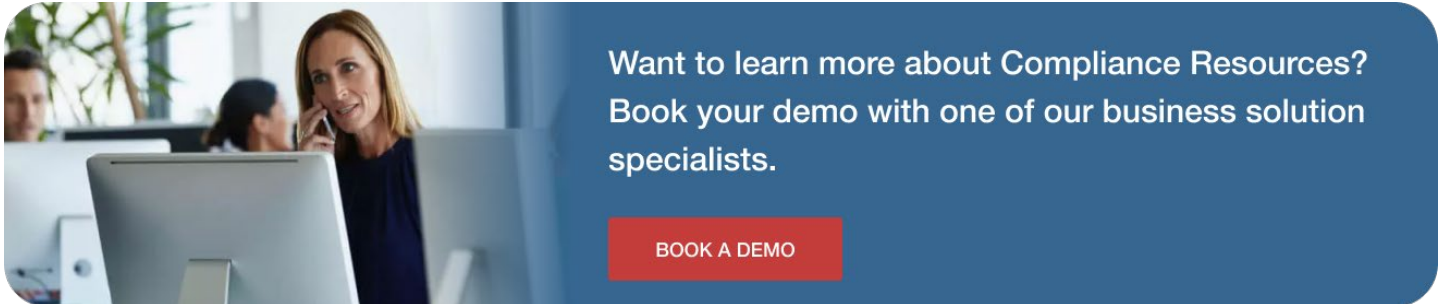


Effective Hotline Program Tips

Richard Kusserow | January 2025

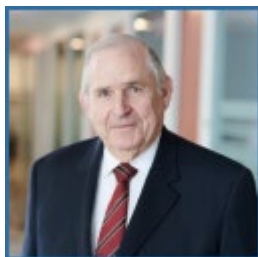


To be effective, all compliance programs must have a channel (hotline) by which employees can report suspected wrongdoing in the workplace without fear of retaliation or reprisal. The operative word is “effective.” To have a hotline as an effective communication channel, it must be seen by employees and management as a priority for addressing concerns, complaints, and allegations of wrongdoing. The alternative for employees distrusting the internal channels is to drive such information externally to government agencies, litigating attorneys, media, etc., which only spells trouble. It is important to make employees comfortable raising concerns internally and lessening the perceived need to resort to “whistleblowing” to external parties. Also, failing to act promptly and appropriately on information received can result in potential liabilities, headaches, and a lot of remedial work. Most organizations outsource the answering of hotline calls to a vendor. How the calls are selected and monitored is a whole different matter from proper management of the information once it is received. The following are tips for ensuring a more effective hotline program:

1. [Implement essential policies](#) (e.g., Hotline Operations, Duty to Report, Non-Retaliation, Anonymous and Confidential Reporting, Investigations, etc.)
2. Log and track all complaints/allegations received through resolution
3. Set timelines for completion and resolution of complaints and verify that they are followed
4. Be sure those investigating hotline allegations have been trained on how to do it properly
5. Document all steps in the process of resolving hotline complaints/allegations
6. Have posters on employee bulletin boards for the availability and use of the Hotline
7. Ensure the Hotline number and its availability are included in new employee orientation
8. Ensure discussion of the hotline program is part of annual compliance training
9. Have information about the use of the Hotline made part of the Employee Handbook
10. Consider having a flyer go out to all employees on the availability of the Hotline

11. If there is an intranet for employee use, include information to promote 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 records are kept in a secure, limited-access area
15. Develop summary reports for management and Board on results from the hotline program

For more information on this topic, see [“11 Tips for an Effective Compliance Hotline”](#) or 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.