

Compliance Hot Lines Establish Better Connection to the Workforce

A Lack of Hot Line Calls Isn't Necessarily a Good Thing

As the compliance officer, do you feel a little bit like the memorable Maytag repairman whose phone never rang because everything was going great? Watch out! A lack of hot line calls could mean just the opposite. You could have serious problems, but people just aren't letting you know.

Communication between employees and management is essential in an effective compliance program. Further, that communication must flow both ways, from management to employees and back. Therefore, it is just as problematic to have too few hot line calls as it is to have an overabundance.

An effective hot line operation should receive an average of one call per thousand employees per month. If your hot line operation does not meet this standard, you may want to consider why employees are not using this communication channel and look for opportunities to establish a better connection.

One reason your employees may not be using the hot line is that they never received proper training on its use. Employees typically are reluctant to call a hot line to report concerns when they have not been provided background on the hot line and its operation. Under these circumstances, they often fear that they will somehow be identified when calling the hot line and will be subject to retaliation and/or retribution by management for doing so.

If you are confident in the training your employees received on the hot line, review your efforts toward promoting it. Have posters been displayed in employee work areas that encourage the reporting of concerns? Have you shared information about hot line calls (*i.e.*, the number, types, subjects) with employees?



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Does management credit the hot line for operational changes when appropriate? Do supervisors and other managers encourage employees to use the hot line if they are uncomfortable raising issues directly with management? If not, you may want to consider revamping your promotional efforts. Other promotional ideas include wallet cards, payroll fliers, and newsletter articles.

Another consideration to be made is whether employees have become disenchanted with the hot line. Review your hot line reports. When callers have scheduled call back dates, do you provide information to them no matter what, or do you force them to call three or more times before they receive any feedback?

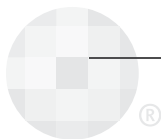
Review your hot line log and look for the average time it takes your organiza-

tion to investigate and resolve issues. Does it appear that simple matters take a lengthy amount of time to resolve? If you answered yes, your employees may feel that the compliance office does not take its concerns seriously.

Develop a corrective action plan to address these deficiencies immediately. Remember that it takes only one employee with one bad experience to bring the hot line down. Word tends to travel quickly through the grapevine from one employee to another.

If you have done all of the above and your hot line calls have dropped or continue to drop in number, you may want to schedule focus-group meetings with your employees to learn why they are reluctant to use the hot line as a reporting mechanism. The results may surprise you.

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