



COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF SOCIAL SERVICES
WORKFORCE DEVELOPMENT BOARD

3433 South Higuera Street, P.O. Box 8119, San Luis Obispo, CA 93403-8119
(P) 1-805-781-1908

POLICY NO: 33-19

TO: Service Providers

FROM: Department of Social Services

EFFECTIVE: January 01, 2020, REVISED: October 20, 2026

SUBJECT: Incident Reporting

REFERENCES:

- 20 CFR 683.620; 2 CFR 200.113 and applicable record retention requirements
- DOL Training and Employment Guidance Letter (TEGL) 15-23 (June 11, 2024)
- EDD Workforce Services Directive WSD24-03, Incident Reporting (September 17, 2024)
- WIOA Sections 185(b) and 188; 29 CFR Part 38

PURPOSE:

This policy establishes procedures to prevent, detect, and promptly report suspected fraud, waste, program abuse, gross mismanagement, misapplication of funds, and criminal conduct involving Workforce Innovation and Opportunity Act (WIOA) funds. It identifies responsibilities of the San Luis Obispo County Department of Social Services (DSS) and WIOA service providers for reporting to the U.S. Department of Labor (DOL) Office of Inspector General (OIG) and Employment and Training Administration (ETA), consistent with EDD WSD24-03.

BACKGROUND:

Under 20 CFR 683.620, information and complaints involving criminal fraud, waste, abuse, or other criminal activity must be reported immediately through the OIG Hotline Portal and simultaneously to ETA. Allegations must be reported promptly without waiting for substantiation or completion of an internal investigation. Separate procedures govern discrimination complaints, grievances, labor disputes, and routine personnel matters

POLICY:

The Workforce Development Board of San Luis Obispo County (WDBSLO) requires all WIOA-funded service providers to maintain written incident reporting procedures, notify the appropriate federal entities without delay, safeguard WIOA funds, and cooperate with authorized reviews and investigations. Internal notification to DSS does not replace or delay required reporting to OIG and ETA.

DEFINITIONS:

Complaint, for this policy only, means criminal complaint and noncriminal complaints accepted by the DOL as incidents, such as gross waste of funds, mismanagement and dangers to the public health and safety.

Subrecipient, for this policy, means local areas and other recipients that receive WIOA funds directly from the State - DSS.

Service Provider means a recipient that does *not* receive WIOA funds directly from the State but receives WIOA funds from DSS.

Additional definitions pertaining to this policy are included in the Glossary of Terms as Attachment 1 to this policy.

PROCEDURES:

DSS and each WIOA service provider shall establish, document, and implement written procedures to prevent and detect fraud, abuse, and criminal activity. At a minimum, procedures shall:

- Identify how staff and participants recognize and report suspected incidents, including direct reporting to OIG.
- Designate a staff member responsible for ensuring employees and participants are informed of reporting procedures.
- Require immediate internal escalation to the DSS WIOA Program Manager without delaying federal reporting.
- Identify responsibility for submitting reports to OIG and ETA and documenting confirmation of submission.
- Provide for emergency response, confidentiality, protection from retaliation, and safeguarding of records.
- Maintain relevant facts known at discovery, any estimated loss of funds, supporting records, and subsequent supplemental information.

The detecting entity shall take prompt and appropriate protective or corrective action when needed to prevent additional financial loss or damage, including contacting law enforcement when appropriate. Internal investigation or incomplete facts must not delay an initial report.

TYPES OF WIOA COMPLAINTS:

There are three (3) distinct procedures for filing WIOA complaints:

- A. Grievance – *See Policy 31-19*
- B. Discrimination – *See Policy 30-19*
- C. **Suspected Fraud, Waste, Abuse, and Criminal Conduct** – *Covered by this Policy. The OIG Hotline Portal is not intended for ordinary employee grievances, EEO complaints, labor disputes, or other personnel concerns.*

REPORTING:

Report suspected fraud, program abuse, or criminal conduct immediately to OIG and simultaneously to ETA using the following two-step process:

1. Complete the relevant fields in the DOL OIG Hotline Portal: <https://www.oig.dol.gov/hotline.htm>
2. Email a copy of the incident report, including screenshots or photographs of the three OIG Hotline Portal screens, to ETAIncidentReporting@dol.gov.

When internet access is unavailable, report to OIG by telephone at 1-800-347-3756 (toll free) or 1-202-693-6999 and ensure simultaneous notification to ETA through an available means. Document the method, date, time, and subsequent follow-up.

All incidents shall be reported as soon as possible. Emergencies must be reported immediately to OIG and ETA, no later than one working day after discovery. This outside deadline does not permit avoidable delay. Service providers shall immediately notify the DSS WIOA Program Manager and provide copies or confirmation of federal submissions through a secure method. Notification to EDD CRO, if requested or otherwise applicable, is coordinated by DSS and does not substitute for federal reporting.

Reports shall include facts known at the time, the nature and date of discovery, parties involved as appropriate, estimated loss, and immediate protective actions. Submit supplemental information as it becomes available. Do not unnecessarily transmit Social Security numbers or other sensitive personal information by unsecured email.

CONFIDENTIALITY AND NONRETALIATION:

No adverse action shall be taken against a person who makes a good-faith report to proper authorities. Complainants may report anonymously and may contact OIG directly if internal reporting could compromise their position. Incident information shall be protected and disclosed only as authorized by law and necessary for reporting, oversight, or investigation.

RECORDS RETENTION AND CORRECTIVE ACTION:

DSS and service providers shall retain incident reports, supporting documents, correspondence, and corrective-action records in accordance with applicable federal requirements and WDBSLO Policy 26-19. Generally, pertinent federal award records must be retained for three years from the applicable final expenditure or periodic financial report date, with extensions where required for unresolved litigation, claims, audits, or written retention notices. Reporting does not relieve entities of the obligation to safeguard funds and promptly address deficiencies. Entities shall cooperate with OIG, ETA, EDD, and other authorized oversight reviews.

ACTION:

All WIOA Adult, Dislocated Worker and Youth Program Service Providers shall comply with this policy. This policy will remain in effect from the date of issue until such time that a revision is required.

INQUIRIES:

Any questions regarding this policy may be directed to the DSS WIOA Program Manager at 805-781-1838.

ATTACHMENTS:

Attachment A - Incident Report Form
Attachment B - Glossary of Terms

Workforce Development Board (WDB) Approval Required? Yes____ No X

Initial approval date: _____ N/A _____

WDB revision approval date: _____