

Early Learning Coalition



of Pinellas County, Inc.

Policy: ELCPC-10.6	Title: Fraud	
	Review Date: 12-9-2009	Next Review Date:

Purpose

To establish the procedures for reporting allegations of possible fraud, misfeasance, nonfeasance, malfeasance, misapplication of funds, gross mismanagement and employee/participant misconduct in the Coalition's programs.

Definitions

- a. Fraud, Misfeasance, Nonfeasance, or Malfeasance: In the operation of any program funded by State or Federal funds administered by the Early Learning Coalition of Pinellas County, Inc., actions which constitute the omission of an act a person ought to do, the improper performance of an act a person might lawfully do, or the performance of an act a person ought not to do. This category includes, but is not limited to, indications of bribery, forgery, extortion, embezzlement, theft of participant checks, kickbacks from participants, and intentional payments to a contractor without the expectation of receiving services.
- b. Misapplication of Funds: Misapplication of funds should be considered as any alleged use of funds, assets or property not authorized or provided for in the grant or contract. This category includes, but is not limited to, nepotism, political patronage, use of participants for political activities, ineligible enrollees, conflict of interest, not reporting income from Federal funds, violation of contract procedures, maintenance of effort violations, and the use of funds for other than their designated purposes.
- c. Gross Mismanagement: Actions or situations arising out of the intentional failure to perform one's duties or responsibilities in reckless disregard of the consequences, which lead to major violations of contract provisions and/or which severely hamper the Coalition's ability to fulfill its mission.
- d. Employee/Participant Misconduct: Employee/participant misconduct should be considered as occupational or professional actions occurring during or outside work hours, that reflect negatively on the Coalition or its mission, and may include, but are 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/State property; misuse of official information;

and such other activities as might adversely affect the confidence of the public in the integrity of the Government as well as serious violations of Federal and State laws.

Responsibility

Management is responsible for the detection and the prevention of fraud, misappropriations and other irregularities. Fraud is defined as intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury. Each member of the management team will be familiar with types of the improprieties that might occur within his or her area of responsibility and be alert for any indication or irregularity. Any fraud that is detected or suspected must be reported immediately to the Executive Director, Treasurer, and the Coalition Board Chair.

Procedure

Any activity or incident that poses a danger to the health, safety or welfare of any individual or individuals should be reported immediately to local law enforcement or emergency management. All allegations, those judged to be of an emergency nature, those receiving public exposure and those related to suspicions should also be reported immediately to the Early Learning Coalition of Pinellas County, Inc. by telephone at 727-548-1439, x222. However, all telephone reports should be followed by prompt written or electronic submission to the Coalition using Form ELCP-GEN-05, Suspected Fraud Referral Record form (copy attached) or other suitable means. In completing the Suspected Fraud Referral Record form, Case Identification number field, use the social security number if the subject is an individual or leave blank if the subject is a business entity. Provide the business entity information in the Comments section of the form. The form should be submitted simultaneously by fax to the following four entities:

- (1) Early Learning Coalition of Pinellas County, Inc. at (727) 548-1509
- (2) James F. Matthews, AWI Office of the Inspector General at (850) 245-7144
- (3) The FDLE Public Assistance Fraud Unit at (850) 922-1911, and
- (4) Agency for Workforce Innovation/Office of Early Learning at (850) 921-3188.

Suspected Fraud Referral Record

Case Identification Number		
Last Name	First Name	MI

<input checked="" type="checkbox"/>	Referral Category	<input checked="" type="checkbox"/>	Reason for Suspecting Fraud
	Recipient		Lost/Stolen/Altered Records
	Non-Recipient - Employee		Forgery
	Non-Recipient - Other		Aiding and Abetting
	Child Care Provider		Illegal Possession
	Other (explain)		Residence
			Trafficking
			Non/Under Reported Income
			Non/Under Reported Assets
			Household Composition
			Deprivation
			Duplicate Benefits
			Other (explain)

Allegations:

Comments:

Signature _____ Date _____
