

Compliance Today – November 2021

Managing compliance: Exit interviews

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Exit interviews are a must to maintain an effective compliance program because they offer departing employees an opportunity to share compliance concerns that have not been reported or resolved and could ultimately help prevent individuals from becoming whistleblowers, according to guidance from compliance professionals and the Office of Inspector General.^[1]

Policy and procedure

Organizations should implement a policy and procedure outlining their exit interview process and questions that will be asked.

Some organizations use human resources to conduct exit interviews. Organizations that do should ensure compliance-focused questions are incorporated into the interview and that responses are shared with the compliance department to determine whether anything needs to be investigated.

Other organizations have the compliance department conduct its own exit interviews that specifically focus on compliance-related questions.

Whom to include?

Leadership should determine which categories of individuals should be included in the exit interview process, and the size and complexity of the organization should be taken into account. Large, integrated health systems, for example, may have multiple layers of leadership, from facility CEOs to a health system CEO, that should be included.

Examples of individuals who should participate in an exit interview include:

- C-suite executives;
- Management;
- Members of certain departments such as compliance, internal audit, human resources, and legal;
- Terminated employees;
- Interim consultants/employees who served in key roles; and
- Physician leaders, such as medical directors.

Sample questions

Basic questions to include in an exit interview include:

- Are you aware of the organization's compliance program and how to report a concern?
- Are you aware of any compliance concerns that have not been reported or are not being addressed?
- Are you aware of any known violations of law, policies, or procedures?
- Do you believe those reporting concerns would be protected against retaliation?

Monitoring and auditing

Work with human resources to obtain weekly reports showing all employees separating from the organization and, if possible, the reason why (e.g., resignation, retirement, termination). Monitor the reports to identify individuals who meet the organization's criteria for an exit interview. Conduct the exit interview, record responses, determine whether anything needs to be addressed/investigated, and keep all documentation related to the exit interview according to the organization's retention policy.

Exit interview results also should be reviewed regularly to identify common themes or trends among reported concerns that need to be further investigated for retaliation.

Finally, exit interview results should be reported to the compliance committee and board. Data could include:

- The number of individuals eligible for an exit interview,
- The number of exit interviews completed,
- The number of follow-up investigations, and
- A summary of concerns.

¹ HCCA-OIG Compliance Effectiveness Roundtable, *Measuring Compliance Program Effectiveness: A Resource Guide*, March 27, 2017, <https://bit.ly/3azb4PA>.

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