

SOUTHERN WORKFORCE BOARD



INCIDENT REPORTING POLICY & PROCEDURES

SWB – #127

June 20, 2018



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SWB is an Equal Opportunity Employer/Program and Activities. Auxiliary aids and services are available upon request to individuals with disabilities.

I. Subject: Incident Reporting

II. Purpose:

To transmit information through clearly defined procedures for reporting known or suspected incidents of fraud, program abuse, or criminal conduct.

III. References:

- The Workforce Innovation and Opportunity Act (WIOA) (29 USC § 3241(c))
- 20 Code of Federal Regulations (CFR) 683 Subpart F
- 29 CFR 37.35
- 20 CFR 38.54

IV. Background

The Workforce Innovation and Opportunity Act (WIOA), Title 20 CFR 683.620, requires that information and complaints involving criminal fraud, waste, abuse or other criminal activity must be reported immediately through DOL's Incident Reporting System to the OIG with a copy simultaneously provided to the Employment and Training Administration (ETA). Complaints of a noncriminal nature, such as mismanagement and gross waste of funds, may also be reported through DOL's Incident Reporting System.

The grievance and complaint procedures in this policy apply to programmatic grievances and complaints, per 29 USC §3241(c) and do not apply to nondiscrimination and equal opportunity complaints under 29 USC § 3248. Such complaints must be handled with the procedures set forth in that regulatory part.

V. Policy and Message

Allegations regarding fraud, program abuse, or criminal misconduct in WIOA programs or any act that raises questions concerning possible illegal expenditures or other unlawful activity shall be reported immediately to the SWB Executive Director, Kerry Manning, 580-745-5397.

VI. Notifications

A. This policy will be distributed to all WIOA and fiscal agent staff, sub-recipients, or/and contractors.

B. The number for the Department of Labor's Office of the Inspector General (DOL/OIG)***HOTLINE** shall be prominently posted [see Attachment – Hotline Poster] in all SWB WIOA One-Stops and offices for reporting suspected incidents. The Incident Procedures outlined in this policy shall be used to report matters to OOWD—and Region IV. The poster can be downloaded from OIG's website at www.oig.dol.gov/hotlinecontact.htm

The Hotline was established for employees and the public to notify the OIG of suspected fraud, abuse, waste in DOL-funded programs. The Hotline permits reporting of matters anonymously, if desired, to avoid fears of reprisal. Information supplied via the Hotline should be as specific as

possible to enable OIG to identify and solve the problem. The Hotline should not be used for resolving employee grievances, EEO Complaints, labor disputes or other person concerns.

VII. Reporting

A. The SWB established reporting procedures are designed to ensure immediate notification (**within one workday of detection or discovery**) to the SWB and to the OOWD, DOL/ETA, and DOL/OIG regarding incidents.

1. These procedures include instructions to report the incident through the mechanisms described below.
2. The SWB has identified the Board Executive Director as the **central point person** to submit and track any and all reports taken.
3. DOL On-Line Complaint form, should be used to notify OOWD and the Regional Administrator of all known or suspected cases of fraud, abuse, or other criminal activities in ETA-funded programs. The original and one copy of this form should be forwarded, by the SWB Executive Director, to Region IV and OOWD within one work day of the discovery of the occurrence. Region IV and OOWD in turn, will immediately distribute the Incident Report in accordance with established DOL procedures.

B. Any entity (staff, sub-recipients, contractors, and the public) wishing to report an incident shall follow the process outlined below:

1. IMMEDIATELY, upon knowledge of the incident, contact the SWB Executive Director by phone or in person to report the incident.
2. Complete the Incident Report (Attachment A) and submit two copies along with supportive documentation to:

Kerry Manning
SWB Executive Director
910 W. Evergreen Street
Durant, OK 74701
Phone: 580-745-5397

Kerry Manning, as SWB Executive Director and designated **central point person will forward to:**

workforce@osuokc.edu or mail to:
Oklahoma Office of Workforce Development (OOWD)
Oklahoma State University-Oklahoma City
900 North Portland Avenue
Oklahoma City, OK 73107

3. One copy of the completed Incident Report will be submitted to the DOL/ETA Region IV Office at the address below:

U.S. Department of Labor/ETA
525 Griffin Street Room 317
Dallas, TX 75202

4. Report the incident to the DOL Office of Inspector General in one of the following ways:
 - a. Complete the online DOL Office of Inspector General hotline form at the following link: www.oig.dol.gov/hotlinecontact.htm
 - c. Call the DOL Office of Inspector General's Hotline Number at 1-800-347-3756.

ATTACHMENTS

Attachment A –On-Line Compliant Form

Attachment B – OIG/DOL Hotline Poster

HOTLINE FORM

You can use this online form to report allegations of fraud, waste, abuse, misconduct, or other wrongdoing concerning DOL programs and operations, including DOL contracts and grants. You can also use this online form to report allegations of labor racketeering, including alleged misuse of union assets, benefit plan assets or other fraud related to labor-management relations or internal union affairs.

The OIG Hotline cannot provide status reports or other information regarding the disposition of your complaint.

Your Name	<input type="text"/>
E-mail Address	<input type="text"/>
Street Address	<input type="text"/>
Building/Room	<input type="text"/>
City, State, and Zip Code	<input type="text"/>
Phone Number	<input type="text"/>
Details of Your Allegation	
Who committed the alleged misconduct/wrongdoing? Include the full name, title/position, and the affected DOL office or program regarding each alleged Subject. If providing information concerning contractor or grantee fraud, please provide the name of the primary contractor or subcontractor, type of contract, contract or grant numbers, the date of award, and name of agency official(s).	
<input type="text"/>	
Describe what the individual(s) did that was wrong and/or how the misconduct or wrongdoing was committed (e.g. falsifying documents, etc.)? Provide specific and relevant details concerning the alleged misconduct or wrongdoing.	
<input type="text"/>	
When did the misconduct or wrongdoing occur? Please provide specific dates and times, if possible.	
<input type="text"/>	
Where did the misconduct or wrongdoing occur? Please provide the office, city, and state	
<input type="text"/>	
Do you know of efforts made thus far to correct the problem and/or the current status of the problem	
<input type="text"/>	

Where can we obtain additional information concerning this misconduct/wrongdoing (e.g. supporting documentation, etc.)? Additionally, who else might be aware of this misconduct/wrongdoing? Please provide names and contact information of any witnesses who may have more information. Explain how these individuals would possess more information and their relationship to the alleged problem.

Optional (Choose one if desired)

Confidentiality

If necessary, you may contact me for additional information, but please keep my name confidential and do not share it outside of the Office of Inspector General.

Our policy is to honor requests for confidentiality and not to release any data that would identify such individuals unless required to do so by order of law (e.g., court order, subpoena).

Anonymity

I wish to remain anonymous.

Your decision to elect anonymity may limit our ability to conduct an inquiry, if one is warranted, or to appropriately address your issue. In the alternative, you can request that your identity and/or contact information remain confidential and not be shared outside of the OIG. Please consider providing your name and/or contact information to allow for follow-up contact by this office, if necessary.

HELP FIGHT

FRAUD WASTE ABUSE

IT'S YOUR MONEY!



Office of Inspector General
U.S. Department of Labor

Misuse of U.S. Department of Labor Funds
Violations of Federal Procurement Regulations
Federal Workers' Compensation Fraud
Falsification or Forgery of Official Documents
Unemployment Insurance Fraud
Visa Certification Fraud

If you suspect wrongdoing involving
U.S. Department of Labor programs or operations,
contact the OIG Hotline
800.347.3756
www.oig.dol.gov

See website for confidentiality and whistleblower information



Report Fraud, Waste
& Abuse Now!