

	POLICY A03: INCIDENT REPORTING
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PURPOSE

The purpose of this policy is to provide guidance and procedures for reporting allegations of fraud, program abuse or criminal conduct.

POLICY

All incidents of suspected fraud and/or abuse must be reported to NOW's Executive Director or be filed with OIG directly. Such incidents may be reported anonymously. All staff and any contractor/subcontractor or other entity responsible for providing WIOA services or board and members of the public have the right to report an incident. NOW's and its subcontractor will provide a way to anonymously report such incidents.

PROCESS

Any incident of suspected fraud, abuse, or other program-related criminal activity will immediately be reported directly to NOW's Executive Director.

NOW will complete necessary reporting documentation now will forward documentation to the Department of Labor (DOL) Regional Office of Inspector General (OIG) and the Regional Administrator of the Employment and Training Administration if necessary.

After conducting the investigation, NOW's will issue a report to the Board Chair requesting response to report findings including plans for debt collection and other corrective actions as appropriate. This initial determination offers the opportunity for informal resolution.

GUIDE TO REPORT AN INCIDENT OF FRAUD AND/ OR ABUSE

General Report Procedures

Staff is responsible for reporting any suspected fraud/abuse, misapplication of funds, gross mismanagement or employee/participant misconduct.

Staff is encouraged to report such incidents to their supervisor who must immediately notify NOW's Executive Director, who will in turn notify the Chief Financial Officer of NOW. If the incident involves NOW's Executive Director, the notification is reported to NOW's Board Chair.

Staff can report directly to the DOL OIG Hotline. Incidents may be reported anonymously.

General Investigation Procedures

When NOW's Executive Director is notified by staff of an incident of fraud or abuse, NOW's Executive Director confers with parties involved in the reporting, gathers details, and submits the Incident Report Form, Office of Inspector General (OIG) 1-156.

If OIG investigates the incident and makes a determination, the Director can request an informal hearing within twenty (20) working days from the initial determination.

RESOLUTION

NOW and/or NOW's Executive Director will determine the final resolution to the incident and inform the appropriate parties.

REFERENCES

Community Colleges and Workforce Development (CCWD) Policy 589-40.2

Workforce Innovation and Opportunity Act

20 Code of Federal Regulations Part 667.630

Training and Employment Guidance Letter No. 2-12

CCWD Policy 589-40.5