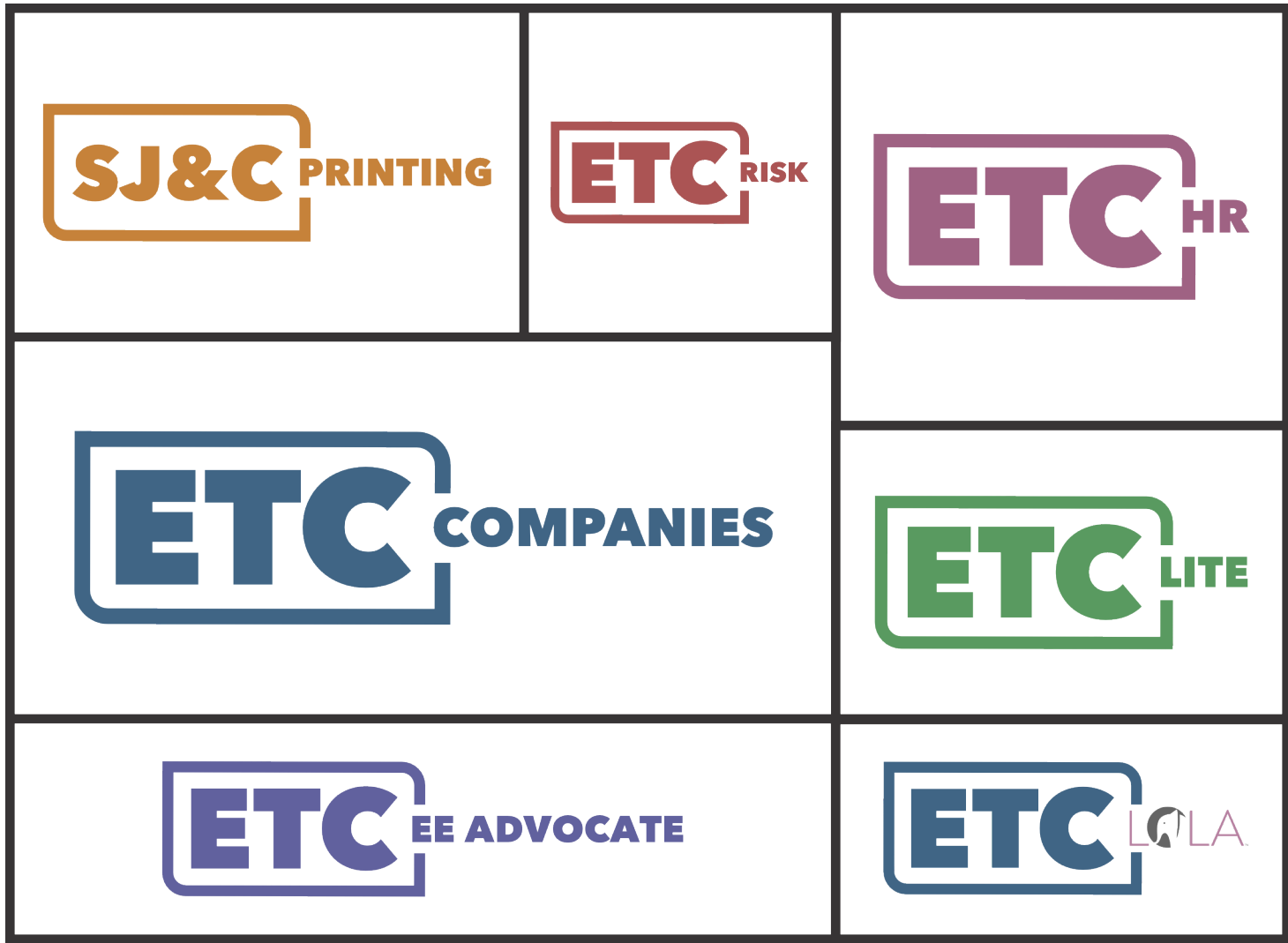


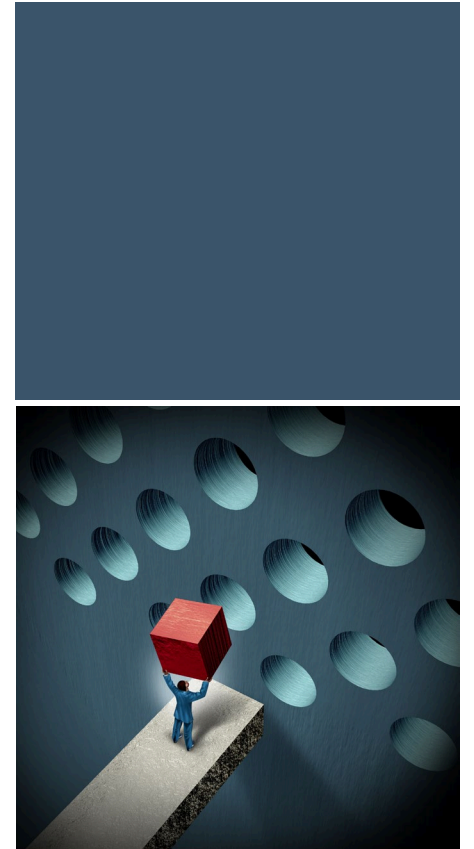


Boutique, Customized, and Personal
Compliance Solutions

Services from
The ETC Companies
2023

ETC's Mission Statement:

Group of professionals working collectively to support the client with compliance services and employee support tools.



The ETC Companies was founded in San Antonio, Texas in September 2012 on a simple concept originally coined by Francis Bacon and more widely known in uses by Thomas Jefferson. **KNOWLEDGE IS POWER.**

ETC feels that what an employer does with that knowledge is probably more important than just “knowing” and each employer should decide their comfort level of action upon that knowledge. ETC Companies is proud to say that in 11 years, they now serve over 2,500 clients annually doing the work that employers have decided they would rather outsource to a partner. Custom solutions and creative applications are always welcome at the ETC Companies.

ETC's Expansion into Today's Services

- Alicia J Haff, JD – Employment Attorney by trade.
- Heather Garcia – Business Consultant with HCM background.

August 2012, ACA
Safeharbors released,
Eligibility Tracking
Calculators & ETC HR LLC
Founded

January 2016, ETC Lite LLC
added to the ETC
Companies

October 2018, SJ&C
Printing added to the
ETC Companies

January 2023, ETC
LOLA LLC added

July 1, 2023, ETC Broker
Services LLC expansion

ETC's Sister Company - 2012



LAW OFFICE OF
HAFF & RAGGIO
PLLC

Clients today need pieces they never considered before! ETC Companies can help fill the gap, not insist on it all!!!!

Prior to the Affordable Care Act passing, founders, Alicia Haff and Heather Garcia focused independently on assisting employers in regulatory and compliance areas. Alicia, an employment law litigator, and Heather working in the human capital management solutions. Today, the ETC Companies is a compliance consulting firm specializing in Employer related issue. Depending on the client's current vendor relationships, ETC can bridge gaps.

While ETC does not directly provide the payroll and HCM technology, ETC can partner with numerous technology companies to build the appropriate solution for each client.

- 1) ACA 1095 reporting and consulting
- 2) Eligibility Tracking and indemnification from 4980H(a) penalties
- 3) Simple to elaborate customized HR support solutions
- 4) Compliance consulting and service offerings
- 5) Employee support professionals that HR departments can tap into for the "hard stuff" with employees
- 6) Wrapping all the above up for preferred partnerships

Today, ETC Companies tracks over 8,000,000 lives in the proprietary software while filing millions of IRS 1095- forms. The Compliance division support over 100 clients with monthly on call support services in various fashions. The ETC Companies is made up of 5 divisional entities that all focus on efficient and compliant solutions. Then leaning into the Haff & Raggio law office when the IRS/DOL get involved.

The ETC solutions are right for a company looking for a partner, not a software.





Since 2017, the IRS has been actively enforcing penalties against Applicable Large Employers (ALEs) related to Form 1094-C and 1095-C reporting requirements using the following letters:

Letter 226J: Proposing employer shared responsibility penalties under Code Section 4980H based on information reported by the ALE in its Form 1094-C or 1095-C filings and information reported by the Marketplace regarding individuals who received subsidized coverage.

Letters 5699 and 5005-A: Proposing civil penalties under Code Sections 6721 and 6722 for failure to file Forms 1094-C and 1095-C as required.

Letter 972CG: Proposing civil penalties under Code Section 6721 for specific filing failures of Forms 1094-C and 1095-C (e.g., failure to timely file and failure to file electronically).

Haff & Raggio, PLLC, has represented numerous ALEs related to these penalties providing savings of more than \$100 million to date. Through the strategic partnership with the ETC Companies, Haff & Raggio, PLLC, can extensively review payroll and benefits data, if needed, to mitigate penalty exposure effectively and efficiently.

Services include:

Full representation before the IRS, including serving as power of attorney and directly communicating with the IRS on the employer's behalf
Preparation and submission of response letters
Preparation and filing of any necessary Forms 1094-C and 1095-C

It started with 2....But today, so much more.



Alicia J. Haff, JD, Founder & Partner at The Law Offices of Haff Raggio PLLC Alicia has oversight of ACA compliance interpretations and manages the ETC Web-Based system to ensure ACA compliance and that the evolutions of ACA rules/regulations are implemented within ETC. Alicia is responsible for the ETC System's calculations, interpretations, and recommendations. Alicia graduated from the University of Texas School of Law (Austin) in 1996 and spent thirteen (13) years litigating employer, insurance, and commercial disputes. In 2010, Alicia left her commercial litigation practice to focus her efforts on general employer compliance. While no longer in the courtroom, Alicia has continued her legal practice in defending employers in Governmental audits including Wage and Overtime, Health & Welfare Benefits and I-9s. Alicia also maintains her Texas General Lines Insurance license, has achieved her Certified Health Care Specialist designation, and is certified as a Patient Protection and Affordable Care Act Professional. As part of her consulting practice, Alicia is retained on a regular basis by clients to advise on the intricacies of the Affordable Care Act and by clients who need to come into compliance with the law and surrounding regulations.

Heather Garcia, Founder. Heather has oversight on business operations within the suite of companies inside ETC. Heather has been in Employer Outsourcing since 1996 when her career started with Automatic Data Processing Inc., (ADP). Heather obtained her Bachelor of Business Administration from Texas A&M University Kingsville in 1995. She began her professional career by working with clients to evaluate how best to handle payroll and tax risks and has evolved into a career of evaluating all business risks dealing with employer related obligations. For the last 25 years, Heather has assisted companies with implementing and/or unbundling complete outsourcing solutions to include payroll, workers' compensation, and health and welfare insurances. Heather has specialized in Federal contractors for many years and continues to assist all employers with today's obligations. She is a licensed General Lines Agent in the state of Texas and achieved her Certified Health Care Specialist designation in 2013. Heather travels the country speaking on both the Affordable Care Act as well as other best practice areas in the employment lifecycle.



Disclaimer: We asked our "behind the scenes" folks to share a picture so you could at least put a face with a name. Not all ETC associates love the camera and spotlight. I bet you can tell who they are.

Meet the Marketing & Client Success Team

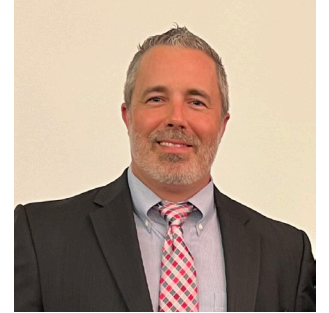
Lisa Davis, Marketing & Client Expansion Manager, Lisa joined ETC in 2016 as an Account Executive and has since moved into a Senior ACA Consultant position. Lisa is a dynamic and motivated consultant that enjoys building long term relationships with ETC clients. Lisa holds a bachelor's degree from Frostburg State University in Public Speaking. Lisa's previous experiences include working in a Client Relationship role at Dell Inc, as well as a Business Analyst with Texas Medicaid and Health Partnership. Lisa brings that corporate background along with her personal caring to the lead role with ETC. She is a natural at keeping her client's best interest at the forefront of every transaction. Lisa has her general lines license and has worked in the healthcare industry for the last 8 years. As Lisa settles in her new West Virginia home, look for her on the board of BIP of WV (WVAHU).



Mark T. Miller, Senior Sales Associate, is a Dallas, Texas native with 30 years of experience in direct sales, specifically to Health and Welfare Benefit plans, ACA Compliance, Dependent Eligibility Verification Audits, Nondiscrimination Compliance, POP/5500 Plan Documents, 401k / 403b plans, Benefits Enrollment Services Health Insurance, Dental-Vision, Short-Term Disability Insurance / Long-Term Disability Insurance, SaaS Software, and Business solutions. Mark holds a Group One Life and Health & Property & Casualty License in the state of Texas. Mark started his technology career in 2015, specializing in ERISA compliance products and services, and continues to stay on top of all changes that can negatively affect employers of all sizes. When Mark isn't working, he spends time with his family making memories that will last a lifetime.

Meet the A-Team, ACA Consulting & Service Team

Matt Scott, *Director of National Account Sales & Team Lead "The A Team"*, Matt joined ETC in 2014 as the first compliance consultant to advise clients on ETC services outside of the founding partners. Matt's understanding of IRS Indicator Codes allows him to work with client's not only during client implementation but throughout the year to completion. As ETC has experienced growth, Matt had a hand in designing and streamlining the implementation processes, templates, and agreements to expedite and improve the client implementation timelines. Matt understands compliance and how it must be integrated differently depending upon the industry and client specific needs. Before joining ETC, Matt worked in sales and business development for business-to-business service companies. Matt received his bachelor's degree in Public Administration from Texas State University



Sheila Roan, *"The A Team" Business Analyst*, Sheila Roan has been with the ETC family since 2020. Before that, she spent ten years as a senior sales support/team leader in selling casino and financial products to the commercial casino industry, which built an ideal foundation for her work as a Business Analyst. She uses her positive energy and collaborative style when working with her teammates and clients alike. She provides quantitative and qualitative analysis of data to be used in the ACA reporting. She continues to use her strong product skill set alongside her background to provide excellent customer service to client companies as well as the in-house ETC team. Sheila holds a BS in Business Administration from the University of Texas at San Antonio.

Maddy Lozano, *"The A Team"*, Maddy joined ETC part time in 2016 as a Business Operations Assistant and transitioned to a Full-Time team member of "The A Team" Pod in 2022. Maddy is now interacting daily with clients and is an integral part of the year end 1095C process. She has an immense knowledge of ETC's back-end systems and processes to ensure client data is reviewed and approved. Maddy has a thirst for personal and business growth and will continue to grow her responsibilities within the ETC Companies. In her spare time, Maddy enjoys playing golf, visiting unique restaurants and finding that perfect item at thrift stores.



Meet the Commercial Avengers, ACA Consulting & Service Team

Jennifer Rodriguez, Director of Operations & “Commercial Avengers” Team Lead Jennifer coordinates all aspects of ETC’s operations to ensure the Clients are serviced as requested and expected. In 1997, Jennifer earned her Associates in Legal Studies from Florida Community College at Jacksonville. Thereafter, she worked as a litigation Paralegal in the fields of employment law and insurance defense for ten years. In 2007, Jennifer returned to school at the University of Texas at San Antonio where she received her Bachelor of Business Administration in Human Resource Management. Her extensive education and experience are useful to the ETC operations as they continue to serve the client needs.

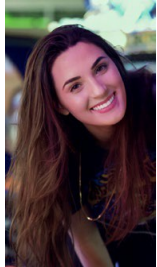


April McGuffie, “The Commercial Avengers” Business Analyst & Lead Data Analyst

As a Senior Data Analyst, April’s role at ETC includes the reviewing of client data, building processors tailored to the format of client-provided files, and the actual processing of data. The role requires keen attention to detail as well as being proficient in Microsoft Excel and Access. Prior to joining the ETC family in 2016, April served her country in the US Navy working as a Registrar at a Military College. This position is where she originally learned how important attention to detail was especially when dealing with a person’s information. Her experience of working in a Registrar’s office brings value to the POD setup at ETC. April will say her biggest strength is her teamwork. While everyone’s role may be different on a team, everyone is vital in the overall success of a team.

Meet the School Avengers, ACA Consulting & Service Team

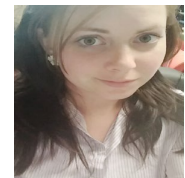
Kelly Teel, “School Avengers” Team Lead, Kelly joined ETC in 2016 as the Texas School liaison. She has evolved into the Team Lead that works directly with all Texas based Independent School Districts. Kelly knows TRS and its intricacies as well as how ACA impacts the school universe with both full-time and substitute teachers. Kelly has her General Lines license as well as serving as a Texas Notary Public. Kelly has four grown boys that continue to play ice hockey and she still loves to watch them tear up the ice. The apple of her eye is her granddaughter that keeps her busy with school activities. Kelly makes it a personal mission to know and understand the key contacts in each school district so ETC can aid in all areas of ACA.



Sydney Lozano “School Avengers” Business Analyst, Sydney started with ETC as a junior data processor and has grown into a Senior Data Analyst. Sydney has been with ETC for projects before her full-time role, so she knows the insides of the systems. Sydney’s core role includes the reviewing of client data and processing data to ensure accuracy in the 1095 compliance process. Sydney has strong knowledge of the Microsoft family of products as well as VBA. Sydney is an artist, too, and if not working you will find her enjoying the outdoors.

Katie Roe, “School Avengers & The Shield Support” Business Analyst

Katie joined the ETC team in 2016. Her role requires both analyzing the data to ensure it is accurate, and getting this data processed into our system without manual manipulation. Katie's skills are strong in the Microsoft family of products and Java programming.



Meet the HR Services Team



Maricia Meyer, Director of ETC HR Companies Maricia joined the ETC compliance team in March of 2015. She has a Bachelor's in Health Administration from Texas State University and 20+ years of practical, operational HR experience. Maricia's hands-on HR experience includes having worked in HR at the fast-growing energy leader and Fortune 100 company Tesoro Companies, Inc. where she created and managed their College Recruitment and Internship Program as well as a premier international grain bin and grain handling manufacturer in the mid-west. Skilled in statutory requirements and HR compliance obligations set out for employers, Maricia provides daily consultation and strategic guidance to the clients regarding complex HR matters – from HR policies and documentation to managing the complexities associated with the interplay of various employer requirements when it comes to FMLA, ADA, Workers' Compensation and State Leave requirements to providing ERISA wrap compliance. She oversees the provision of customized support to not only small mom & pop local establishments but also large, multi-state employers.

Jana Siegle, HR Client Relationship Manager Jana joined the ETC Team in late 2022 bringing with her the experience gathered from decades of life. Back when computers still had floppy discs, she re-started her career as a contractor at the Johnson Space Center working International Space Station projects doing software testing and supporting programming languages. Jana then moved into the "Dot Com" explosion supporting a startup where she put her skills as a "jack of all things, master of many" to good use by becoming the skilled, administrative and project management lead. Jana went back to university and earned her Bachelor of Science degree in front and back-end development in 2016; graduating as valedictorian and discovered her love for PHP programming (just by chance, the programming language ETC is written in). Life always moves us onward and upward so in 2018, Jana found herself encompassed in the world of federal contracting by serving as the Vice President and Director of Human Resources for a contracting firm. Jana's talents will be put to great use by the ETC clients. Much is said about learning in real life versus reading a book and we believe Jana's experiences will bring perspective to clients facing similar situations.



ETC HR con't

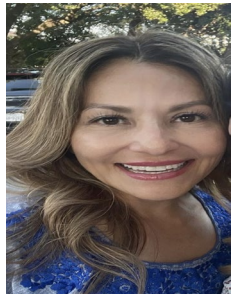
Teresa Saubolle, HR Coordinator Teresa comes to us from USAA Survivor Relations and specializes in customer service and compassion. Prior to USAA, she spent 7 years with State of California, she started her journey as one of the first 300 hires for the CA version of the ACA (Covered California) in 2013. However, most of her 7 years with the State was spent conducting administrative duties for the Department of Corrections and Rehabilitation in the Medical Division. Prior to State service, she was a San Joaquin County Eligibility Worker, and determined government benefits and assistance for those in need at the Human Services Agency for 6 years. Teresa brings many different skills and attributes to the workplace ranging from detail orientation, government compliance, and sales. When Teresa is not working, she enjoys road trips with her family, fishing, nature walks, and going to the beach as much as possible. Teresa is a wife, and mother to 3 sons that keep her on her toes. Teresa is a bit of a jokester and aims to make others laugh and smile, she tries to lift others and always supports her family and peers.



Tristen Milhausen, HR Support Tristen joined ETC HR in 2022 as an HR Systems Support Specialist. She brings with her payroll system knowledge from working directly in HR and Payroll from her prior years of employment. Her current role with ETC HR is assisting employer clients with direct system onboarding and payroll oversight. Tristen's role will expand for clients as she continues to leverage her experience and knowledge. Tristen is a detail-oriented team member and looks forward to maximizing her strengths working alongside the ETC HR team. You will find Tristen listening to country music or enjoying her time on the Florida waters boating and fishing when she is not supporting her client companies.

Julia Cortez, HR Support Julia joined the ETC Team in July 2023 as an HR Consulting Support Staff. Her previous career was in real estate mortgage financing for 25 years. She is detail oriented, has great organizational skills, excellent customer service skills and experience with quality control and risk management. She earned her degree in Business Administration in 2016 from Texas A&M University. She is excited to join the ETC team. She is looking forward to gaining knowledge and experience with the guidance of Heather Garcia and Alicia Haff.

She loves to travel. She has traveled to Mexico, California, Oregon, Washington DC, Canada, Washington State, Maryland, New York, Pennsylvania, Florida, Louisiana and Tennessee. In her free time, she enjoys exercising, meditating, breathing exercises, reading, fishing, and golfing.



Meet the Compliance Team



Cali Beeman, PHR, SHRM-CP, *Director of Broker Operations* Cali joins ETC as Director of Broker Services with a wealth of knowledge in Human Resources and Health and Welfare plans. Her experience in benefit planning, budgeting, compliance, benefit administration, employee relations, training and development, and employee communications will bring expanded knowledge to the already robust team of professionals at the ETC Companies. Her hands-on HR experience will assist the ETC team in providing daily consultation and strategic guidance to the clients regarding complex HR matters. The role will also create new and strategic tools to be utilized by our broker partners to further assist their client companies with obligations and compliance.

Elizabeth Raggio, JD, Director of Compliance for ETC & Partner at The Law Offices of Haff Raggio PLLC Elizabeth joined the ETC Companies in August of 2016 and has spent an inordinate amount of time analyzing the political aspects of ACA as well as other Health & Wellness issues and in educating clients with respect to these issues. Elizabeth serves as a Compliance Consultant for ETC and provides practical guidance and assistance to ETC clients regarding compliance and all employee benefit-related matters including PPACA, ERISA, IRC, COBRA, FMLA, HIPAA, and other laws and regulations impacting the administration of employer-sponsored group health plans. Prior to joining ETC, Elizabeth served as the Compliance Officer for the Employee Benefits practice of Frost Insurance, where she led the employee benefits compliance practice. Elizabeth also worked as a Senior Legislative Analyst for Xerox Corporation and coordinated the implementation of various projects emanating from the Affordable Care Act and other complex legislative changes. Elizabeth is licensed to practice law in Texas, received a Juris Doctor (J.D.) Degree from The University of Mississippi School of Law and a bachelor's degree (B.B.A.) in Economics and Marketing from The University of Mississippi.

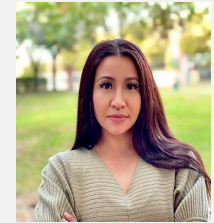


Meet the ETC Companies Support Team



Rhonny Rowden, Director of Accounting & Co-Founder of T1 Rodeo, Rhonny joined ETC in 2014 as marketing and bookkeeping lead. She has evolved into the Director of Accounting running 7 companies Accounting software. She is instrumental in the development of efficient, organized, and accurate systems to make the process seamless for clients. Beyond crunching numbers, Rhonny is instrumental in the creative element of all electronic campaigns and marketing pieces. She is also lead to the newest Employee Advocate tool, T1 Rodeo supporting employees in their T1 Diabetes and Insurance Road trip. Rhonny is a graduate of the University of North Texas with a degree in Kinesiology and a minor in dance.

Michele Rodriguez, Accounting & Admin Support, Michele started with ETC five years ago, as a Business Operations Assistant and has grown to fill several voids within the company. Being a photographer on the side, Michele takes great pride in her work, which flowed perfectly into a Creative Assistant role, inspiring changes to the ETC website. She is also responsible for most of the photos on the website, including employee profiles. This year, Michele expanded her role to include Account Manager, always advocating for and educating customers, and resolving issues to create positive outcomes. Michele is working toward a bachelor's degree in business.



Kari Frederick, HR/ERISA Support, Kari started with ETC in 2015 as a Scheduling Assistant for Ms. Alicia Haff. In her role, she ensures Alicia's calendar of events runs as smoothly as possible. Kari interfaces with clients to make things a bit easier for all which makes Kari feel pride and satisfaction. Kari has brought her attention to detail and strong organizational skills to the ETC HR support team and ETC is super lucky to have her in this role. With sixteen (16) years of Director level experience in the Texas school system, Kari knows what operating efficiently is all about. Kari has a B.S. in Scientific Nutrition from Texas A&M University (Whoop!) and an M.B.A. from Texas Women's University in Denton, Texas. When not working, Kari enjoys spending time with my family and friends. Kari has the most incredible son on the planet and is parent to four fur babies.

Meet the ETC LOLA Support Team (ETC Advocate)



Esther Cardenas Pipoly, Director of ETC LOLA & Founder of Loss of Life Advocates, Esther joined ETC in January 2023 to expand her already amazing employee advocate service known as LOLA, or loss of life advocates which she founded in 2017 after losing her husband and father in a short 63-day window. Esther is a San Antonio native with a passion for helping people. Prior to LOLA, Esther worked as the Chief Creative Officer helping people find resources needed to create synergies. Before Esther found her calling in people advocate services, Esther worked in a retail broker company bringing insurance solutions to employers to retain quality employees. Her background just lends itself to helping people. Today, LOLA is a mental health concierge organization that will hold an employee's hand through loss to living again after life's most difficult moments. LOLA is geared to add value to an employee's experience without jeopardizing the employer's compliance obligations or the employer's position on employment matters. ETC LOLA will support the client walking the fine line between the two positions as an outsider looking in. ETC Companies is so blessed to add this amazing talent and her brilliant concept to the already strong ETC team.

Shelley P. Valdez, Client Success Manager, ETC LOLA, Shelley joined ETC in 2014. She brings to the ETC team 25 years of experience in sales, public relations, and marketing. Shelley uses her strength in communication skills both inside and outside the ETC Companies. Shelley's venture in government contract compliance, before ETC, is the experience that supports her work for ETC Companies. She places high value on customer service, attention to detail, and project coordination. Working with employer clients to implement ETC's myriad compliance services fuels Shelley's passion to educate and strengthen our client's knowledge base on how to embrace the guidelines.



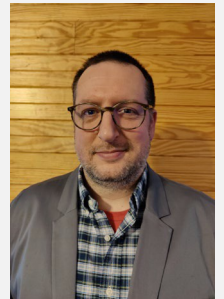
Jeff McMillan, Director of SJ&C Printing Productions & Employee Advocate Support, Jeff McMillan serves as director of print solution for SJ&C. Jeff is responsible for day-to-day operations, working with existing clients and new clients. Jeff previously held numerous roles and positions during his decorated 20-year tenure with Toshiba Business Solutions. Before Jeff joined Toshiba, he worked with the Texas Department of Corrections where one is always served best by finding unique and creative ways to see a different approach in processes. Through his unique discovery approach learned in his early career and mastered at TBS, Jeff has a natural ability to find the opportunity points in a client's process and recommend solutions that not only trim expense but drive increased efficiencies in the collection of revenues. The newest solutions by SJ&C have now grown to truly increasing revenue to the bottom line of an organization with creative and deliberate strategies. Jeff is happy to support the new EE Advocate service line offered inside of the ETC Companies. He is a natural helper.

Meet the Technology Support Team



Kendra Stegemann, *Director of Information Technology*, Kendra has used her 30+ years of experience in the management of IT departments to manage all platforms for ETC. Her expertise as a Database Administrator has been paramount in improving ETC's proprietary system. Kendra has certified numerous organizations for HIPAA/HITECH compliance and brought levels of security to the internal operational platforms. She strengthens the ETC operational team by ensuring the stable operation and performance of all computer systems and networks continually optimizes the network and system performance. Kendra and her team are responsible for AIR XML oversight and IRS filings. Kendra is alumni of the University of Houston.

Pete Morgan, *Director of Programming*, Pete Morgan joined ETC in 2015 and uses his 20+ years of experience in programming to grow and evolve the ETC platforms. Pete can work with a variety of software languages to include Java, PHP, Python, and C++. He is highly skilled in developing processing pipelines to eliminate manual data entry into large database applications. Pete is a highly committed team member always looking to deliver more efficient solutions to data so the ETC Companies can continue to bring new solutions to clients. Outside of his work time with ETC, Pete is married and has five children ages three to thirteen living in East Tennessee where they enjoy outdoor activities. Pete is an avid guitar player and plays at church. To decompress from blinking green & black screens, Pete and the family enjoy running their egg farm with 150 chickens.



Technology Support Team Con't



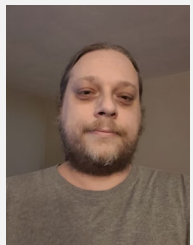
Stephen Carter, *Development Team*, Stephen joined the ETC team in September 2016 in a support role to lead Software Architect and Director of IT. Since the early days, Stephen has transitioned into a full development role inside of the ETC team. One of the earliest accomplishments was migrating the infrastructure to Amazon AWS environment. As a Senior Software Developer now, Stephen is responsible for numerous internal tools and systems. Stephen's focus is on the AIR Electronic filing system as well as state individual reporting systems. Stephen is part of the think tank that is constantly looking at new software solutions that can bring value to clients.

Darlene Deardurff, *Development Team* Darlene joined the ETC Companies just in time to take the systems to a much "prettier" level. Darlene has 30+ years in IT as a Business and System Analyst/Developer/Project Expert. Darlene assists in the development of internal tools to ensure accuracy and efficiency for the service team. Darlene develops well into the "weeds" to find areas of excess time and write protocols and tools to have ETC deliver more efficient information to clients. Darlene's core focus for ETC is automating as many processes and touchpoints as possible for the end-user to eliminate wasted time spent.



Greg Chaffins, *Development Team* Greg joined the ETC Team in July 2018 as a System Developer. Before ETC Greg worked with many different development projects, from a Watson Research Lab project for a well-known insurance name to working with physicists and scientists pushing the bounds of practical radioactive particle detection. Along the way, there were also projects involving Defense Contractor missile tracking and credit card processing utilizing client server architecture. All of this has Greg to his welcomed ideas and advice in developing systems at ETC.

Dave Bennett, *Development Team*, Dave joined the ETC Companies in 2018 as an entry level java programmer. He was quickly given more responsibility and has been instrumental in getting the systems operating much more efficiently. Dave's core talent successes are in an internal application that the end user (client) doesn't see; however, the tool has been a giant success for ETC staff members. Dave is versed in Java, C#, and Python computer languages. Dave is also the financial accountant for his church. Prior to ETC, Dave managed an automotive shop for a contract company and has worked on the installation crew for Spectrum technology. Because Dave has been on the ground levels, he understands how important end user satisfaction is to the overall success of a company.



Jeremy Brammer, *Development Team*, Jeremy joined ETC in 2020 as a software developer focused on ETC's PHP software solutions. Jeremy has a Bachelor of Science in Computer Information Systems with 10+ years of experience. Jeremy is the lead ETC developer on the V2 portal where the focus is the client user experience as well as securing the PII of all client information. Jeremy enjoys time with family, friends, and cats and plays guitar. Jeremy adds a simple philosophy to his work as in his personal life. Be humble, forgive quickly, and make memories. Make each day count. Jeremy brings that mentality into his work by producing results that are meaningful to clients.

Security Protocols and Procedures

For government reporting requirements and to uniquely identify each employee, ETC receives and stores social security numbers provided by employers. These numbers are used exclusively for communication between ETC, employers and the government. Internally, employees are identified by unique random identification numbers. To further ensure protection of Employee Social Security Numbers as well as any other Client Confidential Data, ETC has the following systems/procedures in place:

TX-RAMP Certification - ETC has been granted TX-RAMP Provisional Status and is working towards Level 2 compliance. We use audits and continuous monitoring to prevent and monitor intrusions and attacks. We also rigorously train all employees to ensure that security measures are implemented at every level within the company.

Encryption upon receipt of data containing social security numbers.

ETC site utilizes HTTPS (Hyper-Text Protocol with SSL (Secure Socket Layer)). In a nutshell, this means data passed between browsers and our server is encrypted.

ETC SSL is certified by GeoTrust and/or GlobalSign.

Stored data is protected by PGP encryption.

Gnu Privacy Guard is a public key encryption program, it was designed to interoperate with PGP, the email encryption program. The public key can be freely distributed, and the private key is kept secret. When a file is encrypted with the public key it can only be decrypted using the private key.

The original creation of Gpg4win was supported by Germany's Federal Office for Information Security

Access to the ETC site is restricted to authorized users.

To access any company or employee data, a user must login to the site.

Company representatives are restricted to data for their own company.

Failed login attempts are tracked.

A user id or password error incurs a time delay to prevent brute force login attempts.

Inactive Users are logged out with a 5-minute threshold of inactivity.

Tracking

An Activity Log records all activities. Each log reports to the client affected and the user responsible.

Logins are logged.

Failed logins are tracked.

Backups

Full backups are performed daily.

Incremental backups are performed 2 times during a normal working day, 11am & 4:00pm

Stored data is protected by PGP encryption.

Backups are housed on an off-site storage facility.

Audits

Weekly error reports are run, and corrective measures taken, if necessary.

Security systems are reviewed regularly both by in-house personnel as well as independent third-party experts.

HIPPA/HITECH

ETC is in compliance with HIPAA/HITECH as a Business Associate and all ETC team members with access to PHI have been trained in accordance with HIPAA/HITECH regulations and obligations and will provide a Business Associate Agreement to our Clients.

Social Security Numbers

ETC receives social security numbers provided by employers. These numbers are used exclusively for communication between ETC, employers and the government.

Upon receipt, social security numbers are encrypted.

Only encrypted social security numbers are stored in the database.

Internally, employees are identified by unique random identification numbers.

Reports are available only to the employer and trained ETC personnel. Except when prohibited or mandated by government requirements, reports may contain redacted social security numbers.