

## **HARBOR REGIONAL CENTER Whistleblower Policy**

Harbor Developmental Disabilities Foundation, Inc. doing business as Harbor Regional Center (“HRC”) requires members of the Board, officers, directors, employees, contractors and service providers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. This policy is established to ensure that HRC’s Board members, officers, employees, contractors, service providers, clients, families and other key individuals can report good faith suspicion, concerns, or evidence of illegal unethical improper or other inappropriate activity without fear of retaliation.

### **1. Reporting Responsibility**

If a Harbor Regional Center member of the Board, officer, director, or employee or if a Harbor Regional Center service provider or the member of a service provider Board, officer, director, or employee has knowledge of illegal improper or dishonest fraudulent activity, it is their responsibility to report such violations or suspected violations in accordance with this Whistleblower Policy. For purposes of this Policy:

- An “improper regional center activity” means an activity by a regional center or an employee, officer or Board member of a regional center, in the conduct of regional center business, that is in violation of a state or federal law or regulation; violation of contract provisions; fraud or fiscal malfeasance; misuse of government property; or constitutes gross misconduct, incompetency or inefficiency
- An “improper contractor/service provider activity” means an activity by a contractor/service provider or an employee, officer or Board member of a contractor/service provider, in the provision of Department of Developmental Services funded services, that is in violation of a state or federal law or regulation; violation of contract provisions; fraud or fiscal malfeasance; misuse of government property; or constitutes gross misconduct, incompetence or inefficiency.

### **2. No Retaliation**

Harbor Regional Center shall not retaliate against any person who reports a violation or suspected violation.

### **3. Reporting Violations**

HRC has an open door policy and suggests that board members, officers, directors, and employees share their questions, concern, suggestions or complaints with someone who can address them properly. In most cases, an employee’s supervisor is in the best position to address an area of concern. However, if an employee is not comfortable speaking with his/her supervisor or the employee is not satisfied with his/her supervisor’s response, he/she is encouraged to speak with the Director of Human Resources or anyone in management whom he/she is comfortable in approaching. Supervisors and managers are required to report suspected violations to HRC’s Compliance Officer, who has specific responsibility to investigate reported violations.

Individuals may prefer to contact HRC's Compliance Officer directly, submit a complaint directly to the HRC Board President or to the State Department of Developmental Services.

Violations may be reported to the following contacts at Harbor Regional Center at any time as follows:

- Executive Director, Harbor Regional Center, 21231 Hawthorne Boulevard, Torrance, CA 90503, (310) 543-0630 – [patrick.ruppe@harborrc.org](mailto:patrick.ruppe@harborrc.org) or
- Compliance Officer, Harbor Regional Center, 21231 Hawthorne Boulevard, Torrance, CA 90503, (310) 543-0625 – [judy.wada@harborrc.org](mailto:judy.wada@harborrc.org) or
- Director of Human Resources, Harbor Regional Center, 21231 Hawthorne Boulevard, Torrance, CA 90503, (310) 543-0602 – [tammy.carter@harborrc.org](mailto:tammy.carter@harborrc.org)

Violations may be reported to the President of the Harbor Regional Center Board at any time as follows:

- By letter directed to HRC Board President, c/o Jennifer Lauro, Board Assistant, 21231 Hawthorne Boulevard, Torrance, CA 90503 By email at [boardpresident@harborrc.org](mailto:boardpresident@harborrc.org)

Violations may be reported to the Department of Developmental Services at any time as follows:

- Community Operations Division (916) 654-1958 or fax (916) 654-1987, 1600 - 9th Street, Room 320, MS3-9, Sacramento, CA 95814; or
- Community Services and Supports division (for Early Start Program Services) – (916) 654-2716 or fax (916) 654-3020, 1600 - 9th Street, Room 430, MS 3-24, Sacramento, CA 95814

#### **4. Compliance Officer**

The Organization's Compliance Officer as well as all those specified above is responsible for investigating and resolving reported complaints, including complaints of retaliation, as well as allegations concerning violations of the Code and, at discretion, shall advise the Executive Director and/or the Executive Committee of the Board of Trustees. The Compliance Officer has direct access to the Executive Committee of the Board of Trustees and is required to report to the Executive Committee at least annually on compliance activity. HRC's Compliance Officer is the Chief Financial Officer.

#### **5. Accounting and Auditing Matters**

The Executive Committee of the Board of Trustees shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Executive Director and the Executive Committee of any such complaint and work with the Committee until the matter is resolved.

#### **6. Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation should be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation.

Any allegations made by an employee that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

## **7. Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law to ensure client health or safety or to provide accused individuals their legal rights of defense.

## **8. Handling of Reported Violations**

The Compliance Officer or other recipient of the report of violation will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

## **9. Notification Process**

Harbor Regional Center Board Members, employees, contractors, service providers, clients and families shall be notified annually, via posting on the Harbor Regional Center website, and through other means, of this Whistleblower Policy as well as the State Department of Developmental Services Whistleblower Complaint Process. Harbor Regional Center Board Members and employees shall be required to acknowledge receipt of this Policy in writing annually and such acknowledgement shall be maintained in the Center's Board and personnel files.

*Revised and approved by the Harbor Regional Center Board of Trustees, May 29, 2013*