



ETHICS HOTLINE FREQUENTLY ASKED QUESTIONS

What is an Ethics Hotline?

An Ethics Hotline is a reporting tool that assists an organization in addressing fraud, abuse, and other mismanagement or misconduct in the workplace and cultivating a positive work environment.

Why does WEDC have an Ethics Hotline?

As part of its commitment to operational and fiscal excellence, WEDC takes all reports of fraud, misconduct, or public corruption seriously and will investigate them proportionately and appropriately. To ensure that all persons can report fraud or misconduct of any kind, WEDC established its Ethics Hotline.

Who can file a report through WEDC's Ethics Hotline?

Anyone. WEDC employees and external (non-employee) individuals are encouraged to use the Ethics Hotline if they are aware of illegal or unethical behavior involving WEDC.

What type of situations should I report?

The Ethics Hotline may be contacted to disclose any type of illegal or unethical activity involving WEDC and any of the programs it administers. The types of complaints we may investigate could include:

- Complaints from any source about waste, abuse, or malfeasance involving WEDC programs, grants, loans, tax incentives, or procurements.
- Conflicts of interest involving WEDC employees, Board or Committee members, grantees, or vendors.
- Falsification of contracts, reports, records, or applications for WEDC grants, tax incentives, or loans.
- Any manipulation of WEDC's procurement process, including the knowing submission of false or incomplete information, to gain an improper advantage for the submitter or another party. This can include dishonesty and unethical behavior by a vendor, WEDC employee, or a third party.
- Any type of fraud, including public corruption involving WEDC and/or those administering grants, loans, training, or any programs on WEDC's behalf.
- Employee misfeasance, misconduct, mismanagement, including offensive or inappropriate communication.

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- Illegal discrimination on any basis including, but not limited to, race, color, national origin (including limited English proficiency), religion, disability status, age, sex (including sexual orientation and gender identity or expression), pregnancy, protected veteran status, marital status, or other legally protected characteristics.
- Retaliation against any individual who, in good faith, acted to secure rights protected by civil rights laws or exercised their rights to file a complaint, make an inquiry, or provide information about concerns or suspected violations of any federal or state law or WEDC policy.
- Bribery, embezzlement, or violations involving a gratuity or the improper giving or receiving of gifts.
- Concerns regarding WEDC's accounting or financial auditing matters.

What type of situations should NOT be reported to WEDC's Ethics Hotline?

- Matters involving a conflict between you and your financial institution.
- Matters that involve other (not WEDC) Wisconsin state or local agencies.
- If the matter does not involve WEDC funds or programs, other possible offices to contact are:
 - Wisconsin Department of Revenue (DOR) Fraud, which includes tax-related identity theft
<https://www.revenue.wi.gov/Pages/FAQS/ise-fraud.aspx>
 - Wisconsin Department of Health Services (DHS) Fraud
<https://www.dhs.wisconsin.gov/complaints/index.htm.htm>
 - Wisconsin Legislative Audit Bureau
<https://legis.wisconsin.gov/lab/fraud-waste-and-mismanagement-hotline/about-the-hotline/>
 - Wisconsin Department of Justice (DOJ)
<https://www.doj.state.wi.us/>
 - U.S. Department of Treasury's Office of Inspector General (OIG)
<https://oig.treasury.gov/>
 - U.S. Small Business Administration's OIG
<https://www.sba.gov/about-sba/oversight-advocacy/office-inspector-general>
 - U.S. Department of Energy's OIG
<https://www.energy.gov/ig/office-inspector-general>

- Civil Rights Offices of Federal Agencies
<https://www.justice.gov/crt/fcs/Agency-OCR-Offices>
- U.S. Environmental Protection Agency OIG
<https://www.epaoig.gov/>

Please be aware that local law enforcement is a valuable resource for many issues that you may also refer to this Office. Local law enforcement may offer advantages such as the ability to interact quickly with the community, prosecute criminal offenses, and often have comprehensive victim, witness, and social services support programs that may better offer real-time assistance. Your State, Local, Tribal, or Territorial enforcement agency with primary law enforcement jurisdiction is usually the same agency that responds to 911 calls.

What types of programs does WEDC administer?

WEDC administers various types of grants, tax incentives, and loans utilizing Wisconsin state funds and, for some programs, federal funding. WEDC is only authorized to investigate concerns regarding WEDC programs and the conduct of its employees, vendors, and partners (those who administer programs on WEDC's behalf). For reference, our current programs are: <https://wedc.org/programs/>

What are some of the federally funded programs administered by WEDC and/or its partners or vendors?

- Coronavirus State and Local Recovery Funds (SLRF),
- The State Small Business Credit Initiative (SSBCI) (U.S. Treasury funds administered via various WEDC Programs),
- SSBCI Investing in America Small Business Opportunity Program (SBOP)
- Main Street BounceBack (MSBB) grants or technical assistance
- The State Trade Expansion Program (STEP) via the U.S. Small Business Association.
- U.S. Department of Energy (DOE) Office of Sustainability and Clean Energy (OSCE) Energy Improvement in Rural or Remote Areas
- Solar for All (U.S. Environmental Protection Agency)

Can a WEDC employee report a violation directly to their manager or Human Resources?

Ideally, WEDC employees should forward any concerns regarding violations of our code of conduct to their direct manager or another member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. For such circumstances, we have partnered with EthicsPoint.

Am I required to give my name when filing a report?

No. As part of the reporting process, you can provide your name or remain anonymous.

What should I know about filing an anonymous complaint?

- Please be advised that filing anonymously may limit our ability to seek further information or conduct a complete investigation. If you wish to remain anonymous, you must file a complaint via the online form or by calling the Ethics Hotline at the phone number listed under “How do I file a report.”
- All anonymous complaints made through EthicsPoint will be given a reference number, which you will need to follow up on your complaint. *Please don't lose the reference number* because it is generated one time and only for the person filing the complaint; *we cannot recover it*.
- Federal law requires that a discrimination complaint under Title VI must be submitted within 180 calendar days after the last date(s) of the alleged prohibited act(s) of discrimination. Under Federal law, a discrimination complaint under Title VI **CANNOT** be submitted anonymously and *must* be signed. All complaints alleging discrimination will be routed to WEDC's Nondiscrimination Compliance Coordinator (NCC), who will follow up with the complainant to obtain the necessary signature. If you want to file a Title VI discrimination complaint after 180 days, you may request a waiver by completing the relevant question on the complaint form.

What if I want to be identified with my report?

There is an option to identify yourself if you wish.

Is there a possibility of retaliation?

WEDC is committed to maintaining a fair and respectful environment for all individuals. WEDC prohibits retaliation in any form against individuals who file complaints or report concerns of fraud, misconduct, waste, or any violations of procedures, laws, or regulations. WEDC takes any allegations of retaliation very seriously. We encourage individuals to speak up when they witness any form of misconduct, and WEDC will protect all concerned parties by fully enforcing all applicable laws and procedures prohibiting retaliation.

How do I file a report?

Use the following steps to file a report through the Ethics Hotline:

- Call **844-528-8655**; toll free 24/7, and speak with an EthicsPoint representative (interpreters are available), or
- Report via the online complaint form (see instructions below). With either option, you will be asked the same questions. The online form is available in English, Spanish, and Hmong.
- Click the link from WEDC's website:
 - www.wedc.org
 - Click "Contact Us" at the top of the page
 - Scroll down to Ethics Hotline and click on the "Submit A Complaint" link
 - While not required, first reading through the "EthicsPoint FAQs" by clicking on the blue link in the "Our Commitment" section is recommended
 - Click on the "Make A Report" tab just under the WEDC logo near the top of the page, and you will be taken to the online complaint questionnaire
- You can also scroll down to the very bottom of WEDC's main page and click on "Statement of Non-Discrimination"
 - Scroll down and click on the "Submit A Complaint" button
 - While not required, first reading through the "EthicsPoint FAQs" by clicking on the blue link in the "Our Commitment" section is recommended
 - Click on the "Make A Report" tab just under the WEDC logo near the top of the page, and you will be taken to the online complaint questionnaire

What information should I include when I make a complaint? (Please have this information ready to reference when calling or completing your online report form.)

- Relevant names and titles (if known) of the person or people who committed the wrongdoing, as well as dates, times, and locations of the acts involved in the allegation.
- The name and contact information of any individual who can help verify the information you are reporting.

- Supporting evidence in electronic format that can be uploaded with your report. This may include e-mail communications, documents, billing records, or photographs.
- If applicable, the name of the vendor or grantee, contract or grant numbers, and award dates.
- A narrative explaining the nature, scope, time frame, personnel, and/or program affected.
- Explain how you became aware of the problem, what efforts have been made thus far to correct it, and the current status of the alleged wrongdoing you refer to in your complaint.
- Were you personally impacted? If so, how?
- Please DO NOT include hyperlinks when filing complaints, as these hyperlinks will not be accessed when evaluating the complaint.

What should I expect after submitting an Ethics Hotline report?

- A WEDC employee will review your complaint for relevance and completeness and make a determination of what action is required including whether WEDC has jurisdiction to investigate. Not all complaints result in an investigation. We may refer the complaint to a different state agency, law enforcement, an Office of Inspector General, or another office as appropriate. WEDC's Human Resources Department may address some complaints.
- If you have identified yourself, a reviewing official may contact you for further information. However, if you are not contacted, it does not mean your complaint is not being investigated.
- Upon conclusion of an investigation, a report detailing the finding(s) and any recommendations for future action will be disseminated to and reviewed by WEDC's Senior Leadership and Audit Committee in a timely manner. Other federal and state agencies may also be notified where appropriate or required by law.