City of Carroll

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MEMO TO: Mike Pogge-Weaver, City Manager

FROM: Laura A. Schaefer, Finance Director/City Clerk

DATE: December 17, 2020

SUBJECT: New Policy 0109 – Fraud Reporting Policy

In August 2020, the City began the process to submit a grant reimbursement request with Federal Emergency Management Agency (FEMA) and the Iowa Homeland Security & Emergency Management. The request is for expenses related to mitigating the spread of COVID-19 and for the health and safety of employees and the public.

Part of the process is a review of certain City policies. FEMA and Iowa Homeland Security are requiring the city put in writing a Fraud Reporting Policy. City staff has worked with Iowa Homeland Security & Emergency Management to draft the proposed attached new Policy No. 0109 – Fraud Reporting.

To be in compliance and to be able to receive federal funding, it is required to have a policy in place that lists who at the city is responsible for reporting any suspected violations including fraud, bribery or gratuity potentially affecting a Federal grant. The policy states if any employee, elected official, board or commission member, volunteer etc. learns of any violation, they are to report it to the City Manager. The City Manager is then responsible for reporting the violation to the relevant federal agency or pass-through agency.

RECOMMENDATION: Council approval, by resolution, of new Policy No. 0109 – Fraud Reporting Policy

RESOLUTION NO. _____

A RESOLUTION APPROVING NEW POLICY NO. 0109 – FRAUD REPORTING POLICY

WHEREAS, the City has applied for a Federal Emergency Management Agency (FEMA)/Iowa Homeland Security & Emergency Management grant for reimbursement of COVID-19 expenses and;

WHEREAS, a requirement of FEMA is to have a Fraud Reporting Policy in place, and;

WHEREAS, City staff has worked with Iowa Homeland Security & Emergency Management to create a new fraud reporting policy; and

WHEREAS, the City Council of the City of Carroll, Iowa, finds that new fraud reporting policy is accepted and should, therefore, be approved.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Carroll, Iowa, that the attached new Policy No. 0109 – Fraud Reporting Policy is approved.

PASSED AND APPROVED this 21st day of December, 2020.

CITY COUNCIL OF THE
CITY OF CARROLL, IOWA

_____
Jerry Fleshner, Mayor Pro Tem

Attest:

_____
Laura A. Schaefer, City Clerk

CITY OF CARROLL

POLICIES AND PROCEDURES MANUAL

Subject	Policy No.
Fraud Reporting Policy	0109

Responsible Division(s), Office(s)	Related Policies & Procedures
All	

Effective/Revision Date	Approval(s)
12/21/2020	Mike Pogge-Weaver

Purpose: To be in compliance with Uniform Grant Guidance, in Title 2 Code of Federal Regulation (C.F.R.) Grants and Agreements, Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

Application: A non-Federal entity or applicant for a Federal award must disclose, in a timely manner, in writing to the Federal awarding agency or pass-through entity all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Non-Federal entities that have received a Federal award including the term and condition outlined in Appendix XII—Award Term and Condition for Recipient Integrity and Performance Matters are required to report certain civil, criminal, or administrative proceedings to SAM. Failure to make required disclosures can result in any of the remedies described in §200.338 Remedies for noncompliance, including suspension or debarment. (See also 2 CFR part 180, 31 U.S.C. 3321, and 41 U.S.C. 2313.)

Requirements: If an employee, elected official, board or commission member, volunteer, agent, etc. learns of a violation of Federal criminal law involving fraud, bribery, or gratuity potentially affecting a Federal grant, they will report the violation to the Carroll City Manager Mike Pogge-Weaver. The City Manager is responsible for reporting the violation to the relevant federal agency, or pass-through agency in writing, and in a timely manner.