The Importance of Program Assessment: An SCCE Benchmarking Study
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Society of Corporate Compliance and Ethics
October 2010

Objective
In light of recent changes in compliance and ethics (C&E) program requirements and guidelines on the federal level, the Society of Corporate Compliance and Ethics (SCCE) conducted a survey regarding program assessments. The objective of the survey was to determine if such program assessments are conducted, how, by whom, and whether they were effective tools in improving programs overall.

Methods
The survey was distributed by the SCCE and received responses from 264 people. Respondents were fairly even distributed, as follows:

- 28% represented publicly held companies
- 33% represented privately owned companies
- 27% represented non-profit organizations
- 7% represented educational organizations, and
- 5% were from government organizations

Key findings
- Assessments are being performed
  - 66% of respondents have conducted a program assessment
  - 15% of respondents have not yet conducted an assessment, but plan to do so within a year

- There is little common ground on who performs assessments

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1 The following abstract has been prepared by the Center for Business Ethics at Bentley University and is based on the original document, which can be found in the October 2010 issue of Compliance and Ethics Professional, a publication of the Society of Corporate Compliance and Ethics.
-32% of respondents indicated that assessments were conducted using only internal resources
-34% of respondents indicated that their organization uses only external resources, or a combination of internal and external resources, for their assessments

• **Internal assessments are mostly conducted by C&E officers**
  -56% of respondents whose organizations conduct assessments internally stated that members of the C&E department performed it
  -21% of respondents of internal assessment organizations used the Internal Audit department

• **What is involved in a program assessment? (multiple tactics can be used)**
  -35% include a document review
  -27% include employee interviews
  -8% include interviews of third parties
  -7% involve focus groups
  -19% use employee surveys

• **Most assessments are initiated by the CECO**
  -54% of assessments are initiated by the chief ethics and compliance officer (CECO)
  -12% were initiated by the board of directors or a committee of the board

• **Assessment reports go mostly to one of three groups**
  -35% of respondents reported assessment results to high-level management
  -31% reported to the board or a committee of the board
  -29% reported to the C&E department
  -5% report to all employees

• **Most assessments are not conducted using attorney-client privilege**
  -72% of respondents said that the assessment was not conducted under privilege

• **Assessments are effective**
  -85% of respondents indicated that the assessments were effective
  -11.5% said they “don’t know” if the assessments were effective
Only 3.5% believed that they were ineffective

Conclusion
This survey found that the majority of organizations are conducting program assessments and that those assessments are being found to be very effective. The ways in which those assessments are conducted vary some, but the bottom line is that they are helping those organizations which undertake them. According to the introduction of this study, "now is perhaps the most opportune time in the history of compliance and ethics to undertake a program assessment". Combined with these findings, the evidence can hardly be stronger to urge organizations to audit their programs.