Community Action Opportunities
HELPING PEOPLE. CHANGING LIVES.

Whistleblower Protection
Approved: June 22, 2010

Rationale:

Community Action Opportunities is committed to maintaining the highest ethical standards. This commitment to integrity is key to our mission of "Helping people who live on low-income change their lives..." because we are entrusted with and use public assets to promote this mission. We design and follow internal controls and operating procedures to protect these assets and that help Management to prevent, deter and detect improper activities. However, even the best systems of segregation of duties and controls cannot provide absolute safeguards against irregularities. Therefore, this Policy provides guidance about reporting irregularities and protections against and remedies to reprisals.

Policy:

It is the intent of Community Action Opportunities to adhere to all laws and regulations that apply to the organization. However, the support of all agency employees is necessary to comply with the thousands of relevant laws and regulations.

Reporting Violations

Therefore, if, at any time, any employee, or volunteer, sub-contractor or others with whom the organization has a relationship, reasonably believes that some policy, practice or activity of Community Action Opportunities or its employees, volunteers, sub-contractors or others with whom the organizations has a relationship, is in violation of law, or has evidence of improper activity, The Agency encourages the same to submit a confidential oral or written report about that violation to any supervisor, department head, the Human Resources Manager or the Executive Director.

The Agency's Management shall diligently investigate that report and provide a timely response to the reporter about the legitimacy of the accusation.

Also, as a nonfederal employer that receives ARRA funds, the Agency shall comply with Title XVI Section 1553 of the American Recovery and Reinvestment Act (ARRA) of 2009, and develop procedures and methods for employees, volunteers, sub-contractors or others with whom The Agency has a relationship, to report such information and evidence about the misuse of all agency assets including funds covered under ARRA.

Whistleblower Protections
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<u>No Reprisals</u>
Neither shall Community Action Opportunities Board of Directors, officers or employees retaliate against any employee who discloses or threatens to disclose to the Executive Director, a supervisor, a public official or body, or others as defined in ARRA section 1553, information about any activity, policy, or practice of the Agency that the employee reasonably believes is in violation of a law, rule or regulation mandated pursuant to law, or public policy concerning health, safety, welfare, or protection of the environment or other gross mismanagement, waste, danger abuse of authority, or violations of law or rule as defined in Section 1553 of the ARRA.

<u>Rights and Remedies</u>
Further, the Agency shall develop procedures and methods that notify and encourage any employee of the Agency, or other organizations with whom the Agency has a relationship, including but not limited to those as defined in Section 1553 of ARRA, who believes that s/he has been subjected to a prohibited reprisal, to file a report and request an investigation of the reprisal to either the Agency's Human Resources Manager, Executive Director or other public official as defined in ARRA Section 1553.

If the report process does not result in relief to the employee, s/he can file a civil action under Section §1553(c)(3). Upon request, this section also grants employees with such reports the right to a trial by jury.

Finally, no employee shall be allowed to waive by any agreement, policy, form or condition of employment, including by any pre-dispute arbitration agreement, these legal rights and remedies.

To report fraud, gross waste, misuse or abuse of recovery funds log on to www.recovery.gov or call 919-733-1433.