

# International Groups Call for DOJ Whistleblower Program to Incorporate Best Practices

Article By:

Mary Jane Wilmoth

---

The Department of Justice (DOJ) is in the midst of developing a whistleblower award program. [According to Acting Assistant Attorney General Nicole M. Argentieri](#), “the whole point of the DAG’s 90-day ‘policy sprint’ is to gather information, consult with stakeholders, and design a thoughtful, well-informed program.”

Since the Deputy Attorney General Lisa Monaco announced the policy sprint on March 7, whistleblower advocates in the U.S., including Kohn, Kohn & Colapinto, have consulted with the DOJ, outlining key elements of other successful whistleblower programs which should be incorporated in the DOJ program.

On May 13, a coalition of anti-corruption organizations and law firms from over twenty countries [sent a letter to the DOJ](#) emphasizing that an effective DOJ whistleblower program could greatly aid international anti-corruption efforts.

“We, the undersigned organizations, believe that a U.S. Department of Justice whistleblower rewards program has the potential to be instrumental to each of our anti-corruption efforts,” write the organizations.

“However, without careful consideration for the unique risks of international whistleblowers and without the implementation of the best-practice protocols identified above, this program could be damaging for international whistleblowers, and their catalytic role in transnational anti-corruption efforts,” the letter continues.

In the letter, the organizations call on the DOJ to incorporate four proven best practices for whistleblower award programs. These best practices mirror those previously called for by Kohn, Kohn & Colapinto. Allison Herren Lee, former SEC Commissioner and currently Of Counsel at Kohn, Kohn & Colapinto, [outlined these four elements in a recent article for the Harvard Law School Forum on Corporate Governance](#).

The four recommendations are:

1. Mandatory Awards of 10-30% of Proceeds Collected

2. Anonymous and Confidential Reporting Channels

3. Dedicated Whistleblower Office

4. Eligibility Requirements which Match the SEC Whistleblower Program

*Geoff Schweller also contributed to this article.*

Copyright Kohn, Kohn & Colapinto, LLP 2025. All Rights Reserved.

---

National Law Review, Volume XIV, Number 137

Source URL: <https://natlawreview.com/article/international-groups-call-doj-whistleblower-program-incorporate-best-practices>