

Approved: April 28, 2023  
Resolution No. 23-67

This policy advises employees, vendors, and volunteers when and how to report wrongdoing and of their protection against reprisal or retaliation for reporting. Any person who has knowledge of, or, in good faith, suspects any wrongdoing regarding services, equipment or supplies within the County financial practices, or violation of the Standards of Conduct Policy should report it internally so that an investigation can be conducted and appropriate action taken. Retaliation or reprisal against anyone for such a report is strictly prohibited.

- A. Wrongdoing Defined. In addition to a violation of federal or state law, wrongdoing includes violation of Standards of Conduct Policy. Wrongdoing also includes a gross waste of public funds from any source; financial fraud, gross mismanagement of a federal contract or grant; a substantial and specific danger to public health or safety; or a violation of law, rule or regulation related to a federal contract or grant (including the competition for, or negotiation of, a contract or grant).
- B. Authority and Responsibility. The County Administrator is responsible for investigating any reports of wrongdoing and monitoring actions for retaliation or reprisal against anyone making such a report. However, if a report relates to the County Administrator, in that case the report shall be made to the Board of Commissioners' Personnel and Policy Committee and the Committee shall be responsible for the procedures that would otherwise be assigned to the County Administrator under this Policy.

The County Administrator, in conjunction with the Personnel and Policy Committee, is responsible for periodically reviewing this policy and submitting recommended changes to the Board of Commissioners for approval.

- C. Procedure. Anyone who becomes aware of or, in good faith, suspects wrongdoing by another employee, a department head, an elected official, a board member, a vendor, a contractor or a volunteer should report it to his or her immediate supervisor and the County Administrator. If the report concerns the immediate supervisor, it shall be made to the County Administrator. If the report is related to the County Administrator, the report shall be made to the Board Chair.
1. An individual making a report may do so by reporting the concern in writing and submitting it to his/her immediate supervisor or the County Administrator.
  2. The immediate supervisor will forward the report it to the County Administrator for follow-up.

3. If the report is made to a County Commissioner or Elected Official, it will then be forwarded to the County Administrator for follow-up.
4. Alternatively, a message may be left on the County Administrator's main number (989) 516-9020. Anyone making an anonymous report must realize that the County Administrator will not be able to ask additional questions of the person reporting nor advise the person of the outcome. County Administrator will attempt to maintain the confidentiality of the person reporting the concern, with the understanding that confidentiality may not be maintained where identification is required by law or in order to enable the County or law enforcement to conduct an adequate investigation or to provide due process to the accused.
5. An individual making a report may voluntarily include his/her union in any of the aforementioned reporting processes.
6. Self-reporting is encouraged. Anyone who self-reports wrongdoing or a violation of law will be given due consideration in mitigation of any disciplinary action that may be taken.
7. Upon a report of wrongdoing, the County Administrator will investigate the allegation to determine the nature, scope, and duration of wrongdoing and share the investigation results with the Board of Commissioners.
8. If the charges are substantiated, then the County Administrator will work with the impacted Department Director to develop a plan for correction or impose discipline up to possible discharge.
9. Retaliation or reprisal in any form against anyone who makes a report of wrongdoing, cooperates in an investigation or participates in a compliance program is strictly prohibited. If an employee or a vendor believes that an adverse action in the form of reprisal or retaliation has been taken as the result of making a report or cooperation in an investigation, he or she should contact the County Administrator. Any individual within the County organization who retaliates against an individual who reported a violation in good faith or who, in good faith, has cooperated in the investigation of a violation, may be subject to discipline, including termination of employment.
10. The County Administrator shall maintain a log of all reports of compliance concerns.
11. Anyone who reports a violation must act in good faith, and have reasonable and credible grounds to believe that the information shared in the report indicates a violation has occurred. Anyone who makes a report of wrongdoing maliciously,

frivolously or in bad faith shall be subject to disciplinary action, including termination of employment.

12. Any person may otherwise report wrongdoing that constitutes fraud, waste, and abuse in connection with any federal contract or grant to the County Administrator. However, any person who discovers wrongdoing that is a false claim or statement may report that information to the Department of Justice of the U.S. Attorney by filing a complaint under seal in the court pursuant to the [False Claims Act](#).