

(TOA)

I recommended a pan-Navy
help line/hotline. A year

later it was thought
to be a great
success

MR

5/10/16



INSPECTOR GENERAL
DEPARTMENT OF DEFENSE
400 ARMY NAVY DRIVE
ARLINGTON, VIRGINIA 22202

GENERAL GUIDELINE
FOR
ESTABLISHMENT OF A HOTLINE REPORTING SYSTEM

The following is a general discussion of issues to be considered and possible methods to be employed when establishing a Hotline type program for the reporting of alleged fraud, waste, abuse, mismanagement, treason, or other such issues to the highest levels of government. Although the concepts and methods addressed herein have been effectively employed by the United States Department of Defense Hotline Program, the material may not be appropriate for use in all instances due to the differences existent in different government operations.

1. Authority. The effectiveness of a hotline program is dependent upon the existence of an agency regulation or governmental legislation authorizing the establishment and operation of such a program; lack of such authority leaves the program open to challenge by other governmental elements. The document should authorize the creation of the program, provide for the staffing of the unit, set forth the authority to receive and evaluate information, and specify the relationship and responsibilities of the other components of the government to the hotline program. DoD Directive 7050.1, Defense Hotline Program, the governing document for the Defense Hotline, is provided for your information.

2. Operating Agency. The agency or organization tasked with the responsibility for day to day operations of the Hotline system must be at the national level of government and possess the stature needed to ensure the cooperation and compliance of other governmental elements. Selection of the operating agency should be in accordance with the availability and expertise of the personnel resources required to handle the problems. For example, if it is anticipated that the major effort of the program is to be directed within the criminal fraud area, a criminal investigative organization is the logical element to be charged with the responsibility for establishing and operating the Hotline.

3. Policy and Procedural Considerations. The following are matters which should be addressed during the initial phases of the development of the hotline system.

a. Goals and Objectives. A clearly defined set of goals and objectives must be promulgated to ensure that the program developers, operators, field customers, and monitors

understand the purpose of, and their role in, the Hotline program.

b. Governing Documentation. A government, agency, or organization directive, regulation, or policy document which specifies the program operational policies, procedures, and responsibilities should be published. The document should also contain the requirements and responsibilities of other elements of the government, agency, or organization to the Hotline organization. DoD Directive 7050.1 is the governing document for the Department of Defense, and contains the above mention requirements.

c. Source Protection. The success of any program which relies on the voluntary disclosure of information is dependent upon the ability of the program to protect the identity of such sources from becoming known and subsequently suffering reprisal action. Legislation and/or regulation prohibiting reprisal action against individuals who provide, in good faith, information relating to real or perceived instances of reportable violations, must be enacted to protect these sources. In addition, internal operation policies and procedures should be developed to insure the protection of the source's identity. The following are methods employed by the DoD Hotline to ensure avoidance of the inadvertent disclosure of the identity of the source. Detailed information on the methods used by the Defense Hotline are contained at enclosure 2.

(1) All information which may tend to identify the source is deleted (edited) from all letters, document or other material, when such matter is to be provided to offices outside of the Hotline. Personal pronouns such as "he" or "she" may be replaced by the term "source". Information which may tend to provide specific details about the office or unit of the source is edited from the document. If any of the related documents (letterhead, enclosures, envelopes, etc.) contain identifying information, such data is also removed.

(2) Any correspondence which has been handwritten by the source is transcribed and only the typed material is provided for examination. Any correspondence where the typewritten material contains unusual or readily identifiable characteristics which may be traceable to the information source is retyped and only the retyped document is provided for examination.

(3) Correspondence which contains information which can be traced to the source, is rewritten prior to referral for examination. If protection of the source is not possible through this method, attempts will be made to contact the source and advise him/her of the inability to process the matter without possibly revealing his/her

identity. An example of such an instance is where the source is the only witness to the violation and any revelation of the facts will immediately be attributed to the witness (source).

(4) All correspondence which is to be referred for examination is marked with warning CAVEATS which alert the reader to the sensitivity of the material and restricts dissemination of the information contained in the report.

4. Operational Considerations. The following recommendations are derived from experience gained during 8 years of DoD Hotline operations. Implementation will minimize the time required to review, research, and evaluate reported issues; determine the need for and nature of examination; and finally to properly and objectively analyze the reported results of the inquiries.

a. Personnel Staffing.

(1) Manning Level. The number of personnel required to staff a hotline office will depend upon the known or anticipated number of complaints which will be received during a given period of time and the requirements established for the disposition of the allegations/complaints received. Failure to provide adequate personnel support may result in staff personnel "burnout" due to excessive workload. This is a real issue of concern; experience has shown that even the best of our staff members could not adequately handle more than 8 to 10 substantive calls in an eight hour day over an extended period of time. Employees attempting to constantly handle telephonic complaints for periods in excess of 90 days normally exhibited evidence of nervous strain, lacked accuracy in reporting details of the interview, and were not as efficient and tactful in handling telephone sources toward the end of the period.

The Defense Hotline currently employs a staff of sixteen personnel. Under the current workload, the program averages approximately 800 to 1,200 telephone and letter contacts per month. Four staff personnel are utilized to receive, evaluate, process, and refer for examination, those matters considered to warrant such action. Three staff personnel are assigned to review and analyze the reports of investigation received from the examining agencies to ensure each complaint has been properly examined and corrective measures, if warranted, is taken by the responsible officials. Two employees are involved with operations analysis and the conduct of field quality assurance reviews. The Hotline requires four personnel to support the administrative requirements of the program. The remaining personnel perform management and supervisory functions. This is the minimum staffing level which will adequately support the operational requirements of a program of the size and

responsibility of the Defense Hotline.

(2) Job Specialties and Experience. Selection of personnel to man the staff positions should be based on the area of prime interest to the program managers. If criminal activity is the primary program focus, then the staff should consist of personnel with experience and knowledge of the criminal investigative field. The same criteria would apply if the primary interest is to reduce problems in contract administration; experienced contracting officers should be utilized because of their knowledge of contract and procurement laws, regulations, policies, procedures, and possible problem areas. The experience level of these employees must be sufficient to enable them to demonstrate knowledge of the issue under discussion; to evaluate the complaints being raised by the caller/writer; to ask the appropriate questions and provide guidance, where possible, to enable the source to resolve the matter through the proper local channels.

(3) Employee Grade Structure. A recent review of the various United States Government agency hotline offices reflected a wide disparity in the grades of the employees utilized in the programs. It was also noted that the lower the grade of the employee, the less the capability of the individual to discuss, understand or properly handle the issues being presented. At the onset of the program, the Defense Hotline utilized employees in the grades of GS-7 through GS-12 as action officers. It was found that the senior personnel were more effective and efficient in eliciting information from the callers, dealing with problems being presented, and determining which issues warranted examination or other action. In all instances, this was attributed to the higher grade personnel possessing a broader field of knowledge of and greater experience with such issues; gained through exposure to field operations and staff assignments. It is therefore suggested that hotline desk or action officer positions be established at the GS-13 or equivalent grade level.

b. Equipment Requirements. The equipment covered in the following paragraph is currently in use in the Defense Hotline. However, the employment of the equipment should be dictated by volume of material being received by the program, and of course, the availability of funds.

(1) Multi-line Telephone Instrument. The Hotline utilizes several different telephone system networks to ensure that both government employees and the general public have ease of access to the Hotline. Commercial, Federal (Federal Telephone System [FTS]), Defense (Automatic Voice Network [AUTOVON]), and Toll Free telephone networks are employed. Each network has two incoming lines with separate telephone numbers. The Hotline has sixteen 20

button telephone instruments which permit simultaneous use of all the lines and access by all staff members.

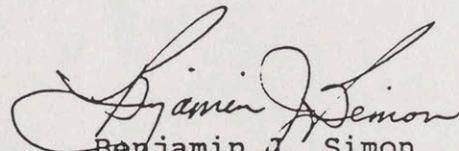
(2) Code-a-phon Answering Machines. The Hotline operating hours are from 0800 to 1630 hours during the duty day. During non-duty hours, a code-a-phon machine provides a recorded message which informs callers of the Hotline operating hours. The caller is requested to call during the cited hours but is also informed that he may present his complaint in writing, if such action is more convenient. The use of recorders to take complaints during nonoperating hours is not recommended. Recorded complaints normally lack the detail required to support the initiation of a formal inquiry. Most callers are not aware of what information is required for such matters and generally provide such data only with the prompting of a trained and experienced investigator. Additionally, if the caller is anonymous and fails to provide sufficient of significant details, there is no way he can be recontacted, and a potentially valuable investigation is lost.

(3) Computer Equipment and Software Support. The Hotline has a current average pending case inventory of 750 investigations. There are over 13,000 case records in the closed case files. During early development of the program, manual administration and control of the case load was deemed to be inefficient due to the volume of complaints. In order to obtain efficiency in the control of files, the Hotline records were automated in early 1983, and further improvements have been made since that time. The current Hotline Management Information System (Computer system) is capable of rapid retrieval of complaint data by case control number, if known, or by source, subject, or organization name. The complaint may also be retrieved using a combination of date, type of allegation, and general location of the problems, if such information is known. The system provides for automatic assignment of case control numbers and can also produce status data, case activity, case suspense, and information analysis reports. The system is used by the staff to draft reports of complaints (word processing), relieving clerical personnel from having to duplicate the efforts of the action officers, and to make input of data upon receipt of the action. The computer reports program alone has resulted in untold manhour resources being made available for other tasks due to the saving in research time previously required for statistical reports. It is recommended that a computer network be established and supporting programs be developed and utilized as an integral part of any contemplated hotline type system.

(4) Working Space and Environment. Provision of a spacious and pleasant working environment is critical to acquiring and retaining an efficient, tactful and courteous staff. The constant involvement with situations which

require immediate attention, continued exposure to the complaints and demands of the general public, combined with a never ending workload and the frustrations of witnessing ineffective operations within the government organizations, give rise to high stress and tension in the staff members. When subjected to cramped, poorly ventilated and lighted working conditions, staff members exhibited evidence of "burnout" within five to six months of arrival and their condition necessitated assignment to other duties. Placing the staff in improved conditions significantly improved the efficiency, morale, and retainability of the employees.

The attached enclosures provide detailed information regarding the day to day operations and procedure of the Defense Hotline. It should be emphasized that these are merely guidelines which are flexible and subject to modification. Should additional information be desired, please feel-free to contact me at area code (202) 694-9068 or write to the Defense Hotline, 400 Army Navy Drive, Suite 957, Arlington, VA 22202.


Benjamin J. Simon
Deputy Director for
Special Programs (Hotline)