



SOCIETY OF CORPORATE  
COMPLIANCE AND ETHICS

# 2012 Cross Industry Chief Compliance Officers Salary Survey

Society of Corporate Compliance and Ethics  
6500 Barrie Road, Suite 250  
Minneapolis, MN 55435

## CONFIDENTIALITY ASSURANCE

The *2012 Cross Industry Chief Compliance Officers Salary Survey* is based on a strictly confidential survey conducted of individuals working in the compliance profession. Upon receipt, all survey responses are assigned a confidential code number by Industry Insights, Inc., and any name or company identification is removed. Survey processing is then conducted on an absolutely anonymous basis. No SCCE staff member nor any industry company or individual, nor anyone else other than a select few Industry Insights, Inc. associates ever see any firm's results.

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## Introduction

## About This Report

The **2012 Cross Industry Chief Compliance Officers Salary Survey** is another important service provided by the Society of Corporate Compliance and Ethics (SCCE) and the Health Care Compliance Association (HCCA). The information contained in this report represents complete and accurate compensation data on individuals working in the compliance profession. The report is designed to allow organizations and individuals to compare their salary to their peers.

The salary data have been aggregated in the following groupings so organizations and individuals can compare their own data to the results of similar operations. These aggregations include:

- All Respondents
- Percentage of Company's Legal and Regulatory Risk Areas the Chief Compliance Officer (CCO) is Involved in
- Number of Employees in the compliance and Ethics Group Managed
- Annual Compliance Budget Managed
- Number of Employees in Portion of the Organization that CCO runs Compliance for
- Annual Revenues in Portion of the Organization that CCO Runs Compliance for
- Number of Countries in Which Compliance is Managed
- Number of Years Managing the Compliance Department
- Type of Organization
- Number of Compliance Program Elements the CCO is Involved in

Because the goal of this survey was to determine salaries for Chief Compliance Officers for an organization or division within it, and not for leaders of specialized areas of compliance, individuals who indicated they were responsible for less than 26% of an organization's legal and regulatory risk were eliminated. These individuals accounted for 19.4% of all respondents. Also eliminated were individuals who indicated they were not responsible for at least seven of the ten surveyed elements of a compliance program. This group constituted 13.2% of the initial respondents.

As an organization or individual compares their salary information to that of the profession, it is important to remember that the statistics published in this report should be regarded as "guidelines" rather than "absolute standards." Since organizations will differ, depending upon their location, size, and other factors, any two organizations may offer their employees a reasonably attractive compensation package and yet be very different. For example, duration of employment and nature of prior experience will obviously influence the compensation offering for a particular individual. Thus, a deviation between any one organization's figures and a number appearing on a table in this report is not necessarily good or bad; it is merely an indication that additional scrutiny may be warranted.

A minimum of five responses was required to show data.

This study was conducted for HCCA/SCCE by Industry Insights, Inc., an independent professional survey research firm located in Dublin, Ohio. The company specializes in conducting industry operating surveys, compensation and benefits studies, and member attitude surveys for trade and professional associations.

The HCCA/SCCE is proud to present the enclosed insights into the salary levels in the compliance industry. We wish to thank the professionals who submitted data for the study. Your support was essential in making this study a success.

## Survey Methodology

In September 2012, an email invitation was sent to approximately 45,000 individuals. In total, 1,858 completed online submissions were received by late October. Of the 1,858 responses, 404 were selected for this report based on the following criteria:

- They worked for a non-health care provider
- They were responsible for at least seven of the ten elements of a compliance program
- They 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 report was completed in January 2013.

## Definitions

**Average (mean):** the arithmetic average obtained by adding the individual values for all responses to a particular question and dividing by the total number answering; a measure of central value that can be distorted by extreme high or low values.

**Median:** a measure of central value that is not affected by extreme values; calculated by arranging all responses in numerical order and selecting the value that falls exactly in the middle, with half higher and half lower.

**25th Percentile:** when responses are ordered from lowest to highest, the lower quartile is the response 25% from the bottom. In other words, 75% of the responses are higher than this measure.

**75th Percentile:** when responses are ordered from the lowest to highest, the upper quartile is the response 25% from the top. In other words, 25% of the responses are higher than this measure.

Tired of  
24/7/365  
compliance  
issues?

Try 4,500/30/12  
instead.

**4,500**  
compliance  
& ethics  
professionals  
joined in one  
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a year to choose  
from, all with special  
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*Compliance & Ethics  
Professional*, the  
exclusive SCCE  
member magazine.

# Join the Society of Corporate Compliance and Ethics.

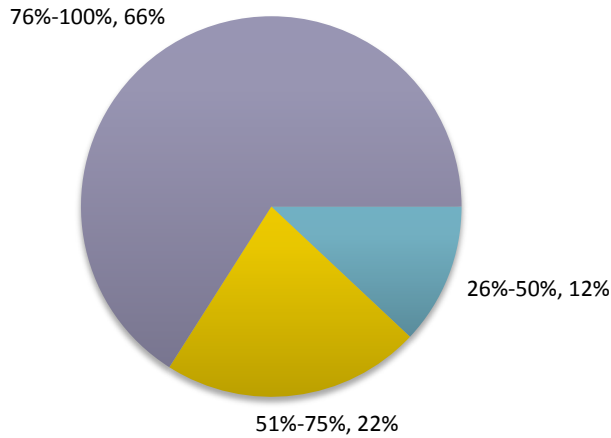
Visit [corporatecompliance.org](http://corporatecompliance.org) to learn how you can enjoy the educational opportunities, networking, and support of the Society of Corporate Compliance and Ethics.



## Respondent Profile

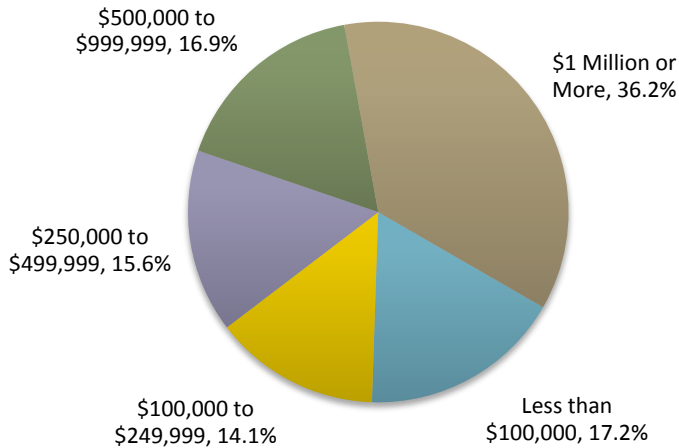
*Percentage of Company's Legal and Regulatory Risk That You are Involved in*

Two thirds of the respondents indicated that they were involved in at least 76% of the company's legal and regulatory risk.



*Annual Compliance Budget Managed*

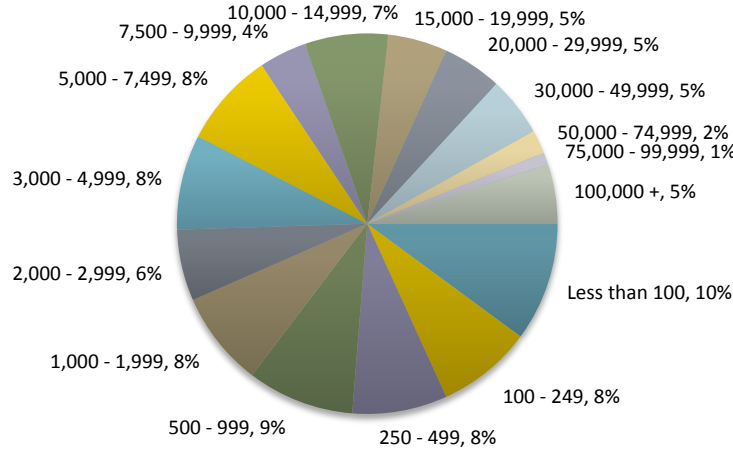
The typical compliance officer managed an annual compliance budget between \$500,000 and \$999,999. More than a third of the Chief Compliance Officers reported managing an annual compliance budget of over \$1 million.





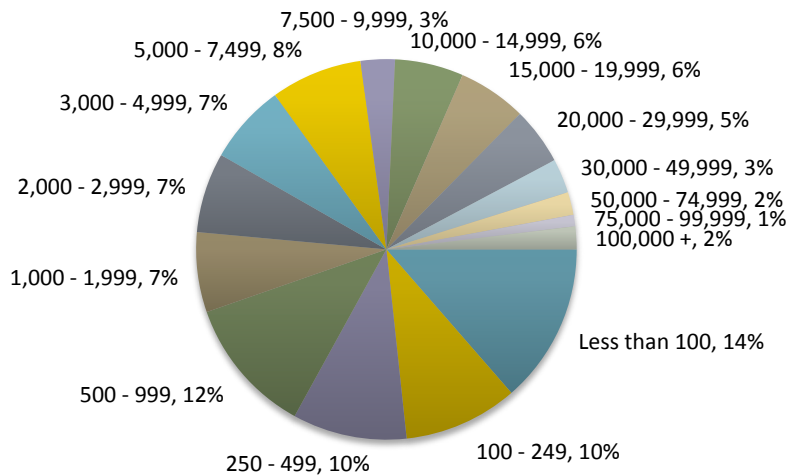
**Number of Employees in Organization as a Whole**

The size of organizations represented in this study varied greatly. Ten percent worked for organizations with less than 100 total employees while 13% worked for companies employing more than 30,000.



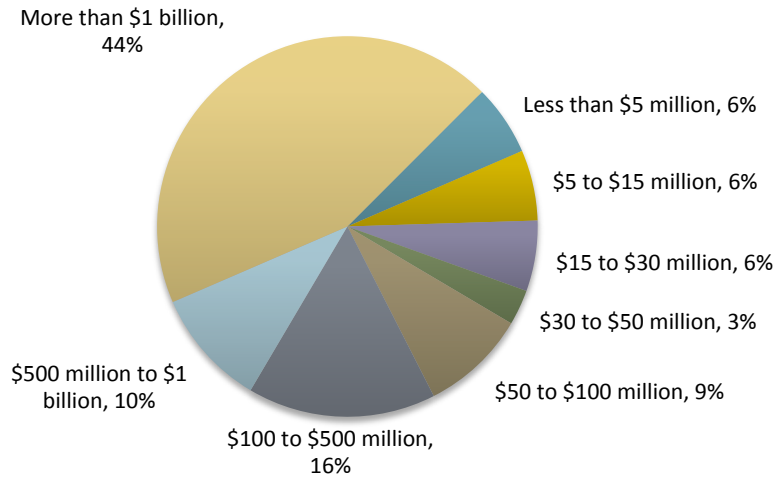
**Number of Employees in Organization that CCO Runs Compliance for**

The chart below looks at only the number of employees in the portion of the organization that the Chief Compliance Officer runs compliance for.



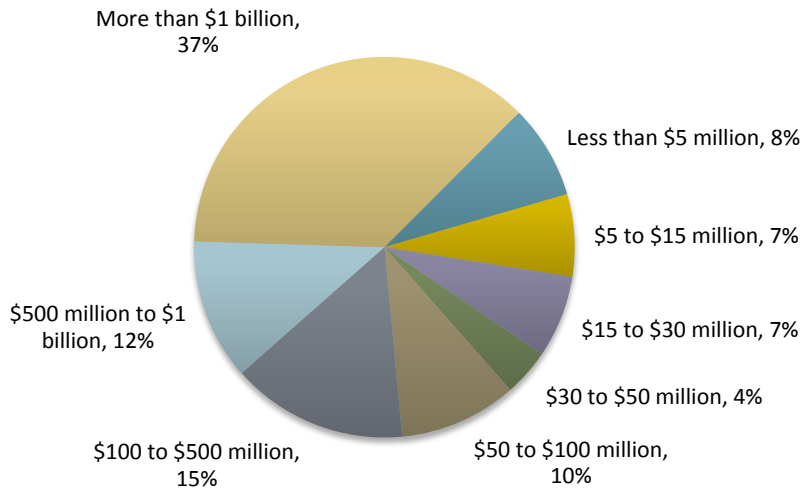
***Annual Revenues of the Organization as a Whole***

The size of organizations responding by annual revenue also varied greatly. Eighteen percent of the respondents reported annual revenue of entire organization of less than \$30 million, while more than half of the respondents reported annual revenue of over \$500 million.



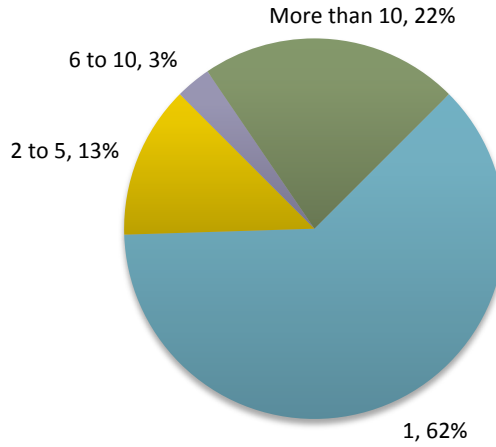
***Annual Revenues of the Organization that CCO Runs Compliance for***

The chart below looks at only the annual revenues of the portion of the organization that the Chief Compliance Officer runs compliance for.



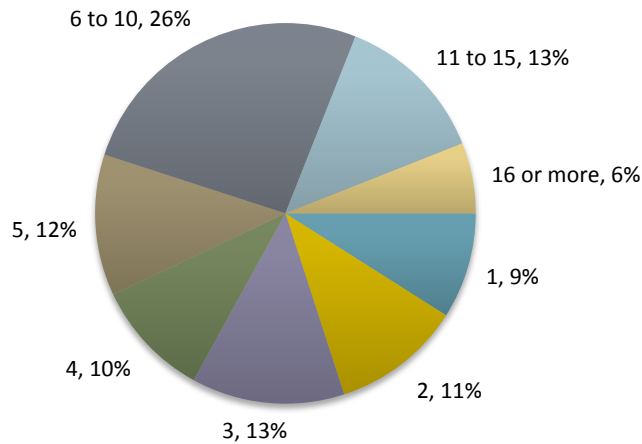
***Number of Countries in Which Compliance is Managed***

More than one-third of the responding Chief Compliance Officers manage compliance in more than one country.



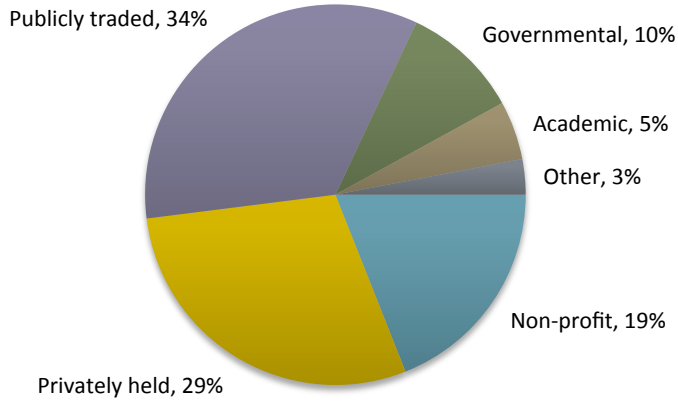
***Number of Years Managing the Compliance Department***

The typical Chief Compliance Officer has managed their compliance department for five years. Less than 10% have managed the department for 16 or more years.



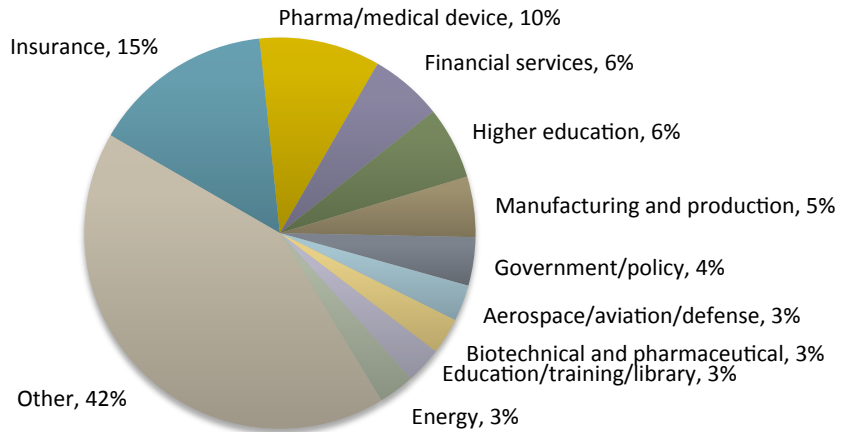
*Type of Organization*

One-third of the responding Chief Compliance Officers worked at publicly traded companies. Nearly one-third indicated that they worked at privately held organizations.



*Type of Industry*

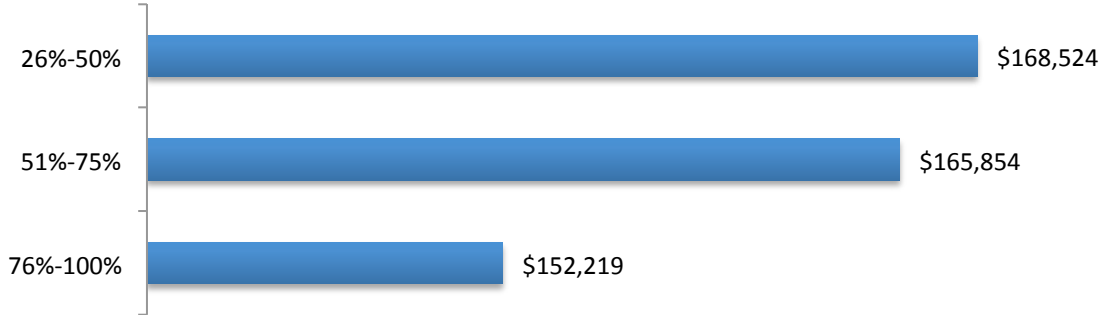
The most represented industry participating in the survey was insurance (15%), followed by pharma/medical device (10%), financial services (6%) and higher education (6%).



## Executive Summary

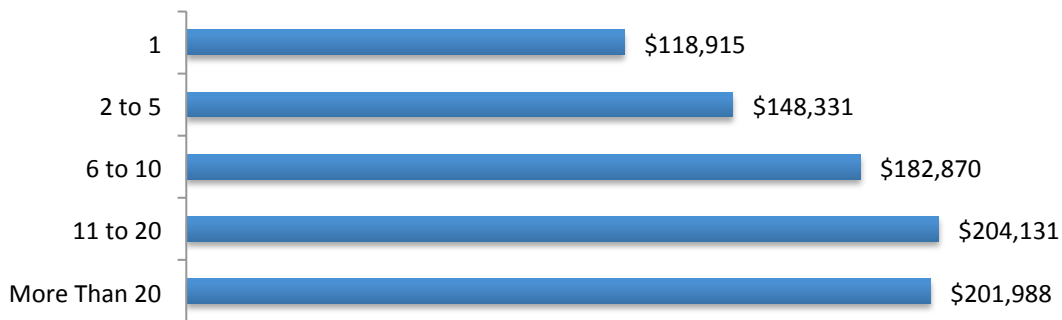
**Average Chief Compliance Officer Salary by Percentage of Company's Legal and Regulatory Risk Areas CCO Involved in**

Chief Compliance Officers reporting that they were involved in 76%-100% of the company's legal and regulatory risk earned less than those with 26%-75% involvement. This is due to the fact Chief Compliance Officers that reported being involved in 76% to 100% of the company's legal and regulatory risk areas are more likely to work for smaller organizations, on average, than those that reported 26% to 75% involvement. Those reporting to be involved in 26%-50% of the company's legal and regulatory risk earned the highest salary at \$168,524 which reflects their tendency to come from larger companies.



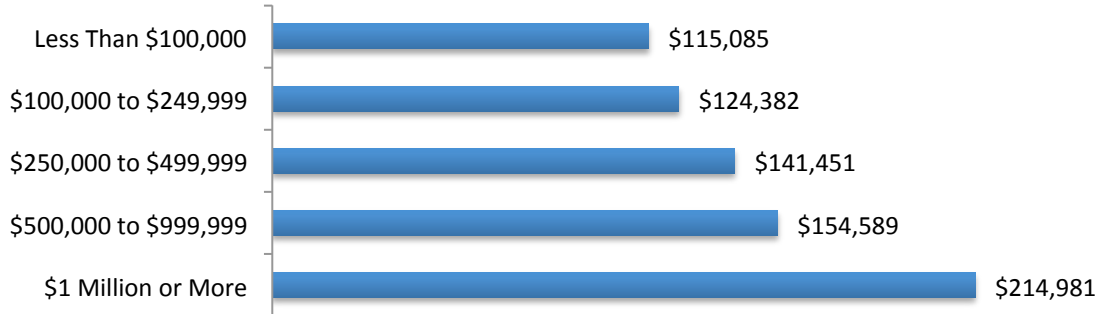
**Average Chief Compliance Officer Salary by Number of Employees in the Compliance and Ethics Group Managed**

Salaries of Chief Compliance Officers showed a direct correlation to the number of employees in the compliance and ethics group managed. Chief Compliance Officers managing one employee earned an average salary of \$118,915 while those managing more than 20 employees earned \$201,988.



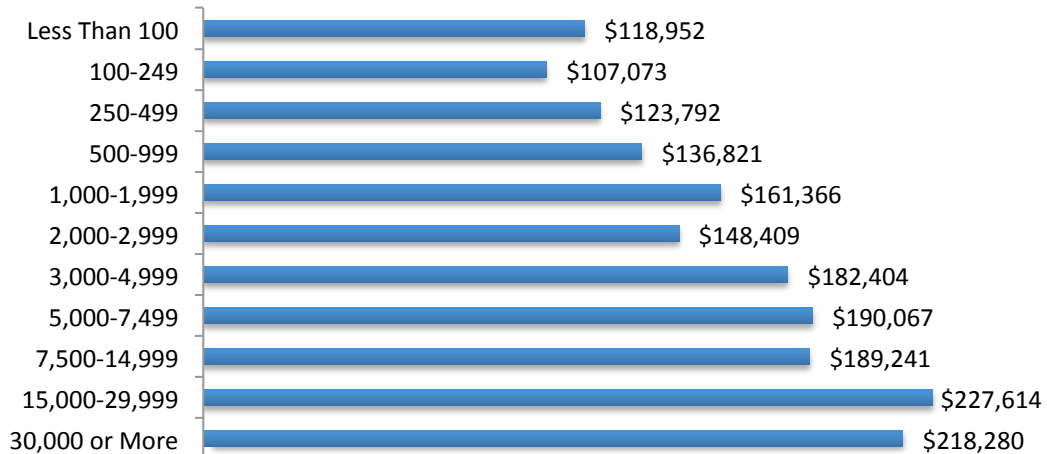
*Average Chief Compliance Officer Salary by Annual Compliance Budget Managed*

A direct correlation also existed between CCO salaries and the annual compliance budget managed. Chief Compliance Officers managing an annual compliance budget of less than \$100,000 earned \$115,085 while those managing budgets of \$1 million or more earned \$214,981.



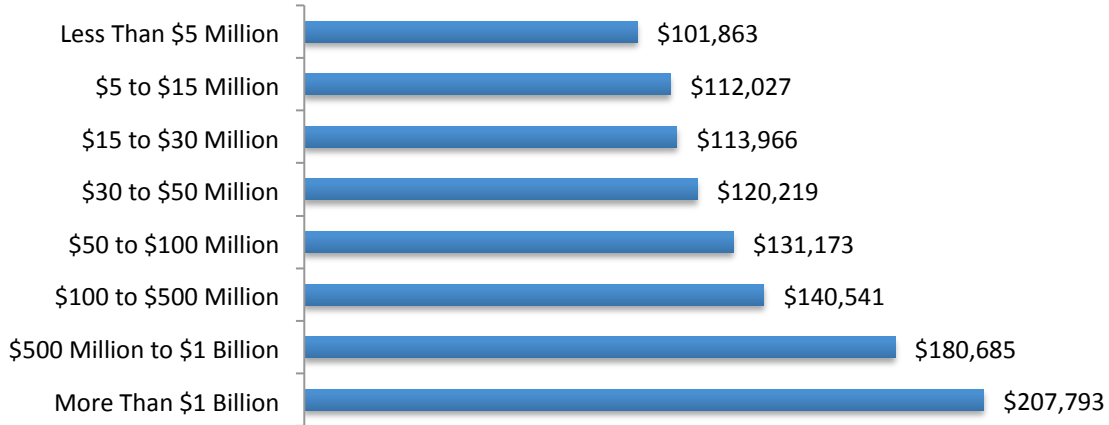
*Average Chief Compliance Officer Salary by Number of Employees that CCO Runs Compliance for*

Chief Compliance Officer salaries tended to increase as the size of the organization increased. CCOs managing compliance for company units with 30,000 or more employees reported salaries nearly twice as high as those in organizations with less than 100 employees. It should be noted that CCOs at organizations with less than 100 employees may have had a higher executive level position or more than one position, which led to a higher average salary, than those working at organization with 100 to 249 employees.



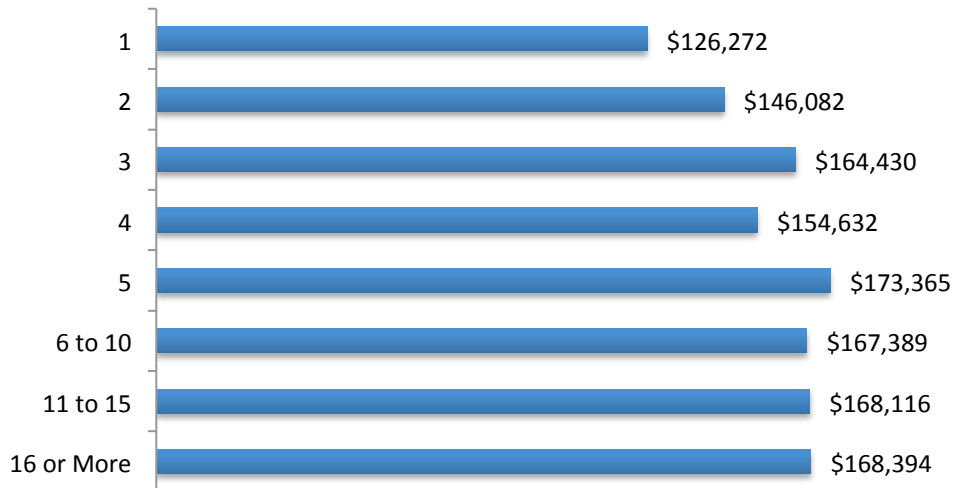
*Average Chief Compliance Officer Salary by Revenue that CCO Runs Compliance for*

A correlation existed between CCO salaries and annual revenue of the organizational unit that the CCO was responsible for, especially when those revenues surpassed \$500 million.



*Average Chief Compliance Officer Salary by Number of Years Managing the Compliance Department*

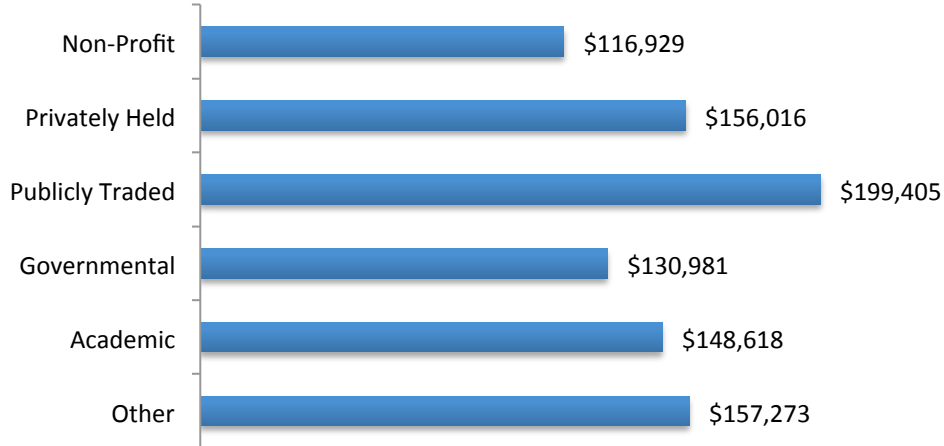
The number of years managing the compliance department made a difference. Chief Compliance Officers with one year of experience managing the compliance department earned \$126,272 in salary, on average. Those managing the compliance department for 16 or more years earned an average salary of \$168,394.





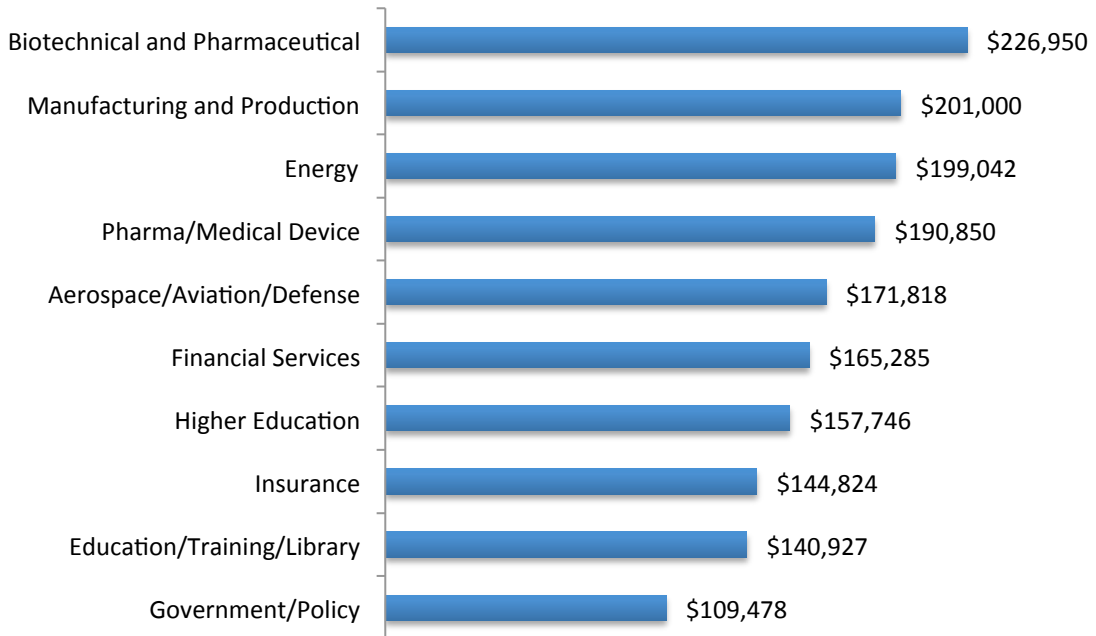
*Average Chief Compliance Officer Salary by Type of Organization*

Chief Compliance Officers working for publicly traded companies earned the highest average base salary at \$199,405. Those working at non-profit organizations earned the lowest average base salary at \$116,929.



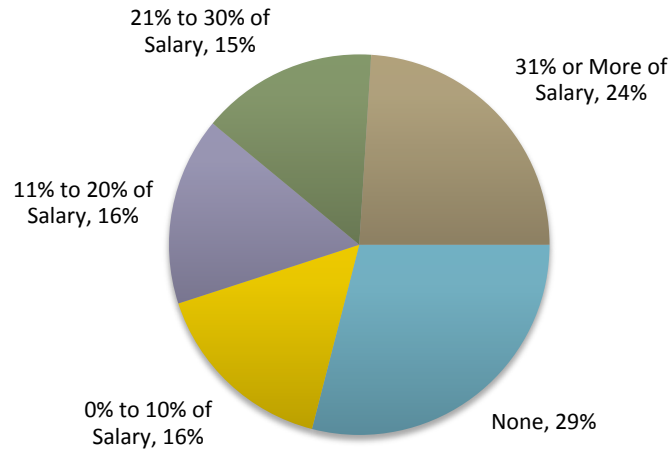
*Average Chief Compliance Officer Salary by Industry*

Chief Compliance Officers working in the biotechnical and pharmaceutical industry reported the highest average salary at \$226,950, followed by manufacturing and production (\$201,000) and energy (\$199,042). Those working in the government/policy industry earned the lowest salary at \$109,478.



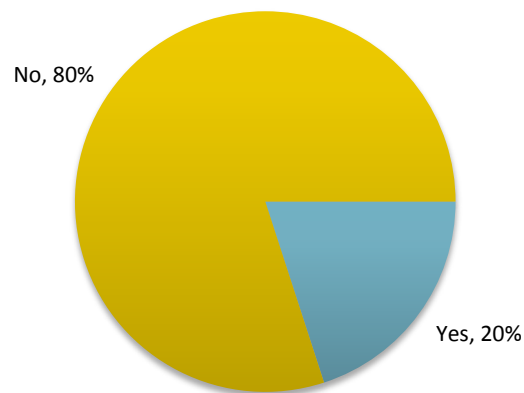
***Amount of Bonus Eligible***

Nearly three-quarters (71%) of the responding Chief Compliance Officers are eligible for a bonus. One-quarter of those responding reported being bonus-eligible 31% or more of their salary.



***Do you have a Contract?***

Only 20% of the responding Chief Compliance Officers have a contract.



## Salary Data

## Chief Compliance Officer

	<i>Respondents</i>	<i>Average</i>	<i>Median</i>	<i>25th Percentile</i>	<i>75th Percentile</i>
<b>All Respondents</b>	<b>398</b>	<b>\$160,654</b>	<b>\$150,000</b>	<b>\$100,000</b>	<b>\$204,385</b>
<b>Percentage of Company's Legal and Regulatory Risk Areas CCO Involved in</b>					
<b>26%-50%</b>	<b>93</b>	<b>\$168,524</b>	<b>\$170,000</b>	<b>\$100,000</b>	<b>\$230,000</b>
<b>51%-75%</b>	<b>135</b>	<b>\$165,854</b>	<b>\$158,000</b>	<b>\$107,500</b>	<b>\$208,000</b>
<b>76%-100%</b>	<b>170</b>	<b>\$152,219</b>	<b>\$141,528</b>	<b>\$97,724</b>	<b>\$187,150</b>
<b>Number of Employees in the Compliance and Ethics Group Managed</b>					
<b>1</b>	<b>74</b>	<b>\$118,915</b>	<b>\$105,500</b>	<b>\$85,638</b>	<b>\$148,750</b>
<b>2 to 5</b>	<b>168</b>	<b>\$148,331</b>	<b>\$141,000</b>	<b>\$100,000</b>	<b>\$181,000</b>
<b>6 to 10</b>	<b>60</b>	<b>\$182,870</b>	<b>\$175,000</b>	<b>\$124,750</b>	<b>\$230,500</b>
<b>11 to 20</b>	<b>55</b>	<b>\$204,131</b>	<b>\$208,000</b>	<b>\$148,000</b>	<b>\$250,000</b>
<b>More Than 20</b>	<b>37</b>	<b>\$201,988</b>	<b>\$200,000</b>	<b>\$110,000</b>	<b>\$260,000</b>
<b>Annual Compliance Budget Managed</b>					
<b>Less Than \$100,000</b>	<b>55</b>	<b>\$115,085</b>	<b>\$100,000</b>	<b>\$70,000</b>	<b>\$154,350</b>
<b>\$100,000 to \$249,999</b>	<b>45</b>	<b>\$124,382</b>	<b>\$110,000</b>	<b>\$91,000</b>	<b>\$150,000</b>
<b>\$250,000 to \$499,999</b>	<b>50</b>	<b>\$141,451</b>	<b>\$140,000</b>	<b>\$100,000</b>	<b>\$170,000</b>
<b>\$500,000 to \$999,999</b>	<b>52</b>	<b>\$154,589</b>	<b>\$136,925</b>	<b>\$116,250</b>	<b>\$188,750</b>
<b>\$1 Million or More</b>	<b>114</b>	<b>\$214,981</b>	<b>\$212,500</b>	<b>\$172,000</b>	<b>\$250,000</b>
<b>Number of Employees that CCO Runs Compliance for</b>					
<b>Less Than 100</b>	<b>53</b>	<b>\$118,952</b>	<b>\$110,000</b>	<b>\$83,000</b>	<b>\$148,000</b>
<b>100-249</b>	<b>37</b>	<b>\$107,073</b>	<b>\$97,000</b>	<b>\$83,000</b>	<b>\$128,000</b>
<b>250-499</b>	<b>38</b>	<b>\$123,792</b>	<b>\$123,500</b>	<b>\$91,875</b>	<b>\$157,500</b>
<b>500-999</b>	<b>46</b>	<b>\$136,821</b>	<b>\$128,500</b>	<b>\$88,250</b>	<b>\$169,725</b>
<b>1,000-1,999</b>	<b>27</b>	<b>\$161,366</b>	<b>\$132,000</b>	<b>\$122,000</b>	<b>\$186,500</b>
<b>2,000-2,999</b>	<b>28</b>	<b>\$148,409</b>	<b>\$130,000</b>	<b>\$102,475</b>	<b>\$182,250</b>
<b>3,000-4,999</b>	<b>28</b>	<b>\$182,404</b>	<b>\$182,500</b>	<b>\$146,125</b>	<b>\$212,500</b>
<b>5,000-7,499</b>	<b>30</b>	<b>\$190,067</b>	<b>\$185,000</b>	<b>\$160,500</b>	<b>\$226,250</b>
<b>7,500-14,999</b>	<b>36</b>	<b>\$189,241</b>	<b>\$200,000</b>	<b>\$137,250</b>	<b>\$236,500</b>
<b>15,000-29,999</b>	<b>39</b>	<b>\$227,614</b>	<b>\$232,000</b>	<b>\$184,500</b>	<b>\$260,000</b>
<b>30,000 or More</b>	<b>28</b>	<b>\$218,280</b>	<b>\$222,500</b>	<b>\$178,250</b>	<b>\$256,250</b>

Detailed Results

	<i>Respondents</i>	<i>Average</i>	<i>Median</i>	<i>25th Percentile</i>	<i>75th Percentile</i>
<b>Annual Revenues that CCO Runs Compliance for</b>					
<i>Less Than \$5 Million</i>	32	\$101,863	\$95,000	\$71,500	\$123,950
<i>\$5 to \$15 Million</i>	26	\$112,027	\$104,000	\$82,450	\$127,750
<i>\$15 to \$30 Million</i>	28	\$113,966	\$100,500	\$68,750	\$133,500
<i>\$30 to \$50 Million</i>	16	\$120,219	\$115,000	\$92,000	\$141,000
<i>\$50 to \$100 Million</i>	37	\$131,173	\$115,000	\$95,000	\$180,000
<i>\$100 to \$500 Million</i>	55	\$140,541	\$130,000	\$100,000	\$170,000
<i>\$500 Million to \$1 Billion</i>	44	\$180,685	\$166,250	\$129,750	\$209,405
<i>More Than \$1 Billion</i>	139	\$207,793	\$202,000	\$162,500	\$250,000
<b>Number of Countries in Which Compliance is Managed</b>					
<i>1</i>	243	\$134,484	\$123,600	\$91,000	\$170,000
<i>2 to 10</i>	63	\$191,146	\$184,000	\$136,675	\$210,500
<i>11 or More</i>	86	\$211,715	\$205,000	\$166,250	\$253,750
<b>Type of Industry</b>					
<i>Aerospace/aviation/defense</i>	11	\$171,818	\$180,000	\$130,500	\$210,000
<i>Biotechnical and Pharmaceutical</i>	10	\$226,950	\$240,000	\$168,500	\$280,250
<i>Chemical/Polymers/Fibers</i>	5	\$196,600	\$205,000	\$153,000	\$225,000
<i>Consulting Services</i>	5	\$111,400	\$110,000	\$100,000	\$125,000
<i>Consumer Products</i>	5	\$195,000	\$185,000	\$180,000	\$220,000
<i>Education/Training/Library</i>	11	\$140,927	\$127,000	\$100,600	\$166,500
<i>Energy</i>	12	\$199,042	\$191,000	\$133,375	\$223,500
<i>Financial Services</i>	21	\$165,285	\$175,000	\$125,000	\$201,792
<i>Government/Policy</i>	17	\$109,478	\$95,000	\$85,800	\$125,000
<i>Higher Education</i>	24	\$157,746	\$147,850	\$106,750	\$167,500
<i>Information Technology</i>	9	\$185,111	\$165,000	\$128,000	\$258,000
<i>Insurance</i>	60	\$144,824	\$125,000	\$100,750	\$171,250
<i>Manufacturing and Production</i>	20	\$201,000	\$200,000	\$167,250	\$250,000
<i>Pharma/Medical Device</i>	40	\$190,850	\$188,500	\$147,500	\$242,250
<i>Retail/Wholesale</i>	9	\$170,761	\$175,000	\$138,850	\$210,000
<i>Utilities</i>	9	\$202,600	\$180,000	\$168,900	\$220,000
<b>Number of Years Managing the Compliance Department</b>					
<i>1</i>	35	\$126,272	\$102,900	\$87,900	\$165,350
<i>2</i>	44	\$146,082	\$132,500	\$107,500	\$180,750
<i>3</i>	53	\$164,430	\$165,000	\$96,000	\$232,000
<i>4</i>	39	\$154,632	\$125,000	\$90,000	\$211,000
<i>5</i>	48	\$173,365	\$172,500	\$128,000	\$211,250
<i>6 to 10</i>	101	\$167,389	\$165,000	\$120,000	\$200,000
<i>11 to 15</i>	53	\$168,116	\$150,000	\$110,000	\$202,540
<i>16 or More</i>	25	\$168,394	\$170,000	\$100,000	\$220,000

## Detailed Results

	<i>Respondents</i>	<i>Average</i>	<i>Median</i>	<i>25th Percentile</i>	<i>75th Percentile</i>
<b>Type of Organization</b>					
<i>Non-Profit</i>	<i>76</i>	<i>\$116,929</i>	<i>\$104,300</i>	<i>\$84,450</i>	<i>\$134,625</i>
<i>Privately Held</i>	<i>117</i>	<i>\$156,016</i>	<i>\$150,000</i>	<i>\$110,000</i>	<i>\$187,200</i>
<i>Publicly Traded</i>	<i>134</i>	<i>\$199,405</i>	<i>\$200,000</i>	<i>\$156,250</i>	<i>\$250,000</i>
<i>Governmental</i>	<i>38</i>	<i>\$130,981</i>	<i>\$111,450</i>	<i>\$85,850</i>	<i>\$149,500</i>
<i>Academic</i>	<i>20</i>	<i>\$148,618</i>	<i>\$140,000</i>	<i>\$99,150</i>	<i>\$171,000</i>
<i>Other</i>	<i>11</i>	<i>\$157,273</i>	<i>\$120,000</i>	<i>\$94,000</i>	<i>\$202,000</i>
<b>Number of Compliance Program Elements the CCO is Involved in:</b>					
<i>7 or More Elements</i>	<i>398</i>	<i>\$160,654</i>	<i>\$150,000</i>	<i>\$100,000</i>	<i>\$204,385</i>
<i>8 or More Elements</i>	<i>357</i>	<i>\$162,152</i>	<i>\$153,000</i>	<i>\$100,000</i>	<i>\$205,000</i>
<i>9 or More Elements</i>	<i>288</i>	<i>\$165,031</i>	<i>\$157,000</i>	<i>\$100,750</i>	<i>\$210,000</i>
<i>All Elements</i>	<i>206</i>	<i>\$169,090</i>	<i>\$159,500</i>	<i>\$105,750</i>	<i>\$220,000</i>