

**TAACCCT GRANT POLICY  
FRAUD AWARENESS AND REPORTING**

I. Purpose

This policy establishes guidelines for reporting and investigating potential fraud, misuse of resources or criminal conduct at Richland College.

II. Persons Affected

- a. Richland College Board of Trustees
- b. All college employees
- c. All students
- d. Volunteers
- e. Contractors and vendors

III. Policy

The policy of Richland College is to ensure the following:

- a. All affected persons have a responsibility to ensure that the college's resources are used for valid and appropriate college needs.
- b. The college establishes and maintains proper internal controls to protect the college's resources from misuse.
- c. The college abides by all applicable federal, state and local laws regarding funding and resources.

IV. Definitions

- a. Fraud – Any illegal act of deceit, concealment or violation of trust. This may include gross mismanagement or misuse of funds or resources, conduct violations, illegal or regulation violations or falsification of data. These acts are not dependent upon the threat of violence or physical force. Individuals or organizations participate in fraud to obtain money, property or services; avoid payment or loss of services; or secure a personal or business advantage.
- b. Gross Mismanagement – Actions or situations arising out of management ineptitude or oversight that leads to a major violation of law, regulations, contracts or grants provisions. This includes unauditable records, unsupported costs, inaccurate fiscal or program reports, payroll discrepancies and lack of proper internal control procedures.
- c. Misuse of Funds or Resources – Any alleged deliberate use of funds or resources not authorized by legislation or regulation, contracts or grants. This includes, but is not limited to nepotism, political patronage, use of participants for political activity, ineligible enrollees, conflict of interest, failure to report program income, violation of contract or grant procedures and use of funds for other than specified purposes.
- d. Retaliation – This behavior includes any form of intimidation, reprisal, or harassment against an individual for reporting or participating in an investigation of fraud. Retaliation may include, but is not limited to:
  - Firing, refusing to hire, or refusing to promote an individual;
  - Departing from customary employment or academic practice regarding the individual;

- Transferring an individual to a lesser position in terms of wages, hours, job classification, job security, employment or academic status;
- Informing anyone who does not have a need to know that an individual has reported fraud or participated in an investigation; and
- Impeding an individual's academic advancement.

V. Responsibilities:

- a. Administrators and any employees who have management responsibility over resources are responsible for maintaining compliance with this policy.
- b. All affected persons are responsible for being aware of fraud and for reporting misuse through proper channels.

VI. Procedures:

- a. All affected persons should be familiar with the risk of fraud in their areas of responsibility and be alert to any fraudulent activity. Administrators and employees who have management responsibility should educate employees under their supervision of potential areas of fraud risk and must implement proper internal controls to safeguard the use and control of college resources.
- b. Any affected persons must promptly report actual, potential or suspected fraud to their supervisor or to the President's Office, unless the report involves the president. The college forbids retaliation against anyone who reports suspected fraud. In the case of fraud involving federal regulations or funds, a report may be made to:

Attention: Hotline  
 Office of Inspector General  
 U.S. Department of Labor  
 200 Constitution Avenue, N.W.  
 Room S-5506  
 Washington, D.C. 20210  
 Telephone: 202-693-6999 or 1-800-347-3756  
 Fax: 202-693-7020  
 Website: <https://www.oig.dol.gov/#>

- c. Supervisors who receive a fraud-related report must promptly make a report to the President's Office, unless the report involves the president. In that case, a report must be made to one of the officers of the board of trustees or the federal hotline noted above.
- d. The President's Office is responsible for managing the investigation of suspected fraud and should engage other college units as necessary. All investigatory decisions must be made in writing and all investigatory documentation must be kept for five years after the close of the investigation. All information gathered is confidential. Information may not be discussed or disclosed to anyone without a legitimate need to know.