Wisconsin Housing & Economic Development Authority Ethics Hotline

FREQUENTLY ASKED QUESTIONS

UPDATED FEBRUARY, 2018

1. What is an Ethics Hotline?

An ethics hotline, also referred to as a whistleblowers hotline, is a tool used by organizations to provide employees and business partners with a vehicle to report incidents of fraud, waste, abuse, and conflicts of interest. An effective way to learn about issues has proven to be through a 24/7 365 day per year hotline which users can call at their convenience.

2. Why does the Authority have an Ethics Hotline?

The Authority wants to promote ethical behavior and reduce losses from illegal or unethical behavior while protecting the person making the report from retaliation.

3. What incidents should be reported to the Hotline?

The Ethics Hotline may be contacted to disclose the following:

- i. questionable accounting practices, internal accounting controls or auditing matters
- ii. violations of state or federal laws, rules or regulations governing the Authority or its employees, including ethics violations
- iii. violation of the Authority's internal policies and procedures
- iv. any observed or perceived conflict of interest

4. Do | have to give my name when | file a report?

No. However, if your complaint cannot be resolved based on the information you originally provide, you may be asked for additional information, or to speak with an investigator. This further investigation may require limited disclosure of your identity, and it is voluntary.

5. How can I be sure my identity, if shared, is kept confidential?

Initial calls are taken by a third-party interviewer. You may choose to remain anonymous but as stated above, the Authority may not get enough information initially to conduct an investigation. In cases where the information provided in the initial report is very serious and will likely result in multiple rounds of questions, you may be asked to work with an ombudsman who will be external to the Authority.

If you choose to share your identity, the ombudsman, or in less severe cases, the Case Management Team, will not provide any information about your identity to the maximum extent possible and where legally permissible.

6. Is there a possibility of retaliation?

No. The Authority believes that the only way the Ethics Hotline can be successful in its purpose to provide employees and business partners with a vehicle to report incidents of fraud, waste, abuse, and conflicts of interest, is to eliminate any possibility of retaliation on the part of Authority management. This pledge by the Authority applies regardless of your decision to remain anonymous.

7. Who is answering the Ethics Hotline?

The Hotline is answered by trained interview specialists employed by a hotline service provider contracted by the Authority (the current contract is with Navex Global).

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8. What process do I go through to file a report?

Following is the process to file a report

- i. Call 800-481-9589; toll free, 24/7
- ii. You will be prompted to select a language (translation services in more than 150 languages are available 24/7) and a prerecorded message will provide a brief message on the hotline.
- iii. An experienced interview specialist will introduce themselves and begin the process, which is a series of questions asked of the caller.
- iv. The interviewer will explain the process which takes between 10 to 15 minutes for a new report. If the call is a follow up call on an existing report, the interviewer will work with you to provide status or may ask additional questions as requested by the case manager.
- v. The interviewer will ensure that you are satisfied with the report. Prior to ending the conversation, the interview specialist will provide a report number for new incidents and will ask that you call back for follow up, typically within two weeks. Write the report number down as you will need that on follow up calls.

9. What happens after my report is filed?

Once the report is filed, the report is e-mailed to the Chairperson of the Board of Members and General Counsel. The Chairperson and General Counsel are responsible for determining how the issue will be investigated, either through and ombudsman or the Authority's Case Management Team. The Finance Committee of the Authority will receive periodic reports regarding complaints and investigations

10. Who are the Case Managers?

The Authority has three Case Managers - the Director of Risk and Compliance, the Director of Administrative Services and General Counsel. A Case Manager will be assigned to each incident that is reported. It is his/her responsibility to ensure the incident is properly investigated and appropriate action is taken. Case Managers will generally be assigned cases within their area of expertise. Case Managers will not be assigned cases that name them as part of the issue.

11. What responsibility do | have after | make a report?

When you have completed your report, the interview specialist will provide a report number and a call back date. To ensure that your report is being properly investigated, you should call back on the date provided. When you call back (Call 800-481-9589; toll free, 24/7), you must provide the report number to the interview specialist. The interview specialist will advise you of the status of your report or may ask you additional questions that the case manager or investigator has provided. The interview specialist will advise you on the next steps you should take related to your report

12. What should I do if additional information related to a previous report becomes available?

If additional information becomes available before your callback date, call the toll free number (800-481-9589; 24/7), give the interview specialist your report number and then the information related to the report. The interview specialist will advise you on the next steps you should take related to your report

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13. Are the reports that are filed subject to open records requests?

The information gathered from the hotline report belongs to the Authority and not to the hotline service provider. The Authority determines what information the general public has rights to, and what should fall under regulations that protect sensitive information from public record scrutiny.

The Freedom of Information Act declares that a government agency's records are subject to disclosure upon request, EXCEPT records "solely related to internal personnel rules and practices" or records like personnel files, which would lead to an invasion of personal privacy

14. Who should I ask if I have questions about the process?

There are many resources available should you have any questions. The Director of Risk and Compliance, Director of Administrative Services, Human Resource Analyst, or General Counsel should be able to answer your questions related to the Ethics Hotline. You are also encouraged to call the Ethics Hotline number with any questions you may have.