



Department of Homeland Security Office of Inspector General

Recommended Practices for Office of Inspector General Hotlines



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**Homeland
Security**

Preface

At the request of the Council of the Inspectors General on Integrity and Efficiency (CIGIE) Investigations Committee, the Department of Homeland Security (DHS) Office of Inspector General (OIG) chaired a Working Group of attorneys and Hotline operators from OIGs of various sizes, including representatives of presidentially appointed and designated federal entity Inspectors General.

This report suggests recommended practices to be used to enhance the operation of OIG Hotlines. It is based on the subject matter expertise of Hotline operators from a representative group of OIGs, interviews with industry professionals, legal research, and a review of applicable documents.

The recommendations herein have been developed to the best knowledge available to the Working Group, and have been discussed in draft with both the Council of Counsels to the Inspectors General and the Assistant Inspectors General for Investigations CIGIE Subcommittee. We trust that this report will result in more effective, efficient, and economical OIG Hotlines. We express our appreciation to all who contributed to the preparation of this report.



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Abbreviations

ACD	Automated Call Distributor
ANI	Automatic Number Identification
CIGIE	Council of the Inspectors General on Integrity and Efficiency
CTI	Computer Telephony Integration
DTMF	Dual-Tone Multi-Frequency
ICR	Intelligent Call Routing
IG	Inspector General
IVR	Interactive Voice Response
OIG	Office of Inspector General
OSC	Office of Special Counsel
PII	Personally Identifiable Information
POGO	Project on Government Oversight
SORN	System of Records Notice
SSA	Social Security Administration
SVC	Scheduled Voice Callback
VFO	Virtual Front Office
VoIP	Voice over Internet Protocol
VQ	Virtual Queue
WPA	<i>Whistleblower Protection Act</i>

Definitions

Anonymous Complainant	A complainant whose identity is unknown to the OIG.
Confidential Complainant	A complainant who provides the OIG with personally identifying information, but requests that it not be disclosed, with the understanding that the OIG will safeguard that information to the best of its ability.
OIG Hotline	An entity that receives allegations from federal employees, contractors, and the public that furthers an OIG’s mission (1) to promote effectiveness, efficiency, and economy in its organization’s programs and operations, and (2) to prevent and detect fraud, waste, and abuse in such programs and operations.
Whistleblower	An employee who lawfully discloses information that he or she reasonably believes evidences (1) the violation of any law, rule, or regulation; or (2) gross mismanagement, a gross waste of funds, an abuse of authority, or a substantial and specific danger to public health or safety committed by the employer. ¹
Whistleblower Reprisal/Retaliation	When a person with personnel authority takes, fails to take, or threatens to take or fail to take a personnel action with respect to an employee because of a disclosure of information by the employee that he or she reasonably believes evidences a violation of a law, rule, or regulation; gross mismanagement; a gross waste of funds; an abuse of authority; or a substantial and specific danger to public health or safety. ²

¹ See 5 U.S.C. § 2301(b)(9); 5 U.S.C. § 2302 (b)(8).

² See 5 U.S.C. § 2301(b)(9); 5 U.S.C. § 2302 (b)(8).

OIG

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Executive Summary

This report offers guidance to Offices of Inspectors General (OIGs) on ways to enhance the efficiency of their complaint management process through improved Hotline operations.

In order to best manage OIG resources and to fulfill organizational mission requirements, Hotline operators must be able to elicit information from complainants quickly and efficiently and, to the extent possible, assist in segregating legitimate complaints from those that are frivolous, malicious, repetitive, or otherwise unsuitable for further Inspector General action.

The topics discussed in this report will assist Hotline operators in identifying, encouraging, and efficiently processing meritorious complaints. Where possible, we have identified certain recommended practices, with the caveat that the various Hotlines and the Inspectors General they serve have such diverse programs, missions, resources, and numbers of complaints received that no one practice will benefit all Hotline operations. It is anticipated that implementation of the proposed recommendations will permit OIGs to increase their focus on those allegations with the most potential for relevant impact.

The report has two sections. The first section identifies practices and techniques for improving a Hotline's performance, as defined by the percentage of allegations that are substantiated through investigation. The techniques discussed include training Hotline intake staff, using specialized technology, identifying trends in the intake process to better assist in call management, engaging in an ongoing dialogue with OIG senior management, effectively communicating with complainants, and proposed Hotline community initiatives designed to share information across the community. The second section discusses other matters that Hotline operators should consider, such as issues relating to whistleblower complaints and the *Privacy Act of 1974 (Privacy Act)*. Although this information does not directly relate to improving Hotline performance, it provides useful information for OIG Hotline operators.

Background

In recent years, there has been increased interest in the use of OIG Hotlines as the principal mechanism for reporting and detecting fraud, waste, and abuse. Entities both within and outside the IG community have studied OIG Hotlines and their important impact on the effectiveness of the IG community.

In March 2009, the Project on Government Oversight (POGO) issued a report that discussed many issues relating to OIG Hotlines, including issues related to the protection of whistleblowers, OIG websites, and the use of contractors to supplement federal Hotline staff.³

In July 2009, at the request of the Council of the Inspectors General on Integrity and Efficiency (CIGIE), the Social Security Administration (SSA) OIG surveyed the OIG community to gather information on OIG Hotlines.⁴ Sixty-seven of the 68 CIGIE member organizations responded to the survey, providing a wealth of information on the diversity of OIG Hotlines with respect to their size, internal procedures, and workload. For example, it was determined that the majority of the OIGs receive fewer than 5,000 complaints each year, while a few OIGs receive more than 50,000 complaints each year. Accordingly, most OIGs have fewer than 10 employees working for their Hotlines, while others have more than 40 employees working for their Hotlines. As a result of the SSA OIG survey findings, CIGIE determined that it would be beneficial to conduct further studies on OIG Hotlines to identify practices that might be universal in their benefit or provide a useful starting point for individual OIGs looking to improve or otherwise refine their Hotline operations.

³ Project on Government Oversight, “Inspectors General: Accountability is a Balancing Act” (March 20, 2009).

⁴ Social Security Administration, Office of Inspector General, “Inspector General Fraud Hotline Survey Report” (July 2009).

Improving Hotline Performance

OIG Hotlines exist to elicit information from federal employees, contractors, and the general public that furthers an OIG's mission (1) to promote effectiveness, efficiency, and economy in its organization's programs and operations, and (2) to prevent and detect fraud, waste, and abuse in such programs and operations. Accordingly, OIG Hotlines play a critical role in the work of an OIG, because an OIG can only investigate, refer, or otherwise handle matters of which it is aware. Agency employees, contractors, and the public who make reports to an OIG via their Hotlines are an important resource because they can provide the OIG with notification of or insider information about potential problems. However, to encourage potential complainants to report fraud, waste, and abuse, an OIG must instill confidence that its Hotline handles complaints professionally and with discretion.

As stated earlier, some OIG Hotlines receive tens of thousands of complaints a year. Many of these calls are frivolous, misdirected, or otherwise unsuitable for further action by the OIG, creating a strain on a Hotline's often limited resources. As a result, Hotline managers must minimize factors that inhibit Hotline resources from focusing on the receipt of new information or the handling of legitimate complaints. By improving intake procedures, OIG Hotlines can focus their resources on allegations that are substantive in subject matter and in detail. Our review of the current practices of OIG Hotline operators identified the following methods for improving the Hotline intake process: (1) employing well-trained Hotline staff; (2) using technology effectively; (3) measuring performance and identifying trends in allegations; (4) incorporating feedback from OIG senior management into the case management process; and (5) communicating with complainants in order to both (i) manage the complainants' expectations with respect to the Hotline's ability to respond to their complaints personally or repeatedly and (ii) minimize the number of misdirected or otherwise unsuitable complaints the Hotline receives. In addition, the OIG Hotline community should participate in ongoing forums for sharing best practices and proven methods for improving performance.

Employing Well-Trained Intake Staff

Well-trained complaint intake staff are a key element of an efficiently functioning OIG Hotline. In the OIG Hotline community, there has been considerable discussion as to whether and to what extent it is appropriate for OIG Hotlines to use contract employees to augment or replace federal

staff. Although the initial discussion revolved around whether operating an OIG Hotline was an inherently governmental function, our review revealed that the true issue of concern is whether OIG Hotline staff, whether federal employee or contractor, know enough about the OIG's mission and the agency's programs to elicit as much useful information as possible and to route incoming complaints efficiently.⁵ Thus, the key element of the discussion is whether it is reasonable to expect a contract employee to have sufficient mission and program knowledge to triage incoming complaints efficiently.

Given the differences in OIG Hotlines, particularly with respect to the volume of complaints they receive and the number and complexity of the programs for which their OIG provides oversight, it is impossible to make a recommendation as to whether best practices preclude the use of contract intake staff. There is no "one size fits all" solution or consensus to this debate. However, all OIG Hotline intake staff, whether federal employee or contract staff, should have a minimum level of skills and program knowledge to enable the operator to properly document and route allegations being reported.

Staffing OIG Hotlines: Federal Employees or Contractors

Some OIG Hotline practitioners believe that Hotlines should be staffed solely with federal employees, asserting that federal employees will have a better knowledge of the specific OIG's and the agency's mission and the ability to perform a wider array of functions than contract staff, who cannot make binding determinations on behalf of the government. These Hotline practitioners believe that federal employees are inherently more efficient at processing incoming complaints. For example, OIG Hotlines that use only federal employees often have a "cradle to the grave" approach in which the same employee takes the complaint from intake to resolution, greatly streamlining the intake and referral process. In addition, at initial intake the employee can immediately refer misdirected callers elsewhere, making it much less likely that a significant amount of the Hotline's resources will be spent on complaints that are not suitable for further OIG action. Further, federal employees, who are generally quite knowledgeable about the OIG's mission and the programs it oversees, can often better elicit relevant information from complainants, allowing for quicker recognition of how to route or prioritize the complaint.

⁵ No OIG Hotline grants contract employees binding decision-making authority. Rather, the OIGs that use contractors to supplement their Hotline staff limit the role of contractors to complaint intake and data analysis, reserving decision-making authority for federal employees.

That said, however, an OIG Hotline may decide to supplement its federal Hotline staff with contractors for several reasons. Management has greater flexibility with regard to the hiring and termination of contract staff, which would allow management to hire staff to handle temporary increases in workload. In addition, OIG management has greater room to negotiate pay, which, depending on the arrangement, could be much more cost effective than hiring full-time federal employees to perform low-level, administrative tasks, such as answering phones and logging complaints. Further, many Hotline contractors can provide skills and services that are too expensive for most OIG Hotlines to retain in-house, such as 24-hour operator staff, multilingual complaint intake, and advanced technology for complaint intake, including technology that ensures that complainants can remain completely anonymous.

Ensuring That Hotline Intake Staff Are Well Trained

A Hotline is often the public's first point of contact with an OIG. Callers and contacts can be apprehensive and unsure of what issues an OIG normally reviews. The terms *criminal activity*, *fraud*, *waste*, and *abuse*, are broad, and the specifics of what these categories encompass within a particular agency or OIG are precisely defined within that particular entity. Thus, a well-trained Hotline staff is vital, regardless of whether they are federal employees or contractors. OIG Hotlines must triage these contacts in a timely, effective, and confidential fashion to determine which issues might have a serious impact on their agency and its clients.

It is important that operators be well trained, skilled in basic interviewing techniques, knowledgeable about the mission and programs of the organization they represent, and adept at handling anonymous and confidential complaints. First and foremost, Hotline intake staff must have the skills to elicit relevant, useful information from complainants who might be angry, emotional, or unaware of what constitutes appropriate grounds for an IG investigation. Second, to determine the significance of allegations of possible fraud, waste, abuse, or mismanagement, the intake staff must understand the mission of their organization and how its programs are adversely impacted by the alleged misconduct. For example, many Hotlines spend much of their resources fielding misdirected calls, acting as a de facto clearinghouse for complaints dealing with requests for assistance from or information relating to agency programs. These complaints are outside of the OIG's purview, and complainants should immediately be directed to the correct program office. However, to refer these complainants

promptly to the correct agency or program office, the intake staff must have a working knowledge of their organization's mission, as well as easy access to the contact information of these other entities. Several OIG Hotlines provide intake staff with reference materials that contain contact information for their agency's programs.

In addition, to ensure that intake staff handle cases consistently, at least one OIG has created a telephone script. The script ensures that the Hotline gives complainants a consistent message and that the intake staff's questions elicit enough information to refer the matter to either a program office or the Hotline's analytic staff, who will decide what further action the Hotline should take. The script is designed to ensure that the intake staff collects all relevant information regardless of their knowledge about the agency's programs.

With respect to OIG Hotlines that rely on contractors to supplement their intake staff, at least one OIG has had success in training contract personnel to triage cases by combining guidance on the agency's programs with robust oversight by federal personnel. The Hotline provided contract personnel with training on the OIG's mission and the agency's programs and a reference book that included the contact information for various agency programs. The contractors were trained to refer matters to either agency program officials or the OIG federal staff, depending on the subject matter of the allegation. When they were uncertain where a complaint should be referred, the default was to send it to the OIG Hotline's federal staff. Further, the federal staff reviewed the allegations received and the referrals that the contractors made to ensure that they were handled properly. In addition, federal Hotline managers frequently visited the contractor's offsite locations to ensure that the contractors were properly trained and handling calls appropriately.

Finally, as discussed in the "Special Issues Related to Whistleblowers" section of this report, it is important that Hotline intake staff understand the need to protect the confidentiality of complainants as well as the laws that govern the protection of whistleblowers. OIG Hotlines should have protocols in place to ensure that Hotline intake staff, whether contractors or federal employees, handle the identifying information that complainants provide properly and refer matters relating to whistleblower reprisal appropriately.

No appropriately-routed complaint is without value. Priorities change as patterns emerge and agency missions sometimes evolve. Therefore, no properly-directed complaint should be trivialized or ignored.

Recommended Practices

We recommend that OIG Hotlines consider the following practices:

Recommendation #1: OIGs should consider ensuring that their Hotline intake staff are adequately trained with respect to interview skills and program- and mission-specific information.

Recommendation #2: OIGs should consider ensuring that Hotline intake staff handle complaints consistently, providing training sufficient to ensure that all complainants receive the same information and that all complaints are handled similarly, without regard to the skill and experience level of a particular staff member.

Using Technology

Hotlines can reduce labor costs and provide better service to Hotline complainants by introducing certain technologies into the complaint intake process. Technology can be used to augment staff by performing some of the lower-level intake functions, such as logging complaints or redirecting misdirected complaints. Because hiring and training Hotline intake staff is expensive, adequately staffing a Hotline can be cost prohibitive—particularly if the Hotline receives a large volume of complaints. By supplementing staff with improved technology, the Hotline intake staff can focus on higher-level tasks, such as interviewing complainants and analyzing the incoming data, thereby increasing efficiency and productivity.

For example, Hotlines receive many requests for assistance that are unrelated to the primary mission of OIGs and typically related to the core mission of the parent department or agency. Using Interactive Voice Response systems, Hotlines can automatically direct callers to informational messages that provide answers or assistance. In other cases, the call may be automatically transferred to a Hotline or helpdesk of the parent organization. More sophisticated systems use speech-enabled prompting to interpret the needs of the caller and route the call to the

correct destination without the need for the OIG Hotline intake staff to engage the caller.

Many individuals choose the Internet in lieu of the telephone to report their allegations. With proper engineering and implementation, Hotlines may achieve greater efficiency by offering electronic web forms on which complainants can file their allegations. This service may be more desirable for some complainants because they can file their allegation from any computer at any time. As discussed in the “Communicating With Complainants” section of this report, OIG websites provide an excellent forum for educating complainants and facilitating the allegation report filing process. OIG websites can provide information on what constitutes fraud, waste, or abuse and can explain how the process works so that complainant expectations are properly managed.

Several existing OIG Hotline websites provide set formats and online forms for complainants to fill out. The forms ensure that the Hotline complainant provides a structured complaint that contains all the information necessary for the OIG reader to make an informed decision about the internal routing of the complaint.

Social networking Internet sites, including Facebook, MySpace, and Twitter, are becoming more popular with a wide range of online complainants. Hotlines may consider incorporating these entities into their line of service channel offerings as the public’s desire to use these sites increases. As with other websites and applications, access should be engineered for simplicity and security. OIGs should take care not to provide open access to sensitive or *Privacy Act* information.

These are just a few examples of technologies that should be considered. A full description of additional items can be found in appendix B, and a chart reflecting the pros and cons of each technology can be found in appendix C. Not every technology is suitable for every Hotline. Hotline managers and technicians should carefully evaluate the scope of their operation, volume of contacts, origin of complaints, costs versus benefits, and other factors before acquiring any of these tools.

Recommended Practice

We recommend that OIG Hotlines consider the following practice:

Recommendation #3: OIGs should consider evaluating the technology available to assist in the complaint intake process in order to determine what, if any, technology might aid their

Hotlines in processing incoming complaints faster, more efficiently, and more cost effectively.

Performance Metrics and Trend Analysis

OIG Hotlines should collect and analyze incoming complaint data to assist in measuring individual and organizational performance. By analyzing data such as the number of complaints processed in an hour, the percentage of calls answered, the percentage of allegations either referred or closed on initial triage, management officials can assess how efficiently the Hotline is processing incoming complaints, whether its intake staff is sufficiently trained, and whether it has enough staff to process the complaints it receives. In addition, by analyzing trends in the allegations received, such as which issues are most prevalent or which types of allegations are most often substantiated, Hotline operators can help managers identify shifting trends and focus their resources on emerging problems most likely to yield a positive result and thereby get a better return on their OIG's investment.

Analyzing data trends can help to predict future problems by comparing information from the past to find indications of either inefficiency or success. These data can also be used for a wide range of trend analyses, such as measuring employee performance, identifying which types of issues are more prevalent, and assessing the quality of complaints.

The difficulty in beginning trend analysis lies in determining which data to collect and compare. For example, a Hotline manager who wants to analyze changes in the amount of time for processing call-in complaints can request data for the number of calls received, number of calls answered, average time spent on each call, and average time spent on documentation after each call. The analysis will then look at the relationships between the numbers of calls received and the amount of time spent on each call over time, focusing on periods where the average time spent on each call was long or short. In addition, the Hotline manager could collect and analyze data dealing with various periods to find trends from month to month or year to year, which could help the manager to allocate resources more efficiently.

Recommended Practice

We recommend that OIG Hotlines consider the following practice:

Recommendation #4: OIG Hotline managers should consider collecting and analyzing data relating to incoming complaints in order to (1) evaluate and improve the efficiency of their intake process and their Hotline operations and (2) identify trends in the nature of the allegations received, particularly as they relate to systemic weaknesses in an agency's programs and operations.

Ongoing Dialogue With OIG Management

An OIG Hotline cannot optimize its performance if it is not in an ongoing dialogue with OIG senior management. To the extent that Hotline operators are aware of IG initiatives and senior management is aware of trends in the allegations received, management officials can determine whether an OIG needs to reallocate resources. The Hotline can also learn what data are most useful to the OIG's investigative staff and which practices need to be changed to better meet the OIG's needs. In return, OIG management will have a better idea of what Hotline operators actually do and what additional resources the Hotline may need to provide better service. By working together, the Hotline operators and OIG senior management can ensure that the Hotline operators continue to improve the speed and efficiency with which they process complaints. In several OIGs, the Hotline managers meet regularly with OIG managers to discuss Hotline performance, trends in allegations, and how the OIG Hotline can best support OIG needs and priorities.

Recommended Practice

We recommend that OIG Hotlines consider the following practice:

Recommendation #5: OIG Hotline managers should consider meeting regularly with appropriate senior OIG managers and staff to discuss Hotline performance, trends in incoming complaints, and prioritizing complaints in a manner that best furthers the OIG's mission- and program-related initiatives.

Communicating With Complainants

OIG Hotlines should provide for ease of communication with employees and the general public while instilling confidence that legitimate

complaints of suspected fraud, waste, or abuse will be acknowledged and that confidentiality will be respected.

Proactively communicating certain information to complainants can be an effective tool for managing complainants' expectations and government resources. OIG Hotline operators should make the complaint intake process as transparent as possible, providing details as to what happens to the complaints received and to what extent a complainant can expect to be informed of the status of any resulting OIG investigation. However, as a practical matter, some OIG Hotlines receive as many as 50,000 calls a year and may not have the resources to respond directly or personally to each complainant. Further, OIG Hotlines may wish to limit communications to the complainant, because unchecked communications could compromise legitimate privacy interests or provide subjects with information that might impede an OIG investigation.

OIG Hotlines should (1) devise procedures to discourage calls from frivolous, malicious, or repetitive complainants; (2) use their websites both to provide complainants with useful information and to assist complainants in providing useful, relevant information to the OIG; and (3) aggressively advertise the OIG Hotline to agency employees and the general public.

Handling Misdirected or Repetitive Hotline Complaints

Many OIG Hotlines spend much of their resources directing complaints to other agency program officials, becoming a de facto clearinghouse for all complaints related to the agency. In fact, most Hotline complaints do not justify further action by the OIG. In many instances, the complaints are frivolous or simply misdirected, and have nothing to do with combating fraud, waste, and abuse. Potential complainants should be properly educated on the role and authority of the OIG. Failure to do so unnecessarily diverts OIG resources and frustrates the complainant. For example, many people call to complain about minor personnel matters or about the status of a federal assistance benefit. If these complainants are educated and redirected, Hotline operators can provide them with valuable assistance while minimizing the impact on the Hotline's limited resources. However, some complainants repeatedly contact the Hotline with the same complaint, either to reiterate their prior complaint or to check on the status of their complaint, thereby siphoning Hotline resources from the intake of new complaints. Handling these repetitive complainants appropriately and effectively is important, but it is advantageous to implement proactive measures aimed at avoiding repetitive complainants.

The *Inspector General Act of 1978 (IG Act)*, as amended, provides little guidance on the specifics of operating an OIG Hotline and no direction on

handling complaints. Rather, OIGs have wide discretion in establishing Hotline processes that they believe are best suited to their mission. The processes established for handling complaints, including repetitive complainants, should reflect an understanding that Hotline resources spent on repetitive complainants may reduce resources available to receive new allegations. At the same time, Hotline managers must ensure that procedures for handling repetitive complainants do not “cut off” an individual’s access to the OIG. A repetitive complainant could be a source for new, important allegations, and the goal must be to provide unrestricted reporting access to all potential legitimate sources of information. Hotlines must proceed with the utmost caution when considering blocking the phone number or email address of a repetitive complainant, and such practices generally should be reserved for complainants who are harassing, vulgar, or threaten violence, or for other extraordinary circumstances.

One proactive approach to repetitive complainants is to provide all complainants with a standard form message that (1) notifies or otherwise confirms that the OIG received their complaint; (2) informs them that the OIG will contact them (if contact information is available) only if it requires additional information; and (3) asks them to refrain from following up with the Hotline unless they have additional, pertinent information.

Admittedly, the initial approach will not eliminate the repetitive complainant issue. If an individual becomes a repetitive complainant, the Hotline may take additional measures. A Hotline may send a letter to certain repetitive complainants to reiterate the information stated in the form message and provide a brief summary of the complainant’s history of contacting the OIG without new or pertinent information. Depending on the circumstances, the letter may answer the complainant’s underlying question. For example, if the complainant is repeatedly calling for status updates or to reiterate a previous complaint, the OIG may choose to describe the status of the matter. OIGs should abide by the *Privacy Act* and other confidentiality obligations when communicating with complainants.

Recommended Practice

We recommend that OIG Hotlines consider the following practice:

Recommendation #6: During its initial contact with a complainant, an OIG Hotline should consider managing the complainant’s expectations with respect to further contact with the

OIG, including providing information as to whether the complainant should expect status updates from the OIG.

OIG Websites

OIG websites can enable the exchange of information with complainants and educate complainants about the role of the OIG, the purpose of an OIG Hotline, and complaint-processing procedures in general. The website can safeguard OIG resources by providing potential complainants with the tools they need to provide useful, relevant information. For example, a website complaint form could provide prompts designed to elicit useful information, such as identifying the program affected by the allegations or specific evidence to support the allegations. The website could also provide answers to frequently asked questions, such as the procedures the OIG will use to process complaints and the extent to which a complainant can expect a complaint to be kept confidential. The website may offer links to information about whistleblower retaliation and other information that will allow the complainant to make an informed decision. Because members of the public often use OIG Hotlines as a clearinghouse for any complaint against or involving the government, OIG websites may also be able to redirect complaints to a more appropriate forum without using a significant amount of the OIG's resources.

A number of OIG websites do not contain a mechanism for reporting fraud, waste, and abuse. These websites are in direct contravention of the *IG Act*, which mandates that each IG “establish and maintain a direct link on the homepage of the website of the Office of the Inspector General for individuals to report fraud, waste, and abuse.”⁶ Because the public increasingly relies on the Internet, not providing a direct website link to report fraud, waste, and abuse creates an unnecessary barrier to potential complainants and their valuable information.

Recommended Practices

We recommend that OIG Hotlines consider the following practices:

Recommendation #7: OIGs should provide a mechanism for reporting information relating to fraud, waste, and abuse via their websites.

Recommendation #8: OIGs should consider providing educational information on their websites, such as (1) information

⁶ 5 U.S.C. app. § 8L(b)(2).

about the whistleblower's protections against retaliation, including a link to the Office of Special Counsel; (2) an explanation of how the OIG responds to complaints; and (3) general information on the OIG's mission and how the Hotline relates to that mission.

Education and Outreach

OIG Hotlines exist to elicit, collect, and document information about fraud, waste, and abuse in their parent organization. To that end, many OIGs educate both federal employees and contractors in their agency or department about their Hotlines. Although most OIG Hotlines are advertised on websites and on posters distributed in the workplace, a few OIGs have conducted more comprehensive education and outreach programs. For example, at one OIG, information about the Hotline is relayed at all new employee orientations; in fraud awareness briefings held at various agency facilities; during site visits to regional offices; during OIG presentations at agency meetings, conferences, and training programs; and in an automatic email notification that is sent to a distribution list whenever a new OIG report is published. Other Hotlines distribute information via promotional items given away at conventions, briefings, and other forums; and in brochures included in mailings to agency employees. Although most OIG Hotlines do not track whether their outreach efforts have resulted in an increase in Hotline complaints, at least one Hotline has identified a surge in complaints after each awareness discussion and after the issuance of its new Hotline poster every year. In addition, an OIG's education and outreach efforts may have the additional benefit of providing an opportunity to educate potential complainants on the purpose and mission of OIG Hotlines and to thereby reduce the number of misdirected complaints.

Recommended Practice

We recommend that OIG Hotlines consider the following practice:

Recommendation #9: OIG Hotlines should consider engaging in education and outreach efforts to raise the profile of their Hotline and its purpose to the parent organization's employees and contractors, thereby increasing the number of relevant and actionable complaints the Hotline receives.

Hotline Community Initiatives

Given the important role that OIG Hotlines play in furthering the OIG community's mission, it is imperative that Hotline operators have ongoing forums in which they can discuss best practices, develop standardized community-wide training materials, and receive updates on relevant developments in law and technology. Suggestions for such forums include the following:

1. A CIGIE Hotline Committee or Subcommittee
CIGIE could establish a formal subcommittee of Hotline directors charged with addressing changes in the laws affecting the Hotline community, creating community-wide standards and procedures, and calling attention to the role of Hotlines in the OIG community.
2. An Annual Training Conference
An annual training conference would enable Hotline staff to keep current on recent developments in the Hotline community, share best practices, and network with other Hotline operators. The conference could also offer standardized training in (1) basic interview skills, (2) best practices for handling complaint intake, and (3) the mission of OIGs and the role of OIG Hotlines in furthering that mission.
3. OIG Hotline Operators' Website and Electronic Mailing List
An access-restricted website and electronic mailing list would allow OIG Hotline staff to share information and seek the advice of their counterparts at other OIG Hotlines. A mailing list would allow Hotline staff to receive immediate responses to their inquiries and to discuss emerging issues without waiting for a formal meeting or training conference. Further, the website would be a repository of documents, training materials, and answers to frequently asked questions that would be accessible to OIG Hotline staff 24 hours a day.

A recent positive step in Hotline community-wide training and procedures is the revival of the Inspectors General Criminal Investigator Academy's Hotline Operators Training Program. The program had been dormant, but was recently revived owing to increased interest in operator training.

Recommended Practice

We recommend that OIG Hotlines consider the following practice:

Recommendation #10: The OIG community should consider creating an ongoing forum through which Hotline operators can share information and best practices, such as a CIGIE Subcommittee, training conference, Hotline community website, or electronic mailing list.

Other Considerations

Special Issues Related to Whistleblowers

In the context of OIG Hotlines, a whistleblower can best be defined as an employee who lawfully discloses information that he or she reasonably believes evidences (1) the violation of any law, rule, or regulation or (2) gross mismanagement, a gross waste of funds, an abuse of authority, or a substantial and specific danger to public health or safety committed by his or her employer.⁷ Whistleblowers can be a valuable source of information to OIG Hotlines, and OIGs should encourage them to come forward and report misconduct. The *IG Act* prohibits OIGs from disclosing the identity of an agency employee without the consent of the employee, unless the IG determines such disclosure is unavoidable during the course of an investigation.⁸ Accordingly, OIG Hotlines should assist whistleblowers who may fear retaliation and be cognizant of the need to safeguard any information that might reveal the identity of a complainant.

Whistleblower Protections

Whistleblowers have special protections against retaliation under the law, and it useful for a Hotline operator to know what those protections are so that the operator can identify any retaliation-related issues and refer both the issues and the whistleblower to the relevant authority for further action. Because an OIG does not have the power to order an agency or a contractor to take any corrective action in response to a finding that retaliation has occurred, Hotline operators should, where practicable, inform whistleblowers of the methods by which they can seek corrective actions on their own behalf.

⁷ See 5 U.S.C. § 2301(b)(9); 5 U.S.C. § 2302 (b)(8); 5 U.S.C. app. § 7(a).

⁸ See 5 U.S.C. app. § 7(b).

Federal and contractor employees have different rights or courses of action relating to reprisal for whistleblowing. Federal employees are primarily protected by the *Whistleblower Protection Act (WPA)*. The *WPA* provides statutory protections for federal employees who disclose employer misconduct. Under the *WPA*, federal employers are prohibited from taking or failing to take a personnel action with respect to an employee or applicant because of a disclosure of information by the employee or applicant that he or she reasonably believes evidences a violation of a law, rule, or regulation; gross mismanagement; gross waste of funds; an abuse of authority; or a substantial and specific danger to public health or safety.⁹

An OIG Hotline staff member who receives allegations or evidence of retaliation should (1) refer the complainant to the Office of Special Counsel (OSC) and (2) refer the allegations or information related to the possible retaliation to a designated OIG official. Generally, the OSC has authority to investigate and, where appropriate, prosecute prohibited personnel practices,¹⁰ including whistleblower retaliation, committed against most employees or applicants for employment in executive branch agencies and the Government Printing Office. OSC also has limited jurisdiction over allegations of whistleblower retaliation for employees of the government corporations listed at 31 U.S.C. § 9101, the Federal Aviation Administration, and the Transportation Security Administration. If OSC finds sufficient evidence to prove a violation, OSC can seek corrective action, disciplinary action, or both. In addition, OIGs have concurrent authority to investigate allegations of whistleblower retaliation. While an OIG cannot compel an agency to take any corrective action in response to a finding of retaliation, the mere fact that the finding is made and brought to the attention of the agency head can prompt the agency to address any identified misconduct.

Certain subsets of federal employees receive additional whistleblower protections. For example, the *Intelligence Community Whistleblower Protection Act of 1998* sets forth a procedure for employees and contractors of specified federal intelligence agencies to report complaints or information to Congress about serious problems involving intelligence activities.

⁹ 5 U.S.C. § 2302(b)(8). The prohibition does not apply, however, if the disclosure is barred by law or is specifically required by Executive Order to be kept secret in the interest of national defense or the conduct of foreign affairs, *except* when such a disclosure is made to the Special Counsel, the Inspector General, or a comparable agency official.

¹⁰ The 12 prohibited personnel practices, including reprisal for whistleblowing, are defined at 5 U.S.C. § 2302(b).

The *Military Whistleblower Protection Act* prohibits interference with a military member’s right to make protected communications to OIGs, members of Congress, certain Department of Defense officials, and other persons or organizations designated by regulation or administrative procedures.

Nonfederal employees are protected by other statutes, but the protection is often limited to a certain type of disclosure. Many of these statutes, such as the *False Claims Act*, the *Sarbanes-Oxley Act*, and the *American Recovery and Reinvestment Act (Recovery Act)*,¹¹ provide nonfederal employees with a private right of action in federal court as well as significant financial compensation for the retaliation. However, OIG Hotlines should not give whistleblowers legal advice or encourage or dissuade a complainant from taking any legal action.

As a result, an OIG Hotline should consider allowing intake staff only to refer complainants to information about the OSC, the *WPA*, and the *Recovery Act*, preferably by directing the complainant to the OIG website or a prescribed list of preapproved sources of information or points of contact.¹² Such a practice would ensure that Hotline intake staff do not inadvertently provide legal advice to complainants.

Confidentiality and the Inspector General Act

Although the *IG Act* gives OIGs discretion with respect to whether they can disclose the identity of a whistleblower, the identity of the whistleblower should be kept confidential whenever possible without contravening an OIG’s mission to combat fraud, waste, abuse, and mismanagement. The *IG Act* also provides that—

The Inspector General shall not, after receipt of a complaint or information from an employee, disclose the identity of the employee without the consent of the employee, *unless the Inspector General determines such disclosure is unavoidable during the course of the investigation.*¹³

¹¹ Under section 1553 of the *Recovery Act*, IGs are responsible for investigating allegations of reprisal against certain nonfederal employees who make protected disclosures related to Recovery Act funds.

¹² The Hotline should also consider referring complainants to the information that its agency provides pursuant to the requirements of *The Notification and Federal Employee Antidiscrimination and Retaliation Act of 2002 (No FEAR Act)*, which requires agencies to notify employees of and provide training with respect to their rights and remedies under antidiscrimination and anti-retaliation laws.

¹³ 5 U.S.C. app. § 7(b) (emphasis added). Because this provision of the *IG Act* applies only to “employee[s] of the establishment,” it is not applicable to contractors, grantee employees, or other nonemployee complainants.

Thus, the *IG Act* allows an OIG to disclose a complainant's identity without the complainant's consent if the OIG determines the disclosure to be necessary to the investigation. The *IG Act* also requires some degree of protection for complainants who provide information via the Internet.¹⁴ Specifically, the *IG Act* mandates that online complainants "shall not be required to provide personally-identifying information."¹⁵ The *IG Act* does not, however, prohibit an OIG from acquiring the information from a complainant who chooses to provide the information or from requesting it, if the information is necessary to investigate the complainant's allegation. By leaving the decision as to whether to acquire or disclose the whistleblower's identifying information within the OIG's discretion, the *IG Act* ensures that OIGs have the flexibility to do what is necessary to combat fraud, waste, and abuse. Investigations can be compromised when OIG Hotlines cannot collect enough information from the whistleblower to verify the claim and therefore justify allocating limited investigatory resources to the matter.

In addition, keeping a complainant's identity confidential can often have unintended consequences, such as compromising the OIG's ability to investigate fraud, waste, and abuse. For example, in some circumstances, either the size of the program or the nature of the allegation is such that the mere act of investigating will make the identity of the whistleblower readily apparent to the employer. In those instances, the OIG must balance the need to safeguard the identity of the whistleblower with the need to combat the misconduct. As it balances these needs, the OIG may utilize one or more of the following practices on a case-by-case basis: call the whistleblower, explain why there is a concern that management may become aware of his or her identity, provide the whistleblower with OSC points of contact, and ask for permission to release the whistleblower's identity to OSC, if necessary.

To gain as much useful information as possible from a Hotline, OIGs should strive to provide sources with the maximum amount of confidentiality that is compatible with the needs of an investigation. Although the *IG Act* sets forth a minimum standard for confidentiality—prohibiting OIGs from disclosing the identity of a complainant unless such disclosure becomes unavoidable in the course of an investigation—OIGs should go beyond this

¹⁴ However, these provisions have no applicability to designated federal entities, such as Amtrak, the Corporation for Public Broadcasting, and the Legal Services Corporation.

¹⁵ 5 U.S.C. app. § 8L(b)(2).

minimum standard and provide complainants with more comprehensive assurances of confidentiality, if practicable. For example, some OIG Hotlines use telephone and computer encryption technologies that allow complainants to leave encrypted anonymous messages.

Disclosures Under the Privacy Act

The *Privacy Act* regulates the collection, maintenance, use, and dissemination of personally identifiable information (PII) about individuals that is maintained by federal agencies and departments. The *Privacy Act* seeks to balance the government's need for information against the need to protect individuals against unwarranted invasions of their privacy. While individual Hotline offices may collect and record a variety of complaint information unique to the programs they oversee, at a minimum, most Hotlines make a record of the following PII for each complaint: (1) identifying complainant information such as name, home address, email address, or other locating data and (2) similar identifying information about individuals who may be involved in or have knowledge of wrongdoing. OIG Hotline staff should be aware of their OIG's procedures for handling PII and when an issue should be referred to the designated official in the OIG for a determination under the *Privacy Act*.

Under the *Privacy Act*, "no agency shall disclose any record which is contained in a system of records by any means of communication to any person, or to another agency, except pursuant to a written request, by, or with the prior written consent of, the individual to whom the record pertains [subject to 12 exceptions]."¹⁶ An OIG Hotline's complaint files, which often consist of complaint information, including PII, indexed by a person's name, telephone number, address, file number, or other identifier, constitutes a system of records, which is defined as "a group of any records under the control of any agency from which information is retrieved by the name. . .or by some other identifying number, symbol, or identifying particular assigned to the individual."¹⁷ An agency must publish a System of Records Notice (SORN) in the *Federal Register* if it has created and is maintaining Hotline files that contain information protected under the *Privacy Act*.

¹⁶ 5 U.S.C. § 552a(b).

¹⁷ A record is defined as any item, collection, or grouping of information about an individual that is maintained by an agency, including, but not limited to, name; identifying number or identifier (e.g., Social Security number, employee number); address; financial data; or other identifying particular assigned to the individual.

Generally, the *Privacy Act* permits disclosure of most PII to the individual who is the subject of a record(s) held in a system of records, and generally prohibits disclosure of PII to individuals who are not the subject(s) of the record. Accordingly, most Hotlines do not provide the results of their OIG's investigations when they are closed, and fewer still respond to requests for status updates. Many Hotline offices will instead provide requesters with information on how to request information regarding the investigation under the *Freedom of Information Act*.

Conclusion and Proposed Areas for Further Study

OIG Hotlines provide an important service for the IG community, acting as a repository for allegations of fraud, waste, and abuse. A well-run OIG Hotline that is adept at (1) eliciting information from complainants and (2) distinguishing credible allegations of misconduct from frivolous and misdirected complaints can play an integral role in furthering the mission of an OIG. Unfortunately, OIG Hotlines are not always well integrated into the organizations they serve, and the OIG community does not have sufficient forums for OIG Hotline operators to share best practices and engage in professional development. More can be done to improve OIG Hotline performance and increase their ability to elicit credible, useful information. We have identified the following areas that may be worthy of future study:

1. The feasibility of a government-wide system for sharing information and pooling data relating to Hotline complaints. For example, the Recovery Accountability and Transparency Board has created a mechanism for sharing Hotline complaint information between federal agencies that has allowed the government to discover trends in misconduct and relationships between various malefactors and their schemes. In addition, sharing information allows the government to pool its resources across agencies, which allows it to combat fraud, waste, and abuse more efficiently.

Specifically, the board established the Recovery Board Fraud Hotline for the public to report potential cases of fraud, waste, and abuse related to Recovery Act funds. The board analyzes the information obtained through the Hotline and refers potential cases of fraud and waste to the relevant IG or agency for further review. This Hotline maintains a database of all reported complaints in order to identify issues or entities that cross organizational boundaries. In addition, the board has created a technologically advanced system to screen, analyze, and manage Hotline complaints. Among other things, the board's system uses a proprietary analysis tool to identify obscure relationships between entities to provide information for potential investigations and audits and to help focus oversight resources where they are needed most.

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2. A review of how an individual OIG could use the information in the Hotline repository in ways that go beyond the pursuit of individual allegations. An examination of the entire universe of allegations received could provide a snapshot of the ethical temperature of the department or agency and invite trend analysis that can identify growing problems and highlight areas that require attention. The rapid development of technology has allowed for the detection of trends among any combination of fields in the repository such as offense, administrative or criminal, problems that develop more significantly at a certain geographic location, or among a certain job series or pay grade. Such analysis could assist leadership in the allocation of resources and offer the potential to remediate problems at an early stage. OIGs could strengthen the results by carefully analyzing the relationship between types of information that would provide desired reporting results and the information that is derived from individual reports and reports requested from bureaus and offices.
 3. A review of how smaller OIGs should structure their Hotlines so that they can maximize the use of federal employee Hotline staff, despite possible resource limitations. For example, the review might explore whether it would be effective for smaller OIGs to either have joint Hotlines with other smaller OIGs or to contract with larger OIGs for assistance in running their Hotlines.
 4. A review of the policies and procedures relating to whistleblower-related issues within the OIG community. This review would identify and highlight best practices that have been proven effective for individual OIGs.

Appendix A

Purpose, Scope, and Methodology

We undertook this review at the request of CIGIE’s Investigations Committee. The purpose of this review was to provide guidance to OIG Hotline operators. Specifically, our goal was to review the practices of several OIG Hotlines in order to identify best practices for improving Hotline performance, defined as increasing the percentage of allegations that are substantiated by subsequent OIG investigations. In addition, we identified certain issues that affect the entire OIG Hotline community as well as areas that might merit further review. Although we recommend certain practices and procedures throughout the report, we do so with the caveat that OIG Hotlines are as diverse as the OIGs they serve, representing organizations of various sizes, program-related missions, and complexities. In addition, each OIG Hotline has different resources, complaint volumes, and staffing concerns. As a result, we cannot recommend any practice as a one-size-fits-all solution to an OIG Hotline’s issues and concerns. Rather, we offer recommended practices that have proved successful for other OIG Hotlines or that a consensus of experienced Hotline operators have recognized as a worthy of sharing with the larger OIG Hotline community. These recommendations are narrowly tailored to address OIG Hotline operations generally and the OIG intake process specifically.

This report is not intended to provide guidance with respect to an OIG’s decision as to what matters merit the allocation of its investigative resources, nor is it intended to provide legal advice to OIG Hotline practitioners. In addition, we did not undertake to provide a comprehensive analysis of the rights and protections afforded to whistleblowers. Further, this report is not intended to be a response to any recent reports or surveys examining OIG Hotlines.

Our Working Group was staffed with attorneys and Hotline operators from OIGs of various sizes and included representatives of presidentially appointed and designated federal entity OIGs. We also used data generated by a previous CIGIE Investigations Committee study of OIG Hotlines conducted by the Social Security Administration. In addition, we interviewed various Hotline operators and other concerned parties.

Telephone Operations

Automatic Call Distributor (ACD)

ACD systems are composed of hardware, software, and telecommunications that route incoming calls to workstations/terminals. ACDs are typical in a Hotline environment where multiple representatives receive inbound calls. These systems can be provided by the network carrier (phone company) or acquired as complainant premise-based equipment. ACDs use predefined routing plans to send calls to the next available representative. ACDs can also use specialized routing plans or “gating” features to segment call routing by specialization. Groups of Hotline representatives with certain expertise may be designated to handle specific types of calls, and the ACD will accommodate these requirements. ACDs can provide management information to assist Hotline managers in assessing organizational and individual performance.

Interactive Voice Response (IVR)

IVR is a technology used by many Hotlines to eliminate the need for human intervention for every incoming call. IVR systems use a combination of directed or natural speech and/or dual-tone multi-frequency (DTMF) telephone push buttons to facilitate interaction between the caller and a series of recorded prompts and messages. Businesses use prerecorded scripts with menus of options that lead callers through the IVR application. Many transactions can be completed automatically without the need for the caller to speak with a Hotline representative. This can save substantial time and money for the Hotline but can also cause frustration for the caller if the application is not properly engineered.

IVR applications are used to segment callers and direct them expeditiously to the appropriate services. Some calls may be satisfied by offering a prerecorded message giving the information the caller is seeking. Other calls may interact with an organization’s database to obtain information such as the status of a pending request. IVR applications can also perform voice-capture operations to facilitate data collection for electronic forms processing. Finally, IVR applications can route calls to a Hotline representative when the caller must speak to a representative.

IVR functionality can be obtained through a telecommunication provider’s network or acquired as part of the Hotline’s on-premise infrastructure.

Directed and Natural Speech

IVR applications function using DTMF inputs or the spoken word. When IVR prompts a caller to “say or press,” both DTMF and speech are supported because the caller can press the digit on the telephone instrument or speak the digit to register a response.

Directed speech applications limit the choices a caller can give in response to a query, e.g., “Say 1 for English.” However, more advanced applications are using natural speech or technology that is sometimes referred to as “speak freely.” Rather than being directed to a limited number of acceptable responses, the caller may say anything, and the application uses predefined speech dictionaries to interpret, translate, and act on the response. For example, in a natural speech application, the caller may hear an introductory message that says, “Thank you for calling XYZ Company today. In a few words, please explain the reason for your call.” Based on the caller’s response, additional questions may be offered to pinpoint the exact business transaction being requested. If intelligent natural speech applications cannot determine the reason for the call, the call is routed to a Hotline representative for handling.

Speech-to-Text Translation

This technology enables callers to interact with corporate databases and to leave information for later transcription. Using a telephone, callers can speak alpha and numeric information, which is interpreted and translated into machine-readable text. For example, a caller may want to confirm an upcoming flight. A natural speech application might prompt the caller to explain the reason for the call, and upon hearing “I want to confirm my flight reservation” would then prompt for the exact flight number and date of travel. This spoken information would be translated and confirmed with the caller. Once the data are verified, the speech that has been translated to text is then used to query the airline’s database to determine flight status. That information is then spoken back to the caller through prerecorded messages or phrases.

An additional application for this technology allows a caller to complete a form over the phone or receive something via the U.S. Postal Service. A voice capture application using speech-to-text translation will prompt the caller to speak information, prompt for verification, and enter the verified data into the form. In cases where a mailer is requested, the spoken information that was captured over the phone is automatically transcribed to generate the outgoing letter. No human intervention is necessary.

Computer Telephony Integration (CTI) Screen Pop/Screen Splash

CTI integrates telephone communications with computer databases. Similar to the technologies outlined above, CTI applications translate the caller’s spoken words into text that is used to access internal corporate databases. CTI applications are used in

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complainant relationship management to segment callers for specialized treatment. This technology uses the Automatic Number Identification (ANI) of the caller (phone number from which the call was generated) coming from the phone company as the first identifying item of information about the call. ANI data are matched against internal corporate databases to locate a repeat caller. Predefined call handling rules are applied to call routing. For example, in retail industries, callers may be routed to the top of the queue if their annual purchase volume exceeds a certain threshold. In other cases, repeat or difficult callers may be routed to a specialized Hotline group that deals with more complex issues. This type of functionality is also referred to as caller recognition routing.

Financial institutions may use their IVR to prompt the caller for an account number. This information is used to locate the caller's records before the call is delivered to a representative. Once the record is retrieved from the database, that information is displayed on the Hotline representative's computer screen as the telephone call is delivered. Searching for and displaying complainant data in synchronization with call delivery is called Screen Pop or Screen Splash. This time-saving technology enables the representative to quickly authenticate the caller and complete the business transaction.

Queue Management

As Hotlines become more popular and call volumes increase, the inability to handle every call quickly results in a queue. Depending on the available human resources to answer calls and the call volume forecasts, Hotline managers will want to adjust the queue depth—the number of calls that can be placed on hold—according to expected performance. Once the threshold is met and the queue is full, every subsequent call deflects to a busy signal or informational message. Advanced queuing technologies enable phone systems to evaluate the current average length of calls, incoming volume per time interval, and available representatives to estimate the average wait time for the caller. Intelligent queuing announces this information to callers, giving them the option to hold or terminate their call.

More advanced techniques for queue management now include scheduled voice callback (SVC) and virtual queue (VQ). SVC allows callers to specify a day and time when they wish to be called back. VQ allows callers to hold a place in queue, but then disconnect and receive a call when their queue position arrives, rather than wait on hold on the line. Outbound predictive dialers use the incoming or entered callback numbers to automatically place the outbound calls.

Intelligent Call Routing (ICR)

ICR solutions are advantageous in cases where Hotlines are geographically dispersed and call volumes are large. ICR uses a combination of network technology and software to manage the entire distributed Hotline enterprise. ICR continuously analyzes traffic volume coming into the network and available answering resources among all linked

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Hotlines. ICR automatically detects when a seat in the enterprise is no longer available at a single location and makes routing adjustments accordingly. These intelligence-based routing platforms minimize call wait time and maximize answer rates and Hotline productivity. These systems can be provided by the telecommunications provider or acquired as complainant premise-based solutions.

Virtual Front Office (VFO)

A VFO provides one central point of contact for all incoming calls to an agency. Callers dialing any field office will be seamlessly routed to one central intake unit, usually headquarters. At that point, the call will be routed to the appropriate destination (Hotline, requested party, externally, etc.). Calls that are routed to the Hotline can be triaged, and any allegations that need immediate action can be forwarded to duty agents in the local area from which the call originated.

Voice over Internet Protocol (VoIP)

VoIP technology enables users to make and receive telephone calls over a broadband Internet connection instead of over a traditional phone line. This system is a single network that combines voice and data transmissions. Voice traffic is converted into data packets and transmitted over the public Internet or over a private network. A basic system requires broadband Internet connection and a VoIP-enabled phone. This technology enables employees to maintain access to office networks whether at work or at home. Staff working remotely can answer calls and access networks. This tool simplifies and streamlines work processes.

Still a relatively new technology for many businesses and government agencies, VoIP promises to reduce overall telecommunications costs because telephone calls travel over the data network rather than the phone network. This technology also facilitates further integration of phone and computer applications, especially on the Internet. For example, Internet users may find it easier to use a “Click to Talk” icon from a web page to speak with a representative about the transaction they are attempting to complete online.

Facsimile

Fax technology is still a viable service channel for Hotlines. Complainants may want to write a letter and expedite its delivery by sending the correspondence using a fax transmission. In some cases, they may follow up with the original paper copy.

Internet Operations

Internet

Complainants usually want multiple options to reach a business or government entity. Hotlines can no longer offer only a single channel for complainants to reach their enterprise, but must be ready to handle all channels of communication.

Complainants may call, write, fax, or send an electronic web form to complete their business transaction, or may opt for social networking sites as a means of conducting business. Telephone call centers have evolved into contact centers because of technological advances and the public's desire for service alternatives.

Complainants are increasingly using the Internet to transact business. However, web applications must be designed for maximum efficiency so that complainants do not become frustrated or feel that their time is being wasted. Electronic forms should be clear, concise, and understandable. Web developers should follow established guidelines for form development, presentation, and complainant use. These applications must operate in a secure environment where users have full confidence that their personally identifiable information will not be compromised. In some cases, the application will use a personal identification number and password to register the user.

Hotlines must also carefully plan for the introduction of additional business channels. While Internet transactions relieve traditional call center representatives of inbound telephone calls, a separate new workload is created if the Internet transaction requires human intervention. Some businesses use a completely separate group of employees to handle Internet/email traffic versus telephone traffic, while others take the "blended agent" approach, where the same employees handle all channels of business transactions. Telephone operations may be limited to certain hours in the day, whereas Internet websites are available 24/7. Transactions will continue to arrive at the organization regardless of whether it is open for business at the time complainants send their requests.

Social Networking

Social networking Internet sites, including Facebook, MySpace, Twitter, and blogs, are becoming more popular with a wide range of online complainants. Hotlines may need to incorporate these entities into their line of service channel offerings as the desire to use these sites increases. As with other websites and applications, access should be engineered for simplicity and security. In particular, OIGs should take care not to provide open access to sensitive or *Privacy Act* information.

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Hardware

Scanning Operations

Many businesses are moving away from paper to optical imaging. Scanning can reduce time spent handling paper and the costs associated with printing and storing documentation. Scanners are designed to meet the needs of almost any workload or operation. High-speed scanners are best for organizations with large volumes of paper, while lower-speed units may be satisfactory for smaller operations.

Scanners can read and create images, and some can read, interpret, and translate documents. For example, optical character recognition devices can read, interpret, and translate mark-sense codes or bar codes. Intelligent character recognition devices can read the same data but can also read and interpret handwritten characters. Scanning operations must be designed with indexes so that the optical image can be easily retrieved. Legal requirements may dictate that some original documents be retained to meet evidentiary requirements in litigation.

Wireless Technology

Wireless devices are becoming more prevalent in today's technological architectures. Physical plant wiring can be expensive and difficult depending on the facility in which it is being installed. Wireless networks that include routers, workstations, and printers are simplifying the installation of computer equipment. Wireless headsets allow employees to be mobile in a call center. Rather than being tethered to the phone instrument, wireless headsets enable employees to walk about the center, perhaps interacting with a senior technician or manager, while still engaging the caller.

Hotlines should evaluate wireless technology for efficiency of operations. However, system designers must ensure that wireless local area networks and other devices are secure, as this has been problematic for wireless computing in the past.

Software Applications

Decision Support Systems

Hotlines may use software applications known as decision support systems to guide representatives through a telephone interview. These desktop applications display on-screen decision trees to assist the staff in eliciting the maximum amount of useful information based on caller responses. Online policy and procedures, frequently asked questions, and other commonly requested information can be made accessible as online desk aides for swift retrieval by the Hotline representative. Organizations can purchase commercially available off-the-shelf products or develop their own in-house applications.

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Case Management Systems

Hotlines frequently serve as data collection points for government and business operations. Systems to collect, store, retrieve, and report on complainant contacts are essential. Complainant relations management applications store useful information about complainants to assist in future interactions. Case management systems store data about an inquiry and can be used to refer that transaction to the appropriate authority for further action. Case management systems can be developed internally or acquired commercially.

Typically, case management includes a back-end database that stores predefined data elements essential for the operation of the business. The user interface or front end can be designed using a variety of software tools. The system must be capable of providing management information reports to inform on a variety of metrics as defined in the business requirements. Report-writing tools such as Crystal and Hyperion are examples of proprietary products that can be used for this purpose.

Workforce Management Software

Medium- to large-scale Hotlines should consider workforce management software to assist in managing the enterprise. These applications allow Hotline personnel to enter parameters relating to expected call volumes, anticipated staffing, and other workloads requiring human resources. Hotline personnel will need a good understanding of their workload characteristics, including historical call volumes, average call length, average after-call work time, not-ready time, and other statistics. These parameters enable the software to calculate and project service levels and performance. At pre-specified time intervals throughout the day, workforce management software will suggest staffing levels to meet the expected call demand. These applications consider lunch periods, priority workloads, specialized call gating, and emergency conditions.

Language Translation

As Hotlines strive to meet the demands of a more diverse population, language translation services may be considered. A variety of businesses offer language translation and this service may be advisable for organizations with a large volume of non-English-speaking complainants.

Appendix C Hotline Technologies Evaluation Chart

Hotline Technologies Evaluation Chart

Technology	Pros	Cons
Automatic Call Distributor (ACD)	<ul style="list-style-type: none"> Automatically distributes calls based on predefined rules and algorithms Evenly distributes incoming calls among all representatives Collects and provides management information May include additional functionality including IVR and voicemail Provides efficient call routing Saves time Simplifies call distribution 	<ul style="list-style-type: none"> Can be expensive to implement Requires technical expertise for setup and maintenance Inefficient for small Hotlines
Interactive Voice Response (IVR)	<ul style="list-style-type: none"> Automates call handling completely or in part Effective for providing general information to callers Expedites call handling by prompting for needed service and then routes call appropriately Reduces labor costs 	<ul style="list-style-type: none"> Can be expensive to implement Requires technical expertise for setup and maintenance Can be frustrating for callers who want to speak to a live representative
Directed Speech	<ul style="list-style-type: none"> Implementation is quicker and less costly than natural speech Routes calls efficiently Limits choices, less confusing 	<ul style="list-style-type: none"> Limits opportunity to identify true complainant need Less flexibility in call routing
Natural Speech	<ul style="list-style-type: none"> More conversational for caller Offers more opportunity to identify true complainant need May result in faster call routing and issue resolution 	<ul style="list-style-type: none"> Takes more time and money to develop Technology continues to evolve May frustrate callers who speak with a dialect or who don't understand the prompts
Speech to Text Translation	<ul style="list-style-type: none"> Enables voice capture applications for self-help Potential labor cost reduction Facilitates IVR 	<ul style="list-style-type: none"> Can be expensive to implement Requires technical expertise for setup and maintenance Can be frustrating for callers who want to speak to a live representative
Computer Telephony Integration Screen Pop/Splash	<ul style="list-style-type: none"> Expedites call handling by gathering information about the caller/account before the call is delivered to a live representative Facilitates flash messages to Hotline call center operators Links telephone network systems to internal legacy data for quick data retrieval Supports faster caller authentication 	<ul style="list-style-type: none"> Requires complex software design Can be expensive to implement Requires technical expertise for setup and maintenance Not suitable for Hotline call centers without a Customer Relationship Model (CRM) requirement

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Hotline Technologies Evaluation Chart

Technology	Pros	Cons
Queue Management	<ul style="list-style-type: none"> Reduces costs through shorter wait time and less calls in queue Reduces caller frustration resulting from long wait times More efficient and flexible call handling Usually included with ACD 	<ul style="list-style-type: none"> May not be suitable for very small Hotline call centers with a low volume of traffic
Intelligent Call Routing	<ul style="list-style-type: none"> Maximizes live representative productivity by directing calls to the next available agent wherever they are physically located Useful for geographically dispersed Hotline call centers when calls must be redirected from one site to another Reduces human error involved in manual call routing to multiple sites 	<ul style="list-style-type: none"> Can be expensive Useful only for large Hotline call centers with multiple physical locations Requires complex routing plan designs and significant technical expertise
Virtual Front Office (VFO)	<ul style="list-style-type: none"> Provides central intake point for incoming administrative calls Ensures consistent handling of all calls More effective use of non-administrative personnel who are freed from answering administrative calls Relatively simple to implement 	<ul style="list-style-type: none"> Requires adequate staffing at central intake point to avoid missed calls Requires VFO personnel to be well-versed in all aspects of the organization's mission Some calls may be routed to several destinations before reaching the right one
Voice over Internet Protocol	<ul style="list-style-type: none"> Reduces costs by integrating voice and data communications on a single network Facilitates interface between telephone and Internet applications 	<ul style="list-style-type: none"> Relatively new technology especially for toll-free voice service Potential degradation of voice communications without appropriate grade of service network designation
Facsimile	<ul style="list-style-type: none"> Inexpensive to offer Universal availability and use Can interface with other electronic systems Available 24/7 	<ul style="list-style-type: none"> Represents another workload channel to which resources must be assigned Some data may be illegible Cannot control volume of incoming work items
Internet	<ul style="list-style-type: none"> Inexpensive to offer Near universal availability and use Can interface with other electronic systems Provides great flexibility in providing and collecting information Available 24/7 	<ul style="list-style-type: none"> Represents another workload channel to which resources must be assigned Cannot control volume of incoming work items Must ensure secure network for privacy/integrity Subject to "spammers" Requires web developer and /or support personnel for setup and maintenance
Social Network Sites	<ul style="list-style-type: none"> Provides another venue for communicating with the public Can be useful to reach a younger demographic 	<ul style="list-style-type: none"> Must ensure secure network for privacy/integrity

Appendix C

Hotline Technologies Evaluation Chart

Technology	Pros	Cons
Scanning	<ul style="list-style-type: none"> Reduces physical storage costs Expedites and streamlines work processing 	<ul style="list-style-type: none"> May represent a duplicative workload if paper must be retained for legal documentation Requires technical expertise for setup and maintenance
Wireless Equipment	<ul style="list-style-type: none"> Wireless headsets facilitate Hotline call center representatives' mobility 	<ul style="list-style-type: none"> N/A
Wireless Networks	<ul style="list-style-type: none"> Reduces physical plant expenditure for equipment wiring and environmental Facilitates flexible hardware installations 	<ul style="list-style-type: none"> Data/network security can be problematic
Decision Support Systems	<ul style="list-style-type: none"> Enables live representatives to conduct a more effective phone interview based on pre-defined interview scripts and caller responses Integrates multiple data sources for quick retrieval during the phone interview 	<ul style="list-style-type: none"> Requires technical expertise for setup and maintenance Can be expensive to implement May require MOUs/licenses to access external data bases
Case Management Systems	<ul style="list-style-type: none"> Provides information about the status of allegations and cases Supports management decision making Serves as central repository for all workloads Can provide CRM parameters 	<ul style="list-style-type: none"> Requires technical expertise for setup and maintenance Can be expensive to implement and maintain Data must be secure to avoid integrity breach
Workforce Management Software	<ul style="list-style-type: none"> Facilitates human resource management decisions in a Hotline call center environment Makes human resource utilization more efficient Supports trend analyses for planning purposes 	<ul style="list-style-type: none"> Not useful for very small Hotlines with limited human resources May not be useful for organizations with a mix of phone and non-phone workloads
Language Translation	<ul style="list-style-type: none"> Enables the Hotline to serve a multi-lingual clientele 	<ul style="list-style-type: none"> Can be expensive depending on the volume and nature of use

Appendix D
Major Contributors to This Report

The CIGIE Hotline Working Group

The CIGIE Hotline Working Group consisted of representatives of the following Offices of the Inspectors General:

Appalachian Regional Commission

Commodity Futures Trading Commission

Department of Commerce

Department of Defense

Department of Homeland Security

Department of Housing and Urban Development

Department of Labor

Department of Veterans Affairs

Federal Maritime Commission

Legal Services Corporation

Small Business Administration

Social Security Administration

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