OPERATIONS GUIDE

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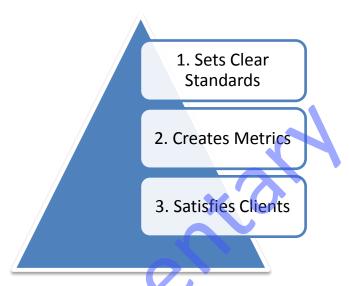
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What a Call Monitoring Program Does



A Call Monitoring Program should set clear standards or clear expectations for your collectors. It should create clear metrics for you. And also, it should satisfy your clients. It should demonstrate that you have policies and procedures, which are the standards that you've set. It should be able to tell them the story that you're telling yourself, your executive team, what you're telling your collectors and your operations team. Within these parameters, reporting back successes and areas for improvement becomes a simpler endeavor.

What a Call Monitoring Program Does Not Do



What your call monitoring program will not necessarily do for you is ensure 100 percent compliance. "We set a goal for ourselves to say right now, we want 3.5 percent of our calls monitored. That's our expectation for violation," Renee Bogar reports. "So, to restate that, we do expect that about 3.5 percent of our total calls monitored will have some type of error, whether a collector didn't say the mini Miranda, whether they missed the call monitoring disclosure, they didn't change the status of the account properly, something along those lines. But what we do know is we will never have 100 percent

of our calls monitored without some type of violation, so we do realize that we will never get to 100 percent compliance, no matter how effective we believe the call monitoring is."

A call monitoring program won't change the behavior of collectors – unless violations and infractions are shared. "One thing we realize is sometimes regardless of the fact, regardless of how great some of our collectors are, we have just had to let them go," says Bogar. "We can tell them what we want from them, we can tell them what we expect them to do; sometimes collectors are just going to do whatever they want to do, regardless. And we've had to let go of some really, really great collectors who just refused to be compliant. Likewise, if you don't have your supervisors who are on board and continuing to push for strong yet compliant collections, they just can't continue to be a part of your team."

Finally, it won't necessarily change the way your company does business. This can be a challenge to anyone working in compliance. If Operations and/or Management are not reviewing the metrics or the information that you are reporting to them, and they continue to treat that information cavalierly, you will not see the type of results that you want from your monitoring program. "Compliance can be great, your program can be great, but if you don't have the follow-through on the side of operations, they're the people that are managing your collectors on a day-to-day basis," said Bogar. "They are really the key to effective compliance. So, if they're not taking the information that you're pushing out seriously, you will have a serious gap that won't allow compliance and your program to really effectively change the way that you're doing business, and that's really a pivotal factor."