

<b>Title: Compliance and Ethics Hotline Policy</b>					<b>Number:</b> <b>1001.v1</b>
<b>Policy Owner:</b> <b>Compliance and CQI Director</b>	<b>Old Number:</b> <b>N/A</b>	<b>Effective Date:</b> <b>6/1/2015</b>	<b>Date Revised:</b> <b>5/19/2015</b>	<b>Rev #</b> <b>1</b>	<b>Page 1 of 3</b>

## 1.0 BACKGROUND AND PURPOSE

Compliance is a top priority at the Jewish Social Service Agency and Premier Homecare (collectively “JSSA” for purposes of this policy). JSSA is committed to operating with integrity in full compliance with all applicable laws, regulations, and policies, and conducting business with the highest levels of ethics, standards, and responsibility. With this, successful compliance across JSSA depends upon all employees, volunteers, consultants, vendors, business associates and board members being alert and committed to compliance.

The Compliance and Ethics Hotline serves as a confidential channel for clients, employees, volunteers, consultants, vendors, business associates and board members to report or seek guidance on possible compliance issues if they do not feel comfortable using JSSA’s current reporting procedures. The hotline is supported by a third party vendor, Lighthouse Services, and staffed by trained professionals 24 hours a day, 7 days a week. This valuable external service may be accessed by the internet at [www.lighthouse-services.com/jssa](http://www.lighthouse-services.com/jssa), by calling the toll-free number at 1-844-600-0056, by emailing [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com), or by faxing your concern to 1-215-689-3885. For more information about the Hotline, please watch the following training video: [www.lighthouse-services.com/Video/EthicsHotlineTraining/JSSA](http://www.lighthouse-services.com/Video/EthicsHotlineTraining/JSSA).

The Compliance and Ethics Hotline is an enhancement of, not a replacement for, current policies and procedures.

### 2.0-3.0 APPLICABILITY AND SCOPE

This policy applies to employees, volunteers, consultants, vendors, business associates and board members for reporting violations of applicable federal, state, and local laws or regulations, and internal policies and procedures if they do not feel comfortable using JSSA’s current reporting procedures.

## 4.0 POLICY

### 4.1 Policy Statement

This policy allows clients, employees, volunteers, consultants, vendors, business associates and board members to remain anonymous at their option when they do not feel comfortable raising these concerns through traditional management or contractual channels. Concerns expressed anonymously will be investigated, but consideration will be given to the seriousness of the issue raised, the credibility of the concern, and the likelihood of confirming the allegation from attributable sources.

The Compliance and Ethics Hotline has been established for complaints related only to noncompliance with federal, state, or local laws or regulations, and internal policies and procedures relating to illegal or unethical conduct. This service should not be used for less-than-serious suggestions, complaints, or concerns, such as grievances regarding performance evaluations, hours of work, wages, raises, disagreements with peers or supervisor, etc. These types of matters should be addressed through the program supervisor, department head, or Human Resources.

Clients, employees, volunteers, consultants, vendors, business associates and board members are encouraged to provide as much specific information as possible including names, dates, places, and events that took place, and their perception of why the incident(s) may be fraudulent, unethical, illegal or dangerous. JSSA will conduct a prompt, discreet, and objective review or investigation.

<b>Title: Compliance and Ethics Hotline Policy</b>					<b>Number:</b> <b>1001.v1</b>
<b>Policy Owner:</b> <b>Compliance and CQI Director</b>	<b>Old Number:</b> <b>N/A</b>	<b>Effective Date:</b> <b>6/1/2015</b>	<b>Date Revised:</b> <b>5/19/2015</b>	<b>Rev #</b> <b>1</b>	<b>Page 2 of 3</b>

#### **4.2 Non-Retaliation**

JSSA prohibits retaliation by or on behalf of the agency against clients, employees, volunteers, consultants, vendors, business associates and board members for making good faith complaints, reports or inquiries or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but proven to be mistaken. If a client, employee, volunteer, consultant, vendor, business associate or board member perceives that they are being retaliated against after making a report to the hotline, this should be promptly reported to the program supervisor, Human Resources, or to the Compliance and Continuous Quality Improvement Director.

#### **4.3 Confidentiality**

Every effort will be made to protect the reporter's identity by our hotline vendor. The information provided in a report may be the basis of an internal and/or external investigation conducted by JSSA and/or its counsel into the issue being reported. It is possible that as a result of the information provided in a report, the reporter's identity may become known during the course of the investigation. The reporter's anonymity will be protected to the extent possible by law.

#### **4.4 Other Mechanisms to Report Non-Compliance**

An employee, volunteer or consultant should report evidence of alleged violations by contacting his or her immediate supervisor, either orally or in writing. However, if an employee, volunteer or consultant is not comfortable speaking with his or her supervisor or is not satisfied with his or her supervisor's response, the employee, volunteer or consultant should contact the supervisor's supervisor, Human Resources, the Compliance and Continuous Quality Improvement (CQI) Director, or anyone in senior management whom they feel comfortable approaching. Supervisors are required to report suspected violations to the Compliance and CQI Director.

Clients, employees, volunteers, consultants, vendors, business associates and board members may also write a letter to the Compliance and CQI Director at 200 Wood Hill Road, Rockville, Maryland, 20850, utilizing interoffice mail or regular mail. If they are not satisfied with the response or are uncomfortable for any reason addressing such concerns to those listed above, the Chairman of the JSSA Compliance Committee, Harold Krauthamer, may also be contacted by email at [Harold@krauthamerstahl.com](mailto:Harold@krauthamerstahl.com) or by phone at 240-353-6339.

#### **4.5 Operation**

The Compliance and Ethics Hotline uses an online case management system and a toll-free number, web address, facsimile, and an e-mail address which can be utilized by all JSSA clients, employees, volunteers, consultants, vendors, business associates and board members. All reports will be assigned a unique File ID with no identifying information unless the reporter chooses to leave information to identify him/herself. Upon submission of the report, the reporter may also use their unique File ID to get a status update on your report.

The confidential report will instantly and anonymously be forwarded to the Compliance and CQI Director. If the report involves misconduct on the part of the Compliance and CQI Director, the hotline vendor will automatically divert the concern to the Chairman of the Compliance Committee to investigate. If the

<b>Title: Compliance and Ethics Hotline Policy</b>					<b>Number:</b> <b>1001.v1</b>
<b>Policy Owner:</b> <b>Compliance and CQI Director</b>	<b>Old Number:</b> <b>N/A</b>	<b>Effective Date:</b> <b>6/1/2015</b>	<b>Date Revised:</b> <b>5/19/2015</b>	<b>Rev #</b> <b>1</b>	<b>Page 3 of 3</b>

report involves the Chief Executive Director, the Compliance and CQI Director will work directly with the Chairman of the Compliance Committee to investigate.

#### 4.6 Policy Compliance

An employee, volunteer, consultant, vendor, business associate and board members who intentionally reports malicious and false allegations, abuses this policy, or anyone who takes retaliatory action against an individual who made a report, may receive disciplinary action, leading up to and including termination.

#### 5.0 INTERNAL COMPLIANCE INVESTIGATIONS

The Compliance and CQI Director will retain documentation of all reports regarding possible compliance violations. He or she will also coordinate and consult with the Chief Executive Officer and outside counsel, as necessary, to determine, based on the subject matter of the possible violation and its severity, whether further investigation is necessary. If further investigation is necessary, the Chief Executive Officer or outside counsel will advise whether the Compliance and CQI Director should personally investigate the report, refer the report to an appropriate department for investigation, or engage an independent third party, such as independent legal counsel, to investigate the report. At a minimum, internal investigations will include a review of all material and relevant facts, as well as interviews, as appropriate. All employees, volunteers, consultants, vendors, business associates and board members are expected to cooperate fully with any requests made of them in connection with any such investigation and to provide truthful and accurate information.

#### 6.0 RESPONSIBILITIES

The Compliance and CQI Director shall administer this policy and is authorized to make modifications to this policy to ensure that it is in compliance with local, state and federal laws or regulations.

#### 7.0 QUESTIONS

Questions concerning the administration, interpretation or compliance of the Compliance and Ethics Hotline Policy or its application, particular compliance issues and their application to JSSA or to clients, employees, volunteers, consultants, vendors, business associates and board members, should be directed to the Compliance and CQI Director. In addition, the Code of Ethics and Professional Conduct should be used for additional information on the types of compliance concerns that should be reported, the rights and responsibilities of employees, volunteers, consultants, vendors, business associates and board members to report concerns, and other information relevant to reporting such concerns.

#### Version Control

Version Number	Date	Applicable Section	Comments	Approver/Todd Schenk, CEO
V.1	05/19/15	Entire Policy	N/A	