

GLOW WORKFORCE DEVELOPMENT BOARD POLICY

NAME OF POLICY: **Fraud and Incident Reporting Policy**

GLOW WDB APPROVAL DATE: 4/8/20

EFFECTIVE DATE: 4/8/20

Background

The WIOA regulations, Title 20 CFR Section 683.620, require that information and complaints involving criminal fraud, waste, abuse, or other criminal activity must be reported immediately through DOL's Incident Reporting System to Office of the Inspector General, with a copy simultaneously provided to the Employment and Training Administration (ETA). When an individual had knowledge or suspicion of a violation of the WIOA or its regulations, the individual must take prompt and appropriate action.

The intent of this policy is to ensure that all instances of fraud, abuse, or other criminal activity associated with WIOA-funded activities are concurrently reported to the Compliance Review Division, and the Executive Director of the GLOW Workforce Development Board.

Policy and Procedures

It is the policy of the GLOW WDB to immediately report information or complaints regarding fraud, waste, abuse or mismanagement of federal funds.

1. Internal controls are in place to prevent the possibility of fraudulent activity within the organization. However, if the known or suspected activity of fraud is related to the organization, this information should be immediately reported to the Director of the Workforce Development Board.
2. Appropriate actions will be taken immediately to stop the fraudulent activities, safeguard remaining assets and records and prevent future instances from recurring, including personnel action if necessary.
3. Whenever the entity reporting the allegation of an incident believes that immediate action to prevent further financial loss or other damage is necessary, or recovery of funds or property may be impeded if immediate action is not taken, the reporting entity has the responsibility to take any action it deems appropriate, including contacting the local law enforcement agency. Any immediate action taken or planned by the reporting entity must be reported to Office of Financial and Administrative Management when the incident report is submitted.
4. All incident reports, emergency or other, must be sent to the OFAM and OIG using the contact information provided below. GLOW WDB and our other subrecipients will use the Fraud and Abuse Hotline Report Form as provided by the Department of Labor at: <https://www.oig.dol.gov/hotlineform2015.htm> to immediately document and report suspicions, allegations or complains involving:
 - WIOA-related fraud;
 - Misfeasance, nonfeasance or malfeasance;
 - Employee/participant misconduct; or
 - Other potential or suspected criminal actions
5. Situations involving imminent health or safety concerns, or the imminent loss of funds exceeding an amount larger than \$50,000 are considered emergencies and must be immediately reported to the OIG via the hotline telephone number and followed up immediately (within one working day) in the form of an incident report.

6. All subcontracts shall also adhere to the reporting requirements noted above for all incidents of fraud as detailed in this policy of federal funds, as well as notifying the Executive Director of the Workforce Development Board immediately of any suspected fraud.
7. Report Submission. All incidents must be reported to each of the following entities either by phone, mail or email;
 - Executive Director
GLOW Workforce Development Board
587 East Main Street Suite 100
Batavia, NY 14020
585-344-2042 ext. 4212
jlazarony@co.genesee.ny.us
 - Office of Inspector General
Complaints Analysis Office
200 Constitution Ave., NW Room S-5506
Washington, D.C. 20210
1-800-347-3756
hotline@oig.dol.gov
 - Office of Financial and Administrative Management
200 Constitution Ave., N.W., Room N-4653
Washington, D.C. 20210
ATTENTION: OGM

In the event that the GLOW career center staff detects the presence or appearance of fire, theft or damage of property the following should be followed:

- 1) Contact the Executive Director of the Workforce Development Board and inform them of the details of the incident
- 2) Contact the Appropriate County Administrator – The County Administrator or a delegated employee will determine if law enforcement or if any other County department should be notified such as Building & Grounds.
- 3) Contact DOL FOTA representative. Send them a detailed report of the incident and copies of any official reports filed.

The detailed report should contain enough sufficient information to provide a clear, concise report of the incident and should be completed within one working day of the detection of the incident. The report must include a statement of all facts, known at the time, as well as any known or estimated loss of WIOA funds resulting from the incident. The submission of the report should not be delayed, even if all facts are not readily available. Any facts subsequently developed are to be forwarded in a supplemental incident report.