



TITLE: INCIDENT REPORTING

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 Rogue Workforce Partnership (RWP) Executive Director and Higher Education Coordinating Commission (HECC). 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.

PROCESS

Any incident of suspected fraud, abuse, or other program-related criminal activity will immediately be reported directly to RWP and HECC.

RWP will complete necessary reporting documentation and will submit the report to HECC. HECC 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 HECC and will be handed over to the DOL/OIG at their request.

After conducting the investigation, HECC will issue an initial determination report to the RWP 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.

GUIDE TO REPORT AN INCIDENT OF FRAUD AND/ OR ABUSE

I. General Report Procedures

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

- B. Staff is encouraged to report such incidents to their supervisor, who must immediately notify RWP Executive Director, who will in turn notify the RWP Chief Finance and Administrative Officer.
- C. 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.


II. General Investigation Procedures

When the RWP Executive Director is notified by staff of an incident of fraud or abuse, RWP 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 HECC investigates the incident and makes a determination, the Executive Director can request an informal hearing within twenty (20) working days from the initial determination.

III. RESOLUTION

RWP Board Chair and/or HECC and/or RWP Executive Director, as appropriate, will determine the final resolution to the incident and inform the appropriate parties.

Approved: 
Rogue Workforce Partnership Chair

Date: 10-22-18