

Community Action, Inc.

Whistleblower Policy for Reporting Fraud, Waste, and Abuse

Policy:

Community Action, Inc. is committed to the responsible management and use of public resources to conduct business and provide quality services.

This policy is intended to encourage and enable hires, Board Directors, consultants, volunteers, consumers, and the general public to disclose information they reasonably believe is evidence of substantially improper, fraudulent, or dishonest use / misuse of public resources without suffering retaliation. This policy supplements, and does not replace, any procedures required by law, regulation, or funding source requirements.

Applicability:

All hires, Board Directors, consultants, volunteers, consumers, and the general public are covered by this policy.

Provisions:

1. Confidentiality will be maintained except where necessary to conduct an investigation, comply with the law, and provide accused individuals their legal rights of defense
2. Examples of improper, fraudulent, or dishonest use or misuse of resources includes, but are not limited to:
 - Violation of any federal, state, or local law, rule, or regulation related to public funds including Federal or State contracts or grants
 - Abuse of authority related to public funds including Federal or State contracts or grants
 - Gross mismanagement or waste of public funds including Federal or State contracts or grants
 - Substantial and specific danger to public health and / or safety
 - Fraudulent financial reporting
3. Anyone may report suspected improper activities to any of the following:

➤ Executive Director Community Action, Inc.	(814) 938-3302 execmgmt@jccap.org
➤ Pennsylvania Office of Inspector General	(877) 888-7927 www.oig.pa.us
➤ U.S. Office of Inspector General	(800) 447-8477 https://oig.hhs.gov

- Pennsylvania Office of Attorney General (717) 787-3391
www.attorneygeneral.gov
 - Pennsylvania Office of Auditor General (800) 922-8477
www.paauditor.gov
 - A management official or employee of the contractor or grantor responsible to investigate, discover, or address improper activities
4. All relevant matters, including suspected but unproved matters, will be promptly investigated, with documentation of the receipt, retention, investigation, and treatment of the complaint. Appropriate corrective action will be taken, if necessary. Investigations may be conducted by independent persons such as auditors and / or attorneys.
 5. If anyone believes they are suffering reprisals (harassment, discrimination, or other adverse consequence) for a protected disclosure, they may submit a complaint, within thirty days of the date on which the alleged reprisal took place, to either:
 - Pennsylvania Office of Inspector General (877) 888-7927
www.oig.pa.us
 - Pennsylvania Office of Attorney General (717) 787-3391
www.attorneygeneral.gov
 - Pennsylvania Department of Labor and Industry (717) 787-4186
www.dli.pa.us

Additional Provisions for Hires:

1. Improper, fraudulent, or dishonest use / misuse of resources does not include personnel actions such as:
 - Hire grievances
 - Appointments
 - Transfers
 - Performance evaluations
 - Complaints
 - Promotions / Demotions
 - Suspensions
 - Pay reductions
2. This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors. Individuals making complaints must be cautious to avoid baseless allegations; hires intentionally making false allegations are subject to disciplinary action in accordance with Community Action, Inc.'s Employee Handbook.