



## Frequently Asked Questions

### FREQUENTLY AKSED QUESTIONS

#### **Why do we have a Confidential Reporting Hotline?**

*To ensure a completely anonymous reporting tool, ESSC has contracted with a separate third party, Lighthouse Services, Inc. to provide a solution for reporting, confidentially and anonymously, any issues of concern or fiscal misconduct to management. By contracting with a separate third party to administer a hotline, it gives ESSC the flexibility to provide anonymous reporting.*

#### **Who is Lighthouse and do they give me an update on my report?**

*Lighthouse Services, Inc. is a separate third party that ESSC contracts with to receive information from a reporter. The information collected from the reporter is routed to a designated party for further review and then a proper, thorough, and timely investigation, such as the Corporate Compliance Officer, Chief HR Officer, or the Director of Risk Services. Since 1998, Lighthouse Services has been providing confidential, 24-hour reporting services, giving companies the flexibility to provide anonymous reporting that assists in providing an ethical workplace environment. Lighthouse Services also allows ESSC to have communications with the reporter while keeping them anonymous. The reporter can get updates or provide follow-up communications without having to provide their contact information.*

#### **Who can file a report, and will I be anonymous?**

**Anyone, including full-time, part-time, vendors/contractors/sub-contractors, and temporary associates can use the hotline service.** *You will have the option to provide your contact information, in which case the Corporate Compliance Officer, for example, or another designee can follow up with you directly. Or, you can choose to remain anonymous. Your anonymity will be protected to the extent possible by the law and Lighthouse will never divulge your identity without your permission.*

#### **How do I file a report?**

*Professionally trained staff from Lighthouse will take your information, by phone, fax or email and compile into a report for the appropriate ESSC's designee to review. Reports to the ESSC's Confidential Reporting Hotline can be made in the following ways:*

#### Telephone:

English:           **(833) 670-0002**

Spanish:           **(800) 216-1288**

Website:           **[www.lighthouse-services.com/essc](http://www.lighthouse-services.com/essc)**

**E-mail:** reports@lighthouse-services.com (include company name with your report)

**Fax:** (215) 689-3885 (include company name with your report)

### Who are the ESSC's authorized designees and what happens after I submit a report?

The outside contractor (Lighthouse) sends the report to these authorized designees:

**Gennadiy Daych** – Director of Internal Audit & Regulatory Compliance (Corporate Compliance Officer)

**Steve Stock** – Director of Risk Services

**Catherine Crow-Gorski** – Chief People Officer

A designee will evaluate your report and determine the most appropriate means for handling the issue. A designee can update the Lighthouse system, if there are additional questions. Lighthouse will provide you with a reference number that you will need to check the status of your report or when the issue is closed.

If you are seeking some additional guidance in regards to your report, you may send your questions/concerns to our dedicated email address at:

[compliance@essc.org](mailto:compliance@essc.org)

### What types of things should be reported using the hotline?

#### Examples of Hotline Reporting Issues:

	REPORTING ISSUE	EXAMPLES
1	<b>Suspected fraud</b>	Embezzlement, fraudulent reporting or accounting issues, auditing violations, and any internal control matters.
2	<b>Ethics and compliance</b>	Any concerns related to compliance and regulation violations, code of ethics violations, conflicts of interest, waste and abuse of company's resources and equipment.
3	<b>Possible HIPAA violations</b>	Related to privacy and security of data.
4	<b>Serious HR violations</b>	Employee relations issues, abuse of benefits, discrimination, harassment, and work environment.
5	<b>Safety-related concerns for associates</b>	Potentially hazardous or unsafe working conditions, unsafe use of company equipment, trip/fall hazards, electrical hazards, chemical/cleaning supplies exposure.

Please note that this list is not all inclusive. Also, please note that the Hotline is **not** a substitute for reporting client abuse issues/violations, quality of care issues or other client-related matters as these are required to be reported to ESSC Regional Centers, Care Community Licensing,

and other departments. These issues will continue to be addressed by appropriate staff and management in applicable ESSC's Service Lines.

**Will all concerns reported be investigated by the ESSC's authorized designees?**

*It depends. In all cases, the claims reported will be viewed by the authorized designees to determine the appropriate steps and to ensure follow-up is taken. Depending on the subject and severity of the claim, some claims might be handled administratively and corrected with communications to the appropriate Service Line head. Other claims might require an investigation by one of those designees. Also, ESSC's Legal Counsel might be involved as well.*

**I am afraid of retaliation, how do I know I will not be fired for making a report?**

ESSC is committed to maintaining a workplace where it can receive information concerning possible illegal or unethical conduct where good faith concerns can be raised free of retaliation. Reporters are afforded protection against retaliation if they report in good faith, even if they are in error. Retaliation against an individual who, in good faith, and acting in an appropriate manner, has made a complaint, disclosed information relating to a complaint, or otherwise participated in an investigation relating to a complaint, is **prohibited**, regardless of the outcome of the investigation. This means that neither ESSC nor any of its associates shall discharge, demote, suspend, threaten, harass, or in any manner discriminate or retaliate against an reporter for participating in these activities. This anti-retaliation provision applies both to internal and external complaints. However, deliberately making a false complaint is against this policy, and may result in disciplinary action, up to and including termination of employment.

Also, the California Whistleblower Protection Act aims to provide an avenue for reporters to raise concerns anonymously and reassurance that they will be protected from retaliation, harassment, reprisals or victimization for whistle blowing in good faith.