

## CEP Magazine – February 2023



Peiman Saadat ([saadatp@acpny.com](mailto:saadatp@acpny.com)) is Vice President and Corporate Compliance Officer at AdvantageCare Physicians PC, in New York, New York, USA.

### Compliance hotline cases: A risk-based approach

---

By Peiman Saadat, MD, MS, CHC, CHPC

Compliance professionals regularly face various work-related challenges, yet the one shared most by everyone is timely access to accurate information. Such timely access is the key to compliance effectiveness mitigating the potential or existing risks within the organization. Access is usually obtained through getting a seat at the table, performing data mining, internal auditing, interviews, walkthroughs, compliance risk assessment, etc.

While compliance and ethics hotlines are accepted as the primary mechanism for employees to report nuances of fraud, waste, and abuse, hotlines are also considered a means for compliance professionals to access information. In fact, a compliance and ethics hotline can serve the compliance program as a direct line of communication between compliance professionals and employees—with no fear of retaliation. Organizations with hotlines detect fraud more quickly and have lower losses than those without hotlines.<sup>[1]</sup>

The United States Sentencing Commission (USSC) set the elements of an effective compliance and ethics program, stating that every organization shall take reasonable steps “to have and publicize a system, which may include mechanisms that allow for anonymity or confidentiality, whereby the organization’s employees and agents may report or seek guidance regarding potential or actual criminal conduct without fear of retaliation.”<sup>[2]</sup>

The piece that has been highlighted by the USSC, yet mostly undermined by the compliance professionals, is “seeking guidance.” Employees and agents should be able to use compliance and ethics hotlines to ask a question and seek guidance—even anonymously.

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

[Become a Member Login](#)