BEST PRACTICES FOR MAINTAINING AN EFFECTIVE ETHICS AND COMPLIANCE HOTLINE

By Emily Tait, Hotline Call Specialist

BENEFITS OF A COMPLIANCE HOTLINE

The U.S. Department of Health and Human Services, Office of Inspector General (OIG) has been promoting hotlines in their compliance program guidance since 1998. By implementing a hotline in your own organization, you can comply with the OIG's recommendation and demonstrate that you value compliance best practices. This can benefit your organization because future employees, vendors, or partners may share the same value, and the OIG will see your efforts to remain compliant with their rules and regulations.

Ethics and compliance hotlines also significantly reduce the chance of whistleblowing in your organization. If your employees and workforce members do not feel comfortable reporting compliance issues internally they may report the issue to external audiences instead. A compliance hotline offers your employees a secure, trustworthy channel through which they can report potential compliance concerns directly to your organization.

Employees and workforce members are also more likely to report possible or actual compliance violations if they know that the hotline is anonymous and confidential. These features are critical for a successful hotline, and ensuring that your hotline protects employees' identities can be a huge benefit to both your compliance program and organization as a whole.

HOTLINE EFFECTIVENESS IN THE WORKPLACE

Implementing a successful ethics and compliance hotline can create positive effects in the workplace that help improve your compliance program. Because your employees know that the hotline is anonymous and secure, you are likely to receive more reports about compliance concerns that may have otherwise gone unreported. This brings potentially serious violations to your attention before they get out of hand.

Additionally, because hotlines make reporting compliance issues easier and less intimidating, you may be able to develop a better relationship with your employees. Employees do not have to fear retaliation or retribution from managers because their identities are completely protected, which creates a safer, more open work environment.

From an employee standpoint, having the option to anonymously call the hotline shows that the organization is responsive to compliance concerns and respects workforce members' privacy and security. This can further improve employees' relationships with upper management and with each other. Workforce members can also regularly communicate with the Compliance Officer through the hotline by checking status updates on their reports or adding more details, which increases overall communication and the flow of critical information.

- **Multiple reporting channels:** Having both telephonic and web-based reporting systems gives your workforce members more options for reporting. If they prefer to speak to a live hotline associate who can transcribe the call, then calling the hotline may be a better option. Or, if they would rather express their concerns in their own words, they can submit the report online.

- **Around-the-clock service:** Reporting should be available 24 hours a day, seven days a week for both hotline calls and online report submissions. This ensures that employees can report a concern as soon as it happens, or as soon as they feel comfortable discussing the details.

- **Confidentiality and anonymity:** All aspects of the reporting system should be both confidential and anonymous. From the report itself to the case tracking system and communication between the employee and the Compliance Officer, anonymity and confidentiality are key for employees' peace of mind.

- **Detailed reports:** Whether reports are submitted by a hotline associate or the employee themselves, reporting systems should have answer boxes that prompt detailed responses. Hotline associates and employees should document as much information as possible to make sure that all parties clearly understand everything that happened.

- **Security measures:** Even though a hotline may be confidential and anonymous, the information that is entered in the reporting system still needs to be protected. Security measures should comply with HIPAA security regulations and you should regularly monitor them for updates.

- **Third party involvement:** Having a third party vendor run your hotline service strengthens the confidentiality and anonymity of the service while ensuring that there is no bias or dishonest information in the reports.

- **Multilingual reporting:** Hotlines that offer reporting in both English and Spanish, or other languages, can be more widely used since they accommodate more potential reporters. Multilingual services show employees that you want everyone to have an equal voice in reporting compliance concerns.