

# GLOW Workforce Development Board (WDB) Policy

Under the Workforce Innovation and Opportunity Act (WIOA)

**Name of Policy:** Fraud and Incident Reporting Policy

**Approval Date:** ~~4/8/20~~ 3/17/26

**Effective Date:** ~~4/8/20~~ 3/18/26

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## **Background**

WIOA regulations, Title 20 CFR Section 683.620, require that information and complaints involving criminal fraud, waste, abuse, or other criminal activity must be reported immediately through the United States Department of Labor's (USDOL's) Incident Reporting System to the Office of the Inspector General (OIG), with a copy simultaneously provided to the Employment and Training Administration (ETA). When an individual has knowledge or suspicion of a violation of WIOA or its regulations, the individual must take prompt and appropriate action.

The intent of this policy is to ensure that all instances of fraud, abuse, or other criminal activity associated with WIOA-funded activities are concurrently reported to the Executive Director (ED) of the GLOW Workforce Development Board (WDB). \* Please reference: TEGL 15-23 Employment and Training Administration Recipient Responsibilities for Reporting Instances of Suspected Fraud, Program Abuse, and Criminal Conduct issued in June 2024

## **Policy and Procedures**

It is the policy of the GLOW WDB to immediately report information or complaints regarding fraud, waste, abuse or mismanagement of federal funds.

1. Internal controls are in place to prevent the possibility of fraudulent activity within the organization. However, if the known or suspected activity of fraud is related to the organization, this information should be immediately reported to the ED of the WDB or in lieu of the ED, to the Chair of the WDB.
2. The Executive Director and/or Chairman for the WDB will report the fraud to NYSDOL – please references: TA-12-15 Employment and Training Administration Recipient Responsibilities for Reporting Instances of Suspected Fraud, Program Abuse, and Criminal Conduct says to report directly to the OIG and ETA.
3. Appropriate actions will be taken immediately to stop the fraudulent activities, safeguard remaining assets and records, and prevent future instances from recurring, including personnel action if necessary.
4. Whenever the entity reporting the allegation of an incident believes that immediate action to prevent further financial loss or other damage is necessary, or recovery of funds or property may be impeded if immediate action is not taken, the reporting entity has the responsibility to take any action it deems appropriate, including contacting a local law enforcement agency. Any immediate action taken or planned by the reporting entity must be reported to the Office of Financial and Administrative Management (**OFAM**) when the incident report is submitted.
5. All incident reports, emergency or other, must be sent to OFAM and OIG using the contact information provided below. GLOW WDB and its subrecipients will use the Fraud and Abuse Hotline Report Form as provided by the USDOL at: [Office of Inspector General - U.S. Department of Labor](#) to immediately document and report suspicions, allegations or complaints involving:

- WIOA-related fraud;
  - Misfeasance, nonfeasance or malfeasance;
  - Employee/participant misconduct; or
  - Other potential or suspected criminal actions.
6. Situations involving imminent health or safety concerns, or the imminent loss of funds exceeding an amount larger than \$50,000 are considered emergencies and must be immediately reported to the OIG via the hotline telephone number and followed up immediately (within one working day) in the form of an incident report.
  7. All subcontracts shall also adhere to the reporting requirements noted above for all incidents of fraud as detailed in this policy of federal funds, as well as notifying the WDB ED immediately of any suspected fraud.
  8. Report submission. All incidents must be reported to each of the following entities:
    - Executive Director  
GLOW Workforce Development Board  
587 East Main Street Suite 100  
Batavia, NY 14020  
585-344-2042 ext. 4212  
[tracy.vanvleck@geneseeny.gov](mailto:tracy.vanvleck@geneseeny.gov)
    - NYSDOL: Complete an incident report ([ta-12-15-attachment-incident-report](#) ) and email it to [LWDB@labor.ny.gov](mailto:LWDB@labor.ny.gov) Additional information is available in [TA-12-15](#).
    - Office of Inspector General  
[Online form: Office of Inspector General - U.S. Department of Labor – Be sure to take screenshots of all three portal screens to submit to the ETA \(see below\)](#).

ETA: Send screenshots of each of the three OIG Hotline Portal screens to ETA via email at: [ETAIncidentReporting@dol.gov](mailto:ETAIncidentReporting@dol.gov). The subject line of the email should contain: “ETA Incident Report – NY”.

If the GLOW Career Center staff detects the presence or appearance of fire, theft or damage of property, the following steps should be taken:

- 1) Contact the WDB ED and inform them of the details of the incident;
- 2) Contact the appropriate County Administrator – The County Administrator or a designated employee will determine if law enforcement or any other county department should be notified such as Building & Grounds; and
- 3) Contact NYSDOL FOTA representative. Send them a detailed report of the incident and copies of any official reports filed.

The detailed report should contain sufficient information to provide a clear, concise report of the incident and should be completed within one working day of the detection of the incident. The report must include a statement of all facts, known at the time, as well as any known or estimated loss of WIOA funds resulting from the incident. The submission of the report should not be delayed, even if all facts are not readily available. Any facts subsequently developed are to be forwarded in a supplemental incident report.