



Cross-Industry Compliance Staffing and Budget Benchmarking and Guidance Survey

February 2018

A survey by the
**Society of Corporate
Compliance and Ethics**



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Background

In 2017, the Society of Corporate Compliance and Ethics (SCCE) conducted a comprehensive survey of compliance professionals in order to create a salary survey. The survey looked at salaries in relation to measures such as size of company (in revenues and employees) as well as compliance budget and ownership structure.

As was the case with the 2015 salary survey, SCCE recognized that there would be an opportunity to reuse the data to create benchmarks for staffing and budget. The association then worked with the research provider to create the following report, which repurposes the salary survey data.

Using this report

On the following pages are a series of data tables that can be used to benchmark compliance program budgets and staffing by several factors. As you review the data, keep in mind that this data should be considered directional in nature. Different companies of the same size will likely have very different histories in terms of compliance issues and risks.

Survey data

Although increasing revenues do tend to lead to higher compliance department staffing levels, compliance departments tend to be small. More than half of respondents from companies of \$500 million or less in revenues reported that their compliance team had no more than five people in it. Even for companies with \$3 billion in revenues or more, 26% reported that their compliance team was five persons or fewer.

REVENUE OF ORGANIZATION AS A WHOLE

CROSS INDUSTRY	EMPLOYEES IN COMPLIANCE AND ETHICS GROUP								
	1	2 to 5	6 to 10	11 to 15	16 to 20	21 to 30	31 to 40	41 to 50	>50
Less than \$5 million	24.7%	42.0%	16.0%	2.7%	7.3%	1.3%	0.7%	2.0%	3.3%
\$5 to \$15 million	14.6%	43.8%	17.7%	6.3%	5.2%	5.2%	3.1%		4.2%
\$15 to \$30 million	11.1%	51.1%	20.0%	8.9%		4.4%	2.2%		2.2%
\$30 to \$50 million	7.5%	49.3%	22.4%	4.5%	3.0%	6.0%	3.0%	1.5%	3.0%
\$50 to \$100 million	12.2%	55.4%	17.6%	4.1%	5.4%	1.4%		1.4%	2.7%
\$100 to \$500 million	12.3%	51.6%	15.5%	8.4%	5.2%	1.9%	1.3%	1.3%	2.6%
\$500 million to \$1 billion	7.0%	41.2%	25.4%	8.8%	3.5%	2.6%	4.4%	2.6%	4.4%
\$1 to \$3 billion	5.7%	41.4%	21.8%	8.6%	4.6%	8.0%	4.0%	2.3%	3.4%
More than \$3 billion	3.5%	22.6%	16.3%	10.9%	7.0%	8.6%	5.1%	5.4%	20.6%

Compliance officers working within divisions of companies, rather than an overall corporate compliance team, generally reported similar staffing levels and smaller compliance teams, generally of five people or fewer. Throughout all the data that follows, there are some anomalies in which staffing and budgets at the division level were reported as being higher than at the corporate level.

REVENUE OF PORTION OF ORGANIZATION COMPLIANCE GROUP SERVES

CROSS INDUSTRY	EMPLOYEES IN COMPLIANCE AND ETHICS GROUP								
	1	2 to 5	6 to 10	11 to 15	16 to 20	21 to 30	31 to 40	41 to 50	>50
Less than \$5 million	24.1%	38.0%	17.7%	3.8%	5.1%	1.3%	1.3%	3.8%	5.1%
\$5 to \$15 million	14.0%	52.3%	17.4%	5.8%	5.8%	3.5%	1.2%		
\$15 to \$30 million	10.4%	52.1%	22.9%	6.3%	4.2%		4.2%		
\$30 to \$50 million	11.7%	50.0%	23.3%	3.3%	3.3%	1.7%	3.3%		3.3%
\$50 to \$100 million	12.7%	53.2%	19.0%	3.8%	1.3%	6.3%	2.5%	1.3%	
\$100 to \$500 million	14.5%	52.4%	13.8%	9.0%	3.4%	2.1%	0.7%	1.4%	2.8%
\$500 million to \$1 billion	13.6%	42.7%	23.6%	7.3%	4.5%	2.7%	2.7%	1.8%	0.9%
\$1 to \$3 billion	4.7%	41.4%	24.1%	8.4%	5.2%	7.3%	3.1%	3.1%	2.6%
More than \$3 billion	4.7%	24.9%	15.5%	9.4%	7.6%	8.5%	4.4%	4.7%	20.5%

Generally speaking, the more employees in an organization, the larger the compliance team. For companies with 2,000–2,999 employees, 53% of survey respondents reported compliance teams of five people or fewer. However, for organizations with 100,000 employees or more, approximately 47% reported a compliance team of 41 people or more.

EMPLOYEES IN ORGANIZATION AS A WHOLE

CROSS INDUSTRY	EMPLOYEES IN COMPLIANCE AND ETHICS GROUP								
	1	2 to 5	6 to 10	11 to 15	16 to 20	21 to 30	31 to 40	41 to 50	>50
Less than 100	17.8%	39.6%	16.7%	5.6%	5.6%	3.3%	2.2%	2.6%	6.7%
100–249	13.1%	53.3%	19.7%	2.5%	1.6%	1.6%		1.6%	6.6%
250–499	8.2%	46.4%	22.7%	10.9%	2.7%	2.7%	2.7%	1.8%	1.8%
500–999	10.1%	50.0%	18.1%	7.2%	6.5%	2.2%		0.7%	5.1%
1,000–1,999	7.8%	36.3%	20.6%	7.8%	8.8%	5.9%	4.9%	2.0%	5.9%
2,000–2,999	11.9%	41.8%	26.9%	1.5%	3.0%	4.5%	3.0%	1.5%	6.0%
3,000–4,999	5.3%	50.0%	14.5%	5.3%	6.6%	9.2%	2.6%	1.3%	5.3%
5,000–7,499	11.1%	33.3%	19.8%	14.8%	2.5%	4.9%	3.7%	3.7%	6.2%
7,500–9,999		32.4%	32.4%	8.8%	11.8%	2.9%		5.9%	5.9%
10,000–14,999	6.3%	42.2%	25.0%	3.1%	7.8%	6.3%	4.7%	1.6%	3.1%
15,000–19,999	2.9%	38.2%	8.8%	14.7%	2.9%	11.8%	2.9%	2.9%	14.7%
20,000–29,999		35.6%	26.7%	8.9%	2.2%	13.3%	4.4%	2.2%	6.7%
30,000–49,999	2.3%	23.3%	16.3%	16.3%	4.7%	16.3%	7.0%	2.3%	11.6%
50,000–74,999	5.3%	10.5%	21.1%		10.5%	15.8%	10.5%	5.3%	21.1%
75,000–99,999		8.3%	8.3%	25.0%	8.3%	8.3%		8.3%	33.3%
100,000 or more		12.5%	12.5%	6.3%	9.4%	3.1%	9.4%	9.4%	37.5%

When looking at the numbers reported by compliance officers working in divisions of companies, rather than in a central compliance department, the same pattern emerges.

EMPLOYEES IN PORTION OF ORGANIZATION COMPLIANCE GROUP SERVES

EMPLOYEES IN COMPLIANCE AND ETHICS GROUP									
CROSS INDUSTRY	1	2 to 5	6 to 10	11 to 15	16 to 20	21 to 30	31 to 40	41 to 50	>50
Less than 100	33.3%	52.9%	8.0%		2.3%	1.1%		1.1%	1.1%
100–249	10.8%	61.3%	19.4%	2.2%	1.1%	2.2%		1.1%	2.2%
250–499	11.9%	53.6%	21.4%	7.1%	1.2%	3.6%		1.2%	
500–999	10.3%	53.2%	19.8%	9.5%	5.6%		0.8%	0.8%	
1,000–1,999	9.9%	45.5%	22.3%	8.3%	3.3%	3.3%	2.5%	0.8%	4.1%
2,000–2999	12.5%	36.4%	29.5%	2.3%	6.8%	5.7%	3.4%	1.1%	2.3%
3,000–4,999	6.6%	46.2%	18.7%	5.5%	6.6%	8.8%	3.3%	1.1%	3.3%
5,000–7,499	12.2%	33.7%	19.4%	13.3%	5.1%	5.1%	3.1%	4.1%	4.1%
7,500–9,999	7.7%	28.2%	28.2%	5.1%	12.8%		5.1%		12.8%
10,000–14,999	10.8%	39.8%	20.5%	7.2%	6.0%	8.4%	2.4%	1.2%	3.6%
15,000–19,999	4.3%	39.1%	15.2%	8.7%	4.3%	6.5%	4.3%	2.2%	15.2%
20,000–29,999	1.7%	35.6%	25.4%	8.5%	5.1%	13.6%	3.4%	3.4%	3.4%
30,000–49,999	2.6%	27.3%	18.2%	14.3%	7.8%	13.0%	6.5%	2.6%	7.8%
50,000–74,999	8.3%	13.9%	16.7%	5.6%	11.1%	8.3%	8.3%	8.3%	19.4%
75,000–99,999	3.6%	28.6%	14.3%	17.9%	10.7%		3.6%	7.1%	14.3%
100,000 or more	3.1%	14.6%	12.5%	6.3%	6.3%	4.2%	4.2%	7.3%	41.7%

Compliance team staffing for publicly traded companies tends to be much greater than for other types of organizations. Fifteen percent of survey respondents from publicly traded companies reported staffing of more than 50 people, compared to just 2% at nonprofits and 4% at privately held institutions.

ORGANIZATION TYPE

EMPLOYEES IN COMPLIANCE AND ETHICS GROUP									
CROSS INDUSTRY	1	2 to 5	6 to 10	11 to 15	16 to 20	21 to 30	31 to 40	41 to 50	>50
Nonprofit	11.6%	42.7%	21.1%	9.1%	6.5%	3.9%	2.2%	0.9%	2.2%
Privately held	13.6%	47.1%	18.7%	6.7%	4.3%	2.9%	1.1%	1.3%	4.3%
Publicly traded	6.5%	30.8%	16.8%	7.5%	7.5%	7.5%	4.9%	3.3%	15.4%
Governmental	11.7%	51.5%	19.4%	3.9%	1.0%	3.9%	2.9%	2.9%	2.9%
Academic	6.9%	45.8%	27.8%	5.6%	1.4%	8.3%	2.8%	1.4%	
Other	4.2%	33.3%	29.2%	8.3%	4.2%	4.2%		16.7%	

As would be expected, compliance budgets tend to rise with the organization's revenues. More than half (58%) of survey respondents from organizations with less than \$5 million reported a budget of less than \$100,000. By contrast, 65% of respondents from organizations with revenues of more than \$3 billion reported a budget of \$1 million or more.

REVENUE OF ORGANIZATION AS A WHOLE

CROSS INDUSTRY	ANNUAL COMPLIANCE BUDGET				
	Less than \$100,000	\$100,000 to \$249,999	\$250,000 to \$499,999	\$500,000 to \$999,999	\$1 million or more
Less than \$5 million	58.1%	7.0%	11.6%	11.6%	11.6%
\$5 to \$15 million	40.0%	12.0%	20.0%	8.0%	20.0%
\$15 to \$30 million	35.7%	28.6%	7.1%	14.3%	14.3%
\$30 to \$50 million	40.0%	13.3%	6.7%	20.0%	20.0%
\$50 to \$100 million	33.3%	29.6%	11.1%	18.5%	7.4%
\$100 to \$500 million	19.0%	15.9%	17.5%	22.2%	25.4%
\$500 million to \$1 billion	15.0%	5.0%	22.5%	27.5%	30.0%
\$1 to \$3 billion	9.0%	6.4%	14.1%	16.7%	53.8%
More than \$3 billion	7.0%	3.5%	7.0%	17.4%	65.1%

Compliance budgets also tended to increase with division revenues.

REVENUE OF PORTION OF ORGANIZATION COMPLIANCE GROUP SERVES

CROSS INDUSTRY	ANNUAL COMPLIANCE BUDGET				
	Less than \$100,000	\$100,000 to \$249,999	\$250,000 to \$499,999	\$500,000 to \$999,999	\$1 million or more
Less than \$5 million	66.7%		9.5%	14.3%	9.5%
\$5 to \$15 million	36.4%	13.6%	27.3%		22.7%
\$15 to \$30 million	31.6%	26.3%	15.8%	15.8%	10.5%
\$30 to \$50 million	40.0%	13.3%	6.7%	20.0%	20.0%
\$50 to \$100 million	21.4%	28.6%	10.7%	25.0%	14.3%
\$100 to \$500 million	25.0%	16.7%	18.3%	21.7%	18.3%
\$500 million to \$1 billion	23.1%	7.7%	20.5%	20.5%	28.2%
\$1 to \$3 billion	7.8%	6.5%	15.6%	19.5%	50.6%
More than \$3 billion	13.6%	4.5%	5.5%	16.4%	60.0%

Compliance budgets also showed a correlation with the number of employees. Respondents from organizations with at least 7,500 employees typically reported budgets of \$1 million or more.

EMPLOYEES IN ORGANIZATION AS A WHOLE

CROSS INDUSTRY	ANNUAL COMPLIANCE BUDGET				
	Less than \$100,000	\$100,000 to \$249,999	\$250,000 to \$499,999	\$500,000 to \$999,999	\$1 million or more
Less than 100	40.6%	10.1%	18.8%	11.6%	18.8%
100–249	45.9%	16.2%	10.8%	13.5%	13.5%
250–499	34.3%	8.6%	20.0%	28.6%	8.6%
500–999	22.7%	15.9%	15.9%	15.9%	29.5%
1,000–1,999	15.2%	15.2%	12.1%	21.2%	36.4%
2,000–2,999	25.9%	7.4%	18.5%	18.5%	29.6%
3,000–4,999	9.1%	12.1%	6.1%	24.2%	48.5%
5,000–7,499	7.7%	11.5%	19.2%	15.4%	46.2%
7,500–9,999			8.3%	25.0%	66.7%
10,000–14,999	8.3%	8.3%	8.3%	25.0%	50.0%
15,000–19,999			7.7%	7.7%	84.6%
20,000–29,999	4.2%	4.2%	12.5%	16.7%	62.5%
30,000–49,999	18.2%	9.1%	9.1%	9.1%	54.5%
50,000–74,999	10.0%	10.0%		20.0%	60.0%
75,000–99,999				100.0%	
100,000 or more			12.5%		87.5%

Even within divisions of organizations, at least half of respondents from divisions with 7,500 or more employees generally reported budgets of \$1 million or more.

EMPLOYEES IN PORTION OF ORGANIZATION COMPLIANCE GROUP SERVES

CROSS INDUSTRY	ANNUAL COMPLIANCE BUDGET				
	Less than \$100,000	\$100,000 to \$249,999	\$250,000 to \$499,999	\$500,000 to \$999,999	\$1 million or more
Less than 100	42.1%	15.8%	18.4%	7.9%	15.8%
100–249	44.8%	17.2%	17.2%	6.9%	13.8%
250–499	37.9%	6.9%	20.7%	24.1%	10.3%
500–999	30.2%	11.6%	11.6%	23.3%	23.3%
1,000–1,999	25.0%	15.6%	12.5%	15.6%	31.3%
2,000–2999	24.2%	9.1%	18.2%	18.2%	30.3%
3,000–4,999	19.5%	9.8%	9.8%	24.4%	36.6%
5,000–7,499	10.0%	13.3%	23.3%	13.3%	40.0%
7,500–9,999			22.2%	22.2%	55.6%
10,000–14,999	6.7%	6.7%	13.3%	23.3%	50.0%
15,000–19,999	17.6%		5.9%	23.5%	52.9%
20,000–29,999	4.0%	4.0%	12.0%	12.0%	68.0%
30,000–49,999	5.9%	5.9%	5.9%	29.4%	52.9%
50,000–74,999	18.8%	12.5%		18.8%	50.0%
75,000–99,999	25.0%	25.0%		25.0%	25.0%
100,000 or more	6.7%		6.7%		86.7%

Once again, publicly traded companies tend to lead, with 53% reporting a budget of \$1 million or more, compared to just 30% from nonprofits and 23% of privately held firms.

ORGANIZATION TYPE

CROSS INDUSTRY	ANNUAL COMPLIANCE BUDGET				
	Less than \$100,000	\$100,000 to \$249,999	\$250,000 to \$499,999	\$500,000 to \$999,999	\$1 million or more
Nonprofit	25.4%	9.5%	15.9%	19.0%	30.2%
Privately held	31.7%	17.6%	13.4%	14.1%	23.2%
Publicly traded	13.6%	5.9%	10.2%	16.9%	53.4%
Governmental	23.3%	9.3%	16.3%	20.9%	30.2%
Academic	12.1%		21.2%	27.3%	39.4%
Other				25.0%	75.0%

Survey methodology

In June 2017, an email invitation to participate in a salary survey was sent to approximately 45,000 individuals.

The data in the report was drawn from 1,542 responses from individuals who:

- Worked for a non-health care provider.
- 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 salary survey report was released in 2017. The data was then retabulated by Industry Insights, Inc., to create this benchmarking report.



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