executive level position for purposes of this survey.

COMPLIANCE OFFICER—The person responsible for the daily operation of the compliance program. This is a middle management-level position for purposes of this survey.
31a: What is the annual base salary of the Chief Compliance Officer?

- Mean: $147,843
- Median: $145,000
- 25th Percentile: $100,000
- 75th Percentile: $182,000

31b: What is the annual base salary of the Chief Compliance Officer? (by number of employees)

- 1,000 or less: $98,529
- 1,001 to 3,000: $139,043
- 3,001 to 5,000: $155,941
- 5,001 or more: $185,881

31c: What is the annual base salary of the Chief Compliance Officer? (by total revenue of health care organization)

- $600 million or more: $183,801
- $300 to $599 million: $142,637
- $100 to $299 million: $131,330
- < $100 million: $108,256
31d: What is the annual base salary of the Chief Compliance Officer? (by geographic region)

- West: $157,286
- Midwest: $150,313
- South: $140,166
- Northeast: $153,054

32a: Is an Annual Incentive Program part of the Chief Compliance Officer’s compensation?

- Yes 50%
- No 50%

32b: If yes, what criteria is the bonus tied to.

- Company year-end financials, 73%
- Individual goals, 66%
- Annual performance review, 65%
- Compliance scorecard results or other compliance measurement, 26%
- Other, 15%

*Note: Results total more than 100% because respondents selected more than one answer.*
32c: If yes, what percentage of your salary are you eligible for?

*Note: Results total more than 100% because respondents selected more than one answer.

33: What other positions does your Chief Compliance Officer hold in the organization?

No Other Position: 26%
Other VP: 19%
General Counsel/Attorney: 11%
Other Director/Manager: 6%
Executive Director/Administrator: 5%
VP of Quality: 5%
CFO: 4%
COO: 2%
COO: 1%
Chief Medical Officer/Medical Director: 1%
Don’t know: 1%
Other: 15%
34: What is the Chief Compliance Officer's highest and/or most recent level of education and/or certification completed?

- JD: 31%
- Masters Degree: 27%
- Certified in Healthcare Compliance: 18%
- Bachelors Degree: 16%
- MBA: 11%
- Other: 9%
- CPA: 8%
- RN/Nursing: 7%
- MD/DO: 5%
- Doctorate: 3%
- No Degree: 1%
- Associates Degree: 1%
- Pharm D: 0%

Note: Results total more than 100% because respondents selected more than one answer.

35: The management level of the Chief Compliance Officer could be best described as which of the following:

- Officer of the company: 29%
- Part of the senior management team: 57%
- Middle management: 10%
- Supervisor: 1%
- Individual contributor: 3%

36: Does the Chief Compliance Officer have an employment contract?

- Yes: 25%
- No: 75%
37: Does the Chief Compliance Officer have the ability to acquire his or her own lawyer at the organization's cost?

- Yes 43%
- No 19%
- Not sure 38%

38: Does the Chief Compliance Officer have additional liability coverage through the organization?

- Yes 28%
- No 39%
- Not sure 33%

39: What is the projected salary increase for the Chief Compliance Officer in the upcoming year?

- Less than 3%, 21%
- Between 3% and 5%, 63%
- Between 5% and 8%, 12%
- Between 8% and 10%, 3%
- More than 10%, 1%
40: Please check all of the additional benefits that are part of the Chief Compliance Officer’s compensation package:

- Health/Life insurance: 76%
- Retirement benefits/401K: 75%
- Dental: 68%
- Disability: 65%
- Professional liability coverage: 30%
- Auto/auto allowance: 9%
- Profit sharing: 7%
- Stock option: 5%
- Club membership: 4%
- Other: 7%

*Note: Results total more than 100% because respondents selected more than one answer.

COMPLIANCE OFFICER

COMPLIANCE OFFICER—The person responsible for the daily operation of the compliance program. This is a middle management-level position for purposes of this survey.

41: Rate each of the following in order of importance from 1 to 8, with "1" representing the industry experience you deem most important in a Compliance Officer

1. Health Care Administration
2. Auditor
3. Attorney
4. Health Care Consulting
5. Government
6. Other Health Care Licensed Professional
7. Human Resources
8. Physician Executive
42: Is your Compliance Officer

<table>
<thead>
<tr>
<th>Year</th>
<th>Female</th>
<th>Male</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008</td>
<td>72%</td>
<td>28%</td>
</tr>
<tr>
<td>2007</td>
<td>70%</td>
<td>30%</td>
</tr>
<tr>
<td>2006</td>
<td>60%</td>
<td>40%</td>
</tr>
<tr>
<td>2005</td>
<td>62%</td>
<td>38%</td>
</tr>
<tr>
<td>2004</td>
<td>60%</td>
<td>40%</td>
</tr>
<tr>
<td>2002</td>
<td>55%</td>
<td>45%</td>
</tr>
<tr>
<td>2001</td>
<td>54%</td>
<td>46%</td>
</tr>
<tr>
<td>2000</td>
<td>56%</td>
<td>44%</td>
</tr>
<tr>
<td>1999</td>
<td>48%</td>
<td>52%</td>
</tr>
</tbody>
</table>

43: What is the age of the Compliance Officer?

- 65 years or older: 2%
- 60 - 64 years: 8%
- 55 - 59 years: 16%
- 50 - 54 years: 22%
- 45 - 49 years: 16%
- 40 - 44 years: 14%
- 35 - 39 years: 11%
- 30 - 34 years: 5%
- 25 - 29 years: 1%
- 24 or younger: 0%
- Don't know: 3%
44: What is the Compliance Officer’s highest and/or most recent level of education and/or certification completed?

- Bachelor’s Degree: 32%
- Certified in Healthcare Compliance: 28%
- Master’s Degree: 25%
- JD: 13%
- RN/Nursing: 12%
- MBA: 12%
- CPA: 5%
- Associate’s Degree: 3%
- No degree: 3%
- MD/DO: 1%
- Doctorate: 1%
- Pharm D: 0%
- Other: 13%

Note: Results total more than 100% because respondents selected more than one answer.

45: To whom (position/title) does the Compliance Officer directly report? (by number of employees)

- CEO/President: 46%
- Chief Compliance Officer: 32%
- Board: 29%
- VP Level: 12%
- Compliance Committee: 11%
- Legal: 7%
- CFO/Finance: 7%
- Audit Committee: 6%
- Administrator/Executive Director: 4%
- COO: 4%
- Risk Management: 1%
- Internal Audit: 1%
- Other Committee: 1%
- Finance Committee: 1%
- Academic Executive: 1%

Note: Results total more than 100% because respondents selected more than one answer.
46: How many hours per week does the Compliance Officer spend on compliance?

47: What is the Compliance Officer’s tenure in their present role?
48: How many other people have previously been in this role at your organization?

<table>
<thead>
<tr>
<th>Year</th>
<th>Zero</th>
<th>One</th>
<th>Two</th>
<th>Three or more</th>
<th>Four or more</th>
<th>No others</th>
<th>Don't know</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008</td>
<td>32%</td>
<td>14%</td>
<td>7%</td>
<td>3%</td>
<td>37%</td>
<td>5%</td>
<td></td>
</tr>
<tr>
<td>2007</td>
<td>34%</td>
<td>13%</td>
<td>4%</td>
<td>3%</td>
<td>42%</td>
<td>3%</td>
<td></td>
</tr>
<tr>
<td>2006</td>
<td>35%</td>
<td>10%</td>
<td>4%</td>
<td>3%</td>
<td>46%</td>
<td>3%</td>
<td></td>
</tr>
<tr>
<td>2005</td>
<td>35%</td>
<td>11%</td>
<td>3%</td>
<td>1%</td>
<td>48%</td>
<td>3%</td>
<td></td>
</tr>
<tr>
<td>2004</td>
<td>56%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>13%</td>
<td></td>
</tr>
<tr>
<td>2002</td>
<td>57%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>31%</td>
<td>7%</td>
</tr>
<tr>
<td>2001</td>
<td>65%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>29%</td>
<td>5%</td>
</tr>
<tr>
<td>2000</td>
<td>76%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>20%</td>
<td>3%</td>
</tr>
<tr>
<td>1999</td>
<td>90%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>9%</td>
<td>1%</td>
</tr>
</tbody>
</table>

49: Has the Compliance Officer assumed responsibility for HIPAA compliance?

Yes 67% | No 33%

50: If Yes to question 49, which aspects of HIPAA is the Compliance Officer responsible for?

- Privacy 97%
- Security 43%
- Transactions and Code Sets 23%
- Other 4%
51a: What is the annual base salary of the Compliance Officer?

Mean: $99,261
Median: $95,000
25th Percentile: $75,000
75th Percentile: $117,000

51b: What is the annual base salary of the Compliance Officer? (by number of employees)

5,001+: $121,102
3,001 - 5,000: $105,806
1,001 - 3,000: $97,855
1,000 or less: $81,284

51c: What is the annual base salary of the Compliance Officer? (by total revenue of health care organization)

$600 million or more: $118,591
$300 to $599 million: $104,471
$100 to $299 million: $96,390
< $100 million: $82,418

51d: What is the annual base salary of the Compliance Officer? (by geographic region)

<table>
<thead>
<tr>
<th>Region</th>
<th>Northeast</th>
<th>South</th>
<th>Midwest</th>
<th>West</th>
</tr>
</thead>
<tbody>
<tr>
<td>Responses</td>
<td>92</td>
<td>178</td>
<td>122</td>
<td>90</td>
</tr>
<tr>
<td>Mean</td>
<td>$105,822</td>
<td>$98,014</td>
<td>$94,449</td>
<td>$102,585</td>
</tr>
<tr>
<td>Median</td>
<td>$100,000</td>
<td>$94,500</td>
<td>$90,750</td>
<td>$100,000</td>
</tr>
<tr>
<td>25th Percentile</td>
<td>$77,750</td>
<td>$75,000</td>
<td>$75,000</td>
<td>$85,000</td>
</tr>
<tr>
<td>75th Percentile</td>
<td>$125,000</td>
<td>$118,000</td>
<td>$110,000</td>
<td>$118,000</td>
</tr>
</tbody>
</table>
51e: Comparison of the annual base salary of the Compliance Officer & Chief Compliance Officer (by education)

<table>
<thead>
<tr>
<th></th>
<th>Compliance Officer</th>
<th>Chief Compliance Officer</th>
</tr>
</thead>
<tbody>
<tr>
<td>CPA</td>
<td>$115,171</td>
<td>$168,667</td>
</tr>
<tr>
<td>MBA</td>
<td>$105,748</td>
<td>$147,328</td>
</tr>
<tr>
<td>Juris Doctorate</td>
<td>$114,967</td>
<td>$170,995</td>
</tr>
<tr>
<td>Masters Degree</td>
<td>$105,748</td>
<td>$144,379</td>
</tr>
<tr>
<td>Certified in Healthcare Compliance</td>
<td>$ 98,828</td>
<td>$133,261</td>
</tr>
<tr>
<td>Bachelor's</td>
<td>$ 96,839</td>
<td>$143,012</td>
</tr>
<tr>
<td>RN/Nursing</td>
<td>$ 95,890</td>
<td>$122,417</td>
</tr>
<tr>
<td>Doctorate</td>
<td>$108,167</td>
<td>$144,000</td>
</tr>
<tr>
<td>Associate's Degree</td>
<td>$ 80,765</td>
<td>$122,200</td>
</tr>
<tr>
<td>MD/DO</td>
<td>$111,667</td>
<td>$161,556</td>
</tr>
<tr>
<td>Pharm D</td>
<td>$116,667</td>
<td>$140,000</td>
</tr>
<tr>
<td>No degree</td>
<td>$ 64,667</td>
<td>$ 68,000</td>
</tr>
</tbody>
</table>

52: What is the projected salary increase for the Compliance Officer in the upcoming year?

- Less than 3%: 23%
- Between 3% and 5%: 67%
- Between 5% and 8%: 6%
- Between 8% and 10%: 3%
- More than 10%: 1%

53: Additional benefits that are part of the Compliance Officer’s compensation package:

- Health/life insurance: 96%
- Retirement benefits/401(k): 92%
- Dental: 82%
- Disability: 76%
- Professional liability coverage: 28%
- Profit sharing: 8%
- Auto/auto allowance: 7%
- Club membership: 4%
- Stock option: 4%
- Other: 7%
54: Is your Compliance Office a stand-alone department with budgetary responsibilities and staff?

Yes
- 68% (2008)
- 67% (2007)
- 65% (2006)
- 61% (2005)

No
- 32% (2008)
- 33% (2007)
- 35% (2006)
- 39% (2005)

55: How many full-time equivalent (FTE) staff members are paid out of the Compliance Department budget?

- 1: 29%
- 2: 15%
- 3-5: 29%
- 6-8: 12%
- 9-10: 8%
- 11-15: 5%
- 16 or more: 3%
- None: 8%
- Don't know: 2%

56: How many staff members (not necessarily full-time equivalents) report directly to the Compliance Officer?

- 1: 29%
- 2: 15%
- 3-5: 29%
- 6-8: 9%
- 9-10: 4%
- 10+: 7%
- 11-15: 3%
- 16 or more: 3%
- None: 38%
- Don't know: 13%
The following definitions were used in conducting this survey:

**ASSISTANT COMPLIANCE OFFICER** – Responsible for implementing compliance policies and procedures and coordinating operational activities for the compliance program.

**COMPLIANCE AUDITOR** – Monitors compliance through conducting compliance reviews/audits.

**CODER** – Reviews coding during audits and investigations or any type of compliance inquiry where coding expertise is needed.

**TRAINER/EDUCATOR** – Develops and presents compliance training programs.

**COMPLIANCE GENERALIST** – Has general knowledge of all areas of compliance.

**ATTORNEY** – Provides legal expertise as needed.

### 57: What is the skill mix of the compliance staff (identify which you have and number of FTEs for each)?

<table>
<thead>
<tr>
<th>Position</th>
<th>Percentage reporting</th>
<th>Average number of FTEs reported</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assistant Compliance Auditors</td>
<td>21.4%</td>
<td>0.5</td>
</tr>
<tr>
<td>Compliance Auditors</td>
<td>34.5%</td>
<td>1.6</td>
</tr>
<tr>
<td>Coders</td>
<td>14.9%</td>
<td>0.6</td>
</tr>
<tr>
<td>Trainers</td>
<td>14.9%</td>
<td>0.4</td>
</tr>
<tr>
<td>Compliance Generalist</td>
<td>24.1%</td>
<td>1.3</td>
</tr>
<tr>
<td>Attorneys</td>
<td>8.3%</td>
<td>0.2</td>
</tr>
</tbody>
</table>

### 58-68: Please indicate what degrees/certifications are required or preferred for . . .

<table>
<thead>
<tr>
<th>Degree</th>
<th>Assistant Compliance Officers</th>
<th>Compliance Auditors</th>
<th>Coders</th>
<th>Trainers/Educators</th>
<th>Compliance Generalists</th>
<th>Attorneys</th>
</tr>
</thead>
<tbody>
<tr>
<td>CCS/CPC/CPC-H Required</td>
<td>16%</td>
<td>46%</td>
<td>21%</td>
<td>58%</td>
<td>0%</td>
<td>22%</td>
</tr>
<tr>
<td>Preferred</td>
<td>46%</td>
<td>21%</td>
<td>58%</td>
<td>0%</td>
<td>22%</td>
<td>9%</td>
</tr>
<tr>
<td>CHC Required</td>
<td>21%</td>
<td>58%</td>
<td>0%</td>
<td>22%</td>
<td>9%</td>
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</tr>
<tr>
<td>Preferred</td>
<td>58%</td>
<td>0%</td>
<td>22%</td>
<td>9%</td>
<td>26%</td>
<td>19%</td>
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<tr>
<td>CPA Required</td>
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<td>0%</td>
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</tr>
<tr>
<td>Preferred</td>
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<tr>
<td>Bachelors Required</td>
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<td>31%</td>
<td>54%</td>
<td>38%</td>
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<tr>
<td>Preferred</td>
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<tr>
<td>Masters Required</td>
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<td>49%</td>
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<tr>
<td>Preferred</td>
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<td>2%</td>
<td>49%</td>
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</table>

<table>
<thead>
<tr>
<th>Degree</th>
<th>JD Required</th>
<th>M.Ed Required</th>
<th>MHA Required</th>
<th>Clinical (RN, RT, etc.) Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assistant Compliance Officers</td>
<td>4%</td>
<td>29%</td>
<td>1%</td>
<td>7%</td>
</tr>
<tr>
<td>Required</td>
<td>1%</td>
<td>7%</td>
<td>2%</td>
<td>32%</td>
</tr>
<tr>
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<td>32%</td>
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<td>Compliance Auditors</td>
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<tr>
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<td>Preferred</td>
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<tr>
<td>Compliance Generalists</td>
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<tr>
<td>Compliance Generalists</td>
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<td>21%</td>
<td>0%</td>
<td>11%</td>
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<tr>
<td>Required</td>
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<tr>
<td>Attorneys</td>
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<td>5%</td>
<td>0%</td>
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<tr>
<td>Required</td>
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<td>5%</td>
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</tr>
<tr>
<td>Preferred</td>
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<td>5%</td>
<td>0%</td>
<td>2%</td>
</tr>
</tbody>
</table>

**CCS/CPC** = Certified Coding Specialist/Certified Professional Coder

**CHC** = Certified in Healthcare Compliance

**CPA** = Certified Public Accountant

**JD** = Juris Doctor

**M.Ed** = Master of Education

**MHA** = Master of Health Administration

**RN** = Registered Nurse

**RT** = Respiratory Therapist
59-69. How much are the following positions compensated?

<table>
<thead>
<tr>
<th>Position</th>
<th>Average</th>
<th>Median</th>
<th>25th Percentile</th>
<th>75th Percentile</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assistant Compliance Officer</td>
<td>$72,034</td>
<td>$70,000</td>
<td>$55,000</td>
<td>$90,000</td>
</tr>
<tr>
<td>Compliance Auditors</td>
<td>$57,612</td>
<td>$55,000</td>
<td>$45,000</td>
<td>$65,750</td>
</tr>
<tr>
<td>Coders</td>
<td>$51,801</td>
<td>$50,000</td>
<td>$40,000</td>
<td>$61,875</td>
</tr>
<tr>
<td>Trainers</td>
<td>$59,068</td>
<td>$60,000</td>
<td>$48,000</td>
<td>$69,500</td>
</tr>
<tr>
<td>Compliance Generalists</td>
<td>$58,924</td>
<td>$57,500</td>
<td>$45,000</td>
<td>$69,750</td>
</tr>
<tr>
<td>Attorneys on compliance staff</td>
<td>$120,135</td>
<td>$106,500</td>
<td>$90,000</td>
<td>$140,000</td>
</tr>
</tbody>
</table>

59-69. How much are the following positions compensated? (by region)

<table>
<thead>
<tr>
<th>Region</th>
<th>Assistant Compliance Officer</th>
<th>Compliance Auditors</th>
<th>Coders</th>
<th>Trainers</th>
<th>Compliance Generalists</th>
<th>Attorneys on compliance staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northeast</td>
<td>$75,126</td>
<td>$59,711</td>
<td>$56,714</td>
<td>$64,250</td>
<td>$63,727</td>
<td>$103,143</td>
</tr>
<tr>
<td>South</td>
<td>$71,269</td>
<td>$55,271</td>
<td>$52,667</td>
<td>$55,600</td>
<td>$59,139</td>
<td>$103,097</td>
</tr>
<tr>
<td>Midwest</td>
<td>$71,536</td>
<td>$53,146</td>
<td>$45,823</td>
<td>$55,869</td>
<td>$55,818</td>
<td>$130,513</td>
</tr>
<tr>
<td>West</td>
<td>$72,300</td>
<td>$67,136</td>
<td>$56,969</td>
<td>$66,789</td>
<td>$59,434</td>
<td>$146,154</td>
</tr>
</tbody>
</table>

70. Does your organization have a Compliance Committee?

Yes 94%
No 6%

71. If Yes to question 70, which of the following responsibilities does it have?

70% Planning
63% Budgeting
66% Disposition of Investigations
66% Disposition of Audits
59% Report to Governing Board
45% Self-Disclosures
45% Enforcement Authority
12% Other
72. Who chairs the Compliance Committee?

Compliance Officer: 74%
Physician: 5%
CEO: 4%
Counsel: 2%
CFO: 1%
Internal Auditor: 1%
Other: 14%

73. Who (position/title) makes up this committee?

CFO/Finance: 73%
Human Resources: 61%
Administration: 55%
Billing Director: 50%
Operations: 49%
Legal counsel: 48%
CEO: 47%
CCO: 47%
Physician Leader: 42%
Risk Management: 40%
HIM Director: 39%
Quality Assurance: 35%
Clinical Dept. Head: 34%
Nursing: 34%
Information Systems: 34%
Auditing Manager: 29%
Lab Director: 22%
Board Member: 21%
Physicians: 15%
Other: 19%
74. How often does the Compliance Committee meet?

- Monthly: 38%
- Quarterly: 46%
- Semi-Annually: 2%
- Annually: 1%
- Other: 13%

75. Do you report your compliance activities to a Governing Board or Owner?

- Yes: 95%
- No: 6%

76. If Yes to question 75, how often?

- Monthly: 11%
- Quarterly: 56%
- Semi-Annually: 11%
- Annually: 17%
- Other: 5%
77. How do you record your reports to the Governing Board?

Via paper report 62%
Verbally 38%

78. Has your organization reviewed the Sarbanes-Oxley Act (SOX)?

Yes 67%
No 33%

79. If Yes to question 78, which of the following components of SOX apply?

- Conflict of interest: 74%
- Corporate responsibility for financial reports: 57%
- Management assessments of internal controls: 49%
- Code of ethics for senior financial officers: 47%
- Disclosure of audit committee financial expert: 38%
- Improper influence on conduct of auditors: 35%
- Enhanced conflict of interest provisions: 31%
- Disclosures in periodic reports: 27%
- Public company audit committees: 15%
- Forfeiture of bonuses and profits: 11%
- Real-time issuer disclosure: 8%

80. Is your organization under a Corporate Integrity Agreement, settlement agreement or consent decree with integrity provisions?

Yes, 10%
No, 89%
Not sure, 1%