Leveraging Employee Survey Data to Measure Awareness and Effectiveness of Your Program

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Corporate Compliance Officer, Circle Health

Session Objectives

- Understand the importance of conducting an all employee, management, and risk assessment surveys to measure awareness and effectiveness of your compliance program
- Tips for properly implementing your survey program and how to avoid common pitfalls
- Learn how to utilize data to identify compliance risks and build an effective work plan
About Circle Health

Approximately 3,900 Employees

Why conduct surveys?

• Compliance Program Awareness
• Compliance Program Effectiveness
• Understand risk areas
• Set direction for Compliance Program/Develop Work Plan
5 Things to consider...

1 Timing

➤ When is the best time for your organization?
  • Be aware of survey fatigue

➤ Understand the time commitment
  • Planning
  • Preparing
  • Gathering
  • Analyzing
  • Presenting

5 Things to consider...

2 Method

➤ What type of survey fits your needs?
  • Mail
  • Online
  • Telephone
  • In-person

➤ There are pros and cons to each method

➤ Sample Size
  ➤ All Employees?
  ➤ Small sample?
## 5 Things to consider...

### Questions & Design

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<table>
<thead>
<tr>
<th></th>
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</thead>
<tbody>
<tr>
<td><strong>What are you looking to answer?</strong></td>
<td></td>
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<tr>
<td>•</td>
<td>Think about main objectives</td>
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<tr>
<td><strong>Number of questions</strong></td>
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<tr>
<td>•</td>
<td>Too few could affect results</td>
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<td>•</td>
<td>Too many could affect response rate</td>
</tr>
<tr>
<td><strong>Format</strong></td>
<td></td>
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<tr>
<td>•</td>
<td>Agree/Disagree</td>
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<td>•</td>
<td>Multiple Choice (Scale)</td>
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<td>•</td>
<td>Yes/No</td>
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<td>•</td>
<td>True/False</td>
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<td>•</td>
<td>Open ended/Free text</td>
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</tbody>
</table>

### Sample Questions – All Employees

1. I know where to find a copy of the organization’s Code of Conduct
2. I would feel comfortable reporting a compliance concern
3. If I reported a compliance concern, I am fearful there would be retaliation
4. I know where to find compliance related educational documents
5 Things to consider...

➤ Sample Questions – Management

1. Do you feel staff members in your department would be comfortable reporting compliance concerns

2. Do you suspect the employees in your department(s) may have a fear of retaliation, if faced with reporting an actual or suspected compliance issue?

3. Please rate the overall content of educational documents published by the Compliance Department

4. If you or one of your employees identified an actual or suspected compliance issue(s), the appropriate follow-up action would be taken within the organization.

Questions & Design

5 Things to consider...

➤ Employee newsletter

➤ Rounding

➤ Raffle

➤ Stress anonymity

Promotion & Visibility
5 Things to consider...

Support & Buy-in

- Support from Senior Leadership
- Support from all management
- Engagement of Compliance Committee
Enterprise Risk Assessment

1. Identify Risk Areas
2. Develop Assessment Tool
3. Assess Risks
4. Prioritize Risk Areas
5. Respond to Risk

2. Please rate the likelihood of a compliance issue/violation for each of the risk areas.

<table>
<thead>
<tr>
<th>Risk Area</th>
<th>Almost Impossible</th>
<th>Extremely Unlikely</th>
<th>Possible</th>
<th>Isolated Incidents</th>
<th>Repeated Incidents</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fear of &quot;Speaking Up&quot; / Retaliation</td>
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<tr>
<td>Training and Development</td>
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<td></td>
</tr>
</tbody>
</table>

3. Please rate the financial impact of a compliance issue/violation for each of the risk areas.

<table>
<thead>
<tr>
<th>Risk Area</th>
<th>&lt; 0.5% of Revenue of Approx. $1.5M</th>
<th>0.5% - 1% of Revenue or Approx. $1.5M - $3M</th>
<th>1% - 2% of Revenue or Approx. $3M - $6M</th>
<th>2% - 5% of Revenue or Approx. $6M - $10M</th>
<th>&gt; 5% of Revenue or Approx. $10M+</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fear of &quot;Speaking Up&quot; / Retaliation</td>
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</tr>
</tbody>
</table>
### Enterprise Risk Assessment

4. Please rate the Reputation Impact of a compliance issue/violation for each of the risk areas.

<table>
<thead>
<tr>
<th>Risk Area</th>
<th>No Likely Impact on Reputation</th>
<th>Limited Negative Impact on Reputation</th>
<th>Moderate Negative Impact on Reputation (Local Media Coverage)</th>
<th>Severe Negative Impact on Reputation (Regional &amp; National Media Coverage)</th>
<th>Sustained Negative Impact on Reputation (Front Page of Newspaper)</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fear of &quot;Speaking Up&quot; / Retaliation</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>Training and Development</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td></td>
</tr>
</tbody>
</table>

5. Please rate the Operational Impact of a compliance issue/violation for each of the risk areas.

<table>
<thead>
<tr>
<th>Risk Area</th>
<th>Not Likely to Result in any Operational Impact</th>
<th>Limited, but Manageable Operational Impact</th>
<th>Moderate Operational Impact</th>
<th>Severe Operational Impact</th>
<th>Catastrophic Operational Impact</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fear of &quot;Speaking Up&quot; / Retaliation</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
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<td>○</td>
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**We have the data...now what?**
We have the data...now what?

Analyzing the Results

Awareness and Effectiveness Scores

- Questions are assigned to Detection, Response, Prevention, and Education
- Calculate an awareness and effectiveness score for each
Analyzing the Results

Awareness and Effectiveness Scores

- Questions are assigned to Detection, Response, Prevention, and Education
- Calculate an awareness and effectiveness score for each category

Analyze the results for different years and categories.
If I reported a compliance concern to my manager or supervisor, I am fearful that they would retaliate against me:

- **Agree**: 20.00%, 13.00%, 5.00%
- **Disagree**: 80.00%, 87.00%, 95.00%

In your opinion, do you feel that staff members in your department(s) would feel comfortable reporting suspected or actual compliance issues:

- **Yes**: 95.00%, 96.00%, 83.00%
- **No**: 5.00%, 4.00%, 17.00%
Analyzing the Results

I am aware that the organization has a Code of Conduct:

- 2015: 99.69% Agree, 0.31% Disagree
- 2016: 99.88% Agree, 0.12% Disagree
- 2017: 100% Agree

Risk Assessment Results

Calculation of Risk

Risk Score = Likelihood X (Financial + Reputational + Operational)

2. Please rate the likelihood of a compliance issue/violation for each of the risk areas.

<table>
<thead>
<tr>
<th>Fear of “Speaking Up”/Retaliation</th>
<th>Almost Impossible</th>
<th>Extremely Unlikely</th>
<th>Possible</th>
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<th>N/A</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
<td>0</td>
</tr>
<tr>
<td>Training and Development</td>
<td></td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>
Risk Assessment Results

<table>
<thead>
<tr>
<th>Overall Likelihood</th>
<th>Financial Impact</th>
<th>Reputational Impact</th>
<th>Operational Impact</th>
<th>Risk Score (Overall Likelihood x Financial + Reputational + Operational)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fear of Speaking Up/Non-Retaliation</td>
<td>2</td>
<td>1</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Training and Development</td>
<td>3</td>
<td>3</td>
<td>2</td>
<td>3</td>
</tr>
</tbody>
</table>

Calculation of Risk

Risk Scores

Risk Assessment Survey

Risk Categories

People  Service  Quality  Financial  Information

Risk Scores

Risk Scores

Risk Scores

Risk Scores

Risk Scores
Developing the Work Plan

The Two M’s

M Manageable
M Meaningful
Developing the Work Plan

Annual Work Plan

- Auditing/Monitoring
- Education
- Other Projects/Initiatives
Questions?

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