



Tips for a More Effective Compliance Hotline Program

Richard P. Kusserow | August 2024

To have an effective compliance program, you must have an effective [Hotline](#) program. The operative word is “effective.” Many organizations have hotlines, but the supporting program reports are not effective. Neglecting to ensure program effectiveness is a grave error. It should be a priority to address complaints and allegations of wrongdoing in-house as opposed to driving that information to government agencies, litigating attorneys, media, and other outside entities, which can only lead to trouble. Not reacting promptly to information received can result in liabilities, challenges, and remediation efforts.

It is also important to promote a culture that encourages employees to raise concerns and report perceived problems internally and have managers assist in efforts to resolve the issues. As a result, employees will be more comfortable in raising concerns informally and resolving matters within the company’s management structure, which will ultimately lessen the need for “whistleblowing” to external parties.

Tips for a more effective Hotline program include the following:

1. Ensure that related policies are implemented. Examples include Hotline Operations, Duty to Report, Non-Retaliation, Anonymous and Confidential Reporting, and Investigations.
2. Log and track all submitted complaints and allegations through resolution.
3. Set time frames for completion and resolution of complaints and verify that they are followed.
4. Be sure that individuals investigating Hotline allegations have been trained on how to do so properly.
5. Document all steps in the process of resolving Hotline complaints and allegations.
6. Include posters on the employee bulletin boards that discuss the availability and use of the Hotline.



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7. Ensure that the Hotline number and its availability are discussed in new employee orientation.
8. Ensure that the Hotline program is part of the annual compliance training.
9. Include information about the Hotline in the Employee Handbook.
10. Consider issuing a communication to all employees on the availability of the Hotline.
11. If there is an Intranet for employee use, include information about the Hotline.
12. If there is an organization newsletter, use it to promote the Hotline.
13. Maintain a document management system for compliance records.
14. Ensure that records are kept in a secure, limited-access area.
15. Develop summary reports for management and the Board on results from the Hotline program.

Interested in learning more about hotlines? Contact Shelby Cole at scole@complianceresource.com.



About the Author

Richard P. Kusserow established Strategic Management Services, LLC, after retiring from being the DHHS Inspector General, and has assisted over 2,000 health care organizations and entities in developing, implementing and assessing compliance programs.