

	<b>POLICY A03: INCIDENT REPORTING</b>
	<b>APPROVED: 10/28/2016 - NOW</b>
	<input type="checkbox"/> NEW <input checked="" type="checkbox"/> REVISED

**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 and Higher Education Coordinating Commission’s Office of Community Colleges and Workforce Development (CCWD). 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 and CCWD.

NOW will complete necessary reporting documentation and will submit the report to CCWD. CCWD will immediately forward documents to the Department of Labor (DOL) Regional Office of Inspector General (OIG) and the Regional Administrator of the Employment and Training Administration.

Investigations are initiated and conducted by CCWD and will be handed over to the DOL/OIG at their request.

After conducting the investigation, CCWD will issue an initial determination report to NOW’s 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. If no informal resolution meeting is requested, CCWD will issue the final determination.

## **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 and CCWD.

Staff can report directly to CCWD staff at 503-947-2401, or to the DOL OIG Hotline at 1-800-347-3756. 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.

When CCWD 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 CCWD 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