

POLICY

It is the policy of Poverello to promote transparency in all its dealings with clients, staff, volunteers and business associates. Even the appearance of impropriety can cause damage to the agency's reputation. The center fully supports any staff, volunteer or client who wishes to provide information about suspected Fraud, Abuse or Unethical Behavior by staff, volunteers or relevant program staff. The Poverello Center, Inc. considers it everyone's responsibility to detect fraud.

PROCEDURE

All Directors, Staff and Volunteers are responsible for the detection and prevention of fraud, misappropriations, theft and other financial or other irregularities.

The code of conduct as contained in the Employee and Volunteer Handbook specifically prohibits theft, fraud or covering up any wrongdoing. The handbook is provided to every employee upon hire and to every volunteer upon their acceptance as a volunteer of the center. Providing the handbook is viewed as an excellent opportunity to communicate the Poverello Center, Inc.'s corporate ethic, and to provide a deterrent for those tempted by an opportunity to perpetrate theft, fraud or covering up any wrongdoing as well as a guide for employees on the proper methods for handling fraud.

Any fraud, abuse, unethical behavior or cover up that is detected or suspected by a staff person, volunteer, client or Director must be reported immediately to the CEO x 101 tpietrogallo@poverello.org and/or Administrative Assistant x 115 jcastillo@poverello.org who documents and Coordinates all investigations with the affected areas, both internal and external. The Board of Directors through the Chairperson is responsible for detection, investigation and action against fraud or corruption in the CEO. Complaints regarding the CEO are handled by emailing: aggabee@aol.com.

Reports may be made in person, in writing or through electronic mail. An investigation includes the assembly of a team comprised of experienced staff and external experts if deemed necessary to adequately investigate the allegation by the assigned investigator and determine whether the incident occurred and what if any controls were missing or in need of implementation to avoid the behavior in the future.

External resources for reporting and addressing fraud are included here:

Medicaid fraud by health care providers may be reported by contacting the Office of Attorney General at 1-866-966-7226 or file a complaint online at <http://myfloridalegal.com>.

Violation of Broward County policies by Broward County employees, such as stealing county time, ethics violations and whistleblower, including whistleblower retaliation can be reported by:

1. To file a complaint by mail, please complete and sign and mail the complaint to:
Broward Office of the Inspector General
One North University Drive, Suite 111
Plantation, FL 33324
2. To file a complaint by fax, you may fax any information and attachments to (954) 357-7857.
3. To file a complaint by e-mail, you may send an email with information and attachments to InspectorGeneral@broward.org.
4. To file a complaint by phone, you may call Broward County's Hotline at (954) 357-TIPS, which will record your information. You may remain anonymous or request to be contacted.

SNAP fraud may be reported through phoning Florida (866) 762-2237 or visiting: <http://www.dcf.state.fl.us/access/reportfraud/>

USDA fraud may be reported by calling [(800) 424-9121; (202) 690-1622 or; (202) 690-1202 (TDD), writing (United States Department of Agriculture Office of Inspector General, PO Box 23399, Washington, DC 20026-3399) or going on line

(<https://www.usda.gov/oig/hotline.php>). The identity of complainants is protected under the provisions of the Whistleblower Protection Act of 1989 (PDF) and the Inspector General Act of 1978 (PDF)

No person employed, volunteering or served by Poverello shall be retaliated against for reporting suspected fraud in good faith through the options provided in this policy. Also, to the extent possible, the identity of the whistleblower shall be protected by the investigators.

The CEO, at their discretion may from time to time ask employees/managers or supervisors to certify their knowledge or suspicion of any of the above in a manner they see fit.

Approvals:

Signature: _____ Date: _____
Shanel Pamphile,
Eat Well Center Manager

Signature: _____ Date: _____
Roy Bendeck,
Thrift Store Manager

CEO Signature:  Date: 6/7/19
Thomas S Pietrogallo, MSW/LCSW, MBA
Chief Executive Officer

BOD Approved Date: 06.22.16

Date Established: 06.01.2016

Date Reviewed/Revised: 07.09.2017; 06.07.2019