ADMINISTRATIVE POLICIES/PROCEDURES

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Subject: Criminal Fraud, Waste, Abuse or Other Criminal Activity Related to Federal Awards

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The Workforce Development Board of North Missouri is committed to preventing Fraud, Waste, and Abuse. In accordance with TEGL No. 15-23, WIOA Regulations (20 CFR 683.200), and Uniform Guidance (2 CFR 200.113), all recipients and subrecipients of federal awards under WIOA Title I, the Wagner-Peyser Act, and any other federally funded programs operated through the Board are required to promptly disclose any known or suspected allegations with credible evidence of fraud, waste, misappropriation, or theft of federal funds. Failure to comply with these requirements may result in severe consequences including the withholding or suspensions of funds, debarment, or other legal actions under federal law.

This Policy applies to all WDB employees, Board Members, Subrecipients, and any individuals or entities involved in the administration of programs operated or managed by the Board.

To maintain the highest standards of ethical conduct is met and to remain in full compliance with policies established by the Office of Workforce Development, federal regulations, and U.S. Department of Labor, a comprehensive set of policies, procedures, and oversight activities have been put into place. These include, but are not limited to:

- North Central Missouri College (NCMC) Board Policy Manual
- WDB Administrative Procedures
- Financial Procedures Manual
- NCMC Audit
- Travel Procedures
- Time Sheets
- Inventory Control
- Annual Fiscal/Program Monitoring
- Annual Continuous Improvement Reviews

For the purpose of this policy the following definitions will be used:

- **Fraud** – Intentional deception or misrepresentation made by a person with the knowledge that the deception could result in unauthorized benefit to themselves or another party.
- **Waste** – The careless or needless expenditure of funds or consumption of resources that results form deficient practices, systems, or controls.
- **Abuse** – Improper use of authority or position for personal gain or in a manner that is inconsistent with sound fiscal or operational practices.

The WDB mains a zero-tolerance stance toward fraud, waste, and abuse. All personnel and affiliated parties are expected to conduct themselves with integrity and in compliance with applicable laws and regulations.

Recipients and subrecipients must disclose any violations with credible evidence involving fraud potentially affecting a federal award in accordance with the laws and regulations mentioned above. These disclosures must be made promptly and to the appropriate authorities, including but not limited to:

- Office of Inspector General (OIG) for the U.S. Department of Labor
  - https://www.oig.dol.gov/hotline.htm
- Department of Labor Employment and Training Administration
  - Screenshots of OIG Form to ETAIncidentReporting@dol.gov
- Office of Workforce Development Director
- North Central Missouri College President
- Workforce Development Board of North Missouri Executive Director

When the WDB Executive Director is made aware of an allegation they will:

- Acknowledge the report and initiate a preliminary assessment.
- Ensure the reporting requirements outlined above are adhered to.
- Determine the appropriate course of action, which may include a formal investigation.
- Collaborate with relevant authorities as necessary.
- Implement corrective measures and, if necessary, pursue disciplinary or legal action against involved parties.

The WDB prohibits retaliation against individuals who, in good faith, report suspected fraud, waste, or abuse. Retaliatory actions will be subject to disciplinary measures, up to and including termination.

The Workforce Development Board of North Missouri is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. Missouri TTY users can dial 711. This information can be translated into another language if requested. Please contact the WDB Office for translation assistance.

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