



TOWN OF LANTANA
ADMINISTRATIVE POLICY

POLICY No. 07
ISSUED: 6/10/2013
REVISED: _____

SUBJECT: Employees Reporting Matters to the Office of Inspector General

REFERENCE: The Office of Inspector General, Palm Beach County, Florida Ordinance and Florida Statutes Section 112.3187 – 112.31895

PURPOSE: To provide policies and procedures relating to an employee reporting a matter to the Office of Inspector General (OIG).

POLICY AND PROCEDURES:

Policy:

The Inspector General has responsibility for investigating possible instances of fraud, waste, mismanagement, misconduct and other abuses by any Town employee, official, contractor or any other parties doing business or in a financial relationship with the Town. Town employees shall report or cause to be reported to the OIG any matter that comes to their attention that they think meets the preceding criteria in accordance with this Administrative Policy. All employees are expected to fully cooperate with the OIG in the exercise of the OIG's functions and authority. Such cooperation shall include, but not be limited to, providing statements, documents, records and other information.

Procedures:

1. Town employees shall *promptly* notify the OIG and/or their departmental head if possible:
 - a. Mismanagement of contract (misuse or loss exceeding \$5,000 in public funds),
 - b. Fraud,
 - c. Theft,
 - d. Bribery, or
 - e. Any other violation of law which appears to fall within the jurisdiction of the Inspector General.

If the matter appears to involve the department head, the employee may *promptly* report it to the Town Manager. An employee may make his or her report to either the OIG or management orally or in writing. If a department head receives such a report from an employee, or otherwise becomes aware of such a situation, the department head shall *promptly* report the situation in writing to the OIG, with a copy to the Town Manager.

2. In addition to the above, an employee may directly report to the OIG any other conduct which may fall within the Inspector General's jurisdiction.
3. Whistleblower Allegations – In accordance with this Ordinance and the Florida Whistleblower Act, if a municipal employee reports any of the following directly in writing to the Inspector General, he or she *may* be granted "*whistle-blower*" protection by the Inspector General:
 - a. A violation or suspected violation of any federal, state, or local law rule or regulation committed by an employee or agent of an agency or independent contractor which creates and presents a substantial and specific danger to the public's health, safety, or welfare.
 - b. Any act or suspected act of gross mismanagement, malfeasance, misfeasance, gross waste of public funds, suspected or actual Medicaid fraud or abuse, or gross neglect of duty committed by an employee or agent of an agency or independent contractor.

Employees should note that reporting a matter to the Inspector General pursuant to the Whistle-blower Act does not guarantee the employee "whistle-blower" protection under the Act. That is a determination which will only be made by the Inspector General after evaluation of the complaint.

This Administrative Policy shall not prohibit or excuse an employee from making other required reports regarding any matter in accordance with any other applicable requirements or laws.

Methods of Reporting:

1. The OIG reporting form can be found at <http://www.pbcgov.com/OIG/rwfa.htm>.
2. Email to the OIG at inspector@pbcgov.org
3. Fax to the OIG at (561) 233-0735
4. U.S. Mail to the OIG at PO Box 16568, West Palm Beach, FL 33416
5. OIG toll free Hotline (877) 283-7068 or (561) 233-2350

PREPARED BY: Crystal B. Gibson DATE: 6/10/13
Crystal Gibson, Town Clerk

APPROVED BY: Deborah S. Manzo DATE: 6/10/13
Deborah S. Manzo, Town Manager