



## Avoiding Hotline Pitfalls

Richard P. Kusserow | October 2024

Pitfalls have been defined as an unapparent source of trouble or danger, a hidden hazard. There are many potential pitfalls associated with hotlines. Careful planning, training, preparation, and proper management can greatly limit problems while promoting the benefits derived from that communication system. It is important for any organization that establishes a hotline function to recognize potential dangers by avoiding vulnerabilities inherent in this kind of activity and ensuring that those answering calls are properly trained.

The following are some notable examples of avoidable pitfalls involving the hotline function:

- Using a one-way communication voicemail hotline.
- Recording a caller's voice could identify callers.
- Calls made to an internal hotline may identify the source of the call.
- Failing to properly debrief a caller may miss important details.
- Poorly training staff to agree with and/or validate a caller's complaint.
- Not giving proper up-front "ground rules" to callers.
- Not acting promptly upon complaints and allegations.
- Using improperly trained people to resolve complaints and allegations.
- Not maintaining a proper hotline log that tracks calls through resolution.
- Misuse of the hotline function by employees



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Most hotline pitfalls can be avoided by using a third-party vendor that can be instructed in the agreement on how calls should be handled. For those deciding to use a vendor to answer calls, it is important that the vendor selected has experience with healthcare-related issues. Any failure to properly debrief a caller or fault in understanding their issues may create an obligation or liability. If they violate instructions pursuant to a written agreement, liability may be laid at their feet. One of the biggest types of pitfalls relates to employees who try to misuse the hotline for personal reasons. It is not uncommon for employees to use compliance hotlines to get even with their bosses, undercut a rival employee, or try to assume the role of whistleblower to protect against adverse actions for past misdeeds. If this is permitted, the hotline will create added problems and degenerate into a function that lacks credibility with both management and employees. The hotline operation should never be allowed to “chill” a supervisor from fulfilling their management responsibilities to hold subordinates accountable for performance and conduct standards. It is important that they maintain accurate and timely records of employee performance and behavior. Like all programs, it should undergo ongoing monitoring. Those charged with the oversight responsibilities of the hotline operation should verify that the hotline function is following approved policies and procedures, that information is addressed promptly and properly, and that staff is properly trained and kept current on policies. Any weaknesses in the operation should be corrected immediately. Senior management should receive periodic reports on the effectiveness of the function.

Interested in learning more about hotlines? Contact Shelby Cole at [scole@complianceresource.com](mailto: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.