
Financial Disclosure for Employees

Instructions	Personal Information	Disclosure Questions
Assets	Stock Options	Income
Sale of Property	Gifts	Liabilities

12/1/2008

FINANCIAL DISCLOSURE 2008

A Survey of How Organizations Implement Financial Disclosure for Employees



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I am pleased to present this first 2008 Financial Disclosure Benchmarking Report that represents a survey of how organizations manage conflicts of interest through financial disclosure and compliance questionnaires.

We prepared this survey to find out how organizations manage conflicts of interest by implementing financial disclosure policies and conflict of interest questionnaires. This information may be useful for those organizations that seek to benchmark their practices for preventing and resolving actual and potential conflicts of interest. In order to gain a perspective on the big picture question of whether these practices were useful, respondents were asked to share their opinions about the effectiveness of the financial disclosure or the compliance questionnaire in preventing, identifying, and resolving conflicts of interest. Almost three-quarters of the respondents said yes, that it was a useful practice.

This report is based on an analysis of responses from 87 persons who work for 23 different types of organizations. The resulting analysis provides insights for any organization that seeks to compare their practices in managing conflicts of financial interests against those of similar organizations.

I encourage you to examine the results of this benchmarking report.

Roy Snell

Chief Executive Officer

Society of Corporate Compliance and Ethics

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Financial Disclosure for Employees

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Executive Summary

The survey was conducted by the Society for Corporate Compliance and Ethics, and was launched on July 15, 2008 to a target audience composed of members of the Society for Corporate Compliance and Ethics and the Health Care Compliance Association.

This 2008 benchmarking survey of 23 questions pertaining to financial disclosures was answered by 62 respondents. The majority of respondents had hands-on responsibilities for financial disclosure or compliance questionnaires in their organizations. Over 58 different types of organizations were represented from small organizations of less than 200 employees to those with more than 50,000 employees.

Governments at the federal, state, and local level have been practicing financial disclosure for senior officials and key employees for over 30 years. In addition to the government sector, other types of organizations and businesses have in recent years begun using financial disclosure and or the compliance questionnaire to manage conflicts of interest. The compliance questionnaire shares the same purpose as the financial disclosure questionnaire, which is to discover if a key executive or employee has a conflict of interest or has engaged in outside activities, either commercial or civic, that may create a conflict of interest between the employee and that of his or her employing organization.

Organizations manage conflicts of interest by using financial disclosure or compliance questionnaires. Almost one-half of the organizations (47%) use financial disclosure. Slightly over half of the organizations (53%) use compliance questionnaires. Ninety four percent of organizations require employees to either certify that there is no conflict of interest, or notify their employer when there is a conflict of interest.

Covered Individuals & Transactions

Respondents were asked to identify the primary groups covered by their financial disclosure or compliance questionnaires. The largest groups covered by either financial disclosures or compliance questionnaires are:

Board of Directors	89%
Corporate Executives	84%
Key Employees	77%
All Employees	43%

Survey participants were provided a diverse array of options to select regarding transactions covered by their disclosures and questionnaires. The items required to be reported with greatest frequency are outside income and assets used in an outside business. The primary threshold for these disclosures is less than USD \$1,000. The table below outlines the details.

Supplements to income	63%
Outside income from sources external to the job	58%
Assets used in trade or business	44%
Stock options	47%
Sale of property used in a trade or business	47%

Data Review

Most organizations review data from financial disclosure and compliance questionnaires. The majority (54%) of organizations review 100% of financial disclosure reports. A smaller percentage, 34%, select samples for review. An overwhelming 80% of respondents interview and conduct desk reviews of the responses received. Organizations generally use their own associates to conduct these reviews (69%).

Resolving Conflicts of Interest

Organizations resolve conflicts of interest in several different ways, as shown in the table below.

Employee asked to disengage from outside activity	84%
Employee removed from an activity or divest their interest	60%
Employee prohibited from making an investment	21%

Benefits of Conflict of Interest Policy

Organizations were asked about the benefits of implementing a Conflict of Interest (COI) Policy. Most organizations found it helpful to:

- Raise awareness of understanding of COI by employees
- Identify current conflicts of interest (either thru self disclosure or detection by the organization)
- Resolve conflicts of interest

Only one-quarter of respondents found it was effective for detecting fraud.

Seventy percent of respondents stated their organization would benefit if they had more resources available for conflict of interest reviews. Increased resources would result in a faster data review, increased amount of questionnaires reviewed, and faster reporting.

Organizations use financial disclosures and compliance questionnaires associated with financial conflicts of interest as a measure of protection. Considering the low financial threshold for reporting and the high percentage of extensive reviews conducted, we see organizations take financial conflicts of interest very seriously and work to combat even the appearance of impropriety through their financial disclosures and conflict of interest policies.

Who Completed the Survey

Eighty seven respondents answered the first question about whether a company had adopted a policy for financial disclosure. Of these 87 respondents, almost one-half (41 or 47%) of the respondents have a financial disclosure policy.

1. Does your organization have a policy for financial disclosure for an employee or officer at any level? Note: Financial disclosure occurs when an officer or employee reports to the employer about his or her personal finances, such as the types, sources, and amounts of assets, real property, income, investments, liabilities, and supplements that they or related family members received during a reporting year or period.		
Yes	41	47%
No	46	53%
Total	87	100%

Types of Organizations

Respondents worked for a wide range of organizations for which the largest group was health care institutions, which represented 40% after removing duplicates. Of the 65 responses the next largest group was education (6 or 9%), followed by energy, utilities, and mining which represented 8%. The remaining categories were fairly evenly spread out amongst private not for profit health agencies (2), not for profit fundraising (1), medical device (1), legal (1), and unspecified conglomerate (1).

18. What type of organization do you work for? (Select all that apply)	Number	Per cent
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Aerospace & Defense	1	2%
Automotive	1	2%
Chemicals	0	0%
Communication	0	0%
Education	6	9%
Energy, Utilities & Mining	5	8%
Entertainment & Media	0	0%
Engineering & Construction	1	2%
Financial services – Banking and Securities	2	3%
Financial services – Public Accounting	2	3%
Financial Services – Other	0	0%
Food	0	0%
Gaming (Gambling, Casinos)	0	0%
Government (federal, state, and local)	4	6%
Healthcare – Medical Insurance	9	14%
Healthcare – Hospitals	9	14%
Healthcare – providers of healthcare services	8	12%
Industrial Manufacturing	2	3%
Insurance (Personal and Commercial)	2	3%
Non governmental organization	1	2%
Pharmaceuticals	0	0%
Retail and Consumer	2	3%
Technology	1	2%
Transportation & Logistics	2	3%
Other	1	2%
Other, please specify	6	9%
TOTAL RESPONSES	65	100%

Number of Employees in the Organization

There was a wide distribution in the numbers of employees working for the organization. Almost one-half of the respondents worked for organizations with 5,000 employees or less.

Number of Employees	Percent of Respondents
1-5,000 employees	49%
5,001-10,000	20%
10,001-49,999	18%
50,000+	12%

19. How many employees work for your organization? (Select one answer)		
	Number	Percent
Fewer than 200 employees	7	11%
201 - 1,000 employees	10	16%
1001 - 5,000 employees	14	23%
5001 -10,000 employees	12	20%
10,001 -20,000 employees	5	8%
20,001-49,999 employees	6	10%
50,000 or more employees	7	11%
Total	61	100%

Role in Implementing Financial Disclosure

Respondents were grouped into categories according to the type of policy they handle (i.e. financial disclosure or compliance questionnaire) and their roles. Options for the roles were whether they manage and implement the process or perform a more hands on role such as verify the data, resolve a conflict of interest, or monitor whether the conflict of interest was resolved.

Item	No.	Percent
Manage/Implement Financial Disclosure and Compliance Questionnaire	10	18.87%
Manage /Implement Compliance Questionnaire Only	22	41.51%
Manage/Implement Financial Disclosure Only	2	3.77%
Implement Financial Disclosure or Compliance Questionnaire and do not manage the process	10	18.87%
Verify data for questionnaire plus perform other role	6	11.32%
Resolve Conflict of Interest Only	2	3.77%
Monitor conflict of Interest only	1	1.89%
Total	53	100.00%

Many of the 53 respondents to this question play multiple roles, which is the reason why the total of the percentages shown in the table below for Question 20 exceeds 100%.

20. What is your role in implementing the financial disclosure or conflict of interest policy of your organization? (Select all that apply.)		
	Number	Percent
Implement policy (contact staff, receive & review data)	35	66%
Verify/audit the data that is submitted	29	55%
Work to resolve conflict of interest	33	62%
Monitor/verify if an employee resolved a conflict of interest	28	53%
Decide what sanctions or administrative action is taken against an employee who violates the conflict of interest policy	15	28%
Enforce disciplinary action against an employee who violates code of conduct	9	17%
Total Number of Responses	53	

Well over half of the respondents (66%) have hands-on responsibilities (such as contacting staff, and receiving and reviewing the data) in implementing either a financial disclosure or compliance questionnaire. About one-half (55%) of the respondents verify or audit the data that is submitted. More than half (62%) work to resolve the conflict of interest, as well as monitor whether an employee has actually resolved a conflict of interest (53%).

Lower percentages reflect that almost one-third (28%) of the respondents decide what sanctions or administrative actions will be taken against employees who violate company policy. An even smaller percentage of respondents (17%) enforce disciplinary action against an employee who violates the policy.

Who is Covered by Financial Disclosure

Question two identifies employees who are covered by a conflict of interest policy, such as financial disclosure or a compliance questionnaire. The majority of the 44 positive responses received pertained to financial disclosure policy with a smaller number (6) pertaining to compliance questionnaires.

Board of Directors

Of the 44 positive responses to the question of who is covered by financial disclosure or the compliance questionnaire, 89% (39) indicated that each member of the Board of Directors was covered by either a financial disclosure or a compliance questionnaire to report conflicts of interest. The percentages steadily declined for those who were related to a member of the board of directors, such as spouse (68%), dependent children (55%), and other (14%).

The next highest category of persons who were covered under a policy that required financial disclosure reports or compliance questionnaires was that of members of the corporate suite. Eighty-four (84%) of the 44 positive responses to this question indicated that their policy covered executives of the Corporate suite such as the Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, or for governments, the operating heads of departments, agencies, and commissions who are often political appointees or senior civil servants. A smaller number of respondents covered the family members of the executive, such as the spouse (68%), domestic partner (39%), dependent children (57%), and other (18%).

Employees Group refers to employees and/or managers who are selected to disclose because of their rank, category of job, or profession. More than three quarters of the positive responses (77%) reported that certain groups of employees were required to report under financial disclosure or compliance questionnaires. Again, there was a decline in the number of family members for whom reports were required, such as the spouse (59%), domestic partner (34%), dependent child (52%), or other dependents.

The smallest group that was covered by the conflict of interest policy was that for the category of all employees. Less than half of the respondents (43%) indicated that all employees had to disclose their finances. There was a decline in percentages of companies that also required reports for family members of the employees, including the spouse (30%) or domestic partner (20%), dependent children (25%), and other dependents (14%).

Persons Covered by a financial disclosure or compliance questionnaire

	Number	Percent
Board of Directors – Self	39	89%
Board of Directors – Spouse	30	68%
Board of Directors - Domestic Partner	17	39%
Board of Directors - Dependent Children	24	55%
Board of Directors - Dependent Others (Not Children)	14	32%
Board of Directors – Other	6	14%
C Suite – Self	37	84%
C Suite – Spouse	30	68%
C Suite - Domestic Partner	17	39%
C Suite - Dependent Children	25	57%
C Suite - Dependents (Other Not children)	14	32%
C Suite – Other	8	18%
Employees Group - (Self)	34	77%
Employees Group – Spouse	26	59%
Employees Group - Domestic Partner	15	34%
Employees Group - Dependent Children	23	52%
Employees Group - Dependents Other (not Children)	10	23%
Employees Group – Other	7	16%
Employees All – Self	19	43%
Employees All – Spouse	13	30%
Employees All - Domestic partner	9	20%
Employees All - Dependent Children	11	25%
Employees All- Dependents Other (not Children)	6	14%
Employees All – Other	5	11%
TOTAL No. of Positive Responses	44	

Items to be Reported

Financial activities of major concern that were required to be reported were grouped into three (3) categories based on the greatest responses: the top tier, middle tier, and lower tier. These activities are reportable even if less than USD \$1,000.

Top Tier	
Supplements to Income	63%
Outside Income from Sources External to the Job	58%

Supplements to income include items such as stipends, honoraria, or reimbursements for expenses for participating in boards, charitable work, or professional activities. Outside income includes investments, such as stocks, bonds, rental income, or ownership in an outside business. Outside activities (43%) which includes serving on the board of directors of a company or civic or volunteer for a profit or for a not for profit organization.

Middle Tier	
Assets used in trade or business	44%
Stock Options	47%
Sale of Property used in a trade or business	47%

Bottom Tier	
Personal Assets	41%
Sale of Stock, bond, or stock options	40%
Liabilities	38%

Slightly smaller percentages of the population require reporting for key items that meet or exceed a threshold of \$1,000-9,000.

Personal Assets	41%
Sale of Stock, bond, or stock options	40%
Stock Options	37%
Assets used in trade or business	33%
Outside Activities such as member of the board of directors	35%
Sale of Property used in a trade or business	29%
Liabilities or debts	23%
Income from sources outside of the job	17%

Those companies that set thresholds of \$10,000 or higher for items to report comprise the smallest group with rates that vary from between 15% to 38% of the sample.

ITEM

AMOUNTS - in RANGES

	Percent		Percent						
	<1	<1	1 - 4K	5 - 9K	1-9K	10 - 49	50 -99	100 - 499	Total Responses

Assets personal	7	41%	6	1	41%	2	0	1	17
Assets used in trade or business	8	44%	5	1	33%	3	0	1	18
Stock Options	9	47%	5	2	37%	2	0	1	19
Sale of Property used in trade or business	8	47%	4	1	29%	3	0	1	17
Sale of Stock, bonds, or stock options	6	40%	5	1	40%	2	0	1	15
Income from sources outside of the job, (i.e. investments, such as stocks, bonds, rental income, or ownership in an outside business	14	58%	4	0	17%	3	1	2	24
Liabilities (Mortgages, debts such as loans, credit cards, etc)	5	38%	3	0	23%	3	1	1	13
Supplements to income such as stipends, honoraria or reimbursements for expenses for participating in boards, charitable work, or professional activities	15	63%	2	0	8%	4	0	3	24

Activities such as member of Board of Directors of a company, or civic or volunteer for businesses or not for profit organization.	9	39%	8	0	35%	4	0	0	23
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Frequency of Reporting

For those organizations that practice financial disclosure, more than 88% of the respondents (35 out of 40) indicate that employees are required to report on their finances or outside activities every year. Of this group of 35, seven or 20% also require a financial disclosure report when the employee is first hired or if there is a change of circumstances during the year. A smaller percent of organizations (5%) require employees to report only when they are first hired, and 7% only require reports if there are changes in the activities of the employee. One other organization requires financial disclosure reports when the employee leaves the organization.

3. How frequently are employees required to report on their finances and/or outside activities?		
Every year	35	88%
Once every 2 years	0	0%
When they are first hired (only)	2	5%
Only report if there is a change in circumstances	3	7%
Total Number of responses	40	100%

Review of Financial Disclosure Data

More than half of the 24 respondents, or 13 (54%), reported that they review 100% of financial disclosure reports. Thirty-four (34%) of the respondents use a method to select a smaller sample size of the target population. This includes random sample, judgmental sample, or trend analysis, in various combinations. One respondent used an automated review. One other respondent (4% percent) said that there was no review of the data, and one respondent reported that the company relied on self-disclosure by the employee.

5. How are records of employees who disclose personal financial data selected for review? (Select all that apply.)		
Review of 100% of all reports filed	13	54%
Only Random sample - every record has an equal chance of being reviewed	3	13%
Only Judgmental sample - some records have a greater chance of being reviewed than others. This may be because the employee fits a risk profile based on function that is compared with actual data.	4	17%
Only random sample Plus Judgmental sample	1	4%
Only Trend Analysis- changes in the financial status or activities of an employee are compared from one year to the next. For example, if the value of assets increases significantly from one year to the next, that employee's record maybe selected for review.	0	0%
Only Automated review of select criteria. For example, there is a list of investments against restricted entities. This is usually done for 100% of all records that are submitted and results in a list of employees who may have a conflict of interest.	1	4%
No review of data submitted.	1	4%
Other, self disclosure	1	4%
Total positive responses	24	100%

How is the Data Reviewed?

For those who were involved in financial disclosure, 24 persons answered the question about how the data is reviewed. Almost 80% said that there was at least a desk review of the data, and 95% of that group interviews the employee. About half of those who review the data verify it by asking the employee for supporting documents or by comparing the data against information from sources internal or external to the company.

6. What is the method for conducting the review of data? (Select all that apply.)		
Desk Review of data		19 79%
Desk Review of Data Plus Interview of the employee (by phone or in person)	18	
Desk Review + Employee provides supporting records to verify his or her report	7	
Desk review + Verify the data that is reported against other sources of information that are either internal or external to the organization	4	
Other		5 21%
Other - Interview of Employee Only	2	
Other - Employee provides supporting docs only	1	
Other - Data verified against an external source	1	
Other Data reviewed by Regulatory Agency	1	
Total Number		24 100%

Who Reviews the Data?

Over 69% of companies represented use employees to review the data, and 31% hire outside contractors to review financial disclosure data. A small percentage (13%) used one employee to review the financial disclosure data, and the rest or 56% used two or more employees. For those companies that do hire outside contractors to review data, three organizations hired between 2-4 contractors.

Question 8

Who reviews the data?	No. Responses	Percent
Review by Employees		
Review by no Employee	7	30.43%
Review by 1 Employee	3	13.04%
Review by 2-4 Employees	12	52.17%
Review by 5-8 Employees	1	4.35%
Total No. of Responses	23	100.00%

Question 8

Who reviews the data?	No. Responses	Percent
Review by Contractors		
Review by No Contractors	11	68.75%
Review by 1 Contractor	2	12.50%
Review by 2-4 Contractors	3	18.75%
Total No. of Responses	16	100.00%

Reporting and Resolving Conflicts of Interest

Reporting Conflicts

Survey participants were asked about general conflict of interest certifications. Ninety-four percent (94%) out of 71 respondents indicated that employees in their companies either certify that there is no conflict of interest, or notify their employer whenever there is a potential or actual conflict of interest. A high percentage 83% or (59) require employees to notify the organization when there is no conflict of interest, and (66%) or 47, report that employees certify in writing or electronically that there is no conflict of interest between their financial interests and personal activities and those of their employer.

11. Are employees required to do any of the following? (Select all that apply.)		
Certify that there is no conflict of interest or notify the organization when there is a conflict of interest	67	94%
Certify (in writing or electronically) that there is no conflict of interest between their personal activities and outside financial and other interests and those of the organization that they work for	47	
Notify the organization whenever there is a potential or actual conflict of interest	59	
None of these options	3	4%
Other	1	2%
Total No. of Responses	71	100%

Resolving Conflicts of Interest

Organizations resolve conflicts of interest in several different ways. One popular approach is that the employee stops his or her involvement in an outside activity or sells their ownership in an asset. A second approach is that the employee maintains the interest in an asset and stops performing a particular function in the organization. The third major approach is that an employee is not permitted to make an investment that could pose a conflict of interest. The table below details the frequency of measures used:

13. How are conflicts of interest resolved? (Select all that apply.)		
Employee stops his/her involvement in an outside activity	36	84%
Employee does not purchase an investment, such as a stock/bond	21	49%
Employee sells or divests his/her financial interest or ownership in an asset	25	58%
Employee is allowed to maintain his/her financial interest or ownership in an asset but is removed from a particular function within the Organization	26	60%
Employee sets up a blind trust and no longer has direct influence in decisions about purchases of investments	8	19%
Total	43	

Monitoring Conflicts of Interest

Organizations use several approaches to monitor the resolution of a conflict of interest, with 43% requiring the employee to submit proof to the compliance officer of how the conflict of interest was resolved. About half of this group conducts monitoring to verify the resolution. About one-fifth do not monitor how a conflict is resolved, and 17% do not require proof that the conflict was resolved. Others indicated that oversight bodies, such as the audit committee or internal audit monitor the resolution of the conflict of interest.

12. How are resolutions of conflict of interest monitored? (Select all that apply).		
There is no monitoring of how the conflict is resolved	12	20%
Employee is requested to resolve the conflict of interest and report to the Compliance/Ethics officer on action taken (no proof required)	10	17%
Employee is required to submit proof of action taken to the Compliance/Ethics officer	26	43%
Employee is subject to periodic monitoring	14	
Other	12	20%
Total	60	100%

Other Matters

How long is the data retained?

Organizations retain data for a minimum of two years (5%) with 35% of the respondents retaining data for 6 years or longer.

15. How long is the financial disclosure data or the compliance questionnaire kept?		
One year	0	0%
Two years	3	5%
Three years	2	3%
Four years	0	0%
Five years	1	2%
Six years	4	7%
Longer than six years	21	35%
Do not know	21	35%
Other	8	13%
Total	60	100%

Data Security

More than three-fourths of respondents protect data collected from financial disclosure and the compliance questionnaire using normal procedures and resources. A smaller group numbering 14% percent use special measures that exceed the normal security protection. An even smaller percentage of companies (4%) store the data off-site of the organization’s premises.

14. How is the data from the financial disclosure and or compliance questionnaire protected by the Organization. (Select all that apply.)		
	No.	Percent
Protected by normal procedures and resources used to protect other confidential data	41	82%
Data is subject to special protection over and above normal procedures	7	14%
Data is kept off-site of the organization's premises	2	4%
Total Positive Responses	50	100%

Automated Data Processing Application

Respondents were asked to rate the level of satisfaction with the data processing application that supports administering conflict of interest questionnaires. For the on-line reporting facility, 63% reported a medium or high level of satisfaction with the application. Levels of satisfaction declined with the function to analyze data (42%) and to report on data submitted by employees. Over one-half were satisfied with the application that allows employees to certify that there is no conflict of interest.

7. For each function listed below, indicate the level of satisfaction with the automated data processing application. (Select all that apply.) High = completely satisfied and all user needs are met. Medium = almost satisfied - most user needs are met. Low = not satisfied - few user needs are met. NO = no opinion				
	High	Medium	Low	NO
Top number is the count of respondents selecting the option. Bottom % is percent of the total respondents selecting the option.				
On-line reporting facility for employees who must disclose their finances and outside activities	7 37%	5 26%	1 5%	6 32%
Analyze data submitted by employees	4 21%	4 21%	6 32%	5 26%
Report on data submitted by employees	2 11%	6 33%	6 33%	4 22%
Receive data in word processing formats	3 17%	7 39%	4 22%	4 22%
Allow employees to certify that there is no conflict of interest	4 22%	6 33%	2 11%	6 33%

More Resources

Participants were asked about the need and benefit of adding additional resources for financial disclosure reviews. Thirty-one respondents answered this question. Sixty-five percent stated that more resources would result in a faster review of the data and in more conflicts of interest indentified. Benefits from allocating more resources to the review function include examining more records and writing reports faster. Twenty-nine percent of the respondents answered that there are no added benefits.

16. If more resources were available to conduct a review of financial data or the compliance questionnaire, what would be the benefits? (Select all that apply).		
Faster review of data	20	65%
Increase in the number of records reviewed	17	
Faster reports on the review exercise	16	
Other - More conflicts of interest indentified	2	6%
No added benefits	9	29%
Total	31	100%

Effectiveness of Conflict of Interest Questionnaires

One big picture question is whether it is effective to administer financial disclosure questionnaires to employees. Respondents were asked to share their opinions about the effectiveness of the financial disclosure or the compliance questionnaire in preventing, identifying, and resolving conflicts of interest. Almost three-quarters of the respondents affirmed that financial disclosure and compliance questionnaires were a useful practice. It is encouraging to note that conflict of interest questionnaires promote a sharper awareness by employees about conflicts of interest and how to avoid and resolve them.

In your opinion, how effective has financial disclosure or the compliance questionnaire been in dealing with these issues?	High	Medium	Low	No Opinion	Total
(a) <i>Raise Awareness</i> of what conflict of interest is in your organization	20	23	12	5	60
<i>Per Cent for Awareness</i>	33%	38%	20%	8%	100%
(b) Give employees an opportunity to <i>disclose</i> an actual or potential conflict of interest	29	17	9	5	60
<i>Per Cent for Disclosure</i>	48%	28%	15%	8%	100%
(d) Give the organization an opportunity to <i>detect</i> conflict of interest situations	18	23	13	6	60
<i>Per Cent for Detection</i>	30%	38%	22%	10%	100%
(e) Give the organization an opportunity to <i>resolve</i> conflict of interest situations	24	18	13	5	60
<i>Per Cent for Resolution</i>	40%	30%	22%	8%	100%
(f) Give the organization an opportunity to <i>detect fraud</i> by employees	11	15	21	13	60
<i>Per Cent for Fraud Detection</i>	18%	25%	35%	22%	100%

Review Methodology

The number of answers varies for each question because it was answered by a different number of persons. Although 87 persons answered the very first question, after that the numbers of responses decreased to a core group of 62 persons who answered most of the 23 questions. In order to provide the best analysis, we reviewed the raw data scores to count how many people answered each question. Since many of the questions had more than one answer, we also examined the pattern of responses to accurately count how many people actually answered a question, and of that, how many respondents selected more than one answer. The on-line survey was conducted in an anonymous manner, and only those persons who chose to identify themselves shared their contact details in the survey.

Most of the 23 questions had more than one answer, with options for do not know and other. Whenever it made sense, the “do not know” and “other” answers were not considered. This helped the survey analysts focus on understanding the breakdown of positive responses.

Glossary

Financial Disclosure – Is a practice that requires employees of an organization to disclose their financial interests that may or may not be in conflict with their position in the organization.

Compliance Questionnaire – A questionnaire utilized to identify compliance issues, including financial conflicts of interest.

Conflict of Interest Questionnaire – A questionnaire utilized specifically to identify financial and general conflicts of interest in an organization.

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