

CDBG-DR

Anti-Fraud, Waste, and Abuse Policy

Lee County, Florida

Version History

Version	Date	Summary Description
1		Creation of CDBG-DR Anti-Fraud, Waste, and Abuse Policy

TABLE OF CONTENTS

Version History	1
Overview	4
Scope	4
Policy.....	4
Definitions and Examples	5
FWA Submission Form	5
Complainant/Discloser	5
Fraud	5
Waste and Mismanagement.....	5
Abuse.....	6
Awareness and Prevention	6
Related Training.....	6
Informative Material.....	7
Implementation of a Conflict of Interest Policy.....	7
Personally Identifiable Information	10
Detection	10
Internal Auditor.....	11
Role in Preventing, Detecting and Investigating Fraud, Waste and Abuse.....	11
Contractor Monitoring.....	12
Subrecipient Capacity and Monitoring.....	12
Beneficiary Evaluation and Eligibility	13
Verifying the Accuracy of the Information	13
Report and Investigation.....	14
Responsibility to Report	14
How to report fraud, waste, abuse, or mismanagement?	15
Investigation.....	16
Investigation Results	16
Other Irregularities	16
Whistleblower Protection Relating to Federal Grants and Contracts	18
Employee's Right to Contact the OIG or Congress.....	19
Common Types of Fraud	21

Disaster Recovery Grants	21
Crosscutting Program Frauds	21
Rental Assistance Programs	22
Single Family Mortgage Insurance	23
Multifamily Mortgage Insurance.....	25
Community Planning and Development	25
Public Housing	25
Contact Information	26

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Overview

The U.S. Department of Housing and Urban Development (HUD) allocated Community Development Block Grant Disaster Recovery (CDBG-DR) funds to address Lee County, Florida's long-term recovery needs caused by Hurricane Ian. As grantee, Lee County is committed to the responsible management of CDBG-DR funds, including maintaining a comprehensive policy for preventing, detecting, reporting and rectifying fraud, waste, abuse, or mismanagement of funds (FWA). To that end, Lee County encourages any individual who is aware or suspects any kind of conduct or activity that may be considered an act of fraud, waste, abuse, or mismanagement to report such acts to the Office of Strategic Resources and Government Affairs, directly to the Office of Inspector General (OIG) at HUD, or to any local or federal law enforcement agency.

The Office of Strategic Resources and Government Affairs is responsible for the CDBG-DR procedures to prevent, detect, report and rectify fraud, waste, abuse, and mismanagement of funds. An Analyst from the Office of Strategic Resources and Government Affairs will be responsible for the intake and routing of all FWA concerns reported.

The Lee Clerk of the Court & Comptroller Department of Inspector General will be the independent Internal Auditor for the duration of this grant.

Scope

This policy applies to any allegations or complaints, either known or suspected, that could be considered acts of fraud, waste, abuse, or mismanagement. Allegations or complaints may involve any citizen, previous, current or potential applicant, beneficiary, consultant, contractor, employee, partner, provider, subrecipient, supplier, and/or vendor under the CDGB-DR Program.

Policy

Lee County, as grantee of the CDBG-DR Program, is responsible for the prevention, detection, reporting and rectifying of fraud, waste, abuse, or mismanagement, among other irregularities. The purpose of this policy is to encourage any individual to raise concerns, known or suspected acts of fraud, waste, abuse, or mismanagement related to the CDBG-DR Program. This policy outlines the process for concerns to be raised, investigated and, where appropriate, acted upon.

Definitions and Examples

FWA Submission Form

The Fraud, Waste, Abuse, or Mismanagement Submission Form (FWA Submission Form) is an electronic form that may be used for the purpose of reporting allegations of fraud, waste, abuse, or mismanagement related to CDBG-DR funds. This form is submitted via an online form, which is routed to the Office of Strategic Resources and Government Affairs. The complainant, as defined below, may choose to remain anonymous or specify that their contact information stay confidential.

Complainant

Complainant is defined as any of the following: citizen; previous, current or potential applicant; beneficiary; consultant; contractor; employee; partner; provider; subrecipient; supplier; and/or vendor under the CDGB-DR Program.

Fraud

Fraud is defined as wrongful or criminal deception intended to result in financial or personal gain. Fraud includes false representation of fact, making false statements, or concealment of information. Examples include, but are not limited to, the following:

- Falsification of information in applications, contracts or procurement processes.
- Billing for services not rendered or duplication of payments.
- Alteration of documents or forgery, which may include contracts, purchase orders, and invoices.
- Bribery or kickbacks.
- False claims or bid rigging.
- Theft, embezzlement, or other misapplication of funds or assets.
- Impropriety with respect to reporting financial transactions.
- Profiting on insider knowledge.
- Destruction or concealment of records or assets.
- Falsifying eligibility.

Waste and Mismanagement

Waste and mismanagement is defined as the thoughtless or careless expenditure, mishandling, and/or abuse of resources to the detriment (or potential detriment) of Lee County. Failure to observe laws, rules or regulations when handling public funds leading to a wrongful use of public funds may constitute waste and mismanagement. For example, incurring unnecessary costs resulting from inefficient or ineffective practices, systems, or controls, such as, but are not limited to, the following:

- Purchasing unnecessary supplies, material, and equipment.
- Purchasing supplies without regard to cost.
- Using supplies, materials, and equipment carelessly resulting in unnecessary waste and replacement.

Abuse

Abuse is defined as excessive or improper use of a thing, or to use something in a manner contrary to the natural or legal rules for its use. Abuse can occur in financial or non-financial settings. Examples include, but are not limited to, the following:

- Making procurement or vendor selections that are contrary to existing policies or are unnecessarily extravagant or expensive.
- Receiving favor for awarding contracts to certain vendors.
- Using one's position for personal gain or to gain an advantage over another.
- Failure to report damage to equipment or property.
- Creating unneeded overtime.
- Requesting staff to perform personal errands or tasks for a supervisor or manager.

Awareness and Prevention

Pursuant to Federal Register, 88-FR-32046, Lee County implements adequate measures to create awareness and prevent fraud, waste, abuse, or mismanagement in all programs administered with CDBG-DR funds.

Lee County aims to maintain an ethical work environment. To that end, directors, deputies, program managers, and supervisors are responsible of promoting, implementing and maintaining a work environment that endorses honest behavior from all employees, contractors, vendors, suppliers, and others directly involved with the CDBG-DR Program. To do so, directors, deputies, program managers, and supervisors must lead by example, behave ethically at all times, and inform their employees and those directly involved in the CDBG-DR Program that they are expected to behave the same way.

See Lee County's Employee Policy and Procedures: [206 – Code of Ethics](https://www.leegov.com/hr/Documents/Policy%20and%20Procedures%20manual/206-%20Code%20of%20Ethics.pdf).
<https://www.leegov.com/hr/Documents/Policy%20and%20Procedures%20manual/206-%20Code%20of%20Ethics.pdf>

Lee County will also create awareness to prevent fraud, waste, abuse, or mismanagement by:

- Establishing open and clear lines of communication with Lee County CDBG-DR Program employees, contractors, subcontractors, partners, subrecipients, vendors, suppliers, providers, among others.
- Correcting any audit or program evaluation findings.
- Conducting site visits to examine the work performed and ensure compliance with contract terms.

Related Training

Lee County will provide fraud related training to CDBG-DR Program staff, partners and subrecipients. Among other topics, the training will include information on how to disclose and manage any allegation of known or suspected acts of fraud, waste, abuse, or mismanagement.

All CDBG-DR program staff and subrecipients will attend fraud related training provided by HUD OIG, when offered, to assist in the proper management of CDBG– DR grant funds.

Informative Material

In its efforts to prevent fraud, waste, abuse, or mismanagement, Lee County will provide informative material, including, but not limited to brochures; flyers; posters; and/or electronic content. These materials will help people identify fraudulent activities or schemes and explain how to report them.

This Policy will also be provided to all CDBG-DR employees, partners, subrecipients, contractors and/or vendors, as well HUD through Lee County’s CDBG-DR Financial Certification.

Following a disaster, property owners and renters are frequently targeted by persons fraudulently posing as government employees, creditors, mortgage servicers, insurance adjusters, and contractors. To ensure that potential CDBG-DR beneficiaries are aware of the risks of fraud and other potentially fraudulent activity, anti-fraud posters will be displayed on, but not limited to, the Lee County website; common areas of Lee County Administration; intake centers; construction sites; and at partner and subrecipient offices. Posters will include information that raises awareness of possible fraudulent activity, how the fraud can be avoided, and what local, state or federal agencies to contact in the event of a known or suspected fraudulent incident.

Conflict of Interest Policy

Lee County will carry out eligible activities and program administrative requirements, including those established in 24 CFR § 570.611 and 2 CFR § 200.318 related to conflicts of interest.

24 CFR § 570.611

Conflict of interest.

(a) Applicability.

(1) In the procurement of supplies, equipment, construction, and services by recipients and by subrecipients, the conflict of interest provisions in [2 CFR 200.317](#) and [200.318](#) shall apply.

(2) In all cases not governed by [2 CFR 200.317](#) and [200.318](#), the provisions of this section shall apply. Such cases include the acquisition and disposition of real property and the provision of assistance by the recipient or by its subrecipients to individuals, businesses, and other private entities under eligible activities that authorize such assistance (e.g., rehabilitation, preservation, and other improvements of private properties or facilities pursuant to [§ 570.202](#); or grants, loans, and other assistance to businesses, individuals, and other private entities pursuant to [§ 570.203](#), [570.204](#), [570.455](#), or [570.703\(i\)](#)).

(b) **Conflicts prohibited.** The general rule is that no persons described in [paragraph \(c\)](#) of this section who exercise or have exercised any functions or responsibilities with respect to CDBG activities assisted under this part, or who are in a position to participate in a decisionmaking process or gain inside information with regard to such activities, may obtain a financial interest or benefit from a CDBG-assisted activity, or have a financial interest in any contract, subcontract, or agreement with respect to a CDBG-assisted activity, or with respect to the proceeds of the CDBG-assisted activity, either for themselves or those with whom they have business or immediate family ties, during their tenure or for one year thereafter. For the UDAG program, the above restrictions shall apply to all activities that are a part of the UDAG project, and shall cover any such financial interest or benefit during, or at any time after, such person's tenure.

(c) **Persons covered.** The conflict of interest provisions of [paragraph \(b\)](#) of this section apply to any person who is an employee, agent, consultant, officer, or elected official or appointed official of the recipient, or of any designated public agencies, or of subrecipients that are receiving funds under this part.

(d) **Exceptions.** Upon the written request of the recipient, HUD may grant an exception to the provisions of [paragraph \(b\)](#) of this section on a case-by-case basis when it has satisfactorily met the threshold requirements of (d)(1) of this section, taking into account the cumulative effects of [paragraph \(d\)\(2\)](#) of this section.

(1) **Threshold requirements.** HUD will consider an exception only after the recipient has provided the following documentation:

- (i) A disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made; and
- (ii) An opinion of the recipient's attorney that the interest for which the exception is sought would not violate State or local law.

(2) **Factors to be considered for exceptions.** In determining whether to grant a requested exception after the recipient has satisfactorily met the requirements of [paragraph \(d\)\(1\)](#) of this section, HUD shall conclude that such an exception will serve to further the purposes of the Act and the effective and efficient administration of the recipient's program or project, taking into account the cumulative effect of the following factors, as applicable:

- (i) Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project that would otherwise not be available;
- (ii) Whether an opportunity was provided for open competitive bidding or negotiation;
- (iii) Whether the person affected is a member of a group or class of low- or moderate-income persons intended to be the beneficiaries of the assisted activity, and the exception will permit such person to receive generally the same interests or benefits as are being made available or provided to the group or class;
- (iv) Whether the affected person has withdrawn from his or her functions or responsibilities, or the decisionmaking process with respect to the specific assisted activity in question;
- (v) Whether the interest or benefit was present before the affected person was in a position as described in [paragraph \(b\)](#) of this section;
- (vi) Whether undue hardship will result either to the recipient or the person affected when weighed

against the public interest served by avoiding the prohibited conflict; and
(vii) Any other relevant considerations.

2 CFR § 200.318(c)(1)

The non-Federal entity must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents of the non-Federal entity may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, non-Federal entities may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the non-Federal entity.

Several federal and state conflict of interest laws can govern CDBG-DR assisted activities. Lee County will conform with the following applicable federal and state regulations:

1. HUD conflict of interest regulations, 24 C.F.R. §570.611 and 24 C.F.R. §85.36;
2. The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 C.F.R. §200 at §200.112 and §200.318 (c)(1);

Lee County takes responsibility, in its role as grantee, to identify, evaluate, disclose and manage apparent, potential or actual conflicts of interest related to CDBG-DR funded projects, activities and/or operations. Lee County will work to identify apparent, potential or actual conflicts of interest in all CDBG-DR assisted activities and/or operations. In accordance with 24 C.F.R. § 570.489(h), this includes standards of conduct of any person who is an employee, agent, consultant, officer, or elected official or appointed official of the State, or of a unit of general local government, or of any designated public agencies, or subrecipients which are receiving CDBG-DR funds.

A conflict of interest occurs any of the above stated parties obtains a financial or personal interest or benefit that is or could be reasonably incompatible with the public interest. The benefit may be for themselves, for those with whom they have business, for an organization which employs or is about to employ any of the parties indicated herein, or for a member of their family unit during their tenure and for two (2) years after.

Such conflicts of interests will not be tolerated by Lee County. Lee County, Program officials, their employees, agents and/or designees are subject to state and local ethic laws and regulations regarding their conduct in the administration, granting of awards and program activities.

No public servant shall intervene, either directly or indirectly, in any matter in which he/she has a conflict of interests that may result in his/her benefit. No public servant shall intervene, directly or indirectly, in any matter in which any member of his/her family unit, relative, partner or housemate has a conflict of interest that may result in benefit for any of the abovementioned. In the case that

any of the abovementioned relationships has ended during the two years preceding the appointment of the public servant, he/she shall not intervene, either directly or indirectly, in any matter related to them until two (2) years have elapsed after his/her appointment. This prohibition shall remain in effect insofar as the beneficial ties with the public servant exist. Once the beneficial ties end, the public servant shall not intervene, either directly or indirectly, in such matter until two (2) years have elapsed.

The above conflict of interest statement does not necessarily preclude Lee County Program officials, their employees, agents and/or designees from receiving assistance from the Program. On a case-by-case basis, Lee County Program officials, their employees, agents and/or designees may still be eligible to apply and to receive assistance from the project or activity if the applicant meets all project or activity eligibility criteria as stated in this policy. Lee County Program officials, their employees, agents and/or designees should disclose their relationship with Lee County at the time of their application.

See Lee County's Employee Policy and Procedures: [206 – Code of Ethics](https://www.leegov.com/hr/Documents/Policy%20and%20Procedures%20manual/206-%20Code%20of%20Ethics.pdf).
<https://www.leegov.com/hr/Documents/Policy%20and%20Procedures%20manual/206-%20Code%20of%20Ethics.pdf>

See Lee County's Procurement Ordinance 22-06; Conflict of Interest, p. 52.
<https://www.leegov.com/procurement/Documents/Ord%2022-06.pdf>

Personally Identifiable Information

Records of federally funded grants may not be disseminated with Personally Identifiable Information (PII), which is defined to include a person's name in combination with information such as a social security number, passport number, credit card number, bank number, health records, and similar information. PII required to be disclosed by law is excluded.

Lee County and CDBG-DR program employees and staff, as well as subrecipients, contractors and partner agencies, which handle PII should exercise special care. Due to the broad nature of the PII definition, context is very important when determining the extent of the protective measures applied. CDBG-DR projects and activities will have procedures documented related to the types of PII, access and management of PII, safe handling and breach procedures.

Detection

While prevention techniques are necessary to avoid risks of fraud, detection techniques must be put in place should preventive measures fail. Lee County is fully committed to the detection of such acts or the intent to commit any fraudulent acts related to the management and expenditure of CDBG-DR funds.

Lee County offers multiple reporting mechanisms for employees, contractors, subcontractors, partners, subrecipients, vendors, suppliers, providers, and members of the public. All parties can

access the Office of Strategic Resources and Government Affairs, via phone, email or web form. Program specific training on what fraud is, what to look for, and how to report it also serves as an empowerment tool for Lee County employees to speak up when they see wrongdoing.

The detection of fraud, waste, abuse, or mismanagement is a collaborative effort that involves every individual inside or directly related to the CDBG-DR Program. Through the Office of Strategic Resources and Government Affairs, Lee County will periodically evaluate the exposure to risk or threat of fraud in order to be able to identify schemes or events that need to be prevented to mitigate the risks. As projects and activities are developed risk or threat of fraud may be studied through various mechanisms such as, but not limited to conducting interviews with key employees (i.e., those who have access or custody of documents and sensitive information), surveys, anonymous feedback mechanisms, among other qualitative and quantitative factors.

Internal Auditor

Throughout the performance period of the CDBG-DR funding agreement, the Internal Auditor activities will be provided by the Lee Clerk of the Courts & Comptrollers Department of Inspector General.

The Audit Services Unit of the Clerk & Comptroller's Inspector General Department will adhere to the generally accepted principles and standards developed by the Association of Inspectors General (AIG). In addition, the office will conduct audits in conformance with the Institute of Internal Auditor's (IIA) International Standards for the Professional Practice of Internal Auditing (Red Book).

Internal auditing is an independent, objective assurance and consulting activity designed to add value and improve an organization's operations. It helps an organization accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

Internal audits performed by the Clerk & Comptroller's Inspector General (IG) are designed to provide assurance and give management an independent, objective assessment of department programs, activities, or functions. An audit may evaluate the following:

- Business unit strategic goals and objectives are organizationally aligned, and successfully met.
- Results and objectives are achieved efficiently and effectively.
- Operations comply with laws, policies, procedures, and regulations.
- Financial and operating information is accurate, complete, and reliable.
- Satisfactory internal controls in place to mitigate risk.
- Governance processes are effective and efficient.
- Sufficient internal controls in place to safeguard against fraud, waste, and abuse.

Internal Audits are performed by qualified certified professionals with a general understanding of the organization.

Role in Preventing, Detecting and Investigating Fraud, Waste and Abuse

Internal auditors support management's efforts to establish a culture that embraces ethics, honesty, and integrity. They assist management with the evaluation of internal controls used to detect or mitigate fraud, evaluate the organization's assessment of fraud risk, and are involved in fraud

investigations.

Although it is management's responsibility to design internal controls to prevent, detect, and mitigate fraud, the internal auditors are the appropriate resource for assessing the effectiveness of what management has implemented. Therefore, depending on directives from management, the board, audit committee, or other governing body, internal auditors might play a variety of consulting, assurance, collaborative, advisory, oversight, and investigative roles in an organization's fraud management process.

Competent professional internal auditors are highly proficient in techniques used to evaluate internal controls. That proficiency, coupled with their understanding of the indicators of fraud, enables them to assess an organization's fraud risks and advise management of the necessary steps to take when indicators are present.

Contractor Monitoring

Lee County's Office of Strategic Resources and Government Affairs will monitor CDBG-DR program augmentation and implementation contractors. The program augmentation contractor may be required, by contract agreement, to assist with monitoring other contractors. Strategic Resources and Government Affairs staff will maintain the ultimate review and approval authority for monitoring reports, contract compliance, addressing findings and concerns, and establishing corrective action plans. Monitoring of contractors will include an evaluation of fraud, waste and abuse safeguards.

Subrecipient Capacity and Monitoring

All subrecipient capacity will be assessed during the application process (typically a Notice of Funding Availability). Each subrecipient applicant will be required to submit the following information to demonstrate adequate capacity to administer CDBG-DR funds:

- a narrative description of their experience administering federal grant funds,
- a narrative explanation of the capacity of the organization to administer the project and oversee all compliance requirements,
- a list of past projects of similar scope and size,
- an organizational chart of key project staff, including a description of their duties and qualifications, and
- a copy of the organizations overall budget, including other services or programs and funding sources, general management and oversight budget.

Prior to the finalization of any written agreement with a subrecipient, County staff will conduct a risk assessment to evaluate the capacity of potential subrecipients. The risk assessment includes review of the subrecipients most recent independent financial audit completed in accordance with the Generally Accepted Government Auditing Standards (GAGAS).

All subrecipients will be monitored at least one time annually, as required by the CDBG-DR funding and Uniform Guidance [2 CFR 200.332\(d\)](#), [2 CFR 200.208\(a\)](#), [2 CFR 200.206\(b\)](#), [2 CFR 200.329](#), [2 CFR 200.339\(a\)](#). Monitoring may result in documenting subrecipient risk related deficiencies,

required risk mitigation and corrective actions, and recommendations. The monitoring will document the areas for financials, performance, reporting and significant developments.

Beneficiary Evaluation and Eligibility

All CDBG-DR policies and procedures will consider fraud, waste and abuse as it relates to beneficiaries of a project or activity. See the section of this document entitled “Common Types of Fraud” from HUD as a starting point for designing program controls.

For CDBG-DR funded programs it is important that eligible beneficiaries are assisted, even if they have experienced contractor or other fraud. Program staff will evaluate each beneficiary’s unmet need and determine the most appropriate amount of assistance to be provided. If the beneficiary is eligible for additional assistance as a result of fraudulent activity and the creation of remaining unmet need, the file will be documented accordingly, and the correct amount of assistance will be provided. Project procedures will document the specific process, funding caps, and eligibility criteria to assist a CDBG-DR beneficiary if the beneficiary has experienced contractor or other fraud.

Verifying the Accuracy of the Information

Lee County has developed effective internal controls throughout different program areas. Areas such as Procurement, Grants Administration, and Finance have specific policies and procedures tailored to the duties and the day-to-day activities and responsibilities of each area and its personnel. Examples include Procurement ordinance, Grants Administration Manual, Employee Policies and Procedures, and Administrative Codes as well as numerous standard operating procedures. These resources provide guidance for the management of specific operations and set expectations for conduct, behavior and results. These resources are complimentary to the FWA Policy and are designed to mitigate and monitor the risk of fraud.

Program area policies establish standards for the management of information and documents, including standards for verifying the accuracy of information provided by applicants. Whenever possible, program staff will gather eligibility documentation from third parties (i.e., employers, social security administration, Property Appraiser, Banks, etc.). Under only limited circumstances, where all other options have been exhausted, will program staff accept self-certifications for eligibility documentation. In such cases, program files must adequately document the efforts made to pursue verification through third parties. Each program file must also include, at least, the following documentation:

- signed certification and fraud acknowledgements,
- completed file checklists documenting items required,
- clear and detailed case notes.

The workflow of each area is to be designed in such manner that one individual’s roles and responsibilities serve as a check and balance of another individual’s work. Lee County will review the quality and effectiveness of the processes undertaken in each area. Monitoring and compliance reviews will assess adequate separation of duties, review and correct any documentation deficiencies or data mismatches (including inaccuracy in the information provided by applicants), and ensure that all agreements with subrecipients, contractors or beneficiaries include the following statement:

“Warning: Any person who knowingly makes a false claim or statement to HUD or causes another to do so may be subject to civil or criminal penalties under 18 U.S.C. 2, 287, 1001 and 31 U.S.C. 3729.”

OR

All applicants shall be required to sign, at the time of application, an affidavit as follows:

I/We agree to notify the [subrecipient] within five (5) business days of any additional or new payments, loans, grants, or awards by HUD, FEMA, the Small Business Administration, the state, or any other entity I/we have not specifically disclosed in this application. Further, I/we understand and acknowledge Lee County's or its subrecipient's right and responsibility to enforce this requirement by recapturing all or a portion of the CDBG-DR award if the funds I/we receive are determined to be a duplication of the CDBG-DR benefit I/we are applying for with this application.

I/We have read and understand the foregoing statement.

Date: Applicant(s):

All applicants shall be required to sign, at the time of application, an affidavit as follows:

PENALTY FOR FALSE OR FRAUDULENT STATEMENT: U.S.C. Title 18, Sec. 1001, provides: "Whoever, in any matter, within the jurisdiction of any department or agency of the United States knowingly and willfully falsifies . . . or makes any false, fictitious, or fraudulent statement or representation, or makes or uses any false writing or document knowing the same to contain any false, fictitious, or fraudulent statement or entry, shall be fined not more than \$10,000 or imprisoned not more than five years, or both."

I/We have read and understand the foregoing statement.

Date: Applicant(s):

The effectiveness of internal controls will also help Lee County in its evaluation and detection of possible inherent risks of fraud and its probability of occurrence. Maintaining effective internal controls help to identify individuals or divisions that are at higher risk for acts of fraud, waste, abuse, or mismanagement and which methods are most likely to be used to perform such illegal activities.

Report and Investigation

Responsibility to Report

Every citizen has an ethical responsibility to report any concern, either known or suspected, of fraud, waste, abuse, or mismanagement relating to the CDBG-DR funds. Reporting deters others from committing similar acts and protects the integrity of the CDBG-DR program.

While reporting acts of fraud, waste, abuse, or mismanagement, the complainant may choose to

remain anonymous or request that their contact information remains confidential. The complainant must provide the following information, to the extent known, regarding the incident:

- Who was involved? (Name(s) and phone(s) number(s), if available)
- What happened? (Summary of events, additional sources of evidence; loss to the CDBG-DR Program)
- When did it happen? (Date or range of dates, time and frequency)
- Where did it happen? (Location; city & state)
- Why? (Gain to the person who allegedly committed the fraud, waste, abuse, or mismanagement)
- How did it happen? (Narrative of complainant's description of incident or scheme)

Incomplete or vague information can result in the inability to investigate the allegations reported.

Although proof of an improper activity is not required at the time the incident is reported, anyone reporting fraud, waste, abuse, or mismanagement must have reasonable grounds for doing so.

How to report fraud, waste, abuse, or mismanagement?

Any person, including any employee of the CDBG-DR Program, who suspects, witnessed or discovered any fraud, waste, abuse, or mismanagement, relating to the CDBG-DR Program, should report it immediately to the Lee County Office of Strategic Resources and Government Affairs. Complaints may be submitted online by filling out the FWA Submission Form, available at the CDBG-DR website www.leegov.com/recovery/cdbg-dr, via email to recovery@leegov.com, or by calling (239) 533-2315.

FWA reports submitted naming Lee County government or county employees will be routed by automated workflow to the Lee County Clerk of Court and Comptroller, Department of the Inspector General and as if applicable the County Attorney's Office or Department of Human Resources.

It is possible that a citizen may disclose acts of fraud, waste, abuse, or mismanagement of CDBG-DR funds to any CDBG-DR program staff (at Intake Centers, Regional Offices, events, others). Therefore, any information received must be treated with extreme confidentiality and must be shared with the Lee County Office of Strategic Resources and Government Affairs through the online form, via email or telephone.

Lee County Office of Strategic Resources and Government Affairs will refer all reported instances of fraud, waste, abuse or mismanagement of CDBG-DR funds to HUD's OIG.

Additional external resources for reporting fraud or criminal activity include:

The Lee County Clerk of Court and Comptroller Inspector General Hotline (phone: 239-337-7799 or email: Info_InspectorGeneral@leeclerk.org)

The Office of Inspector General HUD's OIG Fraud Hotline (via phone 1-800-347-3735 or via email at hotline@hudoig.gov). or any local or federal law enforcement agency.

Investigation

Upon receiving the allegations by any of the reporting means stated previously, the assigned staff within the Lee County Office of Strategic Resources and Government Affairs will have the primary duty of analyzing the complaint. If the allegations have no grounds or are not supported by any documentation, the file will be documented as such and archived. Such determination must be made in writing with the review and approval consent of the staff's manager or supervisor.

If the allegations involve no fraud, waste or abuse (e.g., contract deliverable related issue) staff will work with the appropriate contractor, subrecipient, beneficiary or staff to resolve the issue.

If the allegations do appear to be potential fraud, waste, abuse or mismanagement, staff will forward case documentation and preliminary determination for *de novo* review by Inspector General. Upon completion of the investigation, said office will prepare a final investigation report that reflects all the findings and recommendations. The Inspector General Department and Strategic Resources and Government Affairs staff (as relevant) will report case outcomes in the online portal.

Employees should not confront the suspected individual or initiate an investigation on their own since such actions could compromise the investigation.

Investigation Results

The decision to pursue a report either through an investigation, audit, or review, rests exclusively with the Inspector General Department.

- There will be no case status updates or other information to the complainant or discloser while the case is under review.
- No status will be provided for action taken on an allegation.

Investigation results will not be disclosed or discussed with anyone, other than those who have a legitimate right to know according to the current generally accepted principles and standards developed for offices of inspectors general.

Other Irregularities

Allegations or complaints concerning fraud, waste, abuse, or mismanagement need to be exclusively related to the improper use of CDBG-DR funds. Some examples of situations that are not considered acts of fraud, waste, abuse, or mismanagement are, but not limited to, the following:

- Conflicts between employees and employers related to personnel actions, such as transfers, decreases, suspensions of employment and salary.
- Political-partisan issues.
- Actions to collect money for services rendered and not paid.

Allegations of irregularities received by the Office of Strategic Resources and Government Affairs that are not related to fraud, waste, abuse, or mismanagement, will be referred to the appropriate offices or authorities.

Confidentiality

All allegations or complaints received will be treated with extreme confidentiality. The complainant's contact information will be kept confidential, unless the complainant authorizes otherwise.

The complainant may choose to remain anonymous, in which case, they will not have to provide their contact information (name, address, telephone, and/or email) to report the alleged act or suspected act of fraud, waste, abuse, or mismanagement.

Whistleblower Protection

One of the main reasons to protect the confidentiality is to avoid retaliation against employees that may report an incident of fraud, waste, abuse, or mismanagement.

Retaliation occurs when an employer discharges, demotes, or otherwise discriminates against an employee and the employee's disclosure contributed to the adverse action. If the evidence establishes contribution, the employer will have the burden to show that it would have taken the same action without the disclosure. Factors will include the motive to retaliate, treatment of other employees in similar situations, and evidence supporting the employer's action.

See Lee County's Employee Policy and Procedures: 2.14 Whistleblowing

<https://www.leegov.com/hr/Documents/Policy%20and%20Procedures%20manual/214-%20Whistleblowing.pdf>

The Whistleblower Protection Act (WPA) protects Federal employees and applicants for employment who lawfully disclose information they reasonably believe is evidence of the following:

- a violation of law, rule, or regulation,
- gross mismanagement,
- a gross waste of funds,
- an abuse of authority, or
- a substantial and specific danger to public health or safety.

Under the WPA, certain federal employees may not take or fail to take, or threaten to take or fail to take, any personnel action against an employee or applicant for employment because of the employee or applicant's protected whistleblowing. See 5 U.S.C. § 2302(b)(8).

The Whistleblower Protection Enhancement Act of 2012 (WPEA) strengthens protections for Federal employees who report fraud, waste, abuse, or mismanagement. The WPEA clarifies the scope of protected disclosures and establishes that the disclosure does not lose protection because of the following:

- The disclosure was made to someone, including a supervisor, who participated in the wrongdoing disclosed.
- The wrongdoing had previously been reported.
- The employee's motive for reporting the wrongdoing.

- The disclosure was made while the employee was off duty.
- The disclosure was made during the employee's normal course of duty, if the employee can show that the personnel action was taken in reprisal for the disclosure.
- The amount of time which has passed since the occurrence of the events described in the disclosure.

The WPEA protects disclosures that an employee reasonably believes are evidence of censorship related to research, analysis, or technical information that causes, or will cause, a gross government waste or gross mismanagement, an abuse of authority, a substantial and specific danger to public health or safety, or any violation of law. It expands the penalties imposed for violating whistleblower protections and establishes the position of Whistleblower Protection Ombudsman.

The Office of Special Counsel (OSC) is an independent federal agency tasked by the U.S. Congress to investigate whistleblower retaliation against federal employees. OSC has authority to demand the agency undo any retaliation, compensate the employee suffering reprisal, and act against the retaliating supervisor. Also, OSC can initiate an act against the agency if it refuses to undo the reprisal.

An employee who believes they have been retaliated against may file a complaint on the OSC website or mail a complaint to OSC, 1730 M Street, N.W., Ste. 218, Washington, D.C., 20036, or you may fax it to (202) 254-3711.

Supervisors may receive training on how to respond to complaints of whistleblower retaliation. A supervisor who engages in whistleblower retaliation may be subject to a minimum suspension of 3 days, and removal if the supervisor retaliates a second time.

Whistleblower protections are not intended to prevent otherwise meritorious personnel actions by a supervisor. If a supervisor is aware of covered disclosures by an employee, the supervisor should consult with Human Resources staff when taking any personnel action regarding the disclosing employee.

Congress requires each OIG to designate a Whistleblower Protection Coordinator (WPC). The WPC educates HUD employees on prohibitions on retaliation for protected disclosures. Additionally, the WPC educates employees who have made or are contemplating making a protected disclosure about their rights and about remedies against retaliation for protected disclosures. The WPC is not a legal representative, advocate, or agent of the employee or former employee.

To contact HUD OIG's WPC, email whistleblower@hudoig.gov. If you wish to make a retaliation complaint, access <https://www.hudoig.gov/hotline/whistleblower-retaliation-complaint-form>

Whistleblower Protection Relating to Federal Grants and Contracts

Whistleblower disclosures relating to federal grants and contracts play an important role ensuring that grantees and contractors use federal funds honestly, efficiently and accountably. Employees of federal grantees and contractors are often in the best position to spot waste, fraud, and abuse. Recognizing this, Congress passed laws to protect whistleblowing employees from retaliation.

The National Defense Authorization Act of 2013 (NDAA) enacted a pilot program making it illegal for an employee of a federal contractor, subcontractor, grantee, or subgrantee to be discharged, demoted, or otherwise discriminated against for making a protected whistleblower disclosure. In 2016, Congress amended the program to make those protections permanent. See Enhancement of Contractor Protection from Reprisal, 41 U.S.C. § 4712.

Employees of a federal contractor, subcontractor, grantee, and subgrantee, or organizations holding a professional services contract with a federal agency are covered under this protection. Persons receiving federal assistance are not covered.

An employee makes a disclosure by providing information regarding a federal grant or contract that the employee reasonably believes is evidence of:

- Violation of law, rule or regulation
- Gross mismanagement
- Gross waste of funds
- Abuse of authority
- A danger to public health or safety

The disclosure must be made to:

- a management official or other employee of the contractor, subcontractor, or grantee who has the responsibility to investigate, discover, or address misconduct;
- a federal employee responsible for overseeing the grant or contract;
- the Inspector General;
- the Government Accountability Office;
- Congress;
- a Court or grand jury; or
- the Department of Justice.

Employee's Right to Contact the OIG or Congress

As per Section 7(C) of the Inspector General Act of 1978, as amended, any employee who has authority to take, direct others to take, recommend, or approve any personnel action, shall not, with respect to such authority, take or threaten to take any action against any employee as a reprisal for making a complaint or disclosing information to an Inspector General, unless the complaint was made or the information disclosed with the knowledge that it was false or with willful disregard for its truth or falsity.

As per 5 U.S.C. § 2302(B)(13), it is prohibited that an agency enforces any nondisclosure policy or agreement, if such policy or agreement does not inform the employee that the policy or agreement does not alter the employee's right to communicate with Congress, or report to an Inspector General a violation of any law, rule, or regulation, or mismanagement, a gross waste of funds, an abuse of authority, or a substantial and specific danger to public health or safety, or any other whistleblower protection. This statute does not authorize the withholding of information from Congress or the taking of any personnel action against an employee who discloses information to Congress.

As per 5 U.S.C. § 2302 (C), it is required that the head of each agency to inform employees of the rights and remedies available to them regarding disclosures, including how to make a lawful disclosure of information to the Inspector General of an agency, Congress, or other agency employee designated to receive such disclosures.

DRAFT

Common Types of Fraud

According to the U.S. Department of Housing and Urban Development (HUD) Office of Inspector General (OIG), these are the most common types of fraud:

Disaster Recovery Grants

DUPLICATE BENEFITS: Disaster victims who apply for and receive benefits from multiple agencies; often for duplicate rental assistance and repairs.

FALSE ELIGIBILITY CLAIM: Homeowners falsely claim damage to a primary residence when it was an investment property. Rental properties are not eligible for repair funding. This also refers to cases where recipients falsely obtain Section 8 assistance when they in fact own an undamaged home. They sublet the Section 8 unit and keep the rents as profit.

CONTRACT REPAIR FRAUDS: Home repair firms that contract for work, but do shoddy work, or leave when paid while performing little to no work.

Also see Crosscutting fraud.

Crosscutting Fraud

In Public Housing and Multifamily projects or Community Development organizations receiving HUD funds, the following frauds may occur.

EMBEZZLEMENT AND THEFT: In several HUD programs, administrators and participants may be entrusted with cash or assets and take them for their personal use. There are many ways they may embezzle, from simply taking money from the cash drawer or writing checks to cash, to more elaborate methods to conceal the theft, like falsifying invoices and misusing credit cards of the HUD funded organization. Other examples are when they may steal rental or laundry receipts; falsify deposits, checks or other accounts; or write bonuses to themselves. They may hire “ghost” employees and convert the payroll checks for their own use. They may use staff, materials, or equipment for personal use, which is also a fraud.

CONTRACTING AND PROCUREMENT FRAUDS: There are many variations of these frauds. Some may involve procurement officials and bidders working alone or in collusion to commit frauds, including:

- A false certification of regulatory and statutory compliance, or qualifications necessary to obtain a contract,
- Colluding with others to win a contract using bid rigging, phantom or altered bids, or split bids,
- Falsifying information on contract proposals,
- Using Federal funds to purchase items that are not for Government use,
- Billing more than one contract for the same work,
- Billing for expenses not incurred as part of the contract,
- Billing for work that was never performed,
- Falsifying data such as employee credentials, experience, and rates, false or defective bonds, and test or inspection results,

- Change order abuses,
- Underbidding to win contract and colluding with procurement officer to make up profits through unnecessary change orders,
- Substituting approved materials with unauthorized products,
- Misrepresenting a project's status to continue receiving Government funds, or
- Charging higher rates than those stated or negotiated for in the bid or contract.

BRIBERY AND KICKBACKS: Bidders offering contract officials money or other items of value to award a grant (bribery) or contract officials requiring funds or items of value from bidders to obtain a contract (kickbacks).

CONFLICTS OF INTEREST: Persons in positions of trust that use their authority to steer contracts or program benefits to their own undisclosed businesses, family, or business associates.

SOCIAL MEDIA SCAMS: Programs have seen various scams in which websites and other social media sites are used to induce the public to send money in order to receive various HUD benefits, grants, or contracts. They sometimes falsely advertise as being government representatives or agents of HUD to promote their scheme further.

IDENTITY THEFT: Program administrators and others who steal identities or create false identities to apply for and illegally receive various HUD funded benefits such as rental assistance, mortgages, or block grant program funds.

Rental Assistance Programs

Rental assistance fraud involves several types of bad actors including program administrators, Section 8 landlords, and tenants.

SOLICITING OR ACCEPTING BRIBES: Application and recertification staff, grievance officers, or others may require or accept bribes from a tenant or help an applicant get in, or stay in, a unit (or get priority on the waiting list). Inspectors may ask for or accept bribes to pass units for inspections.

FALSE BILLING: Billing for a vacant unit, or one occupied by an ineligible tenant.

CONFLICT OF INTEREST: Renting to a relative or having a conflict of interest in allowing themselves or a relative to be a Section 8 landlord. Commissioners (except resident commissioners), officers, and policy influencers of a Public Housing Agency (PHA) are prohibited from living in a Section 8 unit.

SEXUAL HARASSMENT / EXTORTION: Instead of requesting money, program administrators as well as landlords and inspectors may demand sexual favors to allow an applicant/tenant to get into or stay in the assisted unit.

SECTION 8 LANDLORD FRAUDS: Section 8 landlords may require additional side payments from tenants above the rents reported to the housing authority.

TENANT/APPLICANT FRAUDS: Applicants will falsify their true income and assets or family circumstances in order to be eligible for or increase rental subsidy.

Single Family Mortgage Insurance

FRAUD FOR PROFIT: A complex profit scheme, fraud for profit involves multiple mortgage lender professionals in an attempt at defrauding the lender of large sums of money. Individuals who may be included are a straw borrower (an accomplice who applies for the loan under the direction of a conspirator), a dishonest appraiser or realtor, and/or a dishonest settlement agent all working to get an undeserved large loan. Some cases have involved hundreds of loans and millions of dollars.

PREDATORY LENDING: Another form of Fraud for Profit, this involves high-pressure tactics to get people to buy a house for which they do not qualify. The scammers often falsify the documentation without the borrower's knowledge.

INCOME FRAUD: One of the most common forms of mortgage fraud involves the borrower overstating his or her income. This allows the borrower to qualify for a loan or a higher loan.

GIFT LETTER FRAUD: Often people will borrow money from their family in order to make a down payment on a property. However, treating this as a gift reduces the amount of debt you appear to have, possibly causing the lender to approve a loan it would otherwise reject.

OCCUPANCY FRAUD: This is when a borrower wants to obtain a mortgage in order to purchase an investment property but claims that they will live in the property. Lenders usually charge higher interest rates for investment property mortgages, because they are riskier loans for lenders.

APPRAISAL FRAUD: This occurs when a home's value is deliberately or fraudulently understated or overstated. When the value is overstated, the scammer receives more money for the loan. When the value is understated, it is done in order to get a lower price on a foreclosed home so the scammer does not have to pay for the property's full worth. "Air Loans" are another form of appraisal fraud, in which fake appraisals support nonexistent properties.

CHUNKING FRAUD: Chunking is the term applied to obtaining multiple loans on the same property at the same time from different lenders. This is also found in the Title 1 Home Improvement Loan program where scammers apply for multiple improvement loans for the same property.

EMPLOYMENT FRAUD: This occurs when a borrower claims to be self-employed in a non-existent company or claims a higher position in a real company in order to misrepresent their income for purposes of obtaining a mortgage.

PROPERTY FLIPPING: This scheme involves the purchase of cheap properties, doing little or no repairs and selling them quickly, often the same day, for huge profits. This scheme is made possible by fraudulent appraisals. Flipping is legal as long as there is a valid appraisal to support the increased valuation.

LOAN MODIFICATION AND FORECLOSURE RESCUE FRAUD: Borrowers who fall behind on the payments or default (miss 3 payments) are prey for scammers who offer to get them relief if they will send their payments to them. Most often, they take the payments and provide no services. The borrowers do not realize the fraud until they receive foreclosure or eviction notices. Sometimes they also may have the borrower sign the deed over to them, and then force them out and sell the property for profit. These scammers may advertise fake government assistance programs or present themselves as HUD representatives.

FORENSIC LOAN AUDIT: HUD prohibits advance fees for loan counseling services, so scammers may sell their services as “forensic mortgage audits.” These audits are reviews of mortgage loan documents to determine whether the lender complied with State and Federal mortgage lending laws. The fraudster claims that the audit report will help avoid foreclosure, force a mortgage modification, or even cancel a loan. The fraudster typically will request an upfront fee for this service.

MASS JOINDER LAWSUIT: The fraudster, often a lawyer, law firm, or marketing partner, will promise that he or she can force lenders to modify loans. The fraudster will try to “sell” participation in a lawsuit against the mortgage lender, claiming that the homeowner cannot participate in the lawsuit until he or she pays some type of upfront fee.

RENT-TO-OWN OR LEASEBACK SCHEME: The homeowner surrenders the title or deed to their home as part of a deal that will let the homeowner stay in the home as a renter with the promise that the homeowner will be able to buy the home back in a few years. However, the fraudster does not intend to sell the home back and, instead, takes the monthly “rent” payments and allows the home to go into foreclosure.

BANKRUPTCY TO AVOID FORECLOSURE: The fraudster may promise to negotiate with your lender or get refinancing on your behalf if you pay a fee up front. Instead of contacting your lender or refinancing your loan, he pockets the fee and files a bankruptcy case in your name—sometimes without your knowledge.

REVERSE MORTGAGE FRAUD: Reverse mortgage (a home equity conversion mortgage or HECM) is often used to defraud senior citizens of the equity in their homes. Using high-pressure tactics and relying on the inability of some seniors to comprehend what they are doing, the fraudsters trick the seniors into applying for a reverse mortgage. They then take the proceeds. Sometimes the fraudster will forge the senior's signature on documents unbeknown to the senior. Sadly, many cases involve family, friends, or caretakers. Other reverse mortgage frauds involve fraudsters who heavily push seniors to take out a HECM and to invest the proceeds in investment portfolios that they are selling. They profit off fees, or the investment itself is a scam.

SHORT SALE FRAUD (FLOPPING): A short sale is a sale of a property where the proceeds of the sale are less than the balance owed on the mortgage loan. A fraud can occur if the seller or a buyer convinces the lender that valuation of the home is less than actual. After the lender approves the short sale, the seller or buyer resells the property at a higher price to a new buyer and pockets the difference. (This is called flopping, a play on the term flipping).

SHORT SALE FRAUD (PREDATORY SHORT SALE NEGOTIATORS): This is a version of a foreclosure rescue scheme and involves borrowers who are underwater (the value of the property is less than the remaining loan balance). Scammers represent to borrowers, who are desperate to sell their homes, that they can help them do so for a fee. After payment, they provide no help, and disappear with the funds.

SOVEREIGN CITIZEN FRAUD: Sovereign citizens are individuals who do not recognize the U. S. government and illegally occupy and take ownership of vacant properties. They take advantage of State laws that require county clerks to accept and file any quitclaim deed presented to them as long as the forms are properly signed, and fees are paid. No proof of ownership is required. It

becomes the burden of the true property owner to go to court and clear the title. There are also instances in which a sovereign citizen has rented a HUD Real Estate Owned (REO) property to unsuspecting tenants. Sovereign citizens have begun participating in the HUD subsidized Section 8 Housing Choice Voucher program as landlords, using properties that they do not own. They provide fraudulent deeds to housing authorities to establish ownership rights so they can participate as a landlord. Sovereign citizens have also been active in foreclosure rescue schemes.

EMBEZZLEMENT OF CLOSING PROCEEDS: In this scheme, closing attorneys receive proceeds for the loan, and keep some or all of them for themselves. The volume of transactions and poor bookkeeping hides this fraud.

Multifamily Mortgage Insurance

EQUITY SKIMMING: When multifamily projects are in default or a non-cash position, they may not withdraw funds from the projects for other uses. Owners of projects who lie or conceal these withdrawals violate Title 12 U.S.C §1715Z-19.

IDENTITY OF INTEREST FIRMS: When owners contract with a management agent or for other services for the multifamily project, they must disclose any financial interest in the contract company. If they lie about their involvement on a HUD certification about this, it is a false statement violation.

FALSE CERTIFICATIONS: Owners sometimes certify to HUD on billings that units are occupied or that the unit meets housing quality standards when those assertions are false.

MONEY LAUNDERING: This occurs when mortgage company officials receive payments on multifamily loans but do not pass the proceeds to investors in mortgage pools.

LOW INCOME TAX CREDIT FRAUD: Some developers who build affordable housing under the low-income tax credit program illegally inflate construction costs in order to get larger loan amounts and siphon off the extra funds.

Also see Rental Assistance and Crosscutting frauds.

Community Planning and Development

See Crosscutting frauds, which entail the majority of offenses in Community Planning and Development programs.

Public Housing

See Rental Assistance and Crosscutting frauds, which entail the majority of offenses in Public Housing programs.

Contact Information

Should you have any questions or wish to report an incident of fraud, waste, abuse, or mismanagement, please contact:

Report Fraud, Waste and Abuse of CDBG-DR Funds to Lee County:	
Web form	www.leegov.com/recovery/cdbg-dr
Email	Recovery@leegov.com
Phone number	239-533-2315

<i>Additional resources for reporting Fraud, Waste and Abuse of CDBG-DR Funds include:</i>	
HUD OIG Hotline	1-800-347-3735 (Toll-Free) 787-766-5868 (Spanish)
Postal Mail	HUD Office of Inspector General (OIG) Hotline 451 7th Street SW Washington, D.C. 20410
Email	HOTLINE@hudoig.gov
Internet	https://www.hudoig.gov/hotline

<i>Additional resources for reporting Fraud, Waste and Abuse of CDBG-DR Funds include:</i>	
Lee County Clerk of Court and Comptroller Inspector General Hotline	239-337-7799
Email	Info_InspectorGeneral@leeclerk.org
Informational Webpage	https://www.leeclerk.org/departments/inspector-general/internal-audit-investigation/inspector-general-hotline