

	<b>Policy No:</b> P-203
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<b>INCIDENT REPORTING</b>	

## PURPOSE

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

## REFERENCES

- Higher Education Coordinating Commission (CCWD) Policy – Incident Reporting
- Workforce Innovation and Opportunity Act
- 20 Code of Federal Regulations Part 683.620
- Training and Employment Guidance Letter No. 2-12

## POLICY

All incidents of suspected fraud and/or abuse must be reported and investigated. Such incidents may be reported anonymously. This policy applies to all staff and any contractor/subcontractor or other entity responsible for providing WOIA services. Staff may anonymously report such incidents to their own agency as well. SOWIB staff and Board shall receive training on this policy and related procedures annually.

## PROCEDURES

1. Any incident of suspected fraud, abuse, or other program-related criminal activity will immediately be reported directly to the SOWIB Executive Director, or if the suspected case relates to the Executive Director, to the Chair of the Board. The Executive Director or Board Chair, upon receiving the report, shall report the incident to HECC and shall investigate. Following investigation, the incident investigation and conclusions shall be reported to the Board and to HECC.
2. CCWD will forward documents to the Department of Labor (DOL) Regional Office of Inspector General (OIG) and the Regional Administrator of the Employment and Training Administration.

3. Follow-up investigations will be initiated and conducted by HECC and will be handed over to the DOL/OIG at their request.
4. After conducting the investigation, HECC will issue an initial determination report to the SOWIB 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, HECC will issue the final determination.
5. Guide to Report an Incident of Fraud and/or Abuse
  - a. General Report Procedures
    - 1) Staff is responsible for reporting any suspected fraud/abuse, misapplication of funds, gross mismanagement or employee/participant misconduct.
    - 2) Staff is encouraged to report such incidents to their supervisor, who must immediately notify the SOWB Executive Director, who will in turn notify the Secretary of SOWIB.
    - 3) Staff can report directly to HECC staff at 503-947-2401, or to the DOL OIG Hotline at 1-800-347-3756. Incidents may be reported anonymously.
  - b. General Investigation Procedures
    - 1) When the SOWIB Executive Director is notified by staff of an incident of fraud or abuse, the Executive Director will confer with parties involved in the reporting, gather details, and submit the Incident Report Form (Office of Inspector General (OIG) 1-156).
    - 2) When HECC investigates the incident and makes a determination, the Director can request an informal hearing within twenty (20) working days from the initial determination.
  - c. Resolution

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