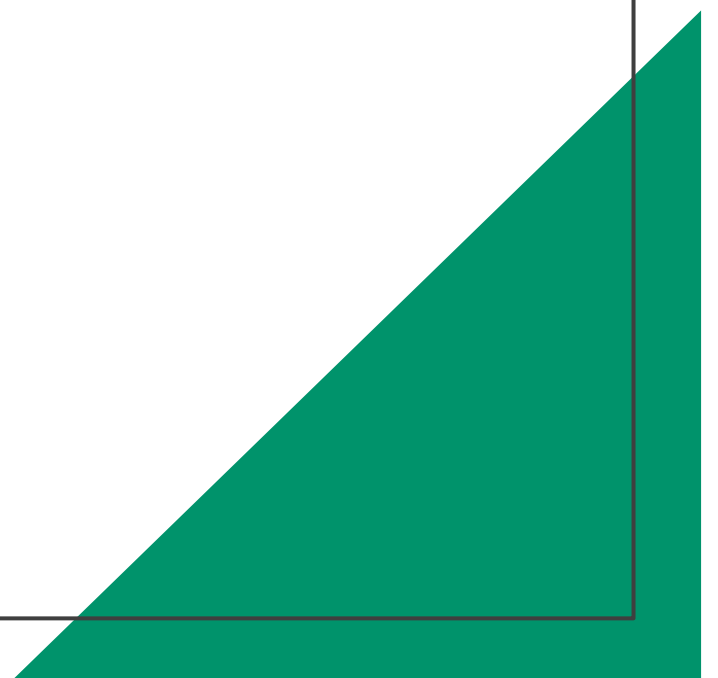


Hotline Harmony: Ensuring Oversight and Investigation Management

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Jereme has over 20 years of experience in litigation, research administration and higher education compliance. As Associate Risk and Compliance Officer at the University of Alabama at Birmingham, he leads compliance initiatives and advises diverse stakeholders across a wide range of areas, including policy development, research and regulatory compliance, risk assessment, and investigations. He also maintains a relatively healthy audiobook/podcast obsession and welcomes recommendations.

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a seasoned HR and compliance leader with over 30 years of experience. Her expertise includes investigations, policy development, and risk assessments, positioning her as a trusted advisor in complex regulatory environments. As Associate Risk and Compliance Officer at the University of Alabama at Birmingham, she draws on her prior role as Director of HR at UAB Hospital to lead privacy and compliance initiatives across the institution.

APRIL LONGLEY, CCEP

a seasoned expert in higher education compliance, known for her ability to navigate complex regulations and foster a culture of integrity. With a strong background in policy development, risk management, and regulatory compliance, she currently leads the compliance program for the University of Missouri System, ensuring operational efficiency and continuous improvement across multiple campuses.

Presenting Today

Learning Objectives

- Understand key components of **effective hotline oversight** in higher education settings
- Apply best practices to conduct **thorough, impartial** investigations
- Create **clear and comprehensive closing reports** that support accountability and trust

Why it matters

A MISMANAGED REPORT DOESN'T JUST DISAPPEAR – IT ERODES TRUST, DAMAGES REPUTATIONS, AND WEAKENS INSTITUTIONAL INTEGRITY





Key

Points

TRUST IS CURRENCY

If reports are mishandled, the hotline, and its owners, lose political and social capital

OVERSIGHT ENSURES FOLLOW-THROUGH

Even if your office isn't investigating, you're accountable for the system working

HOTLINES ARE FRONTLINE TOOLS

Hotlines are meant to surface issues early, before they escalate to a crisis

DOJ EXPECTATIONS

Accessibility, anonymity, and retaliation protection are key

INCONSISTENT HANDLING UNDERMINES CREDIBILITY

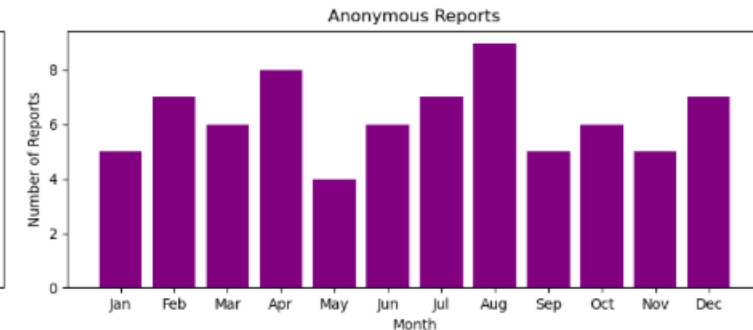
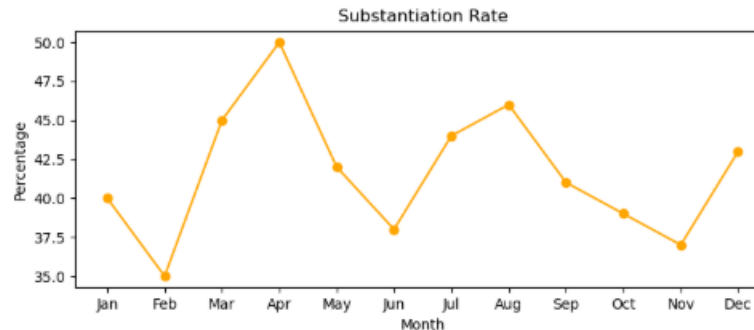
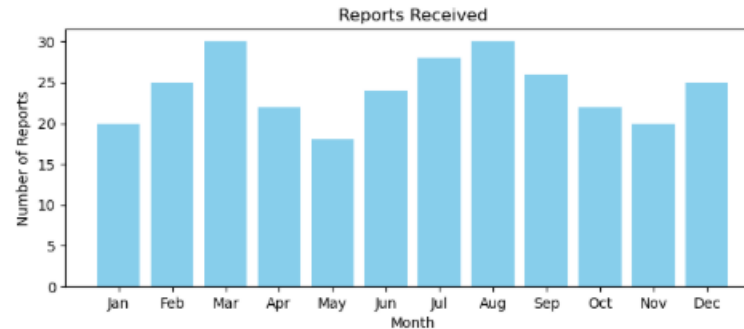
One dropped report can damage the perception of the entire system

EFFECTIVE OVERSIGHT PROTECTS PEOPLE AND INSTITUTIONS

It's not just about compliance, it's about culture and care

Best Practices for Higher Education Hotlines

- ❖ Promote hotline access widely (students, staff, faculty)
- ❖ Ensure ADA options are available
- ❖ Regularly review usage metrics and trends
- ❖ Assign a designated hotline coordinator or compliance officer
- ❖ Use report acknowledgement to provide assurance and set expectations (e.g., reports taken seriously and thoroughly reviewed, but reporter may not be notified of detailed outcome)



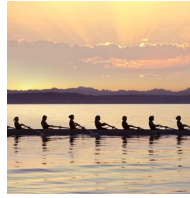
Foundational Elements of Hotline and Investigations Oversight

- **CLEAR GOVERNANCE STRUCTURE**
- **TRANSPARENT TRIAGE AND REPORTING**
- **NOT CONDUCTING, BUT ENSURING:**
Standards are met, deadlines are tracked, outcomes are reviewed, and trends are monitored
- **FEEDBACK AND IMPROVEMENT**
- **INSTITUTIONAL CULTURE & TRAINING**
- **METRICS FOR SUCCESS**



OWNERSHIP

Should have an executive sponsor who ensures the hotline has visibility, authority, and institutional support as well as a primary owner responsible to manage the operations and oversight



COORDINATION

Establish an interdisciplinary group that meets regularly to coordinate reviews, evaluate trends, and address issues



INDEPENDENCE AND INTEGRITY

Ensure that the hotline reports outside of just one unit and appropriate access control is in place to avoid conflicts, ensure there is access to report anonymously with anti-retaliation commitments clearly communicated and enforced

OVERSIGHT

- Oversight committee to review trends, effectiveness, and metrics, that includes senior leaders
- Report to the Board or a committee of the Board at least annually

INTAKE AND CASE MANAGEMENT

Designate an intake team to triage reports and to create and maintain documentation and investigatory standards

Governance Elements

Managing Investigations

- ❖ Encourage employees to raise concerns
- ❖ Help identify root causes of misconduct
 - ❖ Patterns or trend in reporting
- ❖ Demonstrate that the institution addresses concerns that are raised
- ❖ Mismanaged investigations can impact an organization's reputation or create additional risk exposure
- ❖ Investigations may result in an impact to someone's reputation or career, so they must be managed appropriately



Intake Process

OTHER POSSIBLE STEPS

1. Access hotline via portal, phone, in person, etc.
2. Initial triage with the designated intake team who reviews reports for clarity, completeness, and any immediate risks

Triage decision points – type of concern, jurisdiction, urgency

3. Assignment and referral – route to the appropriate investigating office based on issue type

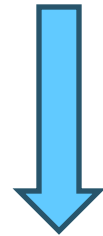
INITIAL REVIEW OF COMPLAINT

- What area is best situated to handle the investigation?
- Should Office of Counsel be included?
- Are interim actions needed pending investigation?



INTERVIEWS

- Can be difficult if anonymous
- Interview everyone you can!



IDENTIFY POLICIES

- What policies do we need to consider that may have been violated?
- May proscribe a specific procedure for conducting investigation and/or resolution of the complaint (e.g., research misconduct, Title IX)



RESULTS OF INITIAL REVIEW

- Open for investigation
- Refer to another unit
- Close the matter and provide guidance

Where do Investigations Happen

- ❖ Single investigator vs. investigative team
- ❖ Caseload considerations
- ❖ Representative from school/unit
- ❖ The process will vary depending on the function and the needs of the office conducting the investigation
- ❖ It is important to follow your process

Conducting Thorough Investigations

- ❖ DOJ expectations for investigations
 - ❖ Prompt response
 - ❖ Qualified, impartial investigators
 - ❖ Well-documented process
 - ❖ Corrective action based on findings

Gathering and Preserving Information

- ❖ Documents help build the narrative
- ❖ Request records promptly
- ❖ Initiate litigation or administrative holds
- ❖ Sequester physical and electronic documents
- ❖ Establish privilege protocols and preserve privilege where applicable
- ❖ Develop institutional protocols and record keeping standards



Interview Process

- ❖ Preparation
 - ❖ Drafting questions
 - ❖ Reviewing documentary evidence
- ❖ Format
 - ❖ Length of interview
 - ❖ In person, zoom, or phone
- ❖ Do you allow personal advisors?
- ❖ Do you record? Allow recording?
- ❖ Safety concerns
 - ❖ Physical security
 - ❖ Employee counseling
- ❖ Reminder of duty to report non retaliation policies



Investigative Report

- ❖ Develop a standard report template
- ❖ Catalog relevant documents
- ❖ Investigator's determination
 - ❖ Findings are fact based, not opinion based
 - ❖ Connect to relevant policy(ies)
- ❖ Investigator bias
 - ❖ Red and blue team program
- ❖ What is included in the system

Final Report

A STRONG REPORT TELLS THE STORY:

- ❖ What happened?
- ❖ What standards are implicated and how?
- ❖ What did the institution do about it?
- ❖ Does the institution need to do something to prevent this from happening again?
- ❖ Did the institution implement a preventative measure, did it need to?

DOJ LOOKS FOR:

- ❖ Clear documentation
- ❖ Reasonable conclusions
- ❖ Tracking of remediation

Transparency and Trust Matters

Closing reports may be internal, but they matter...

- Shows accountability to leadership and allows for better decision making
- Supports policy and training updates needed
- Reassures reporters that action is being taken

Close Out Process

- ❖ Updating the reporter
 - ❖ Notifying them that the matter was investigated and closed
- ❖ Corrective action
 - ❖ Who makes this determination?
 - ❖ How do you ensure corrective action has been completed?
- ❖ Training and education
 - ❖ Targeted groups focusing on the “what” and “how”
 - ❖ Incorporating the Code of Conduct as a framework

Effective Oversight Through Key Metrics

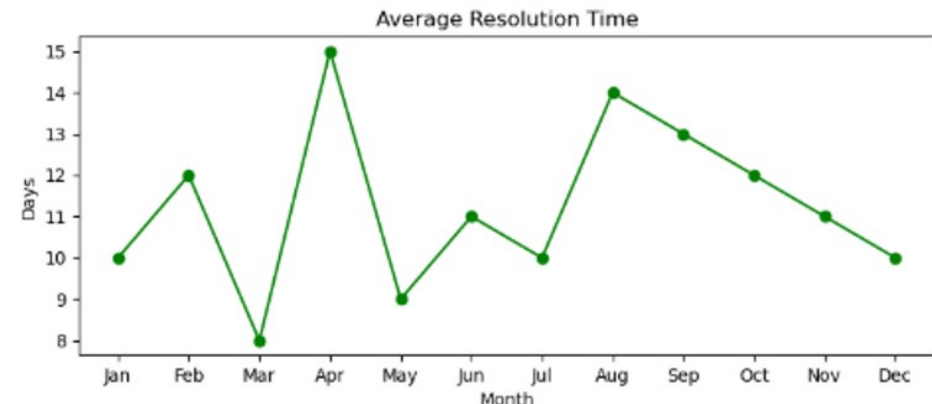
1. Reports Received

- Tracks engagement and awareness of the hotline, a sudden drop may indicate underreporting; a spike may signal emerging issues
- Good Oversight Practice
 - Monitor monthly trends and compare year-over-year
 - Cross-reference with outreach efforts or major institutional events



2. Average Resolution Time

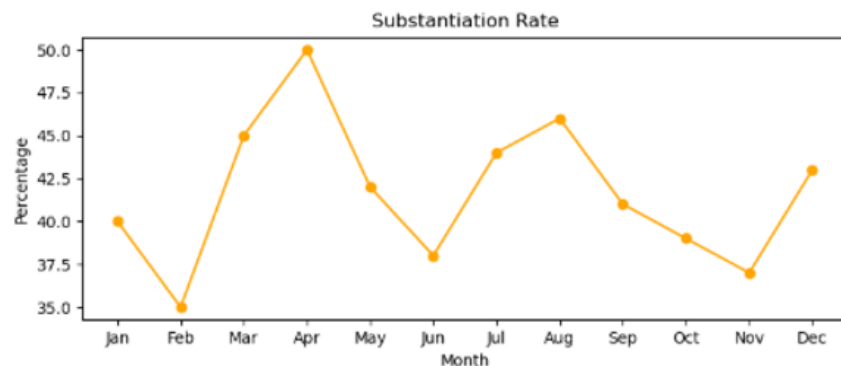
- Reflects the efficiency and responsiveness of your process, long delays can erode trust and increase risk
- Good Oversight Practice
 - Set internal benchmarks (e.g., resolve 80% within 30 days)
 - Flag outliers for review
 - Use resolution time to inform staffing and resource allocation



Effective Oversight Through Key Metrics

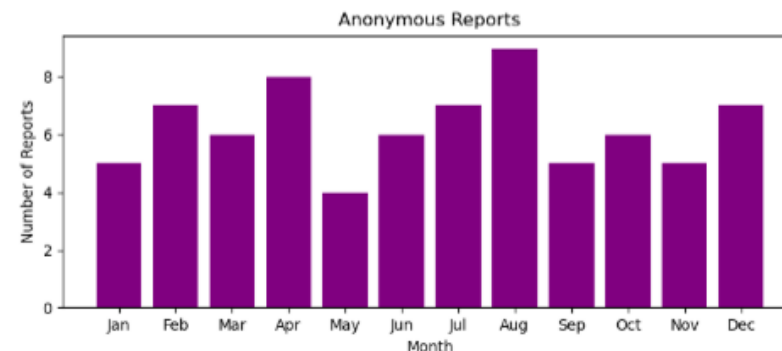
3. Substantiation Rate

- Can provide some insight into the nature of reports and how cases are assessed – but has its limits, low rates don't always mean false reports but can reflect documentation gaps, investigative constraints, or fear of retaliation
- Good Oversight Practice
 - Analyze by report type or source (e.g., anonymous vs. named) to detect patterns
 - Use trends to improve training or clarify policies and procedures



4. Anonymity Rate

- Context matters, the number of anonymous reports can signal perceptions of safety and trust in the system
- Good Oversight Practice
 - Pair with climate data or outreach feedback to understand underlying trust and safety dynamics
 - Analyze by population, issue type, or unit (if you can) to identify trends and disparities



Dashboard Snapshot

KPI	Current	Target	Status
Reports Received (QTD)	312	300	
Avg Resolution Time	28 days	≤ 30d	
Substantiation Rate	22%	N/A	
Anonymity Rate	61%	<50%	
Backlog Over 30 Days	14	5	

Thank you!