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Is your hotline 'hot?' Approaches to improving and promoting your compliance hotline

By J. Veronica Xu, Esq., CHC, CHPC, CCEP

J. Veronica Xu (veronica.xu@saberhealth.com) is the Chief Compliance Officer for Saber Healthcare Group headquartered in Cleveland, OH.

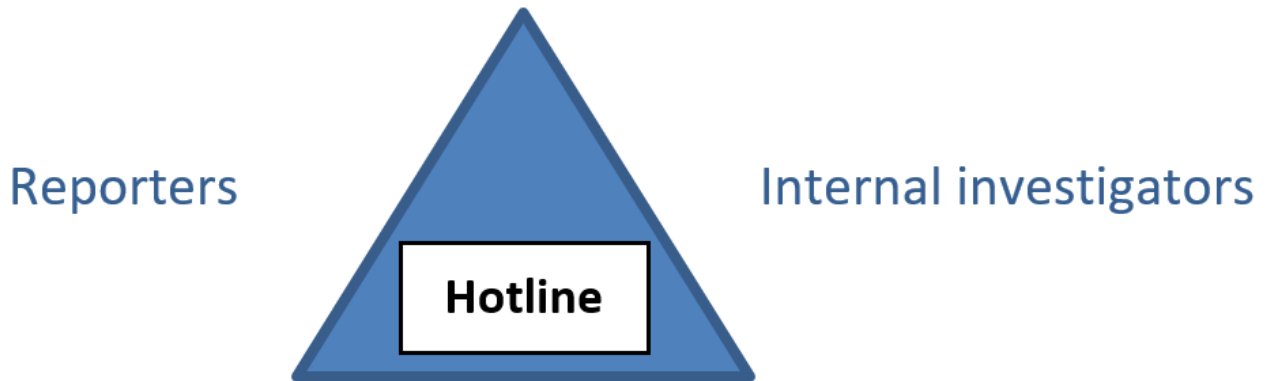
“Why is it called a ‘hotline?’ Is your hotline ‘hot?’” I was recently asked by a nine-year-old language enthusiast. Although I was not completely speechless, there was a slight delay in my response because his questions prompted me to ponder. According to the Merriam-Webster dictionary, “hot” means “having a relatively high temperature,” “currently popular or in demand,” “unusually lucky or favorable,” and “very good,” among other things. Simply put, it can be interpreted as “popular, attractive, appealing, and inviting.” Despite the fact that “hotline” is actually defined by Merriam-Webster as “a direct telephone line in constant operational readiness so as to facilitate immediate communication” and “a usually toll-free telephone service available to the public for some specific purpose,” I can’t help thinking that my compliance hotline should be “hot” — at least hopefully. Joking aside, I started to think further: How can we make our hotline more popular and friendly?

Regardless of our roles and capacities (e.g., a consumer, employee, agent, contractor), we deal with various parties (e.g., merchants, providers, coworkers, institutions) on a regular basis. If you just had a negative customer service experience, what would you do? If you witnessed an employee’s unethical behavior or shady practices, how would you like to rectify the situation? What would cause you to call the compliance hotline? Similarly, in a healthcare setting, what would a patient, a family, or an employee do when they spot suspicious or questionable conduct? We want them to call the compliance hotline. It is a no-brainer that most compliance professionals would suggest. As is widely known in the healthcare compliance field, there are countless risk factors in our business operations, such as billing, quality of care, and patient privacy, to name a few. The hotline, by its inherent design, is meant to help identify issues and risk areas, thereby detecting wrongdoing early and preventing further damages and losses to organizations and public programs.

In my opinion, as an integral component of a compliance program, the compliance hotline (also sometimes referred to as the disclosure program) is a triangular framework that consists of three basic elements: (1) an information intake system, (2) reporters, and (3) internal investigators, all of which are closely correlated and ultimately affecting the overall success of the hotline.

Title 1: Elements of the compliance hotline

Information intake system



This article is intended to share some practical tips to help you and your teams improve, promote, and use your disclosure program as part of your effort to strength your compliance program.

Element 1: Information intake system

First and foremost, there must be a reporting channel—including, but not limited to, a telephone line or a designated web page—dedicated to this cause. Numerous government-issued publications and guidance have emphasized that organizations should establish a disclosure program that includes a mechanism (e.g., a toll-free compliance line) to enable individuals to disclose to the compliance officer—or some other person who is not in the disclosing individual's chain of command—any identified issues or questions associated with the organization's policies, conduct, practices, or procedures with respect to a federal healthcare program believed by the individual to be a potential violation of criminal, civil, or administrative law.^[1]

However, merely having a phone number is not sufficient. Many other pieces, like system integration, data analytics, information security, status tracking, and case notification, should also be taken into consideration. Whether you are internally developing a new information intake system, shopping for one among many options on the market, or evaluating an existing system, there are some assessment questions that should be asked.

Cost and budget:

- What is the cost of initial setup and annual upkeep? Since this is likely to be one of the critical deciding factors in whether the company chooses a particular platform—in-house or outsourced—having a general idea about the cost, including labor, time commitment, technical upgrade, regular maintenance, etc., is helpful in allocating adequate resources and selecting appropriate tools.
- How much is budgeted for this? You may need to categorize your wants and needs. Differentiate desirable, discretionary, and optional features. Balance what your office can afford and what you really need.

User experience and technical support:

- Is the system user-friendly for all parties concerned (i.e., reporters and investigators)? Easy navigation is a must. As we can imagine, people are already upset when they feel the urge to call the hotline. Making it difficult for them to file a report will only frustrate them further and likely worsen the situation.
- Does the system integrate information from other reporting channels (e.g., online portal, email, fax, text)?

With the development of modern technology, there are more and more ways for people to share information. Reporting channels are no longer limited to a telephone line. Many systems allow reporting via text, fax, online app, etc., thus making it convenient for reporters. Regardless of the intake method, in order to streamline the process, ensure consistency, and maintain documentation, it is best to have a centralized database to store all your hotline information, including the complaints, investigative records, outcomes, and actions taken.

- Does the system interface with other software programs? With reports received from various channels and fed into a centralized platform, having everything in one place will not only save you a huge amount of time, but also enable your organization to have an accurate, holistic view of the risk and cultural health of the whole organization. Departments across the organization can manage their investigations according to their own standard operating procedures while all the critical documentation and investigation outcomes are stored within the centralized database, which can preserve continuity, accuracy, and consistency.
- Are there live representatives available 24/7 to answer calls? No matter how advanced our technologies have become nowadays, nothing can replace person-to-person interactions. Sometimes, the mere fact that someone is listening to you makes you feel better instantly, because a little human touch carries magic.
- When the organization encounters a glitch and needs to seek technical support, what is the usual turnaround time? Customer service, such as responsiveness and quality of service, always matters, regardless of the industry you are in.

Capability, functionality, automation, customization, and data security:

- From the hotline greeting to the website layout, does the system allow you to individualize your hotline as well as the compliance program information? It is your platform. This is a great opportunity for you to state your values and convey your message to reporters. Remember, it will be the first thing that they see or hear; first impression is the last impression, so make it count.
- Does it have the ability to automate the case triage process based on preset parameters as well as allowing manual entries, if needed? That way, it can ensure consistency and objectivity while maintaining flexibility.
- What data analytics features does the system have? Does it allow customization to meet the needs of leaders at different levels (e.g., the board, C-suite executives, department heads)? Can it produce summaries, numbers, and graphs to show trends and patterns? As we now live in the age of data, all the information that surrounds the complaints should be captured and be part of the data points. The system should be able to transform seemingly separate complaints into meaningful data and allow them to be sorted by different factors (e.g., issue type, location, region, division, department). Robust analytics can provide enterprise-wide data to identify potential risks and gaps in policy, process, and operations.
- Where are the data stored? Is the system secure? In the healthcare sector, it is not surprising that many complaints are centered on patient care and clinical issues. Hence, much of the data are relating to patients' personal health information. The organization must exercise caution and institute reasonable measures to safeguard such protected information.

Since each organization's line of business, as well as its compliance team's approach, varies, there is no one-size-fits-all system. But hopefully, the aforementioned factors will assist you with evaluating your existing intake system or selecting a suitable one for your organization.

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