

This Whistleblower Protection Policy is for the Des Plaines Valley Education for Employment Region, hereafter referred to as DVR, and all sub-recipient districts of the DVR Joint Agreement. DVR and Joint Agreement members are committed to operating in furtherance of stated educational purposes, and in compliance with all applicable laws, rules and regulations, including those concerning accounting and auditing, and prohibits fraudulent practices by any of its officers, employees, Board members or sub-recipients.

DVR requires directors, officers and employees to observe high standards of business and personal ethics in conduct of their duties and responsibilities related to DVR. As employees and representatives of DVR we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

This document outlines policy and procedures for DVR and Joint Agreement sub-recipient employees to report actions that the person reasonably believes violate a law or regulation or that constitutes fraudulent accounting or other practices. This policy applies to any matter that is related to DVR's business and does not relate to private acts of an individual not connected to the business of DVR.

DVR has an open door policy and suggests that consortium member employees share their concerns with their supervisor relating to the use and/or administration of grants received through DVR. Any person not comfortable speaking with an immediate supervisor, or not satisfied with the supervisor's response, is encouraged to speak with the sub-recipient's compliance officer. This Whistleblower Policy is intended to encourage and enable employees of DVR and Joint Agreement sub-recipients to raise serious concerns internally so that DVR and the sub-recipient can address and correct inappropriate conduct and actions.

A. **Application.** This Whistleblower Protection Policy applies to all of the DVR's staff, whether full-time, part-time, or temporary employees, to all volunteers, to all who provide contract services, and to all officers and directors, and all Joint Agreement sub-recipient employees, each of whom shall be entitled to protection. Joint Agreement sub-recipients have their own Whistleblower Policies, and the compliance officers so named in each policy will also act as the first line of reporting complaints under the DVR Whistleblower Policy. In any case where the sub-recipient does not have a policy and compliance officer, the employee may speak directly with the DVR Director.

B. **Acting in Good Faith.** A protected person in each DVR Joint Agreement district shall be encouraged to report information relating to any illegal practices or violations in relation to the regulations regarding use and/or administration of grants received through DVR, that such person in good faith has reasonable cause to believe is credible. Information shall be reported to the compliance officer published in each sub-recipient's Whistleblower Policy unless the report relates to the compliance officer, in which case the report shall be made to the DVR Director, who shall be responsible to provide an alternative procedure. A DVR employee will report any suspected violation directly to the DVR Board President.

Anyone filing a written complaint concerning a violation or suspected violation must act in good faith, and have reasonable grounds for believing that the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which have been made maliciously or knowingly to be false will be viewed a serious disciplinary offense, to be addressed according to each sub-recipient's individual policy.

C. **Investigating Information**. The sub-recipient's compliance officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The compliance office at each DVR Joint Agreement sub-recipient shall promptly investigate each such report received in relation to use and/or administration of grant funds received through DVR, and prepare a written report to the DVR Director. In connection with such investigation, all persons entitled to protection shall provide the compliance officer with credible information. All actions of the compliance officer in receiving and investigating the report and additional information shall endeavor to protect the confidentiality of all persons entitled to protection.

D. **Confidentiality**. DVR encourages anyone reporting a violation to identify him/herself when making a report in order to facilitate the investigation of the violation. However, reports may be submitted anonymously through the sub-recipient's published procedures. Reports of violations or suspected violations will be kept confidential to the extent possible, with the understanding that confidentiality may not be maintained where identification is required by law or in order to enable the district or law enforcement to conduct an adequate investigation.

E. **Protection from Retaliation**. No person entitled to protection shall be subjected to retaliation, intimidation, or harassment for reporting information in accordance with this Policy. Any person entitled to protection who believes that he or she is the subject of any form of retaliation for such participation should immediately report the same as a violation of and in accordance with the policy of his/her district.

Any individual within the DVR Joint Agreement district who retaliates against another individual who has reported a violation in good faith or who, in good faith, has cooperated in the investigation of a Violation, is subject to discipline including termination of employment or volunteer status, based on the sub-recipient's published policy.

F. **Dissemination and Implementation of Policy**. This Policy shall be disseminated in writing to all Joint Agreement sub-recipients, through publishing on the DVR website, and through training in the DVR Administrative Council meetings and DVR subcommittee meetings at the beginning of each fiscal year, in the first published meeting date for each DVR committee.

DVR procedures for implementation of this Policy include:

- (1) Documenting reported violations;
- (2) Keeping the DVR board of directors informed of the complaints and the progress of the investigation;
- (3) On-site visits including interviewing employees;
- (4) Requesting and reviewing relevant documents, and/or requesting that an auditor or counsel investigate the complaint; and
- (5) Preparing a written record of the reported violation and its disposition, to be retained for a specified period of time.

The procedures for implementation of this Policy shall include a process for communicating with a complainant about the status of the complaint, to the extent that the complainant's identity is disclosed, and to the extent consistent with any privacy or confidentiality limitations. Upon receipt of a complaint, DVR will notify the person who submitted the complaint to acknowledge receipt of the reported or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.