

Compliance Today – May 2021 Is a new hotline vendor in your future?

By Christine Davenport, RHIA, CCS-P, CHC

Christine Davenport (christine.davenport@brooksrehab.org) is the Compliance Operations Manager at Brooks Rehabilitation in Jacksonville, FL.

- [linkedin.com/in/chris-davenport-b80a308/](https://www.linkedin.com/in/chris-davenport-b80a308/)

There could be many reasons your organization needs or wants to change hotline vendors. Perhaps your contract is ending, and you want to take the opportunity to investigate other vendor options. Maybe budget constraints have you contemplating the cost of your current hotline and wondering whether it is too high, or the customer service you receive from your current vendor is less than ideal. Whatever reasons your organization has for looking to change vendors, there are several matters to consider before proceeding.

Before getting into those considerations, we should review why a hotline is needed in the first place. In its Compliance Program Guidance for Hospitals, the Office of Inspector General (OIG) states that one of the seven fundamental elements is to provide effective communication.^[1] This is a way to facilitate communication between compliance and all employees. This can be in the form of comment boxes, open-door policies, or anonymous hotlines. These modes of communication provide a mechanism for employees to report misconduct as well as protect those that do report from retaliation.

In the *Evaluation of Corporate Compliance Programs* guidance issued in June 2020, U.S. Department of Justice states that a “hallmark of a well-designed compliance program is the existence of an efficient and trusted mechanism by which employees can anonymously or confidentially report allegations of a breach of the company’s code of conduct, company policies, or suspected or actual misconduct.”^[2] To determine effectiveness, the Department of Justice asks whether the company’s compliance program has a system in place to allow for anonymity and whether it is well publicized.

If you have had the same hotline vendor for years, you may not have thought about the behind-the-scenes aspects of how it works and what you may need to keep in mind should a change be desired. The following are items to consider when contemplating a hotline vendor change.

This document is only available to members. Please log in or become a member.

[Become a Member Login](#)