

# HEALTH ETHICS TRUST

## CERTIFIED COMPLIANCE PROFESSIONAL REQUIREMENTS

COUNCIL OF ETHICAL ORGANIZATIONS  
HEALTH ETHICS TRUST DIVISION

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## **Are you getting the recognition you deserve for your compliance expertise?**

Distinguish yourself through the Health Ethics Trust's *Certified Compliance Professional (CCP)* Program!

The CCP program defines a level of accomplishment in the compliance profession and recognizes expertise in corporate compliance. Voluntary certification recognizes compliance achievement at a professional level and establishes professional practice standards. CCP certification is a designation sought by individuals who strive to represent high professional standards in executing their compliance responsibilities.

Complete the application and begin today to pursue your certification and be recognized as a compliance professional!

## **What is the Health Ethics Trust Certified Compliance Professional process?**

This is a certification process for a healthcare compliance professional that is offered by the Health Ethics Trust (the "Trust" or "HET"). The Trust began the process of establishing healthcare compliance professional certification shortly after the Trust's inception in 1995. The goal of HET's certification program is to promote professionalism and competence throughout the healthcare compliance community. HET is a division of the Council of Ethical Organizations (a non-profit, non-partisan organization committed to promoting ethical and legal conduct in private organizations, government, and the professions).

The purpose of the Trust is to promote sharing of information and the establishment of best practices in healthcare compliance and ethics. Further information on the Health Ethics Trust and the Council of Ethical Organizations can be found at [www.HealthEthicsTrust.com](http://www.HealthEthicsTrust.com).

## **Why choose to be a HET Certified Compliance Professional?**

Compliance responsibilities continue to grow more complex, more regulated and more costly. New, more rigorous benchmarks for effective programs are demanded. The HET certification process is very comprehensive. The Trust believes this approach is necessary because the compliance professional role is a complex, dynamic and challenging one. This is particularly the case for compliance professionals working in the current healthcare environment. The HET certification process is periodically reviewed and updated to ensure its continued relevance to healthcare compliance professionals.

## **Who oversees HET certification for compliance professionals?**

The Trust's certification process is overseen by the Education Committee of the Council of Ethical Organizations. This is an independent, objective and voluntary committee of experienced compliance professionals (healthcare and non-healthcare) from around the country. Members of this committee oversee changes to HET certification criteria as well as reviewing individual applications for HET certification. Members of the Council staff only serve in an administrative and advisory capacity to the Education Committee. This means that they do not have any decision-making authority regarding HET certification applications. Council staff can, however, offer advice on how to best prepare for HET certification.

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## How do I become certified as a HET Certified Compliance Professional (CCP)?

In order to earn the CCP certification, an individual must complete compliance related courses, have worked or served one year in a compliance position, and be recommended for certification by your supervisor.

The application for the Certified Compliance Professional credential is built around specific factors. These factors include professional experience; higher education background and related continuing education. All items submitted for review with the exception of higher education must have been accomplished in the last four years.

**Requirement:** A total of 100 points is required in the identified categories to qualify for this Certification. The points are listed at the top of each section to indicate the minimum/maximum points a candidate must have in each category. An applicant must have the *minimum number of points in each category* in addition to a total of at least 100 points.

**Requirement:** Basic Work Experience in Compliance and/or Ethics-related area.

Current or recent (one-year minimum) workplace-based experience in a compliance-and/or ethics-related area. This includes experience where the applicant undertakes compliance and/or ethics work as part of their duties, but does not necessarily have primary responsibility for this area (e.g., an individual serving as a compliance director, compliance-training specialist or investigator under the supervision of the chief compliance officer). This could also include a position on a Board of Directors of an entity that has a Board-approved formal compliance program. This individual should demonstrate a specific Board compliance related role such as membership and active participation on the entity Audit Committee. This letter of recommendation should be authored by the Board Chair or Chair of the aforementioned Audit Committee.

**Requirement:** Submission of a letter of recommendation from a sponsor, who would ordinarily be in the person's supervisory chain.\*

\*For example, this could be either the candidate's immediate supervisor or a member of the board committee to which the compliance function reports.

**Requirement:** Submission of a resume detailing the applicant's background and compliance/ethics related work experience.

## Is there a test for Certification?

When sufficient points are accumulated and eligibility is determined, an essay examination will be scheduled on topics such as those in Part IV of the application. The written examination is tailored to the individual applicant and evaluated by compliance professionals serving on the Council of Ethical Organizations Education Committee. Thus, the test questions for an applicant working for a health plan might differ somewhat in focus from those for an applicant working for a home care agency.

## How are applications reviewed?

Applications for HET certification are reviewed by members of the Education Committee of the Council of Ethical Organizations. Responsibility for reviewing applications rotates among members of the

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Committee. All applications are reviewed with recognition of the wide range of backgrounds represented among current graduates, while maintaining the Trust's goal of advancing the competence and reputation of healthcare compliance professionals. Committee members judge applications strictly according to the certification criteria - as described here.

## **What are the requirements for maintaining certification?**

In 2002, the Education Committee and HET implemented a continuing education requirement for maintaining certification. This means that all HET Certified Compliance Professionals who wish to maintain their certification must meet the continuing education requirements over a defined period of time. The only exception is for individuals who retire while currently certified. This stipulation was introduced because both the Trust and the Committee believe that the field of ethics and compliance is evolving rapidly and that continuing education is important to meet the growing challenges in the field of compliance/ethics.

Requirements to maintain certification became effective in 2003. From this time on, every three years, all HET Certified Compliance Professionals are encouraged to apply for re-certification or our advanced certification, Certified Compliance Executive (CCE).

The CCP certificate of achievement is valid for three years. It can be kept current by completion of 40 continuing education points submitted to the Council of Ethical Organizations within each additional three-year period.

## **I've attended an HET course. How can I check the status of my course work?**

Please contact the Certification Coordinator at 703-683-7916 to request an update of your current certification status or for a list of current HET courses attended.

## **What cost is involved?**

There is an application fee of \$150.00 to process each certification application. This fee should be sent with the application. This fee includes the review and evaluation of points and essays. In the event that an applicant does not initially meet the minimum point requirements for essay submission, the fee remains *valid for three years* to allow time for accumulation of points. There is no charge for re-submission to the Education Committee. This fee is waived for employees of organizations that are members of the Council of Ethical Organizations and the Health Ethics Trust.

## **What will successful applicants receive?**

Successful applicants for the HET Certified Compliance Professional status will be notified by mail. Once applicants have been approved, they are entitled to use the designator "CCP" (i.e., Certified Compliance Professional) after their name. HET certified compliance professionals are publicly acknowledged annually at the Healthcare Best Compliance Practices Forum. The Forum is sponsored by the HET and is held in the Washington, DC metro area every year. (Details on the Healthcare Best Compliance Practices Forum can be found at [www.BestCompliancePractices.com](http://www.BestCompliancePractices.com)).

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## **Appendix One: Model of introductory/cover letter for application**

I am submitting the enclosed application and information in order to obtain the Health Ethics Trust Certified Compliance Professional designation. I am seeking the Certified Compliance Professional designation by satisfying the education requirement by attending the Certification Intensive Course in Santa Fe, New Mexico during March 13 – 16, 2006 and one year of basic work experience in compliance as documented herein.

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## Appendix Two: Model letter of recommendation

DATE

Council of Ethical Organizations  
Attn: Certification  
214 South Payne Street  
Alexandria, VA 22314

Dear Certification Coordinator:

I am submitting a letter of recommendation for APPLICANT to attain his/her certification for the Certified Compliance Professional designation from the Health Ethics Trust.

Mr./Ms. APPLICANT has been working for Org-X in (Location) for the past (Duration) serving as the (Title). Org-X is in the early phases of developing their Compliance Program and APPLICANTS's main responsibilities are to... With his/her extensive experience at (list prior positions), we fully expect his/her to be successful.

His/her work ethic, knowledge and dedication make him/her a valuable asset to Org-X.

Sincerely,

SPONSOR NAME  
TITLE  
ORGANIZATION

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## **Appendix Three: Model written summary of compliance relevant work experience**

I have been the Director of Compliance for the Org-X Health System since January of 1998. I previously served for 6 years as Director of Operations. In my capacity as Director of Compliance I report directly to the CEO with a dotted line report to the Org-X Health System Board of Directors. Org-X is an integrated health system which includes 4 hospitals, 6 long-term care facilities, 1 home care agency, 10 physician practices, 1 pharmaceutical subsidiary and a managed care organization. These entities are located in the states of Alaska, Hawaii, Maine and Iowa. Org-X has 5,000 employees. I have two direct reports that assist in administering the compliance program for the system: a full time auditor and a part-time secretary.

In January 1998 the Board of Directors for Org-X passed a resolution to develop a Corporate Compliance Program, and that resolution named me as the Director of Compliance. In the first six months of the program I led the team that wrote the Code of Conduct, which now forms the basis for our training program. The training program is delivered by managers whom I train using a “Train the Trainer” model. In January 1999 we completed our first year of training. I oversee the hotline (implemented in December 1999), that now receives 20 calls per month. I monitor the background check process, which is performed quarterly by our secretary. I also review all reports from the compliance auditor, to ensure that appropriate corrective actions are taken. To illustrate some of the functions for which I have been primarily responsible, I enclosed the following: the cover page and table of contents for our Code of Conduct, the topics covered in our training program, and a policy we developed for background checks.

Because Org-X operates in four different states I am responsible for tracking regulatory developments in these states to ensure that all of Org-X’s operations are compliant. I write an employee newsletter called “Compliance Updates.” A copy is enclosed.

Org-X has a Compliance Management Team composed of senior managers from throughout the system: finance, human resources, medical affairs, government affairs and facilities. This team meets monthly, and I create the agenda for this meeting in cooperation with our CEO. Once per quarter, I submit a report to the Compliance Committee of the Board of Directors. For the Board I describe the progress of program implementation as well as a general description of the types of issues which are raised through our internal reporting mechanism.

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The Health Ethics Trust (HET), a division of the Council of Ethical Organizations, has offered compliance professional certification (Certified Compliance Professional: CCP) since the Trust's inception in 1995. The Council itself has certified compliance professionals since 1988, including healthcare compliance professionals. The goal of the Trust's certification program is to promote professionalism and competence throughout the healthcare compliance community.

The Trust's certification process is overseen by the Education Committee of the Council of Ethical Organizations. This is an independent, voluntary committee of experienced compliance professionals from around the country. Members of this committee oversee changes to the HET certification process as well as reviewing applications for HET certification.

Compliance professionals who wish to complete the certification process must earn a total of 100 points in the identified categories within a three year period to qualify.

Part I	Compliance Related Experience	30 – 150	POINTS
Part II	Educational Background	30 – 100	POINTS
Part III	Related Education	30 – 100	POINTS
Part IV	Essay Examination	10	POINTS

There is an application fee of \$150.00 to process each certification application. This fee is waived for organizations that are members of the Health Ethics Trust and Council of Ethical Organizations.

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## Part I:

### COMPLIANCE RELATED EXPERIENCE

(30 - 150 POINTS)

1. Applicant must have a minimum of 30 points in Part I, Compliance Related Experience area.
2. Applicant must have a minimum of one-year active compliance experience to apply.
3. A letter of recommendation from the applicant's sponsor is required.\*

\* For example, this could be either the candidate's immediate supervisor or a member of the board committee to which the compliance function reports.

1. Recommended by a sponsor with a Certified Compliance Executive (CCE) credential.

From: \_\_\_\_\_ To: \_\_\_\_\_

Years in position: \_\_\_\_\_ x 50 = \_\_\_\_\_ Points

2. Recommended by a sponsor with a Certified Compliance Professional (CCP) credential.

From: \_\_\_\_\_ To: \_\_\_\_\_

Years in position: \_\_\_\_\_ x 40 = \_\_\_\_\_ Points

3. Recommended by a sponsor.

From: \_\_\_\_\_ To: \_\_\_\_\_

Years in position: \_\_\_\_\_ x 30 = \_\_\_\_\_ Points

**SUBTOTAL Related Experience Points (30 point min): \_\_\_\_\_ Points**

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## Part II: EDUCATIONAL BACKGROUND

(30 – 100 POINTS)

1. Applicant must have a minimum of 30 points in Part II, Education Background area.
2. Only highest degree earned may be used toward your total score.

Note: HET reserves the right to ask applicant to verify education.

ASSOCIATE'S DEGREE OR EQUIVALENT – 30 POINTS \_\_\_\_\_ Points

Institution:

Location:

Date:

BACHELOR'S DEGREE OR EQUIVALENT – 50 POINTS \_\_\_\_\_ Points

Institution:

Location:

Date:

MASTER'S DEGREE – 75 POINTS \_\_\_\_\_ Points

Institution:

Location:

Date:

DOCTORATE DEGREE – 100 POINTS \_\_\_\_\_ Points

Institution:

Location:

Date:

**SUBTOTAL Educational Background Points (30 point min):** \_\_\_\_\_ Points

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CCP APPLICATION

## Part III: CONTINUING EDUCATION

**(30 – 100 POINTS)**

HET's Certification Intensive Course - 30 points  
8 points – full day  
4 points – half day  
1 point – hour

1. Applicant must have a minimum of 30 points in Part III, Related Education area. Applicants must obtain 16 of the 30 points through courses offered by the Council and/or HET. The maximum number of points allowed for attending audioconferences is 8 points.
2. All courses and audioconferences sponsored by the Council of Ethical Organizations and Health Ethics Trust are valid for the certification program.
3. If you are submitting courses and audioconferences sponsored by other organizations, please provide a descriptive overview of the course or audioconference as well as the sponsor and course title. Each will be evaluated by the Education Committee for eligibility.
4. All continuing education points must be directly related to the compliance field.

Please use additional pages if necessary.

Sponsor: \_\_\_\_\_ Points

Title of Program:

Date(s):

Number of Hours:

Sponsor: \_\_\_\_\_ Points

Title of Program:

Date(s):

Number of Hours:

Sponsor: \_\_\_\_\_ Points

Title of Program:

Date(s):

Number of Hours:

Sponsor: \_\_\_\_\_ Points

Title of Program:

Date(s):

Number of Hours:

**SUBTOTAL Continuing Education Points (30 points min): \_\_\_\_\_ Points**

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## Part IV: ESSAY EXAMINATION

(10 POINTS)

Once an applicant has 90 qualified points, the applicant may request the Essay Examination. The Essay Examination is evaluated on a pass/fail basis by the Education Committee.

1. The response to an essay shall not exceed 500 words. Generally, an applicant is asked to answer two questions.
2. Topics on this list are examples. Actual questions are selected for each candidate.

Sample Topics.

1. As Compliance Officer, describe how your involvement has improved compliance in medical research and/or the IRB in your organization.
2. As Compliance Officer, describe how your involvement has improved compliance with Sarbanes-Oxley or equivalent governance standards.
3. What are the pros and cons of emphasizing ethics and values as the cornerstone of your compliance program?

CCP APPLICATION

SUBTOTAL Essay Examination Points (10 points min): \_\_\_\_\_ Points

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**Please record your subtotal number of points from each section here:**

Part I - Compliance Related Experience (30 – 150 POINTS) \_\_\_\_\_

Part II - Educational Background (30 – 100 POINTS) \_\_\_\_\_

Part III - Related Education (30 – 100 POINTS) \_\_\_\_\_

Part IV - Essay Examination (10 POINTS) \_\_\_\_\_

**TOTAL POINTS (100 Points Required for Certification):** \_\_\_\_\_

I verify that all information provided is accurate to the best of my knowledge.

**SIGNATURE:** \_\_\_\_\_

## **Application checklist – Are you ready to submit?**

- Completed application form
- Brief introductory/cover letter
- Letter of recommendation
- Resume/summary of work experience
- FOUR copies of the entire application
- Application fee \$150 (Non-members only)

## **Where do I send my application?**

Please send all applications for HET compliance executive to the following address:

Attn: Shaina Wright  
Director, Programs  
Council of Ethical Organizations  
Health Ethics Trust Division  
214 South Payne Street  
Alexandria, VA 22314

## **Questions or further information:**

For further information, please contact Shaina Wright at 703-683-7916 or send an email to [swright@corporateethics.com](mailto:swright@corporateethics.com).