Is Your Hotline Hot? 🔥

— **Discovering Tools for Auditing and Monitoring**

Presented by J. Veronica Xu

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Today's Speaker

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Agenda

▶ Discover and understand the hidden messages in your hotline data

▶ Prioritize real risk areas based on your actual statistics

▶ Develop processes and tools to assist with your auditing and monitoring efforts

▶ Q & A

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Polling Question #1

▶ Do you/your team use a third-party system for hotline intake?

▶ A) Yes

▶ B) No

▶ C) Not sure

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Polling Question #2

► Do you/your team have direct access to the hotline data and statistics?

  ► A) Yes

  ► B) No

  ► C) Not sure

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Discover and understand the hidden messages

► Effectiveness of your compliance program

  ► Auditing and monitoring is one of the seven elements of a compliance program.

  ► Compliance is responsible for the ongoing reviewing, auditing and monitoring of all measures and systems in the compliance program, including the hotline system.

  ► What to audit/monitor and how to do it are often the two things that many compliance professionals struggle with.

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Discover and understand the hidden messages

▶ Know what you have and what you are auditing/monitoring

  ▶ What system do you have?

  ▶ How many calls/complaints does your organization usually receive on a regular basis (e.g., monthly, quarterly, yearly, etc.)?

  ▶ What data is your system tracking and what are the issue types?

  ▶ How many locations does your organization have and how is your organization structured (e.g., by region, job function, etc.)?

  ▶ What languages are used when reporters contact your hotline?

  ▶ Do your investigations have any documentation to support the findings?

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Discover and understand the hidden messages

▶ Understand what data are telling you

  ▶ Which location/office has the least number of complaints?

  ▶ What are the most reported issues in your organization?

  ▶ What is the substantiation rate in the organization/in each region?

  ▶ What are the sources of awareness (e.g., personal experience, hearsay, etc.) and the sources of reporting (e.g., employees, customers, vendors, etc.)?

  ▶ How are the concerns reported (i.e., intake method)?

  ▶ What's the percentage of anonymous reporting?

  ▶ What's the percentage of closed cases with no documentation?

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Polling Question #3

▶ How often do you/your team review your hotline data for auditing and monitoring purposes?
  - ▶ A) Daily
  - ▶ B) Weekly/bi-weekly
  - ▶ C) Monthly
  - ▶ D) Quarterly
  - ▶ E) Yearly
  - ▶ F) No set schedule
  - ▶ G) Not sure

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Prioritize real risk areas based on your actual statistics

▶ Identify risks, breakdowns and weaknesses
  - ▶ Review the total number of complaints across the organization and identify trends and patterns
  - ▶ Examine the locations that have the lowest and highest numbers of complaints (over a period of time)
  - ▶ Identify the top 3 most reported issue types (e.g., retaliation, billing, conflicts of interest, etc.)
  - ▶ Conduct root-cause analysis and ascertain underlying causes and issues

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Prioritize real risk areas based on your actual statistics

- ▶ Identify risks, breakdowns and weaknesses
  - ▶ Check the completeness and thoroughness of your hotline investigations (e.g., investigative documentation, statements, etc.)
  - ▶ Review the average length for case closure, primary outcomes, resolutions, follow-up actions, and investigators' wording and narrative
  - ▶ Compare the data with incidents reported by Operations and connect the dots

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Polling Question #4

▶ Do you/your team audit hotline investigations' documentation to ensure the investigations are thorough and complete?

- ▶ A) Yes
- ▶ B) No
- ▶ C) Not sure

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Develop processes and tools to assist with your auditing and monitoring efforts

- ▶ Establish investigative procedures, protocols and best practices
- ▶ Provide periodic training
  - ▶ The workforce
  - ▶ Your internal investigators
  - ▶ Management (including the board members)
- ▶ Make an audit plan/schedule
  - ▶ Set clear audit objectives
  - ▶ Understand the purpose of the audits
  - ▶ Determine frequency of audits and focus areas

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Develop processes and tools to assist with your auditing and monitoring efforts

- ▶ Make an audit plan/schedule
  - ▶ Determine frequency of audits and focus areas (Cont.)
    - ▶ Interview employees to gauge employees' awareness of the hotline
    - ▶ Audit the physical locations of the hotline posters
    - ▶ Check if the hotline number/web portal actually works (including the handling of the hotline calls, the user experience with the web portal, consistency in the information intake process, etc.) – whether it's handled by a 3rd party vendor or not
    - ▶ Verify if investigative protocols and processes were followed and whether the documentation was complete

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Develop processes and tools to assist with your auditing and monitoring efforts

▶ Share the findings with Management

    ▶ Senior leadership

    ▶ The governing board

▶ Collaborate with other functions/departments

    ▶ Conduct the gap analysis and/or the root-cause analysis

▶ Re-visit areas of concern

▶ Assess progress or re-evaluate deficiencies in processes and practices

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Key Considerations & Takeaways

Read the data	Understand the messages	Identify risks
Develop audit plans	Review findings	Re-visit and re-evaluate processes

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Q & A

Thank you!

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