

Know the difference...not all hotlines are the same.

# ON ADAPTIVE INTERVIEWS

WHY THE DIFFERENCE IS WORTH IT

"What enables the wise sovereign and the good general to strike and conquer, and achieve things beyond the reach of ordinary men, is foreknowledge...

Knowledge of the enemy's dispositions can only be obtained from other men."

-Sun Tzu



Knowledge is what we aim to provide to our clients: information which grants organizations power to take action before a crisis develops or to respond effectively once one has started. Our integrated hotline of risk professionals go beyond what other hotlines offer because we have developed a specialized elicitation method we refer to as the Adaptive Interview.

### Adaptive Interviewing yields better information

Imagine you work for a large government contractor and a call comes in from a distressed employee to your anonymous hotline. The employee complains of unfair treatment from his superior. As a report of the concern is taken, the caller off-handedly mentions how his superior recently signed off on a service contract with a company her husband owns. This is clearly a red flag for a conflict of interest. Unfortunately, if your hotline vendor uses a basic (or worse, "outsourced"), unspecialized call center where agents are trained to ask a strict set of questions and

record answers given, that off-hand mention of a conflict may not even be documented, let alone expounded upon.

Now imagine you or a risk professional hears this. At some point you would certainly ask, "What else can you tell me about that service contract?"

Although the caller is trying to report an employee relations problem, no risk-minded ethics professional would let the mention of a potential conflict of interest slip by. The caller may not understand how it is a compliance or ethical violation, but both issues exist and both need to be discussed and documented. This is one of the many benefits of the Adaptive Interview.

"The Adaptive Interview process sits between the two extremes of rigid, scripted and completely unscripted issue intake interviews."

### Interviews should adapt to both facts and people

The Adaptive Interview process sits between the two extremes of rigid, scripted and completely unscripted issue intake interviews. The Adaptive Interview aims to incorporate the best of both worlds; the first phase is focused on obtaining essential data and incorporating any script-like elements, while the second is unscripted, like a conversation you might have in a good job interview. This approach is an obvious best practice to obtain the right information from complex issues, but is difficult to "standardize," and thus is difficult to replicate in basic, efficiency-focused hotline intake centers.

The aim of the Adaptive Interview is to get a full picture of the who, what, where, when, and why. But we retain the freedom to acquire that information, to get precise details, corroborating evidence and related tidbits, and the freedom to change the approach in the most effective way. It is important to remember of personality, culture, and subculture makes people different and thus report intake cannot always be the same. This is where the "adaptive" part of Adaptive Interviewing shines the brightest.

#### The Four Components of Adaptive Interviews

Now that the broad strokes of the Adaptive Interview have been painted, let's break down each of its components to better understand how they build toward an adaptable framework that yields more and better information from reporters:



- Adaptive Processes: Directives

   (a.k.a., "directions") provided by
   clients that set the general
   framework for interviews
- Adaptive Handling: Feeling out callers and handling their emotions
- Adaptive Communication:
   Adjusting how a caller is spoken
   to for improved comprehension
   and rapport
- Adaptive Questioning:
   Determining independently what questions to ask to maximize the Actionable Information we acquire

### 1. Adaptive Processes

Every call that comes in is processed within a generalized framework to ensure as much relevant, actionable information is obtained as possible while avoiding the burden of gratuitous details. If a static interview is "Paint By Numbers," the Adaptive Process is the blank canvas that provides the boundaries and structure to generate unique expressions.

Clients should engage in the opportunity the Adaptive Process presents with guidance for specific considerations, key regulations, etc., which are followed in each respective situation to help get as much Actionable Information as possible. You should adapt standard treatments where appropriate to achieve better outcomes.

For example, in the course of the interview, if a caller is unable to provide the name of a subject within a report, you could provide a directive to the intake team to at least obtain a physical description of the individual. Separately, if, say, your organization is in the midst of a publicity crisis, you could provide a specific directive containing a script from Public Relations or Legal to read to anyone calling in about this topic. You should give directives about escalating reports, providing early warnings to the right people on your team for certain situations, as well as how to respond to certain questions, etc..

### 2. Adaptive Handling

With the framework established by our Adaptive Process, we begin feeling out each caller from the moment the first words are spoken with the aim of moving them through the reporting process in the most effective way possible. This is what we mean by Adaptive Handling. More often than not, this means gauging the callers' emotional state so we can adapt the process accordingly.

People do not call the hotline when things are going well; calls often come through when someone has been pressed to a point that they can no longer remain silent. While gaining the right information is key, forcing a caller into a rigid process without consideration for their situation can create an adversarial situation that ultimately leaves important information undisclosed.







To acquire the best Actionable Information, emotional callers must be brought to a rational plane of thinking. Empathy assures callers of a secure process, and can often coax a nervous reporter to eventually share full details, even converting an anonymous call to an identified one. It's funny how simply a calm, professional manner and an emphasis on dignity and respect for callers can prompt someone who is initially mistrustful of the reporting process to share more fulsome information.

Just as your callers should not be speaking to an automation, they should not also be subject to a rigid, inflexible call process. The process should always adapt to the individual caller to maximize the Actionable Information acquired.

## 3. Adaptive Communication

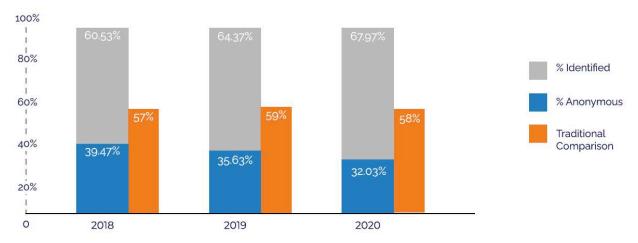
While the proper use of Adaptive Handling allows for the shaping of callers' emotions, it is really only effective when utilized in conjunction with Adaptive Communication.

Adaptive Communication is simple because human beings naturally do this everyday in regular conversations. For example, when you are speaking with a child, you tend to speak more clearly, use shorter sentences, and favor words and ideas the child is likely familiar with. In the same sense that a child will not be able to grasp technical lingo or industry jargon they are unfamiliar with, callers are best able to provide the best information when spoken to at a familiar level.

Adaptive Communication means adjusting our vocabulary in response to the limitations of the caller, for example, when someone is hard of hearing, speaks English as a second language, or is simply not familiar with certain technical terms. If a caller doesn't understand a question due to the way it was asked, then it should be reworded as many different ways as needed to ensure the important information is obtained.

Callers to an ethics hotline are rarely compliance officers themselves. They might not be very familiar with terms like "conflict of interest," "anti-competitive behavior," or may even think "discrimination" is the same as "harassment," so we can't expect them to have the mind of a compliance officer. Sometimes this means we have to dig deeper to ensure that the use of an ambiguous term is being used correctly and that we are on the same page.

# Hotline Anonymity Rates



ABOVE: The effectiveness of Adaptive Handling and Communication is apparent by how Ethico's intake is able to build trust with callers which in turn increases the number of identified reports. Meanwhile other hotlines hold firm at about 60% anonymous reports.

#### 4. Adaptive Questioning

The final component of the Adaptive Interview is the most quintessential part of any interview: the questions. Adaptive Questioning flows directly from Adaptive Communication and this, more than any of the other components, is what makes the Adaptive Interview process so much more effective than simply filling in the blanks on a static list of questions. As previously mentioned, the best way to conduct a comprehensive elicitation interview is to build-in freedom to ask for more information on suspicious details the caller may be trying to omit, or to probe for more information that the caller may not think is important.

Allow us to give an example of the sort of questions we might ask for a particular scenario and contrast them with standardized, scripted questions.



Let's imagine a man named Steve calls into your hotline to report a concern with the research and development department of your organization, a pharmaceutical manufacturer. Steve is a scientist who has been overseeing the results of clinical trials for a new drug. Normally those results are sent to him by proctors in an encrypted email in the form of a spreadsheet. However, one day recently, his supervisor, Tom, gave him a hand-written spreadsheet and told him to use that in the place of the spreadsheet he had received by secure email earlier that day. Steve suspects Tom is trying to manipulate the results of the drug trial.

Example Scripted Questions	Example Adaptive Interview Questions
<ul> <li>When did this happen?</li> <li>Where did this happen</li> <li>Why is it happening?</li> <li>Have you reported this to anyone yet?</li> <li>Can you submit any supporting documentation?</li> </ul>	<ul> <li>Why do you suspect Tom?</li> <li>How did the handwritten copy differ from the other results?</li> <li>Was Tom cc'ed on the email with the spreadsheet or how did he know you would get them that day?</li> <li>Where do you think the new numbers Tom is giving you came from?</li> <li>Have you contacted the clinical trial proctor to ask if there were errors on his or her original spreadsheet?</li> <li>Has Tom done this before?</li> </ul>

The delineation between the two approaches is obvious. The reporting process is essentially automated (or "dumbed down") when only scripted questions are used. If you are using a human to interview your callers on initial intake, then that human should think and ask appropriate questions about the specific, unique situation in question. Of course this requires training, experience, and mindfulness, but the issues and potential risks coming through the hotline intake channel deserve this extra effort. To underscore this point, let's consider another example.

A woman named Theodora calls into your hotline to report a potential information security breach in her department. She works in the medical records of your hospital system, and upon returning from lunch, she discovered someone had unlocked her computer and accessed the medical records program.

Example Scripted Questions	Example Adaptive Interview Questions
<ul><li>When did this happen?</li><li>Where did this happen?</li><li>Why is it happening?</li></ul>	<ul> <li>Does anyone know your log-in information?</li> <li>Does anyone have reason to use your computer?</li> <li>Is your workspace in a restricted access area?</li> </ul>
<ul> <li>Have you reported this to anyone yet?</li> <li>Can you submit any supporting documentation?</li> </ul>	<ul> <li>When you returned to your desk what was on the screen? Was it the regular desktop, was the medical record program open, or something else?</li> <li>Is there a way of going back in the medical record program to see the information which was looked at?</li> </ul>

Again, the scripted approach is static, with the same question repeated, while the Adaptive Interview questions adjust to be relevant to the caller's specific situation and fact pattern.

#### Conclusion

The Adaptive Processes, Handling, Communication, and Questioning are fused together to provide compliance officers and investigators with strong Actionable Information so they can hit the ground running and avoid unnecessary rework. That is the goal of the Adaptive Interview. If enough Actionable Information has been obtained for you to initiate an investigation, then intake is working properly as an extension of your team. Through several decades and hundreds of thousands of calls, we have perfected and standardized this process, however, we are routinely reminded that this effort is key in providing the right information that allows compliance professionals to investigate the resolve their employee relations, ethics, and compliance issues faster. This small piece of your puzzle has an out-sized impact on promoting an engaged workforce that feels safe and that their voices are heard.