



ANTI-FRAUD, WASTE, & ABUSE POLICY

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Date of Original Policy Adoption: _____

Amendment Log

Date of Amendment	Parts Amended	Approved by

Anti-Fraud, Waste, and Abuse (AFWA)

Calhoun Liberty Hospital (the Hospital) is committed to managing Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) funds transparently, honestly, and accountably. As a steward of these funds, the Hospital will work to combat fraud, waste, and abuse in its CDBG programs.

This policy addresses CDBG-DR programs administered by the Hospital, and is intended to aid in the detection and prevention of fraud, waste, and abuse in these programs.

This policy applies to Hospital employees and other entities and individuals accessing or attempting to access benefits under CDBG-DR programs.

AFWA Definitions / Examples

- **Fraud** – the intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to him/herself or some other person. Examples of fraud include:
 - Misrepresentation of –
 - Income
 - Household composition
 - Financial resources
 - Residency
 - Citizenship status
 - Using another person’s identification
 - Forging signatures or documents
 - Concealing access to duplicate funding
 - Misrepresenting a medical condition to obtain additional benefit
 - Misusing funds
- **Waste** – over-utilization of services, supplies, or equipment; causing unnecessary costs through carelessness or inefficiency.
- **Abuse** – financial activities that result in unnecessary costs to the Hospital.
- **Other actions** constituting fraud, waste and abuse include:
 - Any dishonest or fraudulent act
 - Misappropriation of funds, supplies or assets
 - Impropriety in handling or reporting money or financial transactions
 - Profiting as a result of insider knowledge
 - Unauthorized disclosure of confidential or private information

- Accepting or seeking anything of material value from contractors, vendors or any person that seeks a beneficial decision, contract, or action for CDBG activities.
- Unnecessary cost or expenditures
- Diversion of program resources

AFWA Complaint Process

Individuals and entities involved or interested in CDBG activities may report suspected fraud, waste, or abuse by contacting the Hospital or submitting an online form to Department of Economic Opportunity at <http://floridajobs.org/rebuildflorida/report> (all contact information fields are optional to allow for anonymity). The Hospital will utilize the form found in Appendix A to document reports of Fraud, Waste, or Abuse, including:

- The nature of the call or inquiry;
- The actions taken in response to the call or inquiry;
- The results of the actions taken;
- If the caller was referred to a different entity or agency, the results obtained by the referral agency.

The CEO of Calhoun Liberty Hospital shall receive AFWA Complaints, unless they designate another individual in writing to perform said activities. Contact information is as follows:

- Christinia Jepsen, CEO
- (850) 674-5411, Ex.255
- Christiniajepsen@calhounlibertyhospital.com

Substantiated cases of fraud, waste, or abuse of government funds will be forwarded to HUD, Office of Inspector General Fraud Hotline and DEO's HUD Community Planning and Development Representative within 3 business days of receipt.

AFWA Prevention Measures

The Hospital will comply with any DEO Office of Long Term Resiliency requests, and will use financial and project management protocols to prevent Fraud, Waste, or Abuse. This includes:

- Regularly review policy for alignment with federal, state, and local regulations, as well as program activity files.
- Monitor Hospital CDBG programs and project sites.
- Oversee Hospital CDBG prime contractor for compliance.
- Identify and assist DEO with investigations of potential fraud, referring cases to DEO Office of Inspector General as appropriate.

Confidentiality

Complainants reporting fraud, waste and abuse of federal resources or other program irregularities may remain anonymous. All information received about suspected fraud, waste and abuse will be treated confidentially. All investigative materials developed and interviews conducted to substantiate the allegations of fraud, waste or abuse will be treated confidentially.

Information will only be disclosed on a need-to-know basis to appropriate law enforcement authorities. No information about the status of an investigation will be shared outside of necessary high-level Hospital administration and appropriate DEO and HUD personnel.

Florida's Whistle-blower's Act

Florida's Whistle-blower's Act prevents agencies or independent contractors from taking retaliatory action against an employee who reports to a person or agency designated by the statute, violations of law on the part of a public employer or independent contractor that creates a substantial and specific danger to the public's health, safety or welfare. It also prevents agencies and independent contractors from taking retaliatory action against any person who discloses information to an appropriate agency alleging improper use of governmental office, gross waste of funds, or any other abuse or neglect of duty on the part of an agency, public officer, or employee.

Violations of this act should be reported in accordance with Section 112.3187, Florida Statutes. Any employee who has a complaint may contact the state's whistle-blower's hotline at (800) 543-5353.

Cooperation with Investigations

When allegations of violations of these standards are received, full and accurate information will be obtained to ensure an appropriate response. Hospital employees will cooperate with HUD and DEO investigators to uncover facts surrounding possible violations in an official investigation. Failure to comply without a valid mitigating reason, such as exercising a federal or state right, will constitute a violation of this policy and subject the employee to an appropriate disciplinary action up to and including dismissal.

Fraud-Related Training

As a subrecipient of DEO, the Hospital is required to participate in fraud training provided by HUD Office of the Inspector General (OIG). Hospital staff and contractors will participate in this training when it is made available by HUD OIG. When feasible, hospital staff and contractors may receive fraud-related training provided by DEO to assist in the proper management of CDBG funds.

Administration

This AFWA policy will be reviewed and revised as needed to comply with Federal and State requirements. The Hospital's CEO is responsible for administration, revision, and application of this policy.

Appendix A: AFWA Contact Log

AFWA Inquiry Log

Calhoun-Liberty Hospital

This form can be utilized to capture AFWA-related calls and inquiries made to the Hospital. This form will log nature of calls, actions taken, and results of actions.

- Date:
- Caller Name (Optional):
- Caller Contact (Optional):

	AFWA Detail	Other Notes / Further Information
What was the nature of the call? <i>(Taken on date of the call)</i>		
What actions will the Hospital / take to address the call? <i>(Can be entered on date of call or shortly afterward)</i>		
What were the results of the action taken to address the call? <i>(To be obtained within 1 month of actions taken)</i>		