



# Cross-Industry Compliance Staffing and Budget Benchmarking and Guidance Survey

**March 2020**

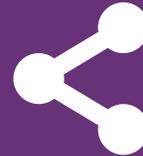
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## Background

In 2019, the Society of Corporate Compliance and Ethics (SCCE) commissioned a new wave of salary research among compliance professionals. Among other measures, the research looked at how salaries compare across a range of individual and firm characteristics, including company revenue, employee size, compliance budget, and ownership structure.

An additional benefit of the salary survey is the ability to establish up-to-date staffing and compliance budget benchmarks. To that end, the tables in this report show how compliance team size and budget differ by firm characteristics, allowing members to compare their own staff and budget levels to those of similar firms.

## Using this report

The tables in this report show how compliance staffing and budget compare across a number of factors. As you review the tables, keep in mind that the data is based on self-reported survey results, and that for some categories, small sample sizes of respondents make the results more directional than definitive. What's more, please keep in mind that many factors combine to influence staffing and budget levels, so if what you see in the data differs from your own situation, it is most likely the result of other characteristics that may be unique to your firm.

A note on reading the tables: The categories by which the data are broken down are in the left hand column and the staffing and budget percentages for each category read across, horizontally.

## Survey data

The majority of all but the very largest companies, revenue-wise, have compliance and ethics staffs of no more than 5 members. In fact, it's not until one reaches \$1 billion in company revenue that a majority of firms have compliance staffs of 6 or more.

### BY REVENUE OF ORGANIZATION AS A WHOLE

#### EMPLOYEES IN COMPLIANCE AND ETHICS GROUP

| <b>CROSS INDUSTRY</b>                    | <b>1</b> | <b>2 to 5</b> | <b>6 to 10</b> | <b>11 to 15</b> | <b>16 to 20</b> | <b>21 to 50</b> | <b>More than 50</b> |
|--|----------|---------------|----------------|-----------------|-----------------|-----------------|---------------------|
| Less than \$5 million                    | 20%      | 38%           | 14%            | 10%             | 3%              | 10%             | 5%                  |
| \$5 million to less than \$15 million    | 23%      | 46%           | 14%            | 5%              | 2%              | 5%              | 5%                  |
| \$15 million to less than \$30 million   | 12%      | 45%           | 20%            | 8%              | 3%              | 7%              | 5%                  |
| \$30 million to less than \$50 million   | 22%      | 55%           | 13%            | 4%              | 0%              | 4%              | 2%                  |
| \$50 million to less than \$100 million  | 13%      | 53%           | 20%            | 7%              | 2%              | 5%              | 0%                  |
| \$100 million to less than \$500 million | 16%      | 52%           | 19%            | 4%              | 3%              | 2%              | 2%                  |
| \$500 million to less than \$1 billion   | 7%       | 48%           | 17%            | 9%              | 5%              | 12%             | 2%                  |
| \$1 billion to less than \$3 billion     | 4%       | 44%           | 21%            | 5%              | 5%              | 17%             | 4%                  |
| \$3 billion or more                      | 4%       | 25%           | 17%            | 13%             | 7%              | 17%             | 17%                 |

Results are similar when looking at compliance teams that serve specific divisions within companies. The majority of divisions with \$1 billion in revenue or less have 1-5 person compliance teams. At the other extreme, 55% of divisions with revenues of \$3 billion or more have compliance groups comprised of more than 10 individuals.

### BY REVENUE OF PORTION OF ORGANIZATION COMPLIANCE GROUP SERVES

#### EMPLOYEES IN COMPLIANCE AND ETHICS GROUP

| <b>CROSS INDUSTRY</b>                    | <b>1</b> | <b>2 to 5</b> | <b>6 to 10</b> | <b>11 to 15</b> | <b>16 to 20</b> | <b>21 to 50</b> | <b>More than 50</b> |
|--|----------|---------------|----------------|-----------------|-----------------|-----------------|---------------------|
| Less than \$5 million                    | 15%      | 38%           | 17%            | 10%             | 4%              | 9%              | 7%                  |
| \$5 million to less than \$15 million    | 22%      | 45%           | 11%            | 5%              | 4%              | 7%              | 7%                  |
| \$15 million to less than \$30 million   | 12%      | 42%           | 22%            | 6%              | 4%              | 8%              | 6%                  |
| \$30 million to less than \$50 million   | 19%      | 55%           | 15%            | 5%              | 0%              | 4%              | 2%                  |
| \$50 million to less than \$100 million  | 12%      | 52%           | 21%            | 4%              | 2%              | 7%              | 2%                  |
| \$100 million to less than \$500 million | 15%      | 50%           | 19%            | 5%              | 4%              | 5%              | 2%                  |
| \$500 million to less than \$1 billion   | 9%       | 44%           | 15%            | 11%             | 2%              | 14%             | 5%                  |
| \$1 billion to less than \$3 billion     | 5%       | 41%           | 22%            | 4%              | 4%              | 16%             | 7%                  |
| \$3 billion or more                      | 2%       | 27%           | 16%            | 14%             | 8%              | 18%             | 15%                 |

We see a much stronger correlation between number of employees in firms overall and employees in the compliance and ethics group. Compliance teams range from 5 or fewer for 86% of firms with fewer than 100 employees, to 21 or more for 54% of firms at the highest employee level.

**BY EMPLOYEES IN ORGANIZATION AS A WHOLE**

| <b>CROSS INDUSTRY</b> | <b>EMPLOYEES IN COMPLIANCE AND ETHICS GROUP</b> |               |                |                 |                 |                 |                     |
|-----------------------|---|---------------|----------------|-----------------|-----------------|-----------------|---------------------|
|                       | <b>1</b>  | <b>2 to 5</b> | <b>6 to 10</b> | <b>11 to 15</b> | <b>16 to 20</b> | <b>21 to 50</b> | <b>More than 50</b> |
| Less than 100         | 28%   | 58%           | 3%             | 3%              | 0%              | 3%              | 5%                  |
| 100–249               | 22%   | 63%           | 4%             | 0%              | 1%              | 3%              | 7%                  |
| 250–499               | 12%   | 63%           | 17%            | 4%              | 2%              | 1%              | 1%                  |
| 500–999               | 19%   | 47%           | 23%            | 4%              | 2%              | 4%              | 1%                  |
| 1,000–1,999           | 9%  | 41%           | 22%            | 5%              | 4%              | 16%             | 4%                  |
| 2,000–2,999           | 17%   | 35%           | 17%            | 8%              | 4%              | 14%             | 4%                  |
| 3,000–4,999           | 8%  | 50%           | 16%            | 7%              | 6%              | 13%             | 0%                  |
| 5,000–7,499           | 3%  | 33%           | 27%            | 13%             | 5%              | 15%             | 3%                  |
| 7,500–9,999           | 8%  | 36%           | 17%            | 15%             | 5%              | 12%             | 7%                  |
| 10,000–14,999         | 6%  | 36%           | 23%            | 8%              | 3%              | 14%             | 10%                 |
| 15,000–19,999         | 2%  | 40%           | 23%            | 11%             | 7%              | 14%             | 4%                  |
| 20,000–29,999         | 5%  | 32%           | 17%            | 17%             | 5%              | 13%             | 11%                 |
| 30,000–49,999         | 3%  | 24%           | 14%            | 14%             | 10%             | 21%             | 14%                 |
| 50,000–74,999         | 6%  | 25%           | 17%            | 18%             | 6%              | 11%             | 17%                 |
| 75,000–99,999         | 9%  | 12%           | 29%            | 12%             | 12%             | 24%             | 3%                  |
| 100,000 or more       | 2%  | 12%           | 14%            | 10%             | 8%              | 17%             | 37%                 |

A similar correlation exists when we look at size of compliance team by the number of employees in a particular division served by that team. Teams of 5 or fewer individuals are most likely to be found in divisions with fewer than 3,000 employees. Divisions with 30,000 employees or more are especially likely to have compliance teams with 11-plus members.

#### BY EMPLOYEES IN 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 50 | More than 50 |
| Less than 100   | 17%                                      | 42%    | 14%     | 6%       | 4%       | 9%       | 7%           |
| 100–249         | 19%                                      | 59%    | 6%      | 3%       | 2%       | 6%       | 6%           |
| 250–499         | 9%                                       | 51%    | 18%     | 5%       | 4%       | 5%       | 7%           |
| 500–999         | 18%                                      | 45%    | 20%     | 4%       | 2%       | 6%       | 5%           |
| 1,000–1,999     | 9%                                       | 41%    | 24%     | 8%       | 3%       | 14%      | 3%           |
| 2,000–2,999     | 16%                                      | 39%    | 18%     | 8%       | 3%       | 13%      | 2%           |
| 3,000–4,999     | 6%                                       | 46%    | 18%     | 9%       | 7%       | 11%      | 2%           |
| 5,000–7,499     | 1%                                       | 33%    | 28%     | 9%       | 3%       | 21%      | 6%           |
| 7,500–9,999     | 4%                                       | 44%    | 14%     | 16%      | 6%       | 8%       | 8%           |
| 10,000–14,999   | 10%                                      | 32%    | 22%     | 8%       | 5%       | 14%      | 9%           |
| 15,000–19,999   | 0%                                       | 33%    | 20%     | 13%      | 4%       | 20%      | 11%          |
| 20,000–29,999   | 2%                                       | 33%    | 19%     | 17%      | 5%       | 19%      | 5%           |
| 30,000–49,999   | 3%                                       | 27%    | 14%     | 14%      | 5%       | 19%      | 19%          |
| 50,000–74,999   | 0%                                       | 17%    | 20%     | 30%      | 7%       | 7%       | 20%          |
| 75,000–99,999   | 0%                                       | 7%     | 29%     | 14%      | 21%      | 21%      | 7%           |
| 100,000 or more | 0%                                       | 16%    | 11%     | 11%      | 14%      | 16%      | 32%          |

Compliance teams tend to be largest in publicly-traded firms, including 14% with teams of more than 50 individuals. (Note: This is largely a function of the fact that publicly-traded firms are larger than other types of firms generally, with much larger numbers of employees.) Privately-held firms tend to have the smallest teams.

**BY ORGANIZATION TYPE**

**EMPLOYEES IN COMPLIANCE AND ETHICS GROUP**

| <b>CROSS INDUSTRY</b> | <b>1</b> | <b>2 to 5</b> | <b>6 to 10</b> | <b>11 to 15</b> | <b>16 to 20</b> | <b>21 to 50</b> | <b>More than 50</b> |
|-----------------------|----------|---------------|----------------|-----------------|-----------------|-----------------|---------------------|
| Nonprofit             | 15%      | 41%           | 17%            | 8%              | 3%              | 11%             | 4%                  |
| Privately-held        | 15%      | 53%           | 15%            | 6%              | 2%              | 7%              | 3%                  |
| Publicly-traded       | 4%       | 30%           | 19%            | 11%             | 7%              | 15%             | 14%                 |
| Governmental          | 18%      | 41%           | 14%            | 4%              | 5%              | 11%             | 6%                  |
| Academic              | 12%      | 41%           | 20%            | 12%             | 3%              | 9%              | 3%                  |
| Other                 | 9%       | 39%           | 35%            | 0%              | 4%              | 13%             | 0%                  |

Compliance budgets are strongly related to overall company revenue. For example, the majority of firms with less than \$15 million in overall revenue have compliance budgets under \$100,000. On the other hand, 6 in 10 firms with revenues of \$3 billion or more have compliance budgets of \$1 million or higher.

**BY REVENUE OF ORGANIZATION AS A WHOLE**

**ANNUAL COMPLIANCE BUDGET**

| <b>CROSS INDUSTRY</b>                    | <b>Less than \$100,000</b> | <b>\$100,000 to \$249,999</b> | <b>\$250,000 to \$499,999</b> | <b>\$500,000 to \$999,999</b> | <b>\$1 million or more</b> |
|--|----------------------------|-------------------------------|-------------------------------|-------------------------------|----------------------------|
| Less than \$5 million                    | 60%                        | 14%                           | 5%                            | 9%                            | 12%                        |
| \$5 million to less than \$15 million    | 58%                        | 20%                           | 10%                           | 3%                            | 10%                        |
| \$15 million to less than \$30 million   | 43%                        | 17%                           | 17%                           | 17%                           | 7%                         |
| \$30 million to less than \$50 million   | 39%                        | 31%                           | 9%                            | 9%                            | 11%                        |
| \$50 million to less than \$100 million  | 30%                        | 23%                           | 18%                           | 16%                           | 14%                        |
| \$100 million to less than \$500 million | 33%                        | 20%                           | 15%                           | 20%                           | 13%                        |
| \$500 million to less than \$1 billion   | 32%                        | 11%                           | 11%                           | 9%                            | 36%                        |
| \$1 billion to less than \$3 billion     | 18%                        | 10%                           | 14%                           | 27%                           | 32%                        |
| \$3 billion or more                      | 17%                        | 2%                            | 7%                            | 14%                           | 60%                        |

The relationship with compliance budget is similar when looking at revenue levels for divisions of firms served by compliance teams.

### BY 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                    | 53%                      | 13%                    | 8%                     | 11%                    | 16%                 |
| \$5 million to less than \$15 million    | 51%                      | 25%                    | 8%                     | 6%                     | 10%                 |
| \$15 million to less than \$30 million   | 41%                      | 21%                    | 17%                    | 14%                    | 7%                  |
| \$30 million to less than \$50 million   | 41%                      | 27%                    | 13%                    | 9%                     | 11%                 |
| \$50 million to less than \$100 million  | 28%                      | 15%                    | 23%                    | 15%                    | 19%                 |
| \$100 million to less than \$500 million | 32%                      | 19%                    | 11%                    | 23%                    | 15%                 |
| \$500 million to less than \$1 billion   | 31%                      | 14%                    | 12%                    | 10%                    | 33%                 |
| \$1 billion to less than \$3 billion     | 19%                      | 8%                     | 13%                    | 27%                    | 33%                 |
| \$3 billion or more                      | 13%                      | 2%                     | 7%                     | 13%                    | 65%                 |

In general, the more employees a firm has, the greater the compliance budget. At the lowest level, about half of firms with fewer than 250 employees have compliance budgets under \$100,000, while nearly 6 in 10 of those with 30,000 or more employees have compliance budgets of \$1 million or greater.

### BY 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   | 51%                      | 20%                    | 14%                    | 7%                     | 8%                  |
| 100–249         | 50%                      | 33%                    | 12%                    | 3%                     | 2%                  |
| 250–499         | 42%                      | 13%                    | 18%                    | 13%                    | 15%                 |
| 500–999         | 39%                      | 17%                    | 9%                     | 17%                    | 18%                 |
| 1,000–1,999     | 29%                      | 19%                    | 11%                    | 21%                    | 21%                 |
| 2,000–2,999     | 34%                      | 11%                    | 14%                    | 14%                    | 26%                 |
| 3,000–4,999     | 29%                      | 6%                     | 8%                     | 21%                    | 37%                 |
| 5,000–7,499     | 19%                      | 8%                     | 11%                    | 19%                    | 43%                 |
| 7,500–9,999     | 24%                      | 12%                    | 8%                     | 4%                     | 52%                 |
| 10,000–14,999   | 16%                      | 16%                    | 13%                    | 29%                    | 26%                 |
| 15,000–19,999   | 12%                      | 6%                     | 12%                    | 12%                    | 59%                 |
| 20,000–29,999   | 12%                      | 12%                    | 6%                     | 29%                    | 41%                 |
| 30,000–49,999   | 24%                      | 0%                     | 6%                     | 12%                    | 59%                 |
| 50,000–74,999   | 22%                      | 4%                     | 4%                     | 13%                    | 57%                 |
| 75,000–99,999   | 15%                      | 0%                     | 15%                    | 8%                     | 62%                 |
| 100,000 or more | 29%                      | 0%                     | 5%                     | 10%                    | 57%                 |

For divisions within firms, compliance budgets tend to remain relatively small (under \$250,000) for divisions with fewer than 1,000 employees. Budgets increase quickly once one reaches the 3,000-employee level within a division.

#### BY 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   | 48%                      | 17%                    | 11%                    | 7%                     | 17%                 |
| 100–249         | 47%                      | 29%                    | 13%                    | 7%                     | 3%                  |
| 250–499         | 40%                      | 12%                    | 16%                    | 16%                    | 16%                 |
| 500–999         | 40%                      | 15%                    | 12%                    | 15%                    | 18%                 |
| 1,000–1,999     | 27%                      | 18%                    | 11%                    | 23%                    | 21%                 |
| 2,000–2,999     | 34%                      | 14%                    | 14%                    | 10%                    | 28%                 |
| 3,000–4,999     | 22%                      | 4%                     | 8%                     | 22%                    | 43%                 |
| 5,000–7,499     | 13%                      | 9%                     | 9%                     | 19%                    | 50%                 |
| 7,500–9,999     | 17%                      | 8%                     | 4%                     | 8%                     | 63%                 |
| 10,000–14,999   | 18%                      | 18%                    | 21%                    | 21%                    | 21%                 |
| 15,000–19,999   | 21%                      | 7%                     | 7%                     | 14%                    | 50%                 |
| 20,000–29,999   | 0%                       | 7%                     | 0%                     | 40%                    | 53%                 |
| 30,000–49,999   | 15%                      | 0%                     | 8%                     | 8%                     | 69%                 |
| 50,000–74,999   | 20%                      | 0%                     | 0%                     | 10%                    | 70%                 |
| 75,000–99,999   | 0%                       | 0%                     | 0%                     | 25%                    | 75%                 |
| 100,000 or more | 8%                       | 0%                     | 8%                     | 8%                     | 75%                 |

As was the case for compliance staffing, publicly-traded companies have much higher budgets than other firm types. (Again, keep in mind that publicly-traded firms are generally larger than other types of firms.)

#### BY 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       | 39%                      | 12%                    | 10%                    | 15%                    | 24%                 |
| Privately-held  | 41%                      | 17%                    | 11%                    | 12%                    | 18%                 |
| Publicly-traded | 19%                      | 11%                    | 10%                    | 17%                    | 43%                 |
| Governmental    | 33%                      | 21%                    | 10%                    | 14%                    | 22%                 |
| Academic        | 27%                      | 10%                    | 20%                    | 12%                    | 31%                 |
| Other           | 43%                      | 14%                    | 0%                     | 29%                    | 14%                 |

## Survey methodology

In June 2019, an email invitation to participate in a salary survey was sent to approximately 50,000 individuals.

The data in this report was drawn from 1,399 responses from individuals who:

- Work for a non-healthcare provider.
- If a chief compliance officer is responsible for at least 26% of an organization's legal and regulatory risk.

This report is based solely on this group. Strict confidence of survey responses was maintained throughout the course of the project.

Final results were tabulated by Fondulas Strategic Research, and the salary report was completed in October 2019. The data was then retabulated to create this benchmarking report.

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