

# Healthcare Industry Compliance Staffing and Budget Benchmarking and Guidance Survey

February 2018

A survey by the Health Care Compliance Association

## HEALTH CARE COMPLIANCE ASSOCIATION LEARN. NETWORK. INSPIRE.

Stay informed on privacy issues, Stark compliance, conflict of interest, False Claims Act, federal privacy rules, and patient rights. Learn proactive compliance strategies from industry leaders.



### **MEMBERSHIP BENEFITS**

- *Compliance Today* magazine, 12 issues exclusively for HCCA members plus full access to the magazine archives
- Be part of a community of 11,500+ healthcare compliance professionals
- Members-only discounts on conferences, manuals, and books
- Network and learn at 50+ conferences a year
- Save on weekly Web conferences for live learning at your desk
- Receive a discount on Compliance Certification Board (CCB)® exam pricing for CHC, CHRC, and CHPC

#### Additional resources

- HCCAnet® provides access to an online Resource Library and networking
- Weekly newsletters and blog posts from industry experts

## LEARN MORE AND JOIN TODAY hcca-info.org/join

#### Background

In 2017, the Health Care Compliance Association (HCCA) conducted a comprehensive survey of compliance professionals in order to create a salary survey. The survey looked at salaries in relation to measures such as size of company (in revenues and employees) as well as compliance budget and ownership structure.

As was the case with the 2015 salary survey, HCCA recognized that there would be an opportunity to reuse the data to create benchmarks for staffing and budget. The association then worked with the research provider to create the following report, which repurposes the salary survey data.

#### Using this report

On the following pages are a series of data tables that can be used to benchmark compliance program budgets and staffing by several factors. As you review the data, keep in mind that this data should be considered directional in nature. Different companies of the same size will likely have very different histories in terms of compliance issues and risks.

#### Survey data

Compliance departments tend to be small for all but the largest of organizations. Although department size does tend to increase with revenue, more than half of survey respondents from organizations with \$1 billion dollars or less in revenue reported that the compliance team was no more than five people. Only when revenues rise above that mark do the majority of survey respondents report a team of six or more.

		EMPL	OYEES I	N COMF		AND ETH	IICS GRO	UP	
HEALTHCARE	1	2 to 5	6 to 10	11 to 15	16 to 20	21 to 30	31 to 40	41 to 50	>50
Less than \$5 million	28.7%	29.8%	17.0%	3.5%	8.8%	4.1%	3.5%	2.3%	2.3%
\$5 to \$15 million	28.5%	45.9%	15.1%	4.7%	1.7%	1.7%	0.6%	0.6%	1.2%
\$15 to \$30 million	23.2%	49.5%	17.9%	1.1%	2.1%		1.1%	1.1%	4.2%
\$30 to \$50 million	30.1%	50.5%	9.7%	4.3%	2.2%	1.1%			2.2%
\$50 to \$100 million	17.4%	53.7%	15.7%	6.6%	1.7%	0.8%	0.8%	0.8%	2.5%
\$100 to \$500 million	23.3%	37.3%	20.0%	6.0%	6.7%	1.3%	3.3%		2.0%
\$500 million to \$1 billion	7.5%	43.9%	26.2%	9.3%	0.9%	6.5%	0.9%	2.8%	1.9%
\$1 to \$3 billion	3.2%	23.4%	28.5%	15.2%	14.6%	6.3%	4.4%	2.5%	1.9%
More than \$3 billion		7.7%	13.2%	17.6%	16.5%	11.0%	7.7%	5.5%	20.9%

#### **REVENUE OF ORGANIZATION AS A WHOLE**

When looking at the data provided by compliance professionals working in a division of an organization, the pattern is the same: lower revenues correlate to smaller departments, typically of five employees or fewer. Throughout the data that follows, there are some anomalies in which staffing and budgets at the division level were reported as being higher than at the corporate level.

		EMP	LOYEES	N COMP		AND ETH	ICS GRO	UP	
HEALTHCARE	1	2 to 5	6 to 10	11 to 15	16 to 20	21 to 30	31 to 40	41 to 50	>50
Less than \$5 million	35.1%	34.0%	13.8%	4.3%	6.4%	2.1%	1.1%		3.2%
\$5 to \$15 million	28.9%	46.5%	13.2%	3.1%	3.8%	0.6%	1.9%		1.9%
\$15 to \$30 million	29.0%	44.1%	19.4%	1.1%		2.2%	1.1%	2.2%	1.1%
\$30 to \$50 million	30.8%	45.2%	14.4%	5.8%	3.8%				
\$50 to \$100 million	17.1%	54.7%	14.5%	6.0%	3.4%	0.9%		1.7%	1.7%
\$100 to \$500 million	24.0%	37.7%	21.0%	6.0%	6.0%	1.8%	3.0%		0.6%
\$500 million to \$1 billion	4.6%	45.9%	26.6%	10.1%	2.8%	5.5%	1.8%	0.9%	1.8%
\$1 to \$3 billion	4.0%	23.7%	29.5%	13.3%	10.4%	7.5%	5.2%	4.0%	2.3%
More than \$3 billion	5.4%	13.6%	16.3%	13.6%	15.0%	6.8%	7.5%	4.1%	17.7%

#### **REVENUE OF PORTION OF ORGANIZATION COMPLIANCE GROUP SERVES**

When looking at department size compared to the number of employees in an organization, staffing does increase as employee population increases, but compliance teams of five people or fewer is the norm for organizations with fewer than 7,500 people.

		EMI	PLOYEES	IN COMP			CS GROU	Р	
HEALTHCARE	1	2 to 5	6 to 10	11 to 15	16 to 20	21 to 30	31 to 40	41 to 50	>50
Less than 100	28.6%	24.3%	21.1%	2.7%	7.6%	3.2%	5.9%	3.2%	3.2%
100–249	45.9%	31.2%	10.1%			1.8%	0.9%	1.8%	8.3%
250-499	30.3%	45.5%	14.5%	4.8%	2.1%	2.1%			0.7%
500–999	27.3%	54.0%	10.8%	1.4%	0.7%	0.7%	1.4%	1.4%	2.2%
1,000–1,999	21.5%	49.2%	16.2%	6.9%	5.4%		0.8%		
2,000–2999	19.0%	44.3%	20.3%	3.8%	5.1%	3.8%	1.3%		2.5%
3,000-4,999	9.3%	50.0%	24.6%	8.5%	3.4%	1.7%			2.5%
5,000–7,499	4.9%	44.3%	31.1%	8.2%	5.7%	4.1%	0.8%	0.8%	
7,500–9,999	4.1%	32.7%	30.6%	22.4%	4.1%	2.0%		2.0%	2.0%
10,000–14,999	2.9%	23.2%	24.6%	14.5%	11.6%	13.0%	7.2%	2.9%	
15,000–19,999		9.1%	11.4%	22.7%	34.1%	11.4%	9.1%	2.3%	
20,000–29,999		10.6%	27.7%	21.3%	14.9%	10.6%	8.5%	4.3%	2.1%
30,000-49,999		9.7%	22.6%	12.9%	9.7%	16.1%	9.7%		19.4%
50,000–74,999		9.5%		23.8%	23.8%		19.0%	9.5%	14.3%
75,000–99,999		11.1%	11.1%		11.1%	11.1%	22.2%		33.3%
100,000 or more			23.1%		7.7%		15.4%		53.8%

#### **EMPLOYEES IN ORGANIZATION AS A WHOLE**

The same pattern is roughly found in staffing on a division level. More than half of survey respondents in divisions with under 5,000 employees had five compliance officers or fewer.

		EMI	PLOYEES	IN COMP	LIANCE A		CS GROUP	c	
HEALTHCARE	1	2 to 5	6 to 10	11 to 15	16 to 20	21 to 30	31 to 40	41 to 50	>50
Less than 100	56.5%	24.2%	9.7%	1.6%	1.6%			3.2%	3.2%
100–249	51.0%	36.0%	6.0%			1.0%	1.0%		5.0%
250–499	31.9%	45.9%	14.1%	5.2%	1.5%	0.7%			0.7%
500–999	29.7%	53.9%	14.1%	1.6%			0.8%		
1,000–1,999	20.5%	53.3%	18.0%	4.1%	3.3%			0.8%	
2,000–2999	21.8%	42.3%	19.2%	3.8%	6.4%	3.8%	1.3%		1.3%
3,000–4,999	10.5%	53.2%	25.0%	5.6%	2.4%	2.4%			0.8%
5,000–7,499	4.5%	40.6%	33.8%	7.5%	7.5%	3.8%	0.8%	0.8%	0.8%
7,500–9,999	4.8%	35.7%	31.0%	19.0%	2.4%	2.4%	4.8%		
10,000–14,999	4.9%	24.5%	21.6%	14.7%	12.7%	8.8%	8.8%	2.0%	2.0%
15,000–19,999	7.0%	10.5%	19.3%	17.5%	24.6%	8.8%	8.8%	3.5%	
20,000–29,999	1.3%	18.7%	20.0%	16.0%	13.3%	12.0%	9.3%	5.3%	4.0%
30,000–49,999	4.8%	14.3%	23.8%	12.7%	15.9%	11.1%	4.8%	1.6%	11.1%
50,000–74,999	2.6%	13.2%	10.5%	15.8%	13.2%	5.3%	13.2%	7.9%	18.4%
75,000–99,999		7.7%	15.4%		7.7%	15.4%	23.1%		30.8%
100,000 or more	11.8%	15.7%	19.6%	5.9%	9.8%	2.0%	7.8%	7.8%	19.6%

#### EMPLOYEES IN PORTION OF ORGANIZATION COMPLIANCE GROUP SERVES

Publicly traded healthcare entities are most likely to have very large compliance departments, with just over 26% reporting a compliance team of 31 or more. By contrast, just 7% of nonprofits could make the same claim. Governmental entities tended to have the smallest compliance teams, with 31% reporting compliance departments of just one person.

#### **ORGANIZATION TYPE**

		EMI	PLOYEES	IN COMP	LIANCE A		CS GROUP	D	
HEALTHCARE	1	2 to 5	6 to 10	11 to 15	16 to 20	21 to 30	31 to 40	41 to 50	>50
Nonprofit	16.9%	36.4%	19.4%	7.2%	7.8%	5.1%	2.8%	1.1%	3.2%
Privately held	23.8%	43.6%	19.5%	5.3%	3.5%	0.7%	1.1%	1.1%	1.4%
Publicly traded	9.5%	28.6%	13.1%	14.3%	6.0%	2.4%	8.3%	2.4%	15.5%
Governmental	30.9%	35.3%	13.2%	2.9%	2.9%	2.9%	2.9%	5.9%	2.9%
Academic	7.8%	29.4%	23.5%	11.8%	7.8%	3.9%	11.8%	3.9%	
Other	45.0%	10.0%	25.0%	5.0%	10.0%			5.0%	

Compliance budgets tend to be closely aligned with revenues for the organization as a whole. Nearly two thirds (62.5%) of respondents from organizations with less than \$5 million in revenue reported compliance budgets of less than \$100,000. By contrast, just under 90% of respondents in organizations with more than \$3 billion in revenue reported a compliance budget of \$1 million or more.

HEALTHCARE	Less than \$100,000	\$100,000 to \$249,999	\$250,000 to \$499,999	\$500,000 to \$999,999	\$1 million or more
Less than <b>\$5</b> million	62.5%	20.0%	5.0%	2.5%	10.0%
\$5 to \$15 million	38.9%	27.8%	16.7%	7.4%	9.3%
\$15 to \$30 million	35.9%	30.8%	20.5%	7.7%	5.1%
\$30 to \$50 million	48.7%	17.9%	20.5%	10.3%	2.6%
\$50 to \$100 million	28.3%	26.4%	22.6%	13.2%	9.4%
\$100 to \$500 million	21.3%	22.7%	25.3%	17.3%	13.3%
\$500 million to \$1 billion	4.1%	6.1%	24.5%	24.5%	40.8%
\$1 to \$3 billion	6.3%	5.0%	3.8%	26.3%	58.8%
More than \$3 billion				11.1%	88.9%

#### **REVENUE OF ORGANIZATION AS A WHOLE**

For those working in divisions of a company, the pattern of spending stayed the same.

#### **REVENUE OF PORTION OF ORGANIZATION COMPLIANCE GROUP SERVES**

		ANNUAL COMPLIANCE BUDGET							
HEALTHCARE	Less than \$100,000	\$100,000 to \$249,999	\$250,000 to \$499,999	\$500,000 to \$999,999	\$1 million or more				
Less than \$5 million	64.3%	21.4%		3.6%	10.7%				
\$5 to \$15 million	43.8%	27.1%	16.7%	8.3%	4.2%				
\$15 to \$30 million	35.9%	30.8%	20.5%	5.1%	7.7%				
\$30 to \$50 million	52.5%	15.0%	22.5%	7.5%	2.5%				
\$50 to \$100 million	32.6%	30.4%	17.4%	10.9%	8.7%				
\$100 to \$500 million	25.3%	20.3%	22.8%	19.0%	12.7%				
\$500 million to \$1 billion	4.2%	12.5%	18.8%	20.8%	43.8%				
\$1 to \$3 billion	5.2%	5.2%	5.2%	27.3%	57.1%				
More than \$3 billion	6.3%	8.3%	8.3%	14.6%	62.5%				

Budgets are also closely tied to the number of individuals in an organization. 100% of respondents from organizations of 30,000 employees or more reported budgets of at least \$1 million.

		ANNUAL C	COMPLIANCE	BUDGET	
HEALTHCARE	Less than \$100,000	\$100,000 to \$249,999	\$250,000 to \$499,999	\$500,000 to \$999,999	\$1 million or more
Less than 100	45.2%	21.4%	11.9%	7.1%	14.3%
100–249	57.8%	24.4%	8.9%	4.4%	4.4%
250–499	43.9%	22.8%	21.1%	8.8%	3.5%
500–999	33.8%	24.6%	18.5%	12.3%	10.8%
1,000–1,999	27.6%	24.1%	22.4%	12.1%	13.8%
2,000–2999	15.2%	21.2%	18.2%	15.2%	30.3%
3,000–4,999	4.2%	10.4%	20.8%	41.7%	22.9%
5,000–7,499	10.6%	12.8%	14.9%	19.1%	42.6%
7,500–9,999	5.9%	11.8%	5.9%	17.6%	58.8%
10,000–14,999	8.7%		4.3%	21.7%	65.2%
15,000–19,999			16.7%	25.0%	58.3%
20,000–29,999				11.1%	88.9%
30,000–49,999					100.0%
50,000–74,999					100.0%
75,000–99,999					100.0%
100,000 or more					100.0%

#### **EMPLOYEES IN ORGANIZATION AS A WHOLE**

Compliance budgets, when measured against the number of employees in a division (rather than in the company as a whole), also tended to increase as the employee base increased.

		ANNUAL COMPLIANCE BUDGET								
HEALTHCARE	Less than \$100,000	\$100,000 to \$249,999	\$250,000 to \$499,999	\$500,000 to \$999,999	\$1 million or more					
Less than 100	59.1%	13.6%	9.1%	4.5%	13.6%					
100–249	56.5%	34.8%	6.5%	2.2%						
250–499	42.4%	25.4%	20.3%	8.5%	3.4%					
500–999	36.7%	23.3%	21.7%	11.7%	6.7%					
1,000–1,999	33.3%	18.5%	24.1%	13.0%	11.1%					
2,000–2999	15.2%	27.3%	18.2%	15.2%	24.2%					
3,000–4,999	4.3%	12.8%	21.3%	42.6%	19.1%					
5,000–7,499	8.9%	13.3%	15.6%	17.8%	44.4%					
7,500–9,999	6.7%	6.7%	6.7%	13.3%	66.7%					
10,000–14,999	10.0%	3.3%	6.7%	20.0%	60.0%					
15,000–19,999			27.3%	18.2%	54.5%					
20,000–29,999		5.9%	5.9%	23.5%	64.7%					
30,000-49,999			7.1%	7.1%	85.7%					
50,000–74,999				10.0%	90.0%					
75,000–99,999					100.0%					
100,000 or more	33.3%	25.0%	8.3%	8.3%	25.0%					

#### EMPLOYEES IN PORTION OF ORGANIZATION COMPLIANCE GROUP SERVES

Although publicly traded healthcare entities generally had the highest staffing, survey respondents from academic institutions reported the highest budget. Half reported budgets of \$1 million or more, compared to 35% from publicly traded companies.

#### **ORGANIZATION TYPE**

	ANNUAL COMPLIANCE BUDGET							
HEALTHCARE	Less than \$100,000	\$100,000 to \$249,999	\$250,000 to \$499,999	\$500,000 to \$999,999	\$1 million or more			
Nonprofit	24.2%	17.3%	15.9%	15.6%	27.0%			
Privately held	32.0%	21.4%	19.4%	6.8%	20.4%			
Publicly traded	15.4%	15.4%	3.8%	30.8%	34.6%			
Governmental	25.8%	25.8%	12.9%	16.1%	19.4%			
Academic		6.3%	12.5%	31.3%	50.0%			
Other	75.0%		12.5%		12.5%			

#### Survey methodology

In June 2017, an email invitation was sent to approximately 45,000 individuals.

The data in the report was drawn from 1,346 responses from individuals who:

- Worked for a healthcare provider.
- Were responsible for at least 26% of an organization's legal and regulatory risk.

This report is based solely on this group. Upon receipt, all submissions were assigned a confidential identification number. All data were checked both manually and by a specially designed computer editing procedure. Strict confidence of survey responses was maintained throughout the course of the project.

Final results were tabulated by Industry Insights, Inc., and the salary survey report was completed in October 2017. The data was then retabulated by Industry Insights, Inc., to create this benchmarking report.



# **Become Certified**

## A few letters after your name can make a big difference.

Why do people add JD, MBA, or CPA after their name? They know those initials add credibility.

Showcase your healthcare compliance knowledge and experience: Become Certified in Healthcare Compliance (CHC)®, Certified in Healthcare Privacy Compliance (CHPC®), Certified in Healthcare Research Compliance (CHRC)®, or a Certified in Healthcare Compliance-Fellow (CHC-F)®.

## Applying to become certified is easy.

To learn what it takes to earn the CHC, CHPC, CHRC, or CHC-F designation, visit **compliancecertification.org**.





## HCCA'S MISSION

HCCA exists to champion ethical practice and compliance standards in the healthcare community and to provide the necessary resources for compliance professionals and others who share these principles.

## hcca-info.org