

Community Action Services and Food Bank

Whistleblower Policy (Employee Handbook)

Amended June 24, 2014

Community Action Services (Organization) Code of Ethics (“Code”) requires trustees, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Organization, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all trustees, officers and employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

In addition to compliance with the Organization’s Code of Ethics, there are additional reporting requirements related to Federal contracts and/or grants. This includes notifying their supervisor, manager, or the Organization’s Compliance officer if they know of, or reasonably believes there is evidence of:

- Gross mismanagement or waste of a Federal contract or grant,
- An abuse of authority relating to a Federal contract or grants (an arbitrary and capricious exercise of authority that is inconsistent with the mission of the entity or the successful performance of a contract or grant.
- A substantial and specific danger to public health or safety, or
- A violation of law, rule, or regulation related to a Federal contract or grant

No Retaliation

No director, officer or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Organization prior to seeking resolution outside the Organization.

If an employee believes that he or she has been subject to retaliation for disclosing a wrongdoing related to a federal grant or contract, they may submit a complaint to Office of the Inspector General within three (3) years of the date on which the alleged retaliation took place. You can find the procedures for submitting fraud, waste, abuse, and whistleblower complaints on the CNCS OIG Internet site at www.cncsoig.gov. All complaints are kept confidential per Section 7(b) of the Inspector General Act of 1978, which prohibits OIG from disclosing the identity of anyone who provides information relating to fraud, waste or abuse of Federal resources.

Reporting Violations

The Code addresses the Organization’s open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee’s supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with the Finance/Personnel Director or anyone in management whom you are comfortable in approaching. Supervisors and managers are required to report suspected violations of the Code of Conduct to the Organization’s Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following

the Organization's open door policy, individuals should contact the Organization's Compliance Officer directly.

In addition to reporting violations or suspected violations to those listed above, employees may reports suspected wrongdoing related to Federal contracts or grants to any of the following:

- The CNCS Office of Inspector General (OIG),
- A CNCS employee responsible for contract or grant oversight or management,
- A management official or other employee of the contractor or grantee who has the responsibility to investigate, discover, or address misconduct, or
- An authorized official of the Department of Justice or other law enforcement agency, a Member of Congress or a representative of a committee of Congress, or the Government Accountability Office
- Violations may also be reported using an on-line form at <http://www.cncsoig.gov/complaint-form/complaint-and-disclosure-form>.

Compliance Officer

The Organization's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his discretion, shall advise the Executive Director and/or the Executive/Finance Committee. The Compliance Officer has direct access to the Executive/Finance Committee of the board of trustees and is required to report to the committee at least annually on compliance activity. The Compliance Officer shall report anything of a serious nature to the Executive Director and the Executive/Finance Committee. The Organization's Compliance Officer is an ex-officio member of the Finance Committee. The Organization's Compliance Officer is the outsource HR representative – Glen Haynie.

Accounting and Auditing Matters

The Executive/Finance Committee of the board of trustees shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Executive/Finance committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Compliance Officer will notify the sender, when known, and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.