

2025 Top Ten Planned Compliance Program Initiatives

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The 2025 Compliance Benchmark Survey, conducted by SAI Global and Strategic Management Services, LLC, asked respondents about their planned compliance initiatives. Below are ten key focus areas, presented in descending order based on how frequently they were cited by respondents, along with a brief description of each activity.

1. [Improve Ongoing Compliance Monitoring and Auditing](#). Ongoing Monitoring includes ensuring that program managers: (a) identify compliance risks within their area of responsibility; (b) implement written guidance; (c) train staff on following that guidance; and (d) monitor compliance with the guidance. Ongoing Auditing involves an independent review of the monitoring process to verify it is being performed effectively and is mitigating or eliminating risks.
2. Updating [Compliance Related Documents](#) (e.g., charters, Code, policies). The best practice is to update these documents annually to maintain alignment with current regulations and standards. It is critical that written guidance be user friendly and easily accessible by all covered persons. The form and format should be standardized and written at a level understandable by employees.
3. [HIPAA Privacy and Security Assessment](#). This assessment involves evaluating and ensuring compliance with HIPAA standards for protecting patient information. These assessments should address both privacy (patient information, or protected health information (PHI)) and security (safeguarding electronic PHI or ePHI).
4. [Enterprise-Wide Regulatory Risk Assessment](#). This involves risk assessment and management that: (a) identifies weaknesses, gaps, and vulnerabilities; (b) addresses identified risks and implements controls to mitigate them; and (c) maintains continuous monitoring and reassessment of risks.
5. [Employee Compliance Knowledge or Culture Survey](#). These surveys are a way to assess an organization's compliance program effectiveness by gathering employee opinions and insights, helping identify areas for improvement, and ensuring adherence to regulations and ethical standards. Compliance knowledge surveys have yes or no questions regarding employee understanding of the compliance program, whereas compliance culture surveys

focus on the attitudes and perceptions of the compliance program, using Likert-scale question as to degree of agreement. Best practice involves using a validated vendor survey that can benchmark results against the universe of users.

6. [Claims Processing Evaluation](#). This refers to the systematic review and assessment of the efficiency, accuracy, and effectiveness of claims processing workflow to identify errors and areas for improvement and ensure optimal performance.
7. Enhancement of [Conflicts of Interest \(COI\) management](#). This initiative includes: (a) development of policies and procedures; (b) training on compliance with written guidance; (c) proactive identification and disclosure; (d) resolution and mitigation of potential COI; (e) verifying that policy is being followed; and (f) maintaining detailed documentation of the process.
8. Review of [Arrangements with Physicians](#). This review ensures alignment with existing statutory requirements such as the Anti-Kickback Statute, Stark Law, and other regulatory standards. Arrangements should be scrutinized for compliance, including ensuring fair market value and commercial reasonableness in services provided.
9. [Independent Compliance Program Effectiveness Assessment](#). This involves a thorough, objective, and independent review conducted by experts to determine if a compliance program is achieving its goals of reducing the likelihood of unwanted events and adverse consequences, and focuses on program outcome and results, rather than just the process and outputs.
10. [Compliance Program Gap Analysis](#). This analysis is a method of identifying the differences between an organization's current compliance state and its desired future state, highlighting areas where improvements or changes are needed to achieve goals. It should determine if all the seven standard elements of an effective compliance program are being addressed. The key to the review is focusing on metrics and outputs. Gap analyses are usually done for organizations that are developing a program and desire to identify weaknesses warranting attention.



About the Author

Richard P. Kusserow established Strategic Management Services, LLC, after retiring from being the DHHS Inspector General, and has assisted over 2,000 health care organizations and entities in developing, implementing and assessing compliance programs.