

May 18, 2019

**Subject: Fraud, Waste or Abuse Anonymous Reporting Hotline**

Dear Triumph Public High Schools Employees,

The Board of Directors and I as Superintendent of the charter districts operated by Student Alternatives Program, Inc. are committed to the ethical and lawful operation of each charter district and the use of public funds, public property and other resources. To this end and to provide employees and other individuals with a venue by which to express their concerns, the Board of Directors and I have established the Fraud, Waste or Abuse Anonymous Reporting Hotline to provide for the anonymous and confidential reporting of **suspected fraud, financial impropriety and other unlawful, unethical or otherwise unauthorized or prohibited conduct.**

To report suspected fraud, financial impropriety or other unlawful, unethical or otherwise unauthorized or prohibited conduct, employees and other individuals should use the following methods of reporting a concern to the Fraud, Waste, or Abuse Anonymous Reporting Hotline:

- **Toll-Free Telephone:**
  - English Speaking Hotline: (844) 990-0002
  - Spanish Speaking Hotline: (800) 216-1288
  
- **E-mail Address:**
  - [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) [reports must include organization's name]
  
- **Fax:**
  - (215) 689-3885 [reports must include organization's name]
  
- **Website:**  
[https://www.lighthouse-services.com/triumphpublicschools.](https://www.lighthouse-services.com/triumphpublicschools)
  
- **Regular U.S. Mail:** [reports must include organization's name]
  - Lighthouse Services, Inc.  
Fraud, Waste, or Abuse Anonymous Reporting Hotline  
1710 Walton Road, Suite 204  
Blue Bell, PA, USA 19422

**Toll-Free Telephone:**

Employees may call the Fraud, Waste, or Abuse Anonymous Reporting Hotline toll-free. Telephone calls can be made **24 hours a day**, seven days a week at (844) 990-0002 for English Speaking Hotline or (800) 216-1288 for Spanish Speaking Hotline. This telephone line is operated by Lighthouse Services, Inc., an independent, third-party hotline services provider. This is a safe, secure and confidential toll-free telephone number.

**E-Mail:**

Employees may e-mail the Fraud, Waste, or Abuse Anonymous Reporting Hotline at [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com). The report must include the organization's name. This email address is also maintained and monitored by Lighthouse Services, Inc. an independent, third-party hotline services provider. This is a safe, secure and confidential email address.

**Website:**

Employees may submit a report to the Fraud, Waste, or Abuse Anonymous Reporting Hotline via the hotline website at <https://www.lighthouse-services.com/triumphpublicschools>. The report must include the organization's name. This website

is also maintained and monitored by Lighthouse Services, Inc. an independent, third-party hotline services provider. This is a safe, secure and confidential website.

**Fax:**  
Employees may fax the Fraud, Waste, or Abuse Anonymous Reporting Hotline at (215) 689-3885. The report must include the organization's name. This fax machine is also maintained and monitored by Lighthouse Services, Inc., an independent, third-party hotline services provider. This is a safe, secure and confidential toll-free telephone fax number.

**Regular U.S. Mail:**  
Employees may also send a letter to Lighthouse Services, Inc., Fraud, Waste, or Abuse Anonymous Reporting Hotline, 1710 Walton Road, Suite 204, Blue Bell, PA, USA 1942. The report must include the organization's name. This mailing address is maintained and monitored by Lighthouse Services, Inc., an independent, third-party hotline services provider. This is a safe, secure and confidential mailing address.

For more information on the Fraud, Waste, or Abuse Anonymous Reporting Hotline, visit our webpage at <https://www.triumphpublicschools.org/information/fraud-waste-or-abuse-anonymous-reporting-hotline/>.

This Fraud, Waste, or Abuse Anonymous Reporting Hotline is **NOT** a substitute for routine communications within our organization between associates and their supervisors and managers, particularly as to workplace duties. Likewise, it does not replace communications with HR staff about benefit issues or other job-related issues. This Fraud, Waste, or Abuse Anonymous Reporting Hotline is an additional communication tool for specific types of situations and it is provided because we believe that it is a good business practice to do so. Regular business matters that do not require anonymity should be directed to the employee's supervisor and should not be submitted using this service.

You can use any of the above listed forms of communication to report fraud, waste, or abuse that is related to funds from the following:

- The Foundation School Program and other state funds received from the Texas Education Agency (TEA) and other state agencies.
- The federal grant and child nutrition funds received from the TEA, the Texas Department of Agriculture (TDA) and other state and federal agencies.

You may report any suspected fraud, waste or abuse if you have reasonable cause to believe that money was lost, misappropriated, or misused or that other fraudulent or unlawful conduct has occurred. In this context, the following meanings will be used.

- "Reasonable cause to believe" means that a set of facts exists that would lead a reasonable and prudent person to believe that an offense may have been committed.
- "Fraud" means any act that constitutes fraud under applicable federal or state law, including any intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to that person or some other person.
- "Waste" means practices that a reasonably prudent person would deem careless or that would allow the inefficient use of resources, items or services.
- "Abuse" means practices that are inconsistent with sound fiscal, business, or public education practices and that result in unnecessary costs.

Although not all-inclusive, the following illustrative examples of inappropriate behavior may be reported.

- Altering or destroying any record except as otherwise allowed by Board policy.
- Cash withdrawals that are not accounted (i.e., no receipts are filed with the business office).
- Cheating on a STAAR administration.
- Failure to report child abuse.
- Failure to deposit employee income tax deductions into an IRS depository.
- Failure to properly calculate and withhold income taxes.
- Failure to perform required background checks.
- Falsely reporting a person as a charter school employee to the Teacher Retirement System of Texas.
- Falsification of an expense reimbursement request.
- Falsification of data or reports filed with TEA, TDA or other agency.

- Reporting students as enrolled when they are enrolled at another school or have never enrolled at the charter school.
- Reporting students as present when they are absent or had withdrawn.
- Reporting students as enrolled in a special program without providing them with the related services.
- Payment of salaries and wages to an employee that does not exist.
- Transferring public funds to a non-charter school account except as otherwise authorized by the Board.
- Use of state or federal funds for prohibited activities or costs such as alcohol and gifts.
- Use of state or federal funds to purchase personal goods and services such as clothing, shoes, perfume, rings, earrings, funeral arrangements, home improvements, etc.
- Use of state or federal funds for loans to employees, management and board members, including relatives and friends.
- Use of state or federal funds and property purchased with state or federal funds for a purpose not related to the state or federal program.
- Use of employee time and talents to perform work not related to the charter school.
- Use of tax exemption for personal purchases.

## Investigation

Lighthouse Services, Inc., the fraud, waste, or abuse anonymous reporting hotline services provider, has been instructed to refer any complaint received to the Board's designee(s) and legal counsel. In consultation with legal counsel, the Board's designee(s) shall promptly establish if the report is regarding waste, abuse, or fraud or if another investigatory process or legal requirements are triggered. Such reports will be channeled to the Board Chair by legal counsel and the Board's designee(s). In consultation with legal counsel, the Board Chair and the Board's designee(s) shall promptly investigate reports of a suspected violation of a legal requirement, Board policy or administrative procedure or other impropriety.

As deemed appropriate and necessary, the Board may procure the services of a qualified professional to conduct the investigation. If an investigation substantiates the anonymous allegation, the Board's designee(s) or the contracted professional, in coordination and collaboration with legal counsel, shall promptly inform the Board of the report, the investigation, and any responsive action taken or recommended by the administration. All employees involved in an investigation shall be advised to keep information about the investigation confidential.

If in consultation with legal counsel, the Board's designee(s) establishes that the complaint is not regarding waste, abuse, or fraud or otherwise of a nature where the Board should continue to supervise the investigation based on advice from legal counsel, the Board's designee will be instructed to address such complaint administratively and in consultation with and through the Superintendent. Certain complaints (such as Title IX, Title VII, ADA/504, SPED) may be referred to other processes and to coordinators as outlined in policy or procedure (including Employee Handbook).

## Retaliation

The Board is committed to protecting employees from any form of reprisal, retaliation, or discrimination if they, in good faith, report suspected fraud and other impropriety. An employee who believes that he or she has been the subject of reprisal, retaliation, or discrimination must report any such incident(s) to the Superintendent or Board, as appropriate. The Board considers reprisal, retaliation, or discrimination to be a major offense that will result in disciplinary action against the offender up to and including termination of employment.

Thank you for your continued support.

Respectfully,

*Frances Berrones-Johnson*

Frances Berrones-Johnson  
Superintendent/CEO

Cc: David Ojeda, Board Chair  
Joe Hoffer, Legal Counsel  
Daniel Hall, Director of Human Resources & Risk Management