



WILLAMETTE WORKFORCE
— PARTNERSHIP —
INCIDENT REPORTING

Revised: July 10, 2024

Policy: A09

PURPOSE

This policy provides guidance and procedures under which Willamette Workforce Partnership (WWP) and its sub-recipients in reporting instances of suspected fraud, program abuse, and criminal conduct. It aims to ensure compliance with federal regulations and the directives outlined in the Training and Employment Guidance Letter (TEGL) 15-23, thereby promoting the integrity and accountability of WIOA-funded activities. This policy also provides protections against retaliation for individuals reporting such incidents in good faith and outlines the processes for documenting and reporting to the Office of Inspector General (OIG) and the Employment and Training Administration (ETA).

REFERENCES

Code of Federal Regulations 20 CFR 683.600; 620
Training and Education Guidance Letter (TEGL) 15-23

DEFINITIONS

Emergency: A situation involving imminent health or safety concerns or the imminent loss of funds exceeding \$50,000.

Employee/Participant Misconduct: Actions occurring during or outside work hours that reflect negatively on the U.S. Department of Labor (Department) or its mission including, but not limited to: conflict of interest or the appearance of conflict of interest involving outside employment, business and professional activities; the receipt or giving of gifts, fees, entertainment, and favors; misuse of Federal property; and misuse of official information and such other activities as might adversely affect the confidence of the public in the integrity of the government (See 29 CFR Part 0; 5 CFR Parts 2635 and 5201), as well as serious violations of Federal and state law.

Fraud, Misfeasance, Nonfeasance, or Malfeasance: Any alleged deliberate action or inaction which may be in violation of Federal statutes and regulations. This category includes, but is not limited to, indications of bribery, forgery, extortion, embezzlement, theft of participant checks, kickbacks from participants or contractors, intentional payments to a contractor without the expectation of receiving services, payments to ghost (fake) enrollees, misuse of appropriated funds, and misrepresenting information in official reports.

Gross Mismanagement: Actions or situations arising out of management ineptitude or oversight and leading to a major violation of statutory (such as Workforce Innovation and Opportunity Act) processes, regulations, or contract/grant provisions. Such actions or situations have the potential to severely hamper accomplishment of program goals, waste government resources, and jeopardize future support for a particular program/project.



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This category includes, but is not limited to, unauditible records, unsupported costs, highly inaccurate fiscal reports or program reports, payroll discrepancies, payroll deductions not paid to the Internal Revenue Service, and lack of good internal control procedures.

Incident Referrals: When the OIG receives an incident report from any source, the OIG determines whether the allegations have merit and, when appropriate, conducts or arranges for an investigation and/or audit. However, in instances where the OIG determines that the incident report does not have investigative or audit merit, the incident report is referred to ETA for resolution. In these instances, depending on the circumstances, ETA will either forward the incident report to the recipient to research and report back, or ETA will work with the recipient to analyze and report on the incident. When an incident report is referred to a recipient, the recipient must prioritize this activity, so ETA can report the resolution to the OIG in a timely manner.

Misapplication of Funds: Any alleged deliberate use of funds, assets or property not authorized or provided for by legislation or regulations, grants, or contracts. This category includes not limited to, nepotism, political patronage, use of participants for political activity, ineligible enrollees, conflicts of interest, failure to report income from Federal funds, violation of contract/grant procedures, and the use of Federal funds for other than specified purposes. An incident report should be filed when there appears to be an intent to misapply funds rather than merely for a case of minor mismanagement.

POLICY

This policy aligns with the directives outlined in TEGl 15-23 and requires dual reporting to both the Office of Inspector General (OIG) and the Employment and Training Administration (ETA). Maintenance of internal procedures regarding criminal fraud, abuse, waste, or other criminal activity will be monitored annually to ensure ongoing compliance and timely updates.

Sub-recipients must report allegations of fraud, waste, and abuse, as well as criminal and other illegal or improper activities in ETA-funded grant programs and operations to the OIG via the OIG Hotline Portal (<https://www.oig.dol.gov/hotline.htm>). Additionally, sub-recipients must send screenshots or photos of the OIG report to ETA via email at ETAIncidentReporting@dol.gov, with the subject line: "ETA Incident Report – [Oregon]." This dual reporting requirement ensures that both the OIG and ETA are promptly informed of any incidents.

In situations involving imminent health or safety concerns or the imminent loss of funds exceeding \$50,000, sub-recipients must report the incident within one working day by telephone to the OIG Hotline at 1-800-347-3756 or 202-693-6999 and follow up



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immediately thereafter with a written incident report. No action, including retaliation, will be taken against any individual who discloses information concerning criminal or improper activities or makes a good faith complaint to proper authorities. Individuals reporting incidents may remain anonymous if they choose, and their anonymity must be protected.

PROCEDURES

To comply with this policy, WWP and our sub-recipients must follow these procedures. To report an incident to the OIG, you must complete the relevant fields in the OIG Hotline Portal <https://www.oig.dol.gov/hotline.htm>. At each submission page, you are required to take screenshots or photos of each step (Your Information, Alleged Violator Information, and Allegation Information) before final submission.

Once you have submitted your form, WWP and our sub-recipients must report the same incidents to ETA by sending the screenshots or photos taken during the OIG report submission process to ETA via email at ETAIncidentReporting@dol.gov. The subject line of the email should read: "ETA Incident Report – [Oregon]." If personal information such as Social Security Numbers (SSNs) was provided to the OIG, it must be redacted before sending the email to ETA.