

# What should the hotline be used for?

The hotline should be used for any suspicions or allegations of incidents of fraud, waste, or abuse. Some examples of concerns to report are:

- Falsifying financial records or fraudulent financial reporting
- Contract or procurement fraud
- Bid rigging and collusion between contractors and employees
- Billing schemes - billing for services not actually provided
- Payroll fraud (e.g falsifying overtime)
- Expense reimbursement fraud
- Soliciting or accepting a bribe or kickback
- Theft of property
- Using government equipment for personal use
- Running a business while at work

## Who answers the hotline?

An operator who is employed by [Lighthouse Services, Inc.](#), our third-party hotline provider, will answer your call. The operators are highly trained in taking hotline calls and will ask you a series of questions regarding your report.

You can access the hotline 24 hours a day, 7 days a week. In addition to a toll-free phone number, you can also report by email, online or even by fax.

- Toll-Free Number: 844-290-0008 (an operator will ask a series of questions and you may remain anonymous)
- E-mail: [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (include our organization's name in the email)
- Fax: (215) 689-3885 (include our organization's name in the fax)

## Will the person I am reporting about know that I filed a report?

First, you do not have to disclose your identity. If you do provide it, your identity will not be shared with anyone other than those investigating your reported incident. You should be aware that in some cases information you share may lead to the investigators deducing your identity. However, it is not appropriate for the investigators to disclose your identity or take action knowing your identity. Regardless of whether your identity is known, the County Performance Auditor or other internal or external investigator will conduct objective, impartial, and fact-based investigations.

# What does anonymous reporting really mean?

You do not have to disclose your identity to Lighthouse Services when you make a report, either by phone or web. If you provide your email address, your email address will be encrypted during any correspondence between you and the County Performance Auditor.

# Can I be fired for reporting a concern?

Legally, under State whistleblower protections laws ([ORS 659A.199-236](#)), you cannot be fired or otherwise retaliated against just for the reason of making a report. The law states “It is an unlawful employment practice for an employer to discharge, demote, suspend or in any manner discriminate or retaliate against an employee with regard to promotion, compensation or other terms, conditions or privileges of employment for the reason that the employee has in good faith reported information that the employee believes is evidence of a violation of a state or federal law, rule or regulation.” (ORS 659A.199)

# Will I have to confront the individuals that I filed a complaint against?

No. You are only asked to provide as much detailed information as you can in your report and in any requests for follow up information.

# Where does my reported concern go and who reviews it?

Lighthouse Services sends each report to the County Performance Auditor and County Counsel. The County Performance Auditor is responsible for reviewing each report.

The County Performance Auditor will perform initial work to determine whether an investigation is appropriate, depending upon the nature of the concern and whether enough information is provided. See our APM Chapter 2 Section 26 for more information on what happens once a report is received.

# Who will respond to my call?

Once you make a report, if you share your contact information, the County Performance Auditor will communicate with you via Lighthouse Services to let you know your report has been received. If you have provided an email address, your email address will be encrypted. The County Performance Auditor continues to update you throughout the process. The County Performance Auditor may also ask you follow up questions via Lighthouse Services. If you make your identity known to the County Performance Auditor, she will maintain confidentiality of your identity and the allegation as allowed or required by law.

## Who will investigate my concern?

The County Performance Auditor has the primary responsibility for the investigation of all suspected fraud, unless it is suspected that fraud may have been committed by a member of the Board of County Commissioners, other elected official, the County Administrator, or County Counsel. In those cases, the County Performance Auditor may contract out the review to an independent auditor or Certified Fraud Examiner. See APM Chapter 2 Section 26 for more information.

## Who is the County Performance Auditor, who does s/he report to, and what is her/his training?

Currently, the Performance Auditor role is vacant. In addition to monitoring the hotline and conducting investigations, the performance auditor's main role is conducting performance audits, which entails reviewing County programs for effectiveness in meeting program goals and objectives.

## What is management's role in investigations?

The County Performance Auditor has the primary responsibility for the investigation of all suspected fraud (with some exceptions, see APM Chapter 2 Section 26). However, the County Performance Auditor may delegate responsibility for the investigation of suspected fraud to appropriate department management staff depending on the nature and scope of the suspected fraud. If this occurs, the County Performance Auditor will continue to monitor and provide advice as requested. The County Performance Auditor may, at any time, initiate an investigation or audit even if the report had initially been referred to another department.

For investigations performed by the County Performance Auditor, management will be informed as appropriate of an allegation of fraud at the start of the investigation. The auditor will also, as appropriate, consult with County Counsel, Human Resources and department management regarding a fraud allegation.

## What if I am too fearful to report an allegation and I am afraid of potentially being retaliated against?

We understand it takes great courage and is a very hard thing for employees to report a concern or allegation. Statistics show only 63 percent of people who have a concern actually call an employer's fraud hotline. We understand retaliation and other stresses are real concerns, and may prevent you from making a report. If these concerns stop you from making a report, as an

alternative, you have the option of calling the Oregon Secretary of State hotline instead at 800-336-8218 or <https://oregonsos.alertline.com>.

## Will I be informed of the outcome of my report and any actions taken?

Yes, if you have provided a way for Lighthouse Services to contact you. Once a report is closed or an investigation is completed, the County Performance Auditor will notify you of the outcome of the investigation and any actions taken to the extent allowable by law via Lighthouse Services. The specifics of any disciplinary action will be kept confidential to the extent permitted by law. Absent highly unusual circumstances, you may be informed as to whether appropriate action was taken, but not the details of the specific action.

You can also call the hotline or go to the hotline web page to inquire about the status of your report.

## What if I don't know if my complaint is related to fraud, waste and abuse or I don't have all the information?

When in doubt, use the hotline. Make a report even if you don't have all the facts – even if you just have a suspicion or have heard rumors. Provide as much detail as you know, including who, what, where, when, how, and why. You are not expected to be able to prove the allegation, though you are expected to provide as much accurate and actionable information as you can. You may also leave your contact information with Lighthouse Services so you can be asked follow up questions. If the County Performance Auditor reviews your report and determines there is not enough information to warrant an investigation, the auditor will still retain your report in case another report over the same incident or situation comes in, or in case there is a pattern of reports.

## Can I submit documentation with my report?

Yes. You can email, upload online, or fax documentation to support your report.

## Can the hotline be used for reporting harassment, mobbing, or discrimination?

We ask that reports related to harassment, discrimination, or mobbing and other employee matters, should continue to follow our existing grievance procedure or bring your concerns to the attention of your supervisor or the Human Resources Department (See APM Chapter 3, Section 53). However, if an employee matter is related to an ethical concern then it would be appropriate to report it via the hotline.

# What if someone makes a false or malicious allegation to the hotline?

It is our expectation that employees will not abuse the hotline in making false or malicious allegations. Making false allegations would not be keeping with our values nor help us maintain a respectful and healthy work place culture. Our third party vendor, Lighthouse Services, has found that people take the hotlines very seriously, and we know that Lane County employees will too.