

HCCA



HEALTH CARE
COMPLIANCE
ASSOCIATION

10th Annual Survey

2008 Profile of Health Care Compliance Officers

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.

From HCCA



Steven W. Ortquist
2007–2008 President



Roy Snell
Chief Executive Officer

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%.

Title	Average Salary
Chief Compliance Officer	\$147,843
Compliance Officer	\$ 99,261
Assistant Compliance Officer	\$ 72,034
Compliance Auditor	\$ 57,612
Coders	\$ 51,801
Trainers/Educators	\$ 59,068
Compliance Generalists	\$ 58,924
Attorneys on Compliance Staff	\$120,135

In Closing

On behalf of the HCCA, we would like to extend our sincere appreciation to all compliance professionals who contributed to this project by taking the time to complete the survey questionnaire. Next year it is our goal to increase this year's survey response to an even higher rate.

Survey results of past years remain on the HCCA Website at www.hcca-info.org, if you would like to further compare results. Please note that no survey was conducted in the year 2003, thus it is not included in trending graphs from 1999-2008.

If you have any questions about this year's results or would like to make a suggestion for the next year's survey, please contact Margaret Dragon at HCCA, 888/580-8373.

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Profile by regions

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

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?

Alaska, Guam, Hawaii, or Puerto Rico	2%	New England: CT, MA, ME, NH, RI, VT	6%
East North Central: IL, IN, MI, OH, WI	16%	Pacific: CA, NV, OR, WA	14%
East South Central: AL, FL, GA, MS, SC, TN	16%	South Atlantic: DE, DC, MD, KY, NC, VA, WV	10%
Middle Atlantic: NY, NJ, PA	13%	West North Central: IA, KS, MN, MO, NE, ND, SD	8%
Mountain: AZ, CO, ID, MT, NM, UT, WY	6%	West South Central: AR, LA, OK, TX	9%
		Countries other than the United States	1%

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

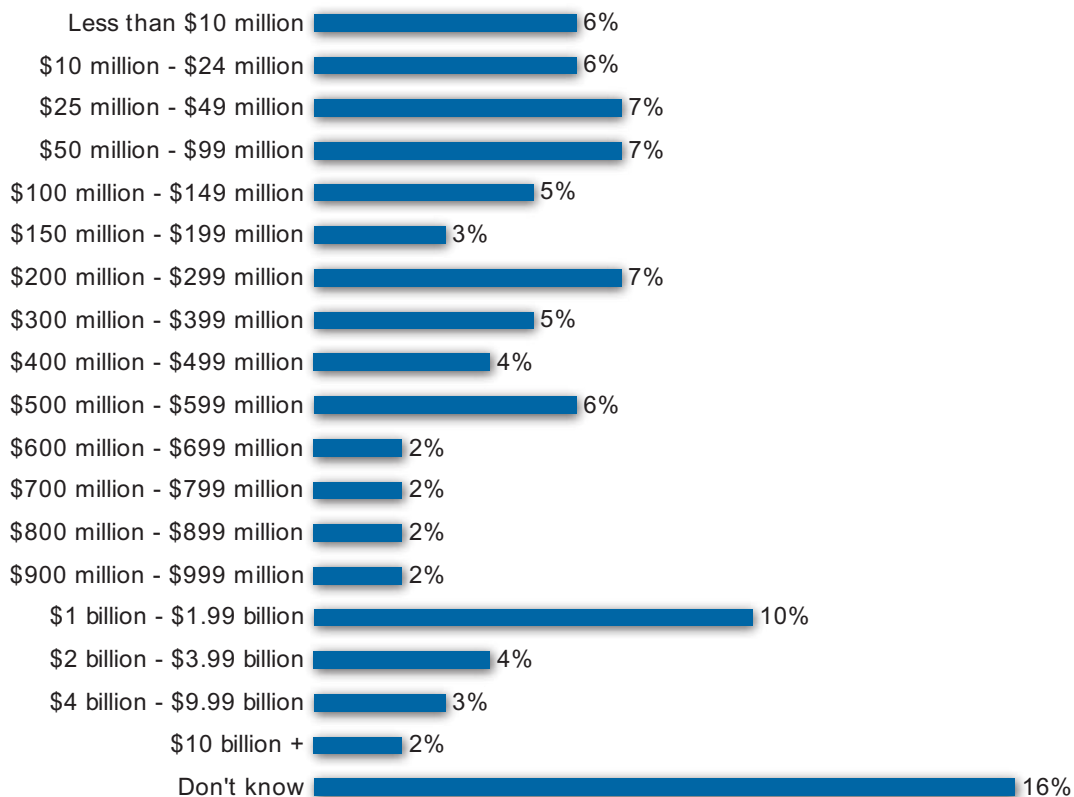


2: What type of health care entity do you work for?

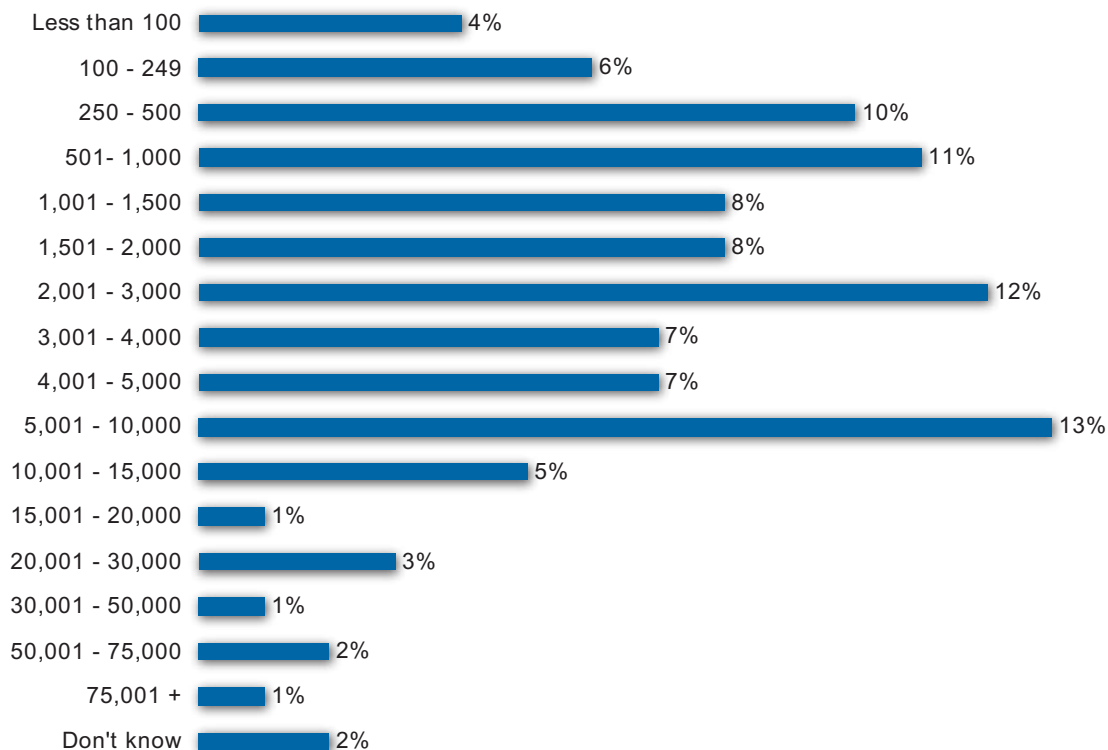
Health System-Teaching	19%	Medical/Clinical Research	0%
Health System-Nonteaching	15%	Pharmaceutical Manufacturer	0%
Hospital-Teaching	10%	Pharmacy	0%
Hospital-Nonteaching	15%	Device Manufacturer	0%
Health Plan	7%	Retail Pharmacy	0%
Durable Medical Equipment Supplier	1%	Reference Lab	0%
Laboratory	0%	Ambulatory Surgery Center	1%
Medical Billing Company	2%	Outpatient Services	1%
Ambulance/Transportation	0%	Rehabilitation (Inpatient/Outpatient)	1%
Integrated Delivery System	4%	Assisted Living/SNF/Nursing Home	3%
Physician Practice	6%	Mental Health (Inpatient/Outpatient)	3%
Home Health Agency	1%	Other	9%



3: What is the total revenue of your health care organization?



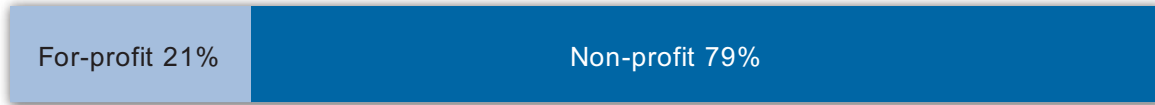
4: How many employees does your health care organization have?



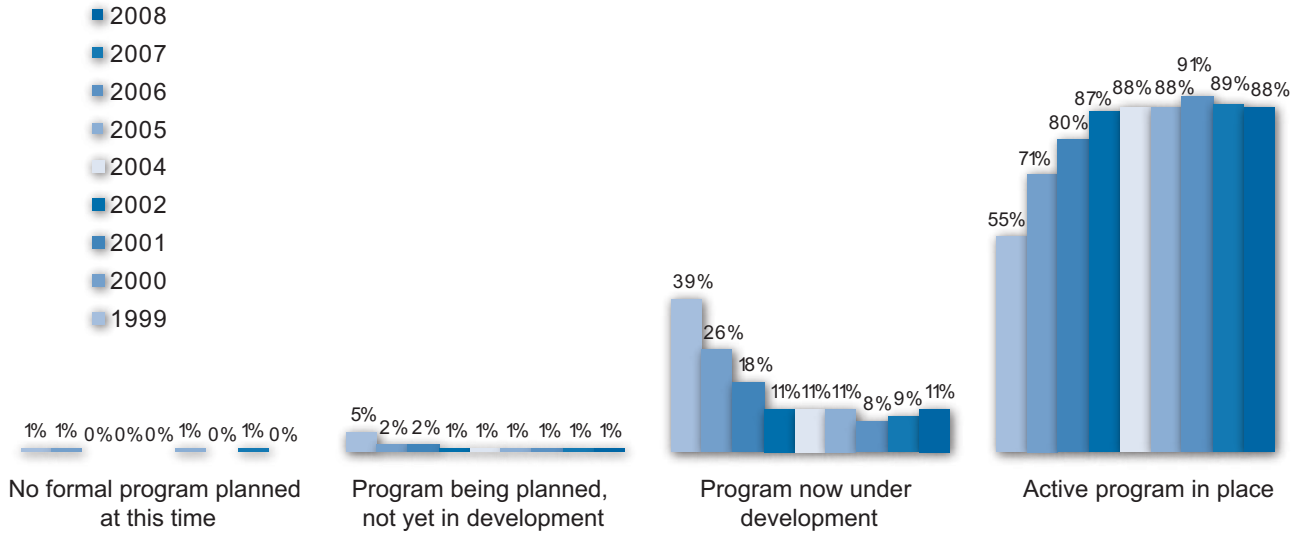
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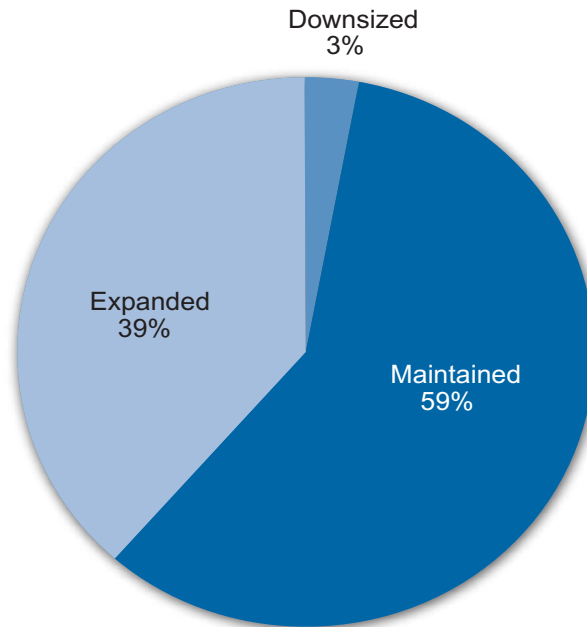
5: What is the corporate structure of your organization?



6: Which best describes your compliance program?

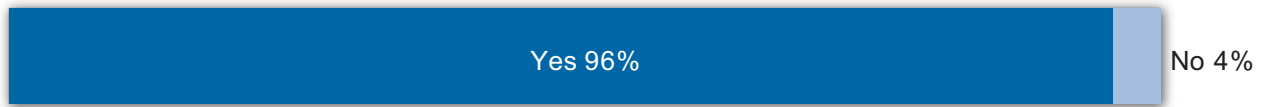


7: Is the compliance program being...?

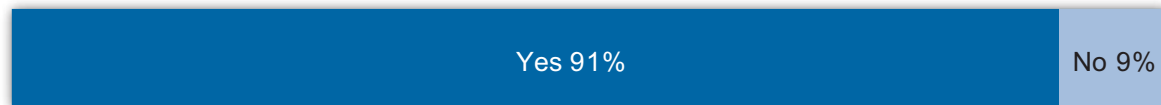




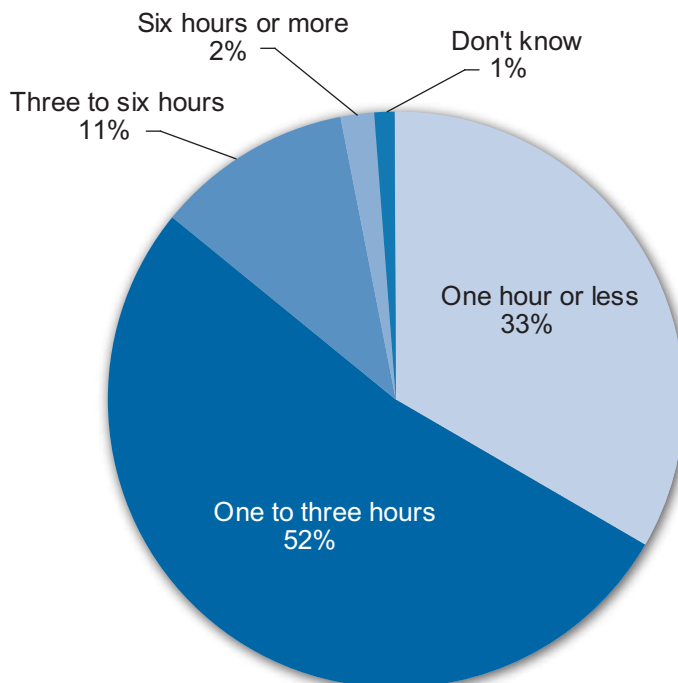
8: *Is compliance training mandatory?*



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



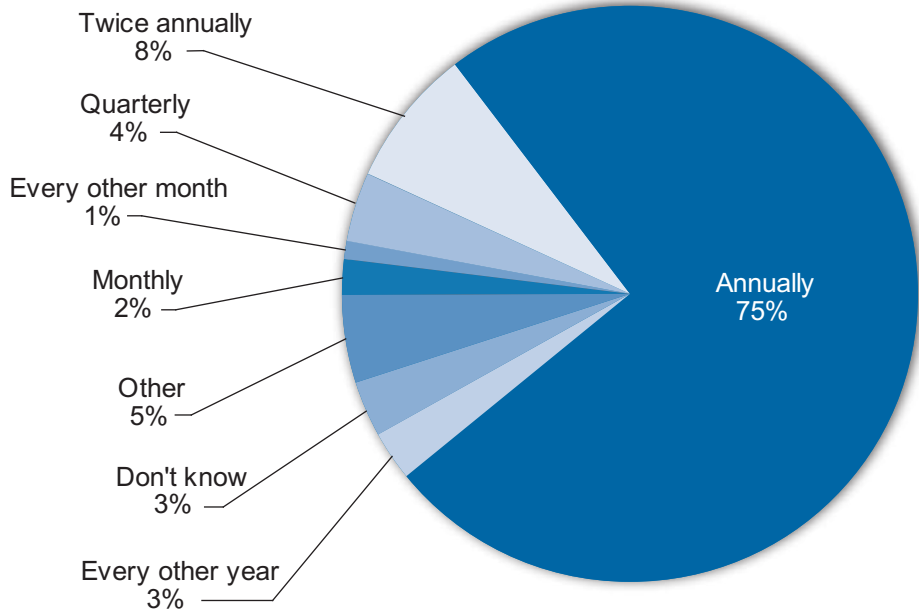
10: *On average, how much time does an employee spend in compliance training each year?*



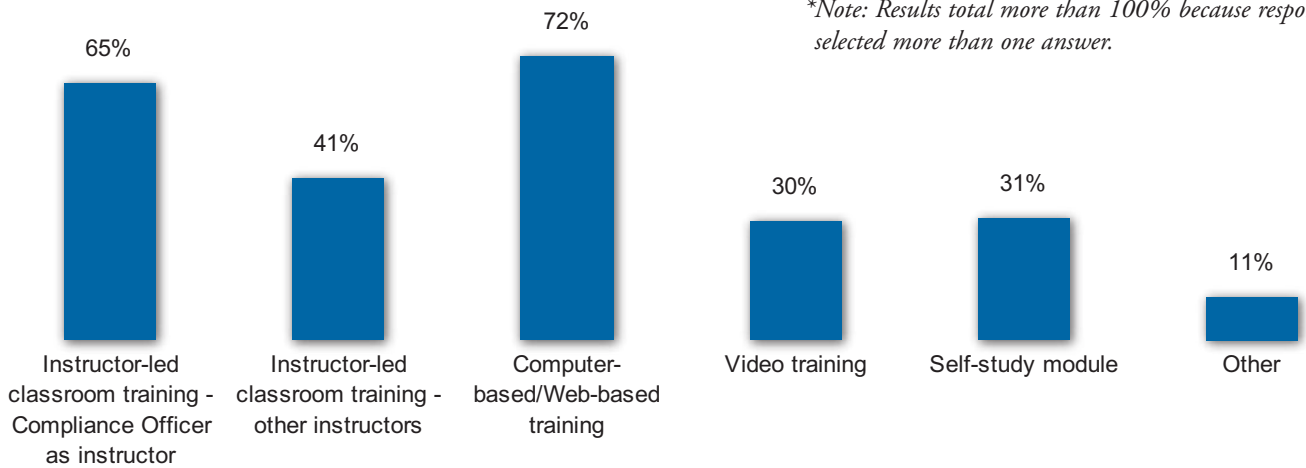
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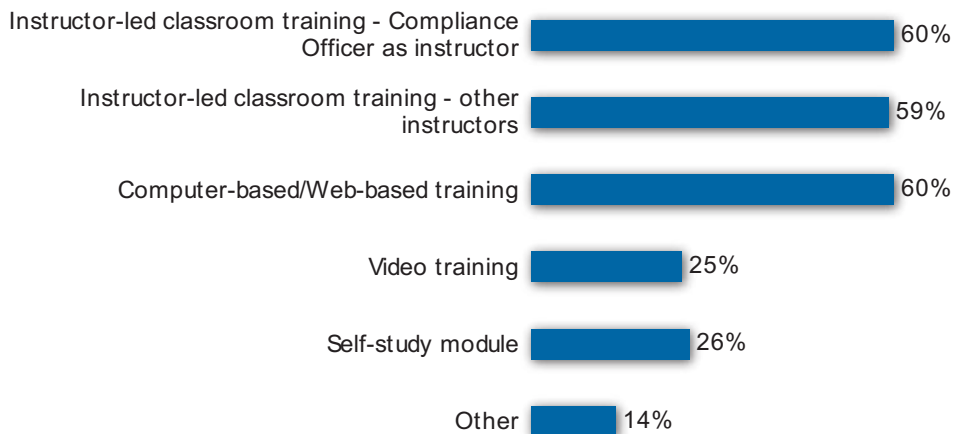
11: How frequently does the typical employee receive compliance update training?



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

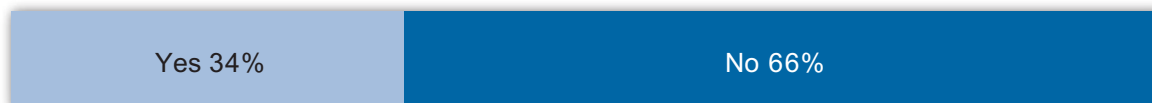


13: What methods of training are used by your organization for topic-specific training?*





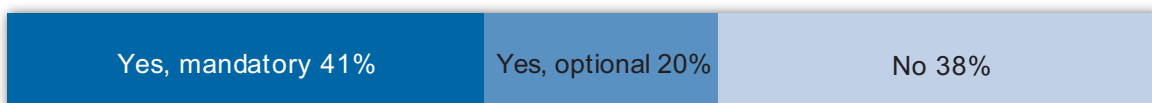
14: Do you have a budgeted line item in your compliance budget for the direct costs of training?



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



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



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



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?

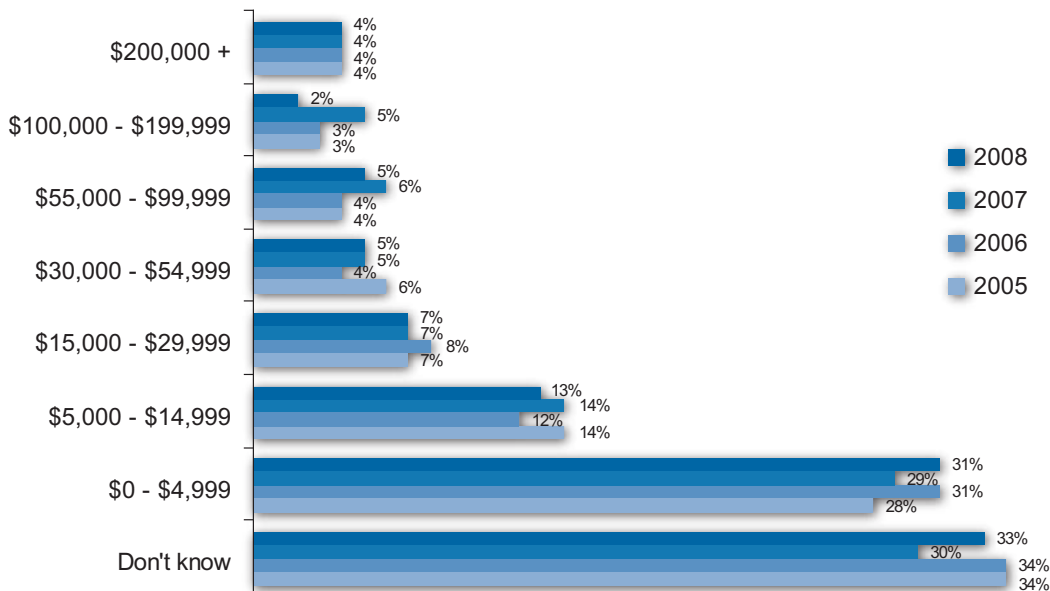
Top 5 Methods used:

- 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

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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)**

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



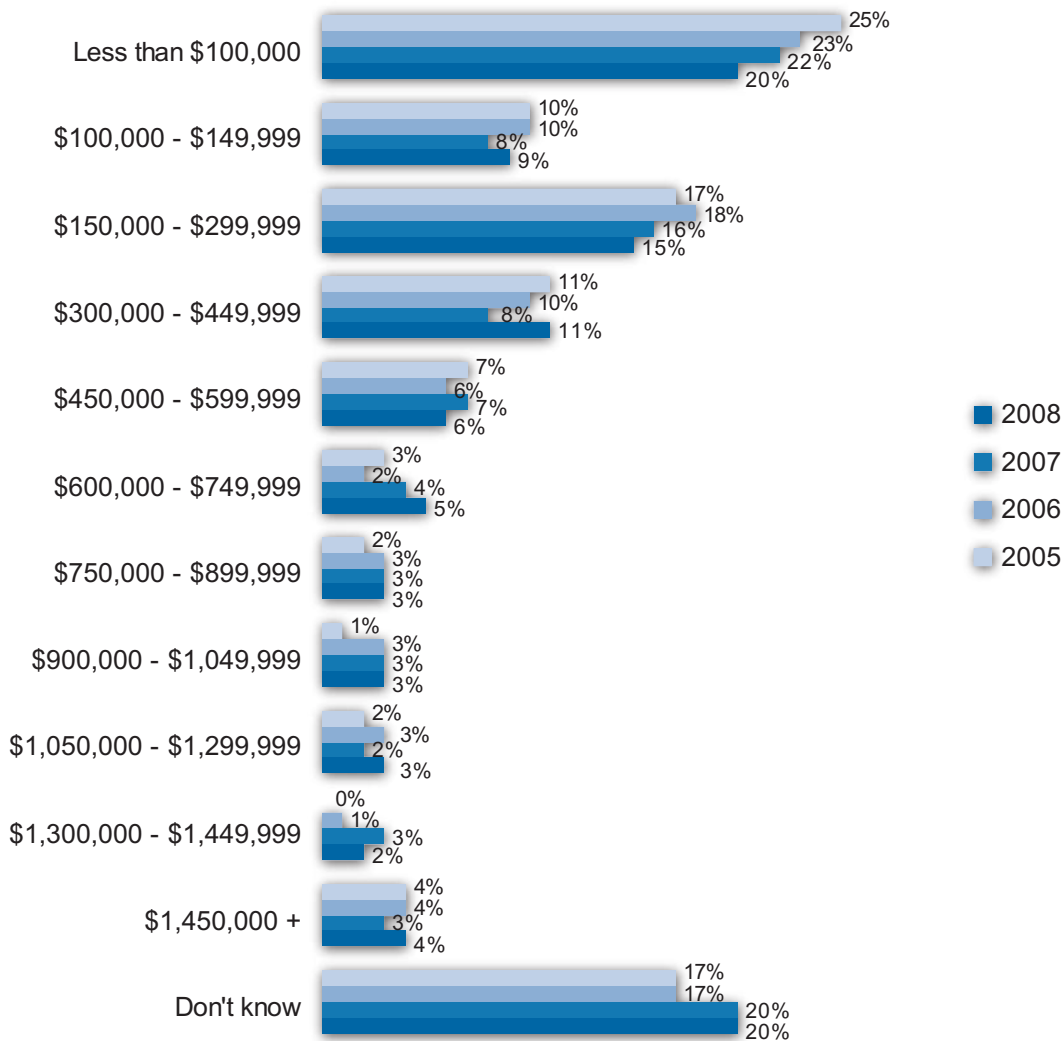
**20c: What is the estimated 2008 compliance training budget for your organization?
(by size of organization--number of employees)**

Training Budget	Total		Number of Employees							
	#	%	1,000 or Less		1,001 to 3,000		3,001 to 5,000		5,001 or More	
	615	100%	186	100%	165	100%	87	100%	159	100%
\$0 - \$4,999	189	31%	91	49%	68	41%	16	18%	11	7%
\$5,000 - \$14,999	83	13%	30	16%	21	13%	13	15%	17	11%
\$15,000 - \$29,999	42	7%	9	5%	8	5%	8	9%	16	10%
\$30,000 - \$54,999	33	5%	5	3%	8	5%	7	8%	12	8%
\$55,000 - \$99,999	29	5%	4	2%	7	4%	8	9%	10	6%
\$100,000 - \$199,999	15	2%	1	1%	3	2%	1	1%	10	6%
\$200,000 +	22	4%	2	1%	2	1%	4	5%	14	9%
Don't know	202	33%	44	24%	48	29%	30	34%	69	43%

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21a: What is the estimated annual budget of your Compliance Department?



21b: What is the estimated annual budget of your Compliance Department? (by total revenue of organization)

Annual Budget	Total		Total Revenue							
	All Respondents		<\$100 Mil.		\$100 to \$299 Mil.		\$300 to \$599 Mil.		>\$600 Mil.	
	#	%	#	%	#	%	#	%	#	%
Less than \$100,000	121	20%	76	48%	22	22%	11	13%	3	2%
\$100,000 - \$149,999	55	9%	20	13%	10	10%	9	11%	5	3%
\$150,000 - \$299,999	90	15%	21	13%	21	21%	13	15%	22	13%
\$300,000 - \$449,999	71	11%	16	10%	15	15%	17	20%	16	10%
\$450,000 - \$599,999	39	6%	3	2%	11	11%	5	6%	15	9%
\$600,000 - \$749,999	30	5%	2	1%	3	3%	5	6%	17	10%
\$750,000 - \$899,999	19	3%	1	1%	3	3%	4	5%	8	5%
\$900,000 - \$1,049,999	19	3%	1	1%	0	0%	2	2%	14	9%
\$1,050,000 - \$1,299,999	20	3%	0	0%	1	1%	1	1%	16	10%
\$1,300,000 - \$1,449,999	10	2%	0	0%	2	2%	1	1%	6	4%
\$1,450,000 +	23	4%	0	0%	1	1%	2	2%	19	12%
Don't know	123	20%	18	11%	10	10%	14	17%	23	14%

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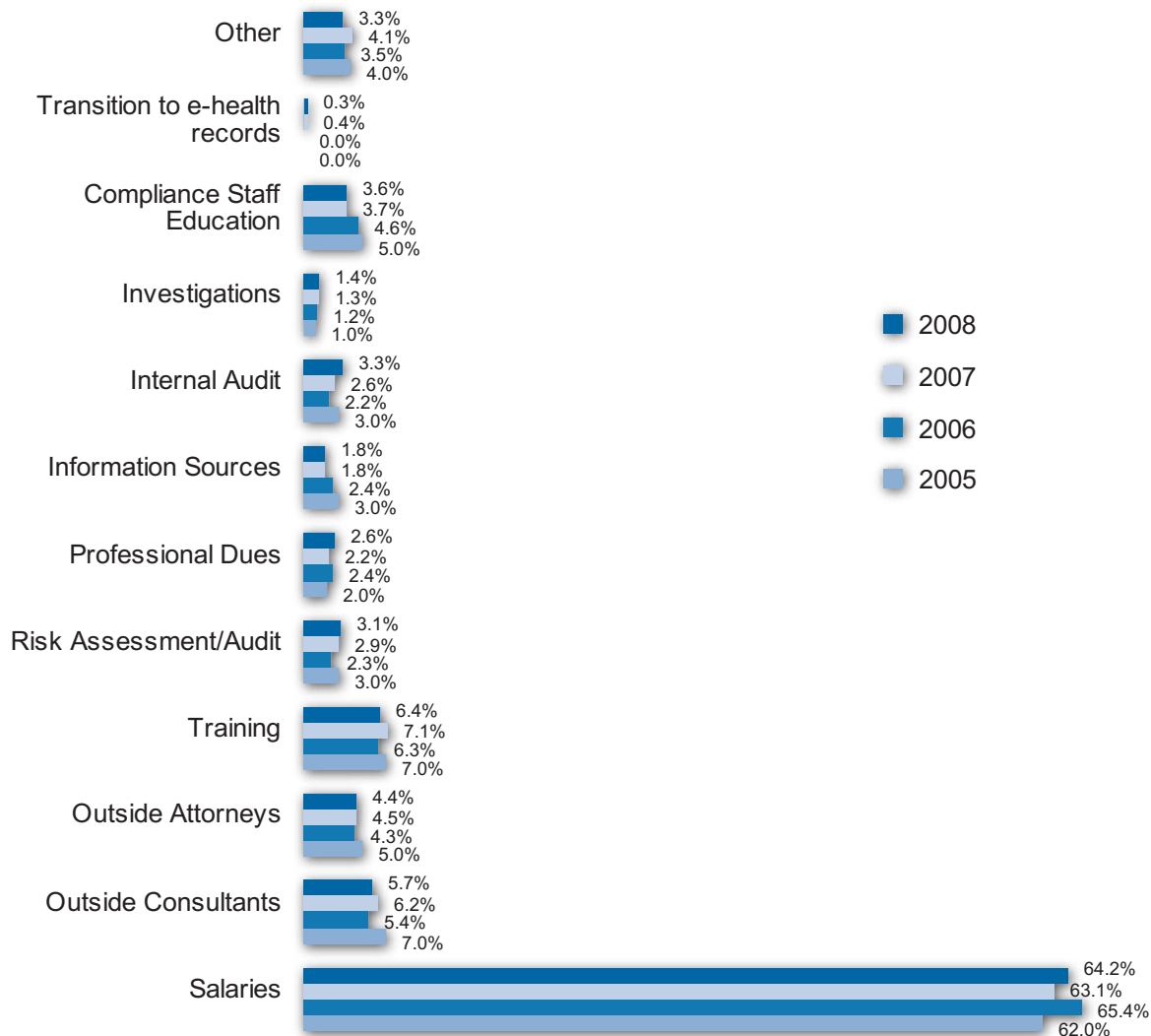


21c: What is the estimated annual budget of your Compliance Department? (by number of employees)

Annual Budget	Total		Number of Employees							
	All Respondents		1,000 or Less		1,001 to 3,000		3,001 to 5,000		5,001 or More	
	#	%	#	%	#	%	#	%	#	%
Less than \$100,000	121	20%	76	40%	35	21%	4	5%	4	2%
\$100,000 - \$149,999	55	9%	23	12%	22	13%	4	5%	3	2%
\$150,000 - \$299,999	90	15%	28	15%	29	18%	21	24%	10	6%
\$300,000 - \$449,999	71	11%	16	9%	26	16%	13	15%	16	10%
\$450,000 - \$599,999	39	6%	8	4%	8	5%	8	9%	14	9%
\$600,000 - \$749,999	30	5%	1	1%	7	4%	6	7%	14	9%
\$750,000 - \$899,999	19	3%	1	1%	3	2%	5	6%	9	6%
\$900,000 - \$1,049,999	19	3%	2	1%	0	0%	4	5%	13	8%
\$1,050,000 - \$1,299,999	20	3%	0	0%	3	2%	5	6%	11	7%
\$1,300,000 - \$1,449,999	10	2%	1	1%	1	1%	1	1%	7	4%
\$1,450,000 +	23	4%	0	0%	0	0%	1	1%	22	13%
Don't know	123	20%	32	17%	29	18%	14	16%	40	25%

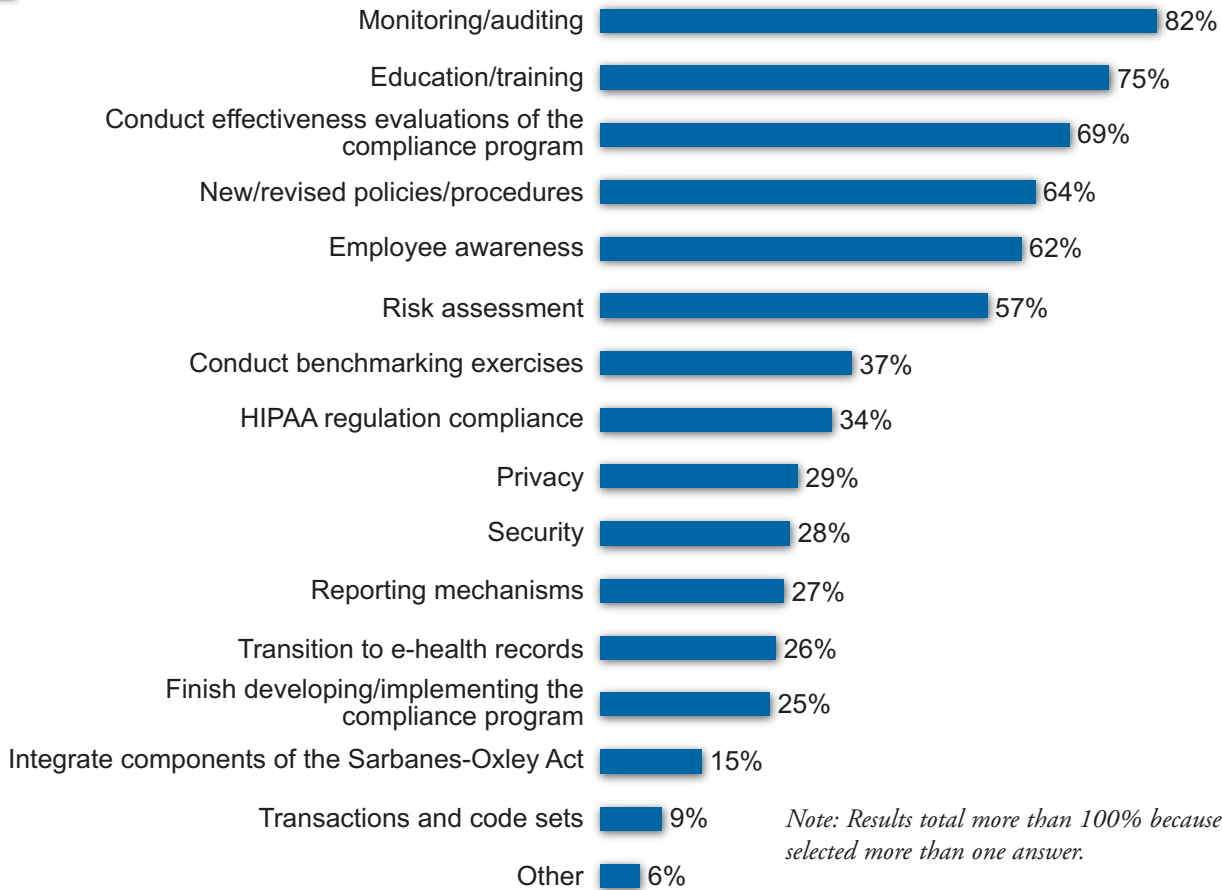


22: What percent (%) of your compliance budget is spent on the following (please give an estimate that totals 100%):

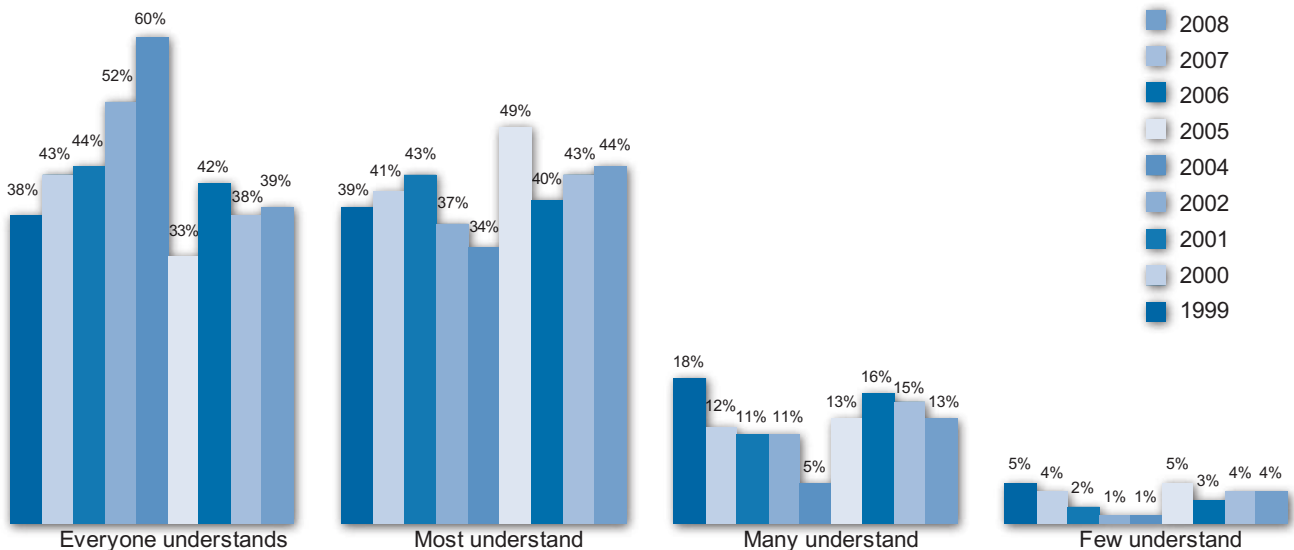




23: What specific goals do you hope to achieve with your compliance program in the next three years?



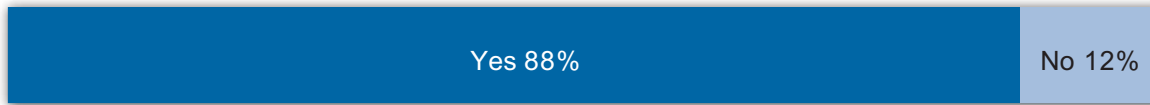
24: Do all of the major constituencies of your compliance program (including senior management, physicians, department directors, and board members) have a basic understanding of compliance?



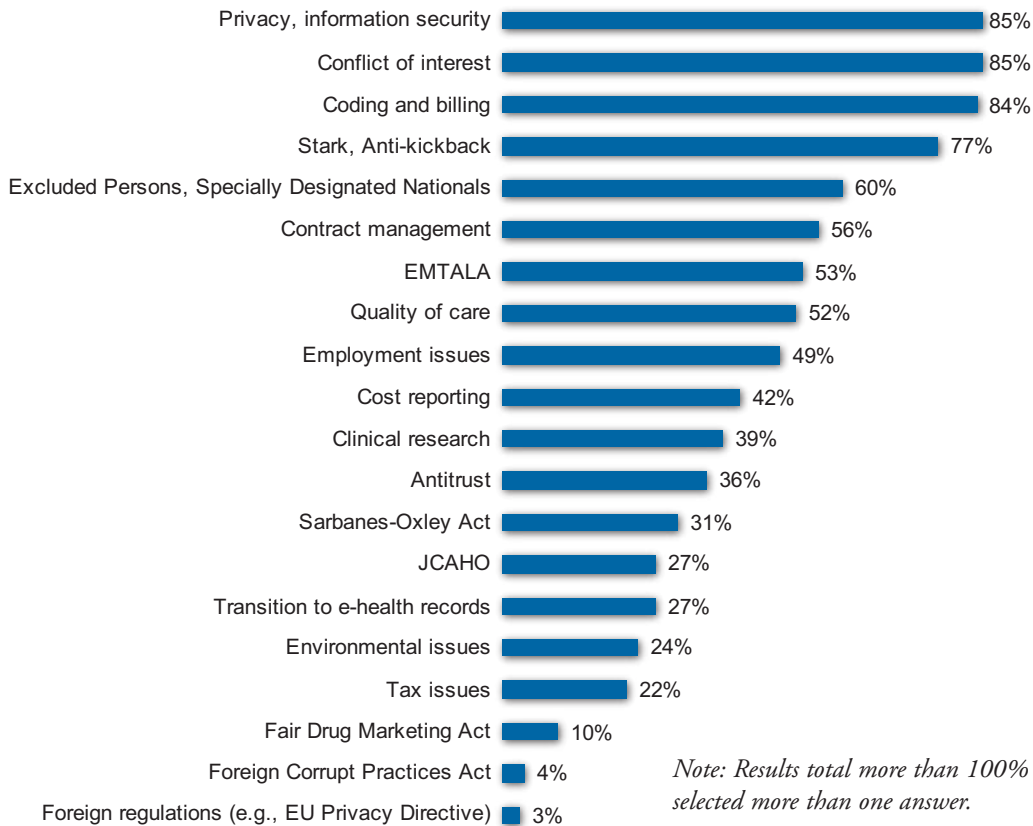
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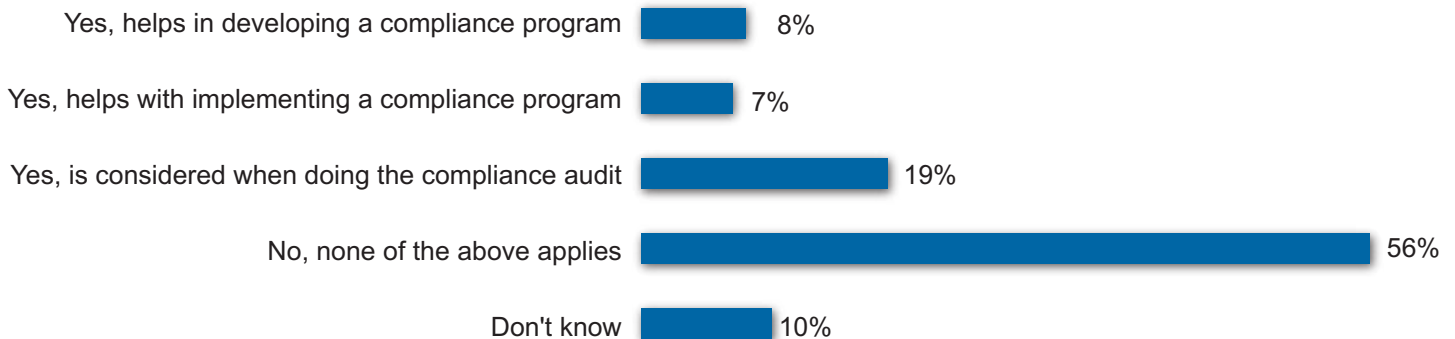
25: Is the compliance program comprehensive for your entire organization?



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

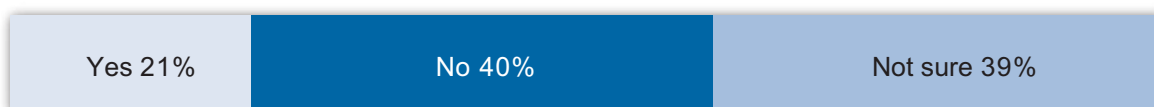


27: Does or did JCAHO (Joint Commission on Accreditation of Health Care Organizations) accreditation and/or compliance with JCAHO standards play a role in helping you develop or implement your compliance program?





28: *If No to question 27, COULD JCAHO accreditation and/or standards play a role in these activities?*



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*



CHIEF COMPLIANCE OFFICER

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

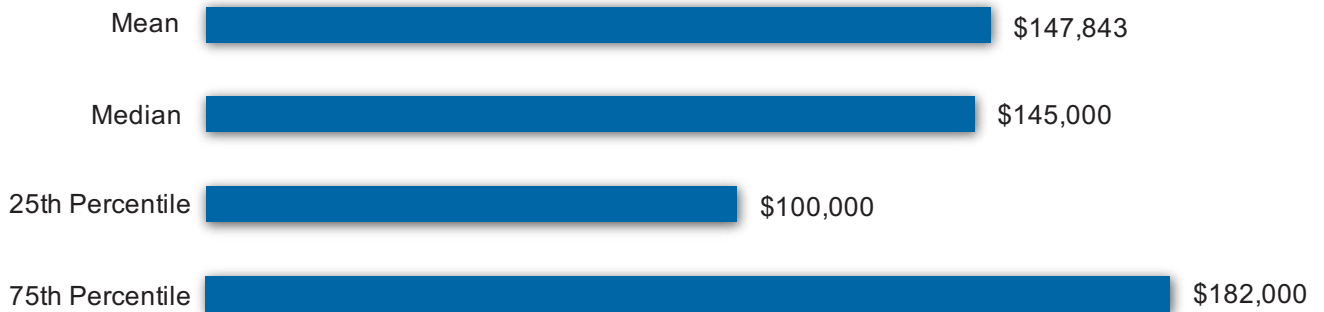
CHIEF COMPLIANCE OFFICER—*The person responsible for the general oversight of the program. He or she supervises a compliance program manager/administrator who handles the daily operation of the compliance program. This is an executive level position for purposes of this survey.*

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.*

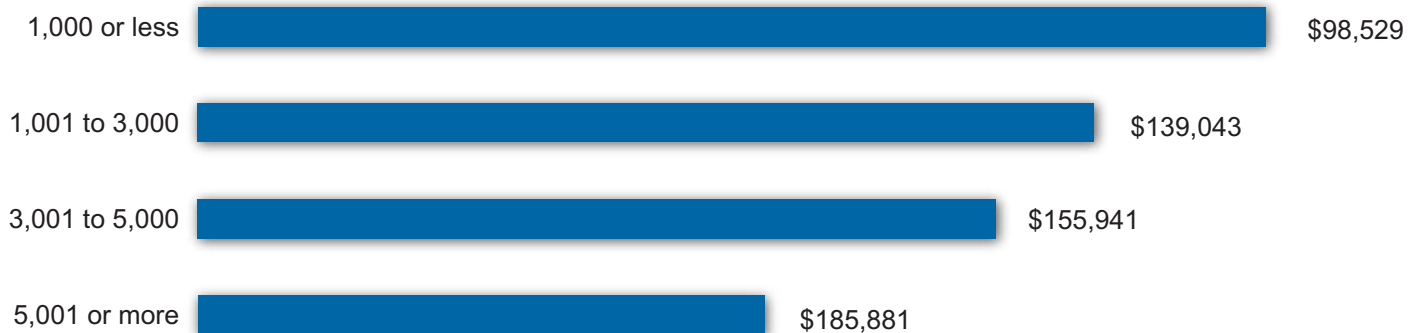
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31a: What is the annual base salary of the Chief Compliance Officer?



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



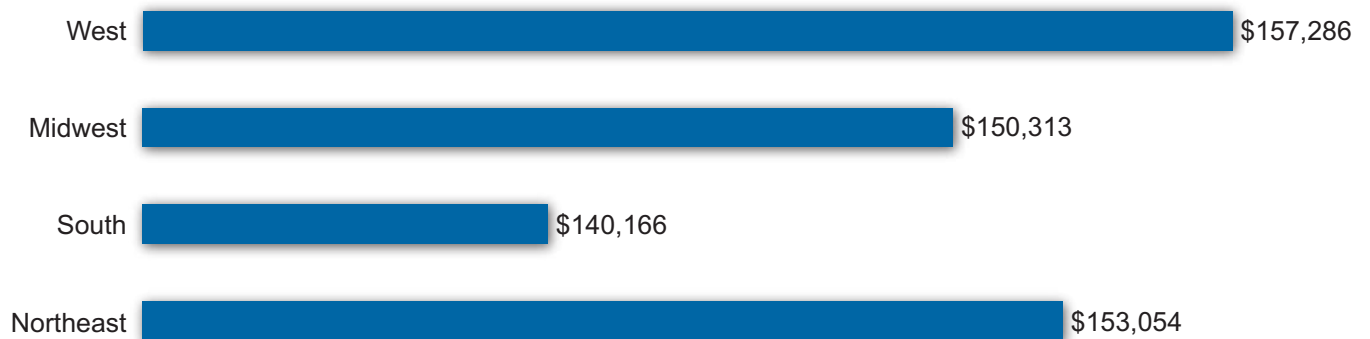
**31c: What is the annual base salary of the Chief Compliance Officer?
(by total revenue of health care organization)**



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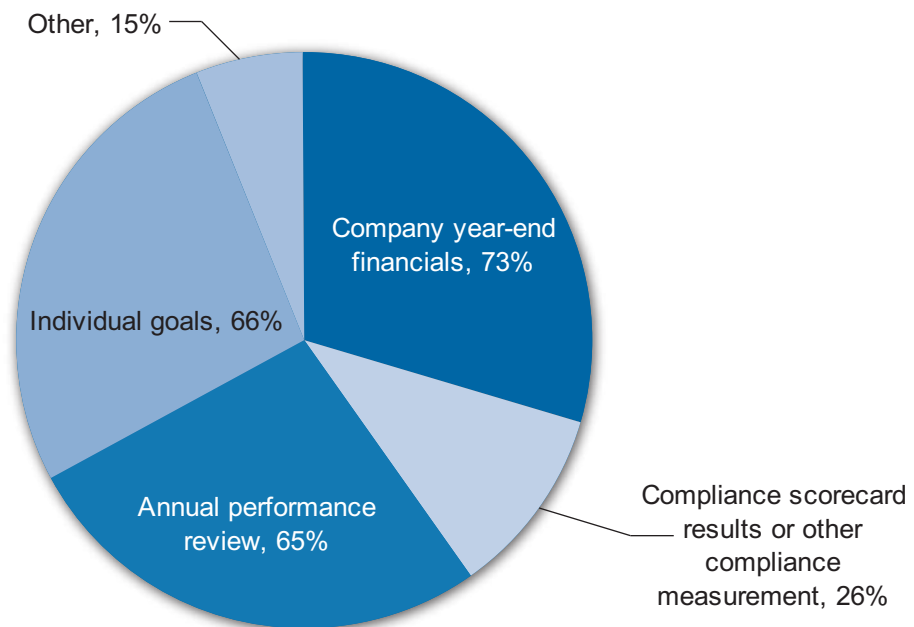
31d: What is the annual base salary of the Chief Compliance Officer? (by geographic region)



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



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

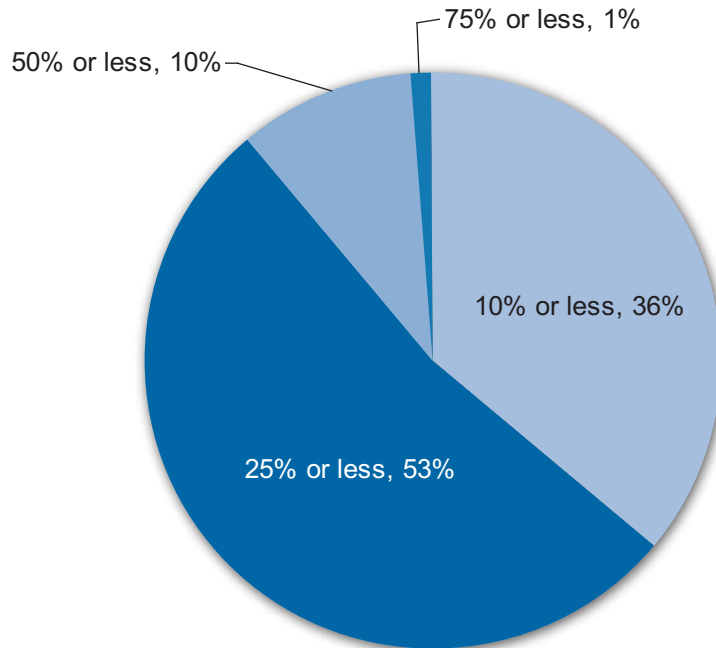


**Note: Results total more than 100% because respondents selected more than one answer.*

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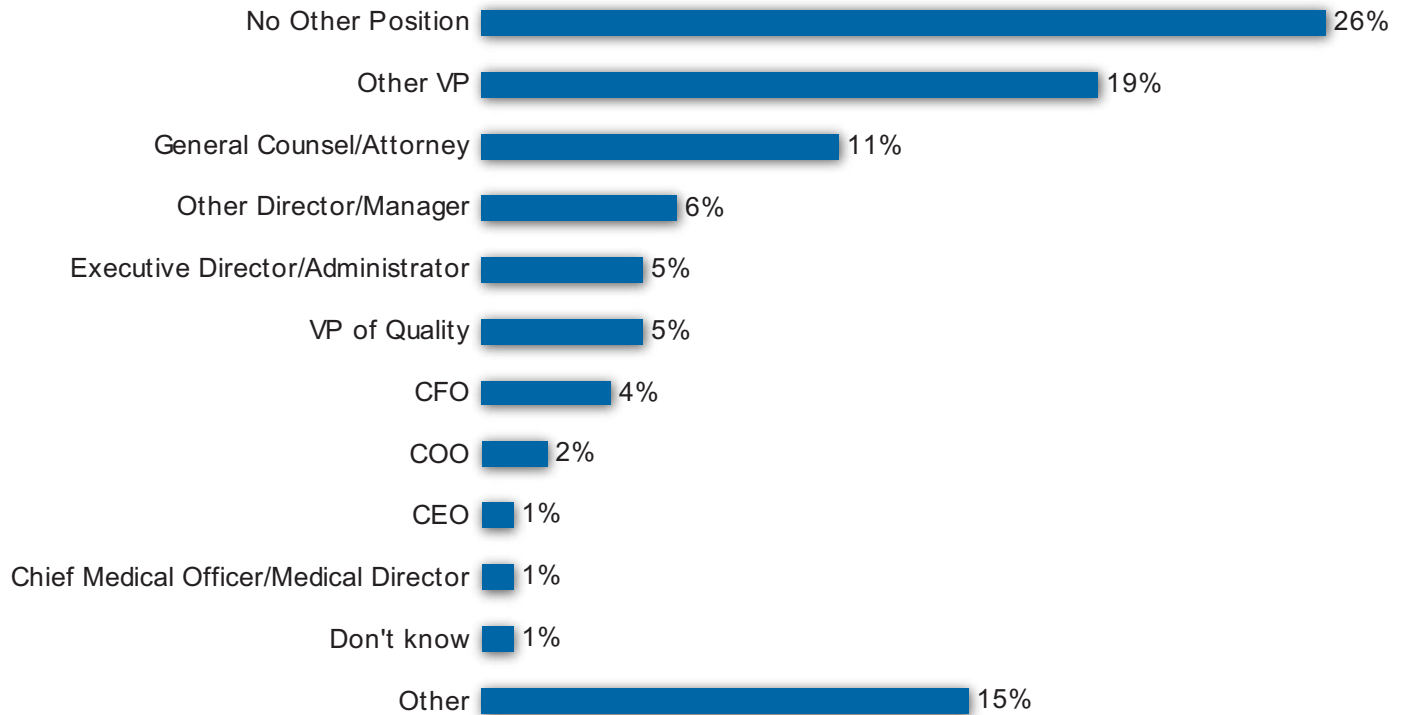
32c: If yes, what percentage of your salary are you eligible for?



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



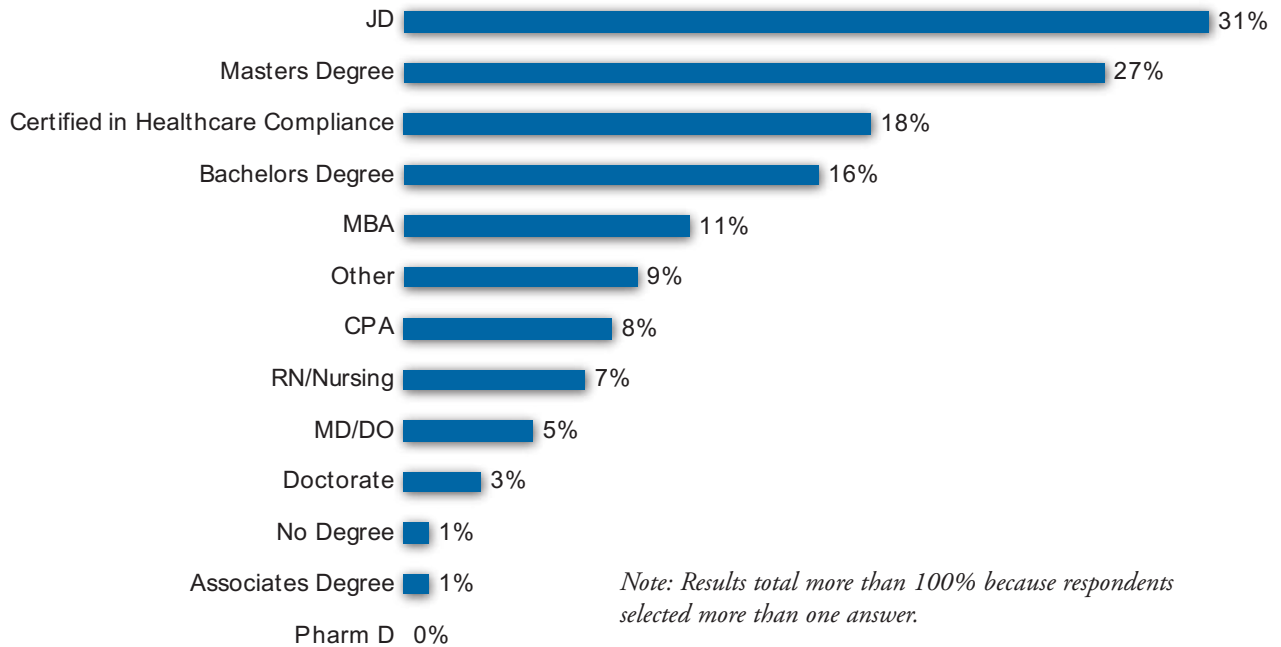
33: What other positions does your Chief Compliance Officer hold in the organization?



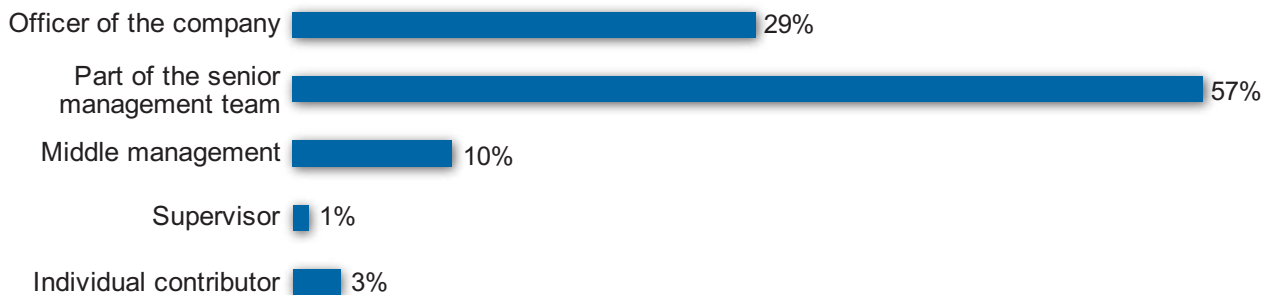
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34: What is the Chief Compliance Officer's highest and/or most recent level of education and/or certification completed?



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



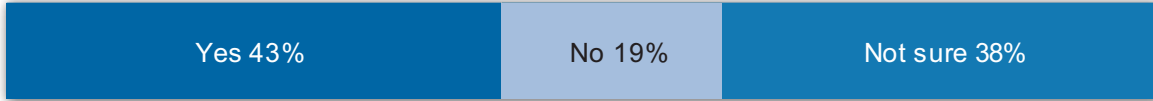
36: Does the Chief Compliance Officer have an employment contract?



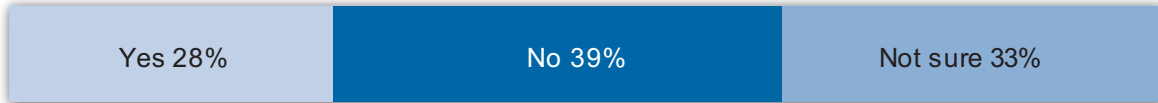
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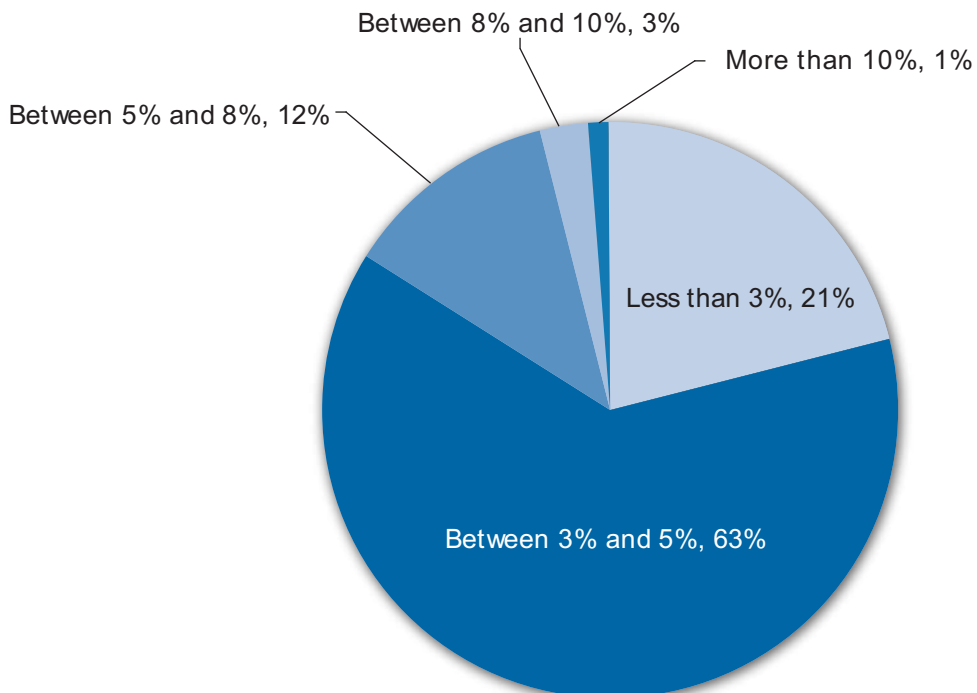
37: Does the Chief Compliance Officer have the ability to acquire his or her own lawyer at the organization's cost?



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

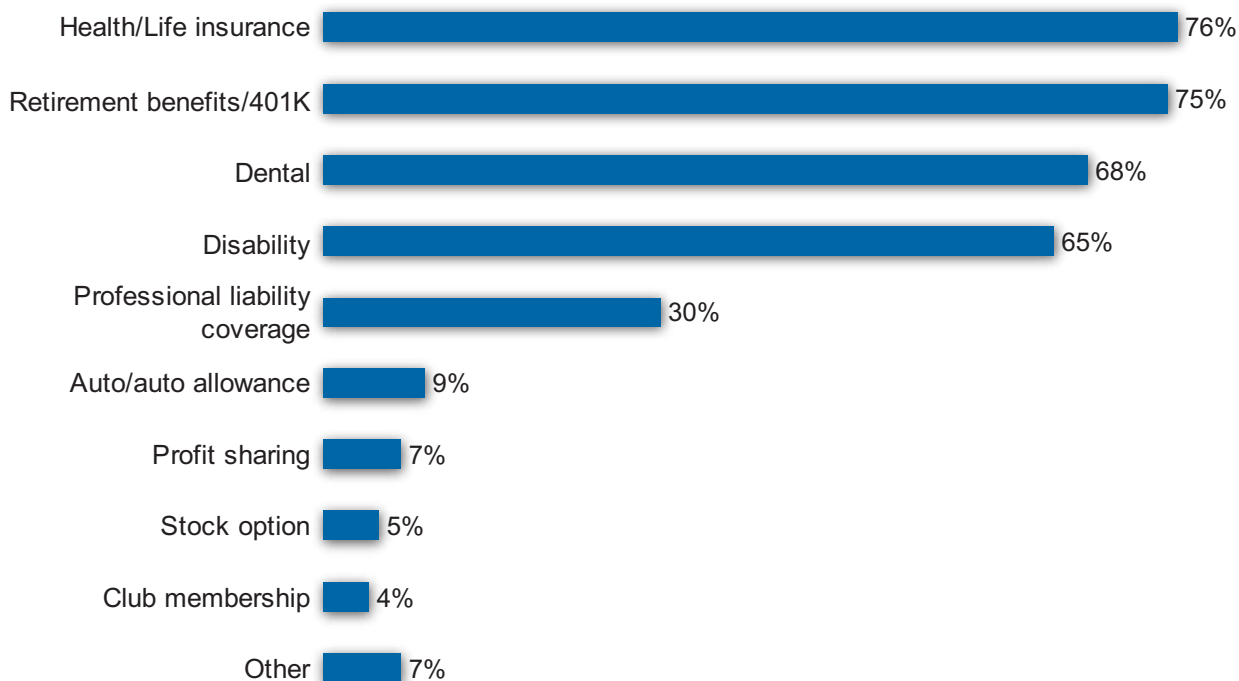


39: What is the projected salary increase for the Chief Compliance Officer in the upcoming year?





40: Please check all of the additional benefits that are part of the Chief Compliance Officer's compensation package:



**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.*



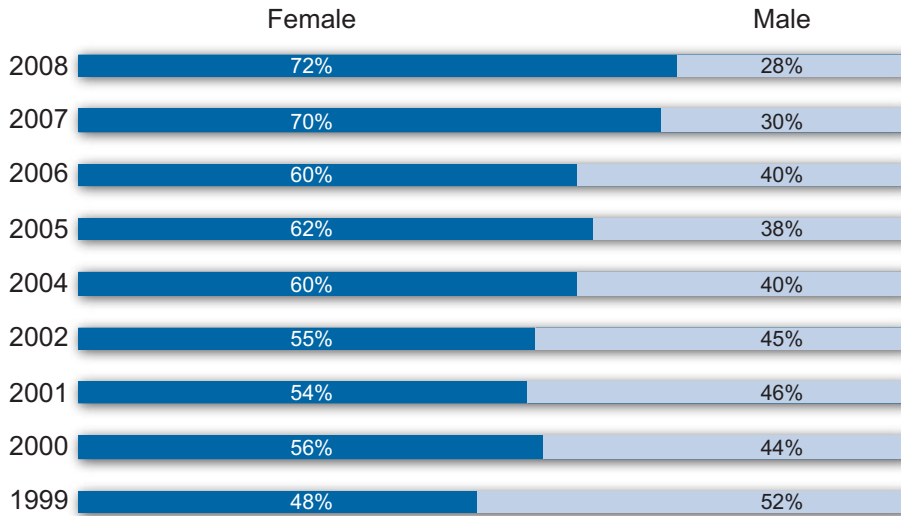
41: Rate each of the following in order of importance from 1 to 8, with "1" representing the industry experience you deem most important in a Compliance Officer

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

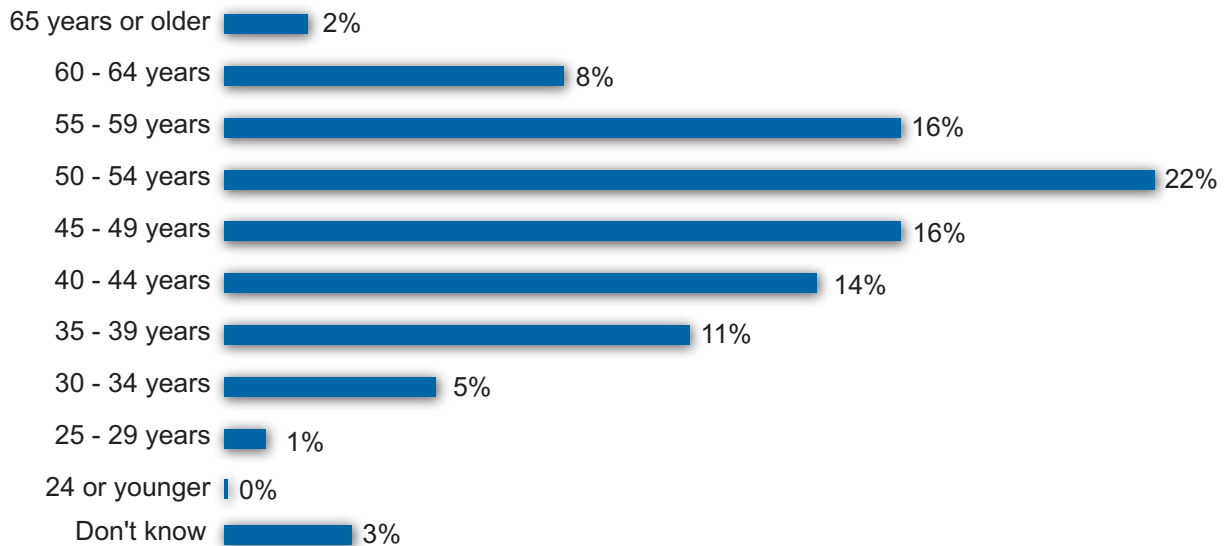
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42: Is your Compliance Officer



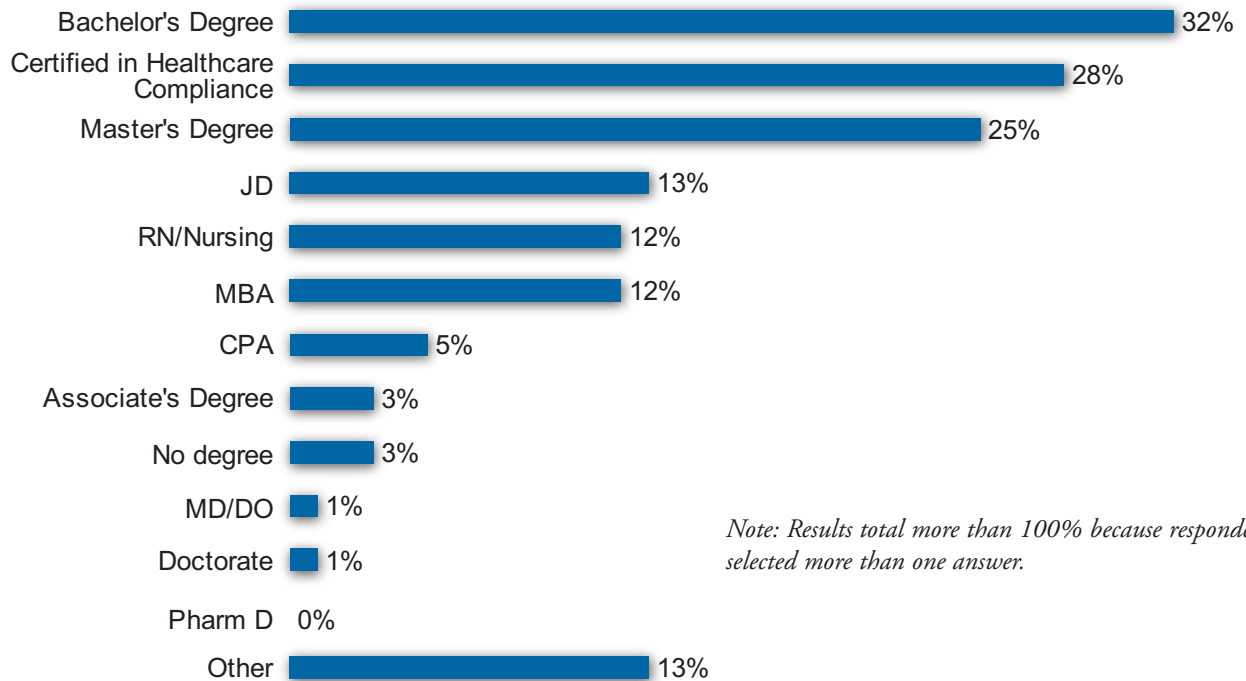
43: What is the age of the Compliance Officer?



2008 Profile of Health Care Compliance Officers



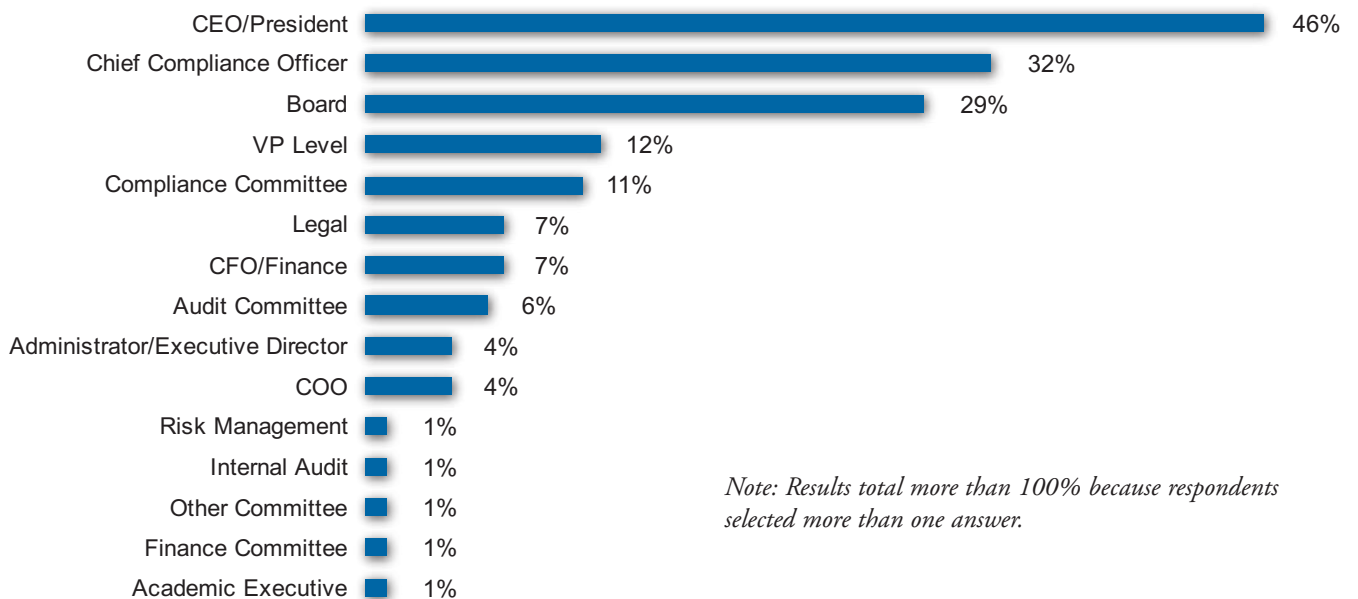
44: What is the Compliance Officer's highest and/or most recent level of education and/or certification completed?



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)

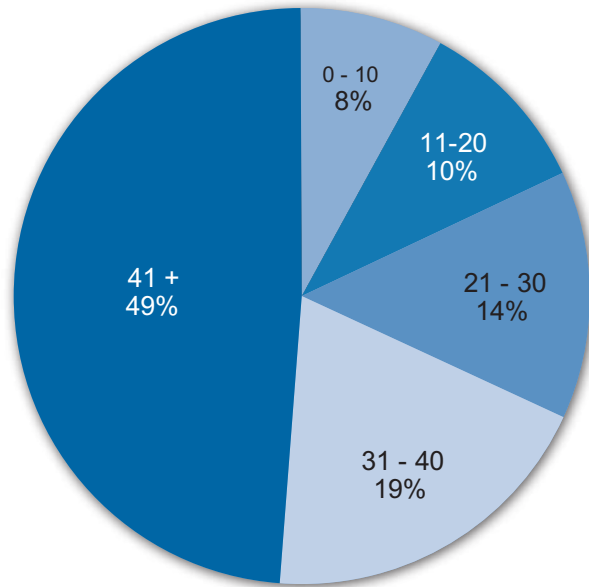


Note: Results total more than 100% because respondents selected more than one answer.

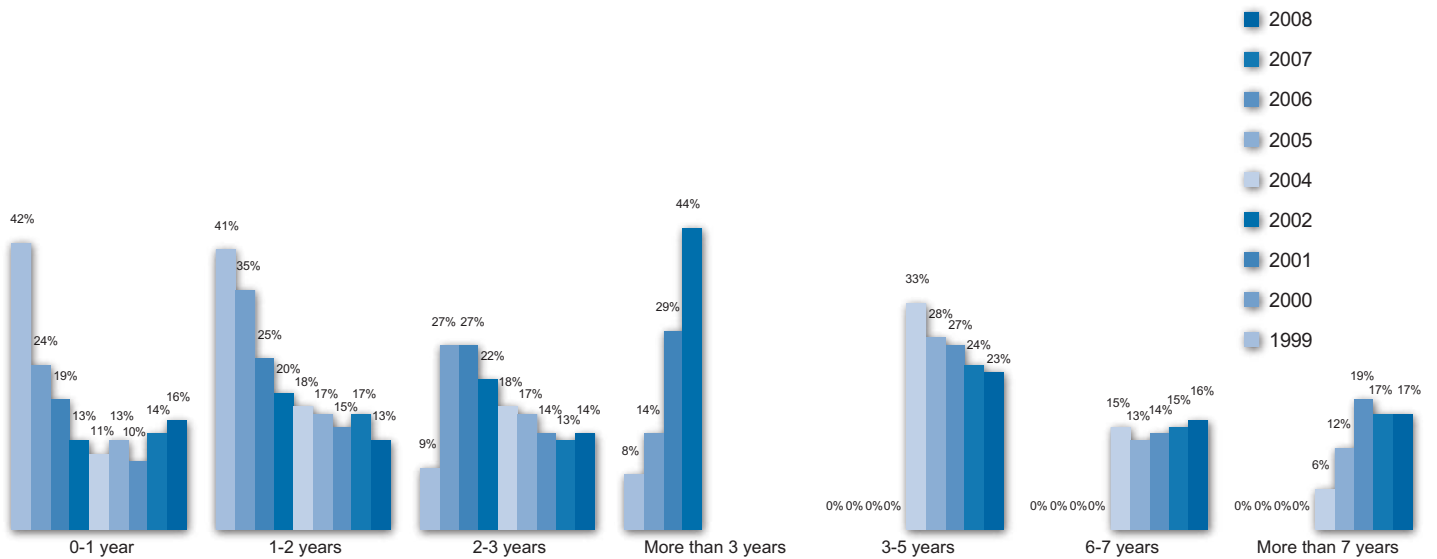
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46: How many hours per week does the Compliance Officer spend on compliance?



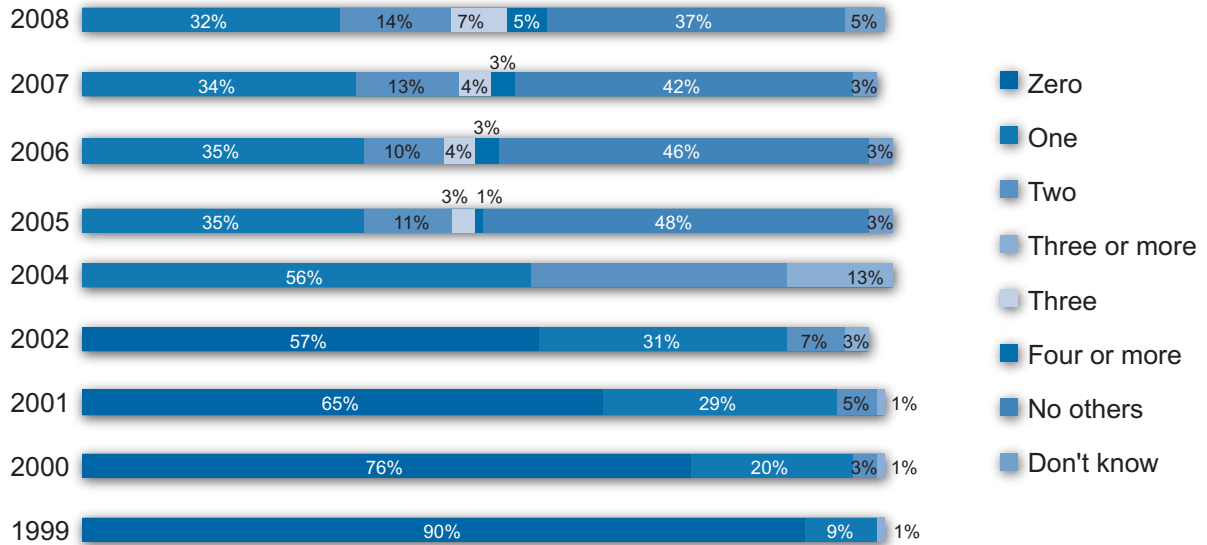
47: What is the Compliance Officer's tenure in their present role?



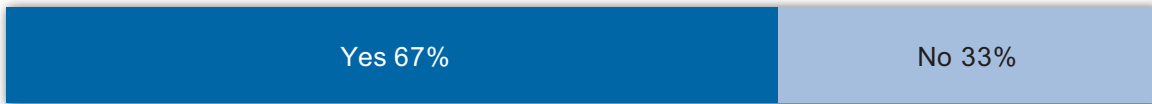
2008 Profile of Health Care Compliance Officers



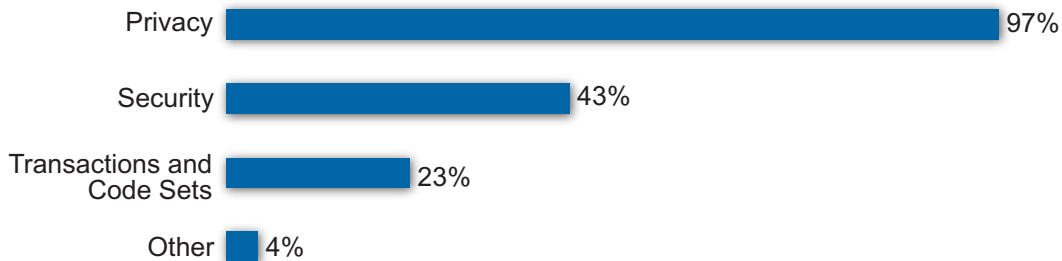
48: How many other people have previously been in this role at your organization?



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



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



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51a: What is the annual base salary of the Compliance Officer?



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



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



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

	Northeast	South	Midwest	West
Responses	92	178	122	90
Mean	\$105,822	\$ 98,014	\$ 94,449	\$102,585
Median	\$100,000	\$ 94,500	\$ 90,750	\$100,000
25th Percentile	\$ 77,750	\$ 75,000	\$ 75,000	\$ 85,000
75th Percentile	\$125,000	\$118,000	\$110,000	\$118,000

2008 Profile of Health Care Compliance Officers

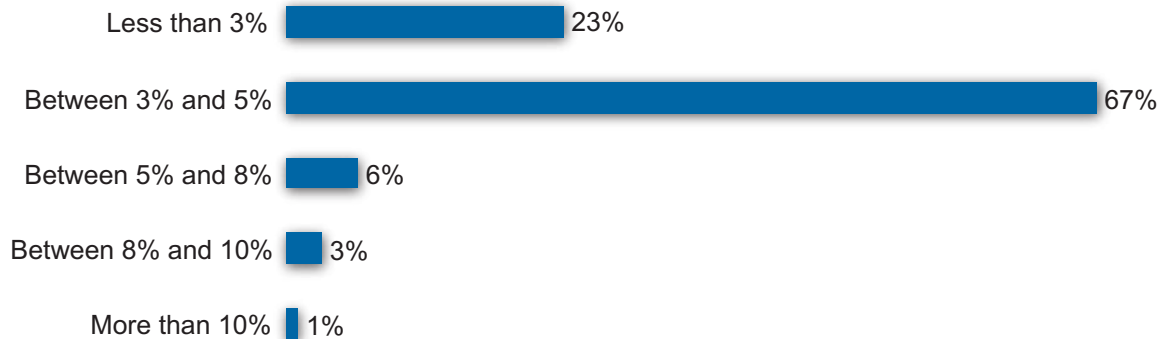


51e: Comparison of the annual base salary of the Compliance Officer & Chief Compliance Officer (by education)

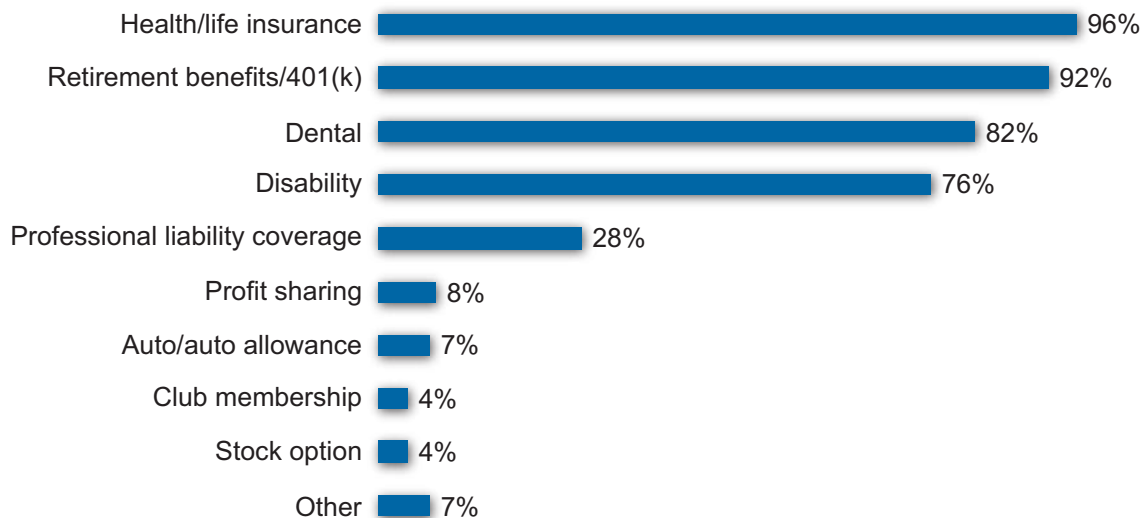
	Compliance Officer	Chief Compliance Officer
CPA	\$115,171	\$168,667
MBA	\$105,748	\$147,328
Juris Doctorate	\$114,967	\$170,995
Masters Degree	\$105,748	\$144,379
Certified in Healthcare Compliance	\$ 98,828	\$133,261
Bachelor's	\$ 96,839	\$143,012
RN/Nursing	\$ 95,890	\$122,417
Doctorate	\$108,167	\$144,000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



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



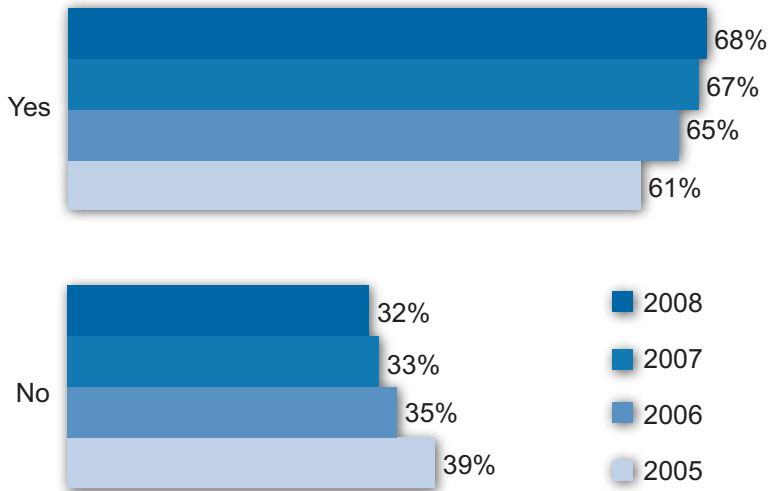
53: Additional benefits that are part of the Compliance Officer's compensation package:



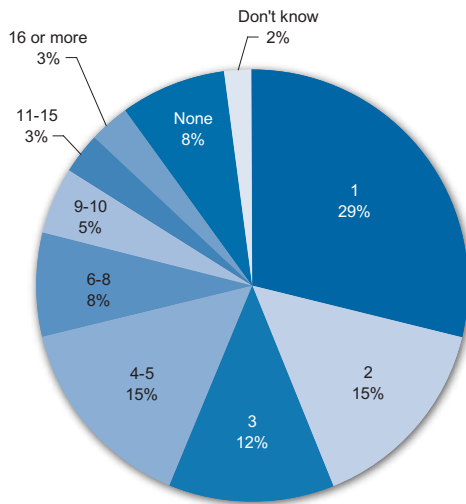
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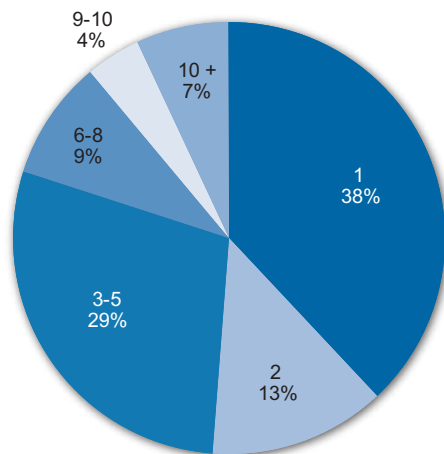
54: Is your Compliance Office a stand-alone department with budgetary responsibilities and staff?



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



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



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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)?

	Percentage reporting the following positions	Average number of full-time equivalent employees reported for each
Assistant Compliance Auditors	21.4%	0.5
Compliance Auditors	34.5%	1.6
Coders	14.9%	0.6
Trainers	14.9%	0.4
Compliance Generalist	24.1%	1.3
Attorneys	8.3%	0.2



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

Degree	CCS/CPC/CCS-H		CHC		CPA		Bachelors		Masters	
	Required	Preferred	Required	Preferred	Required	Preferred	Required	Preferred	Required	Preferred
Assistant Compliance Officers	16%	46%	21%	58%	0%	22%	61%	31%	9%	60%
Compliance Auditors	40%	40%	11%	67%	6%	39%	54%	38%	2%	49%
Coders	67%	26%	14%	50%	0%	9%	26%	44%	1%	19%
Trainers/Educators	30%	30%	12%	64%	0%	10%	52%	38%	7%	59%
Compliance Generalists	9%	48%	17%	61%	1%	23%	59%	32%	2%	57%
Attorneys	4%	23%	17%	45%	6%	16%	60%	10%	19%	36%

Degree	JD		M.Ed		MHA		Clinical (RN, RT, etc.)	
	Required	Preferred	Required	Preferred	Required	Preferred	Required	Preferred
Assistant Compliance Officers	4%	29%	1%	7%	2%	32%	10%	50%
Compliance Auditors	0%	8%	0%	6%	0%	19%	22%	54%
Coders	0%	0%	0%	1%	1%	1%	8%	45%
Trainers/Educators	0%	14%	0%	30%	0%	18%	14%	41%
Compliance Generalists	1%	21%	0%	11%	0%	20%	10%	47%
Attorneys	88%	5%	0%	2%	2%	18%	5%	33%

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

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59-69. How much are the following positions compensated?

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

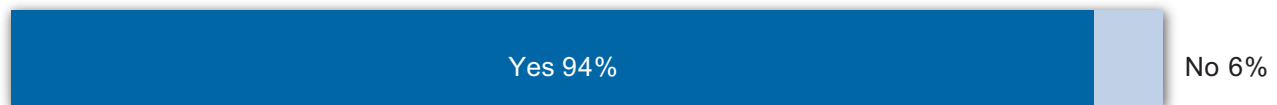


59-69. How much are the following positions compensated? (by region)

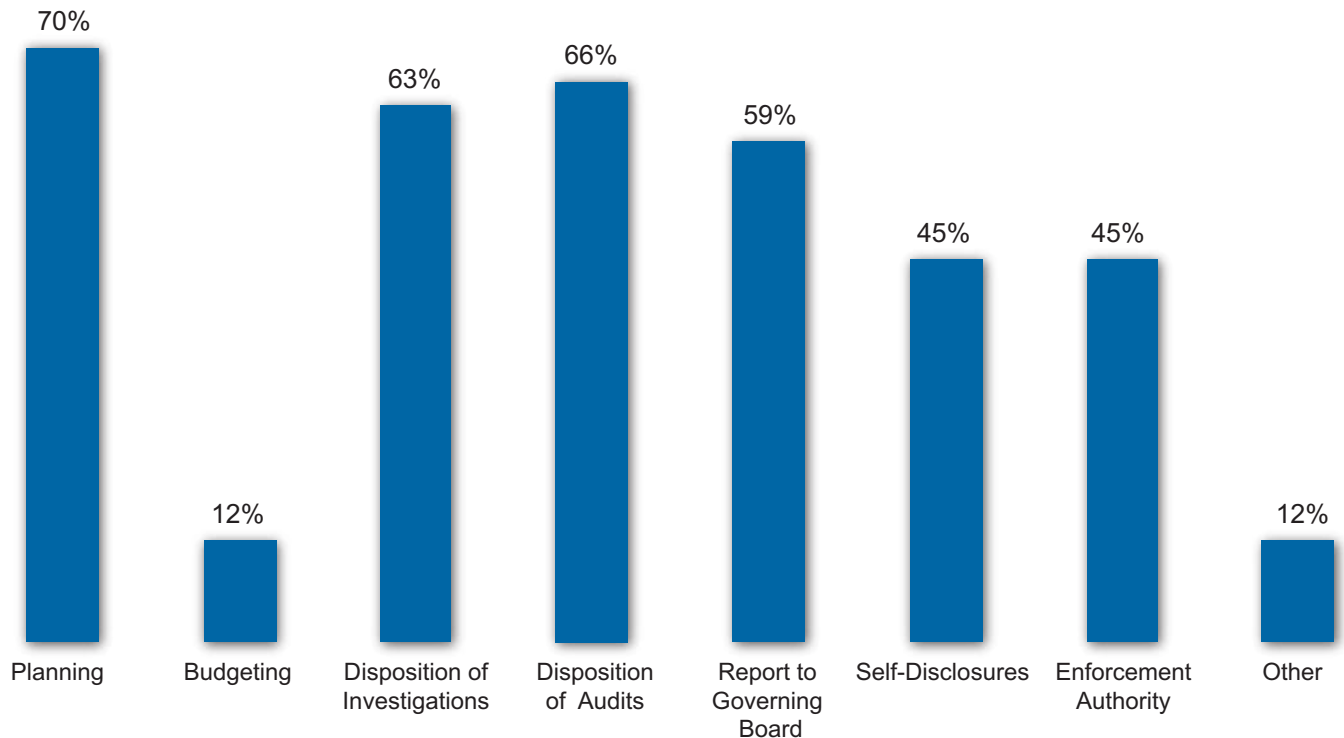
Region	Assistant Compliance Officer	Compliance Auditors	Coders	Trainers	Compliance Generalists	Attorneys on compliance staff
Northeast	\$75,126	\$59,711	\$56,714	\$64,250	\$63,727	\$103,143
South	\$71,269	\$55,271	\$52,667	\$55,600	\$59,139	\$103,097
Midwest	\$71,536	\$53,146	\$45,823	\$55,869	\$55,818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



70. Does your organization have a Compliance Committee?

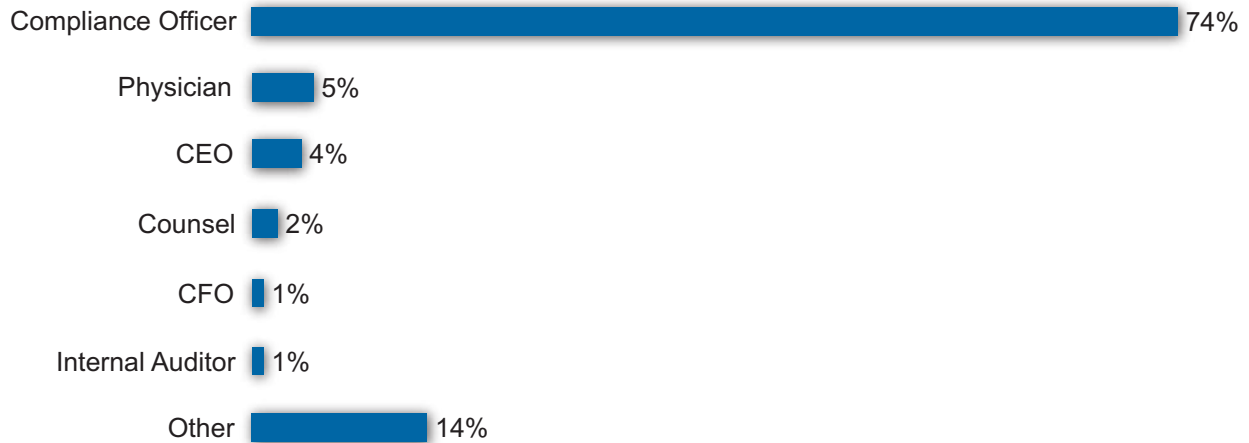


71. If Yes to question 70, which of the following responsibilities does it have?

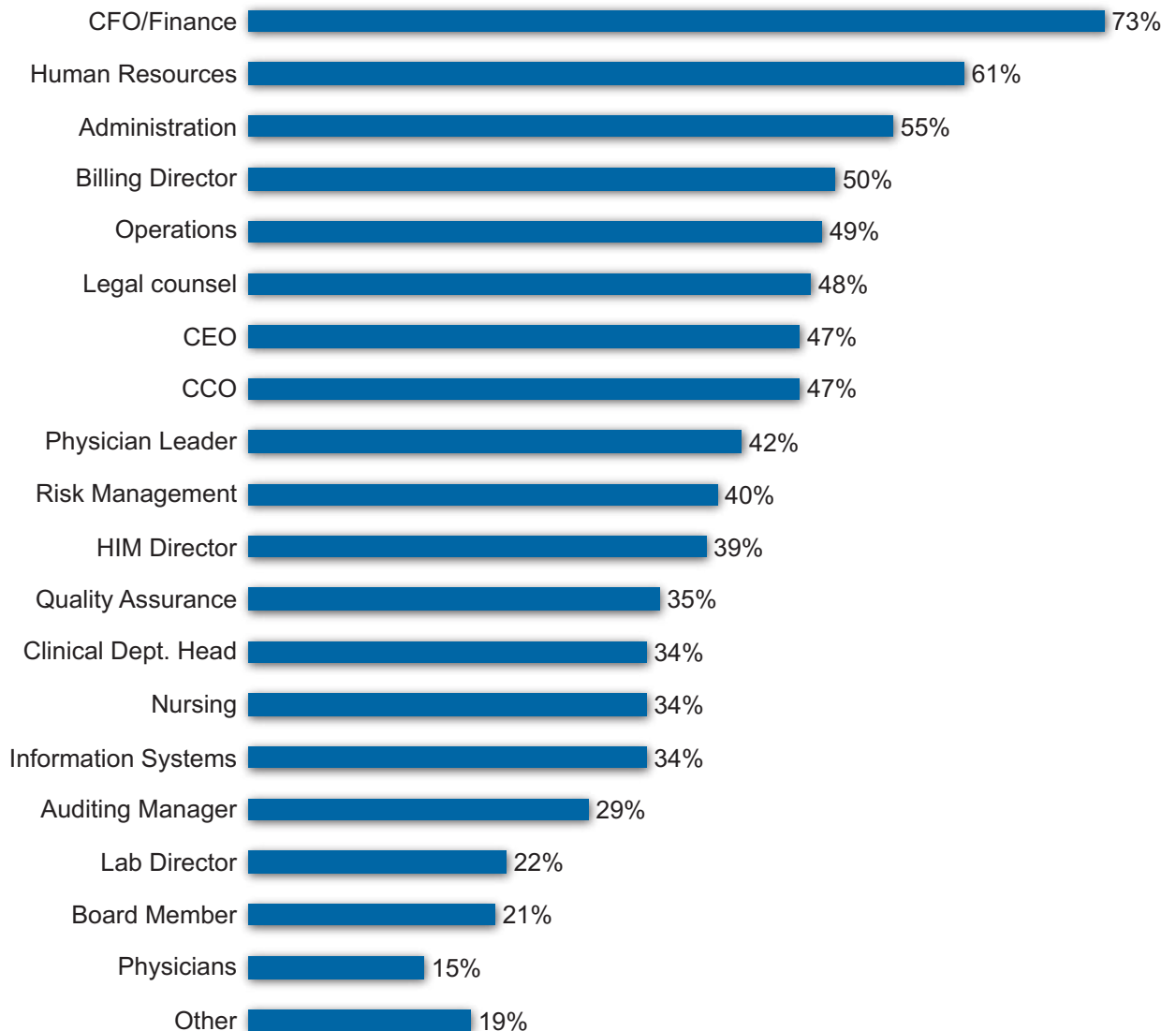




72. Who chairs the Compliance Committee?



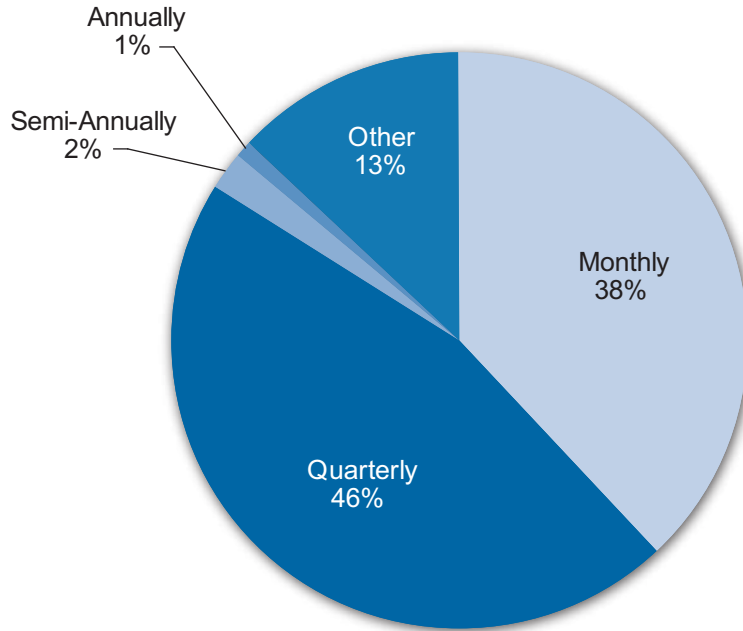
73. Who (position/title) makes up this committee?



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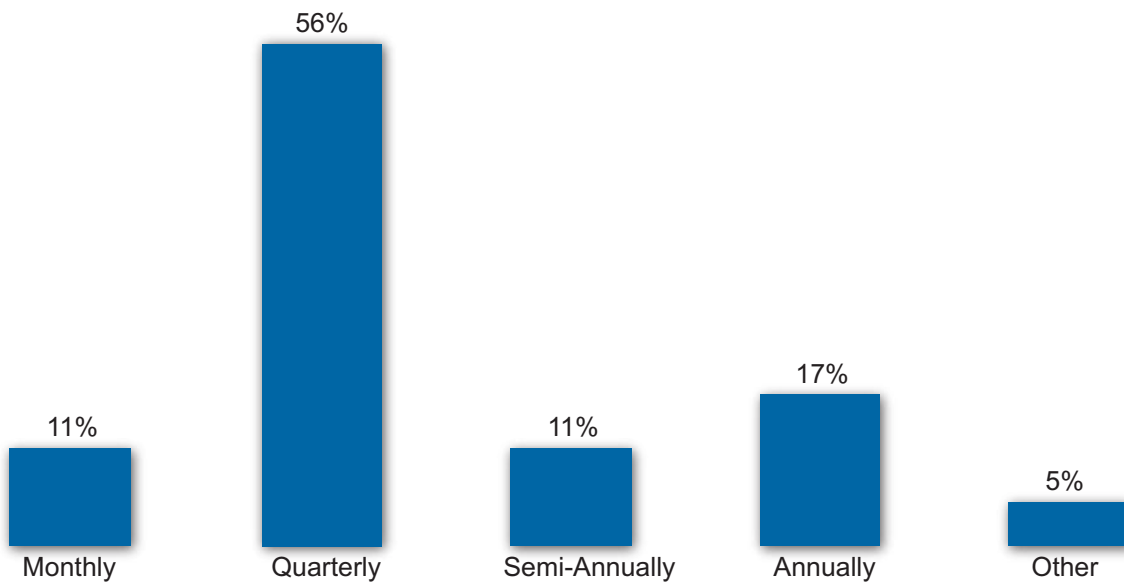
74. How often does the Compliance Committee meet?



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

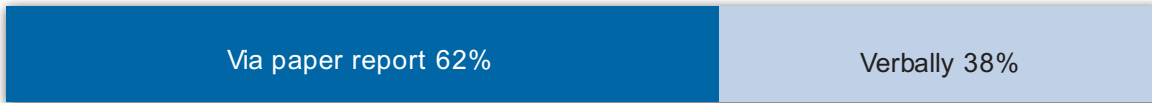


76. If Yes to question 75, how often?

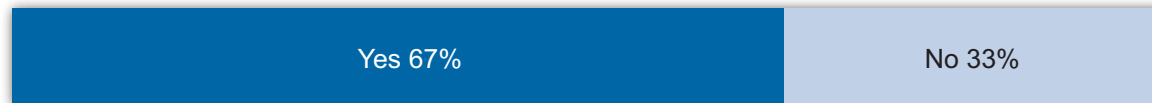




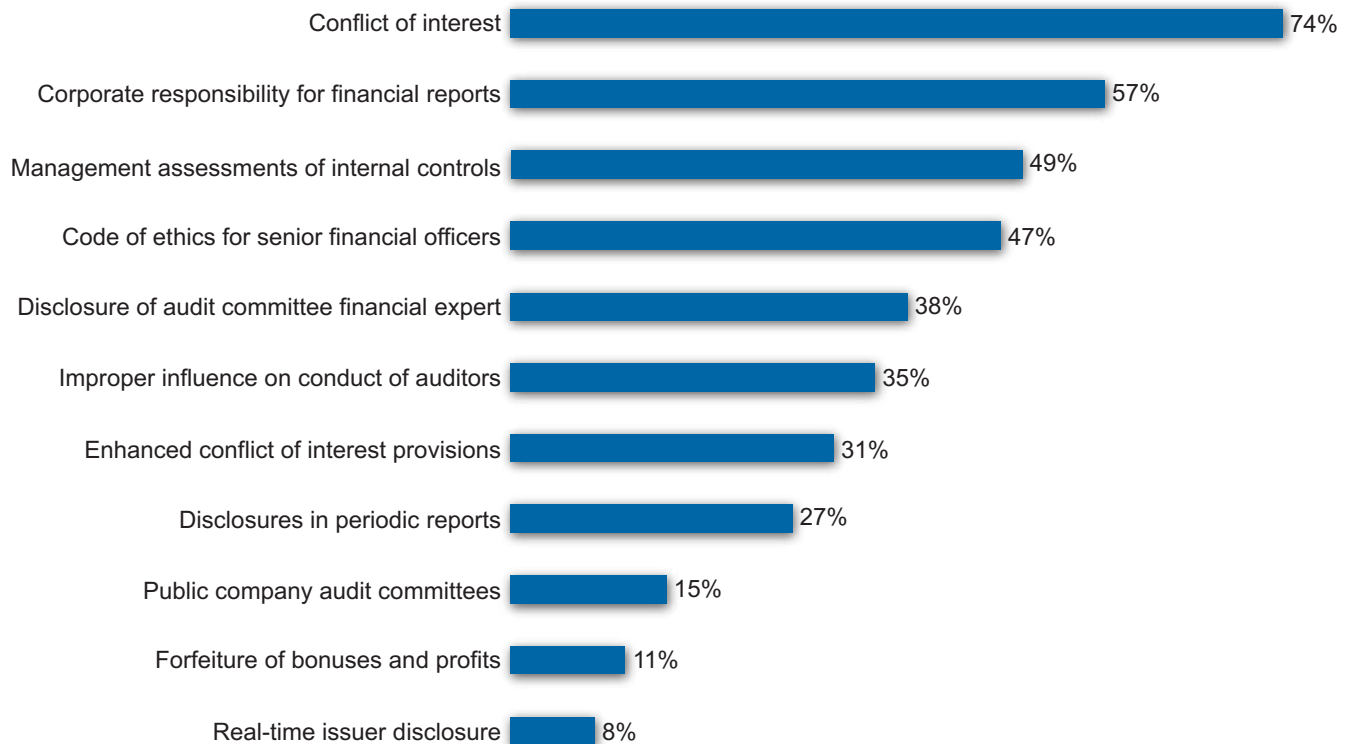
77. How do you record your reports to the Governing Board?



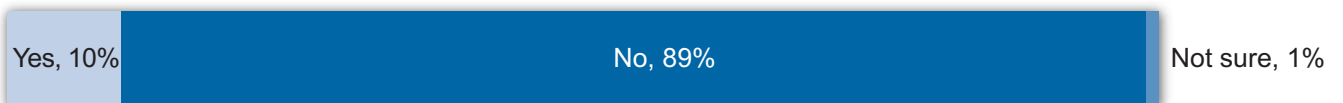
78. Has your organization reviewed the Sarbanes-Oxley Act (SOX)?



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



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



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Notes

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2009

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COMPLIANCE INSTITUTE

April 26–29, 2009

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