INDIANA DEPARTMENT OF CHILD SERVICES ADMINISTRATIVE POLICIES AND PROCEDURES		
Policy Number: HR-3-6	Effective Date: August 1, 2022	Version: 3.0
POLICY TITLE: SUSPICIOUS ACTIVITY AND FRAUD REPORTING		
OVERVIEW: The Indiana Department of Child Services (DCS) will not tolerate misuse of department services, funds, or property. Any person who knows of or suspects such activities must report the information via the established channels. Participation in such activities will result in disciplinary action by DCS and may result in referrals to the Indiana State Ethics Commission, Law Enforcement Agencies (LEA), and the Indiana Office of Inspector General.		

I. DEFINITIONS

A. Fraud: False representation of a matter of fact, by words, conduct, or concealment of that which should have been disclosed.

B. Fraud Investigation Unit: The unit within DCS which ensures DCS providers are making appropriate use of the intended services offered to Indiana children and families.

C. Independent Contractor: An individual who, in exercising independent employment, contracts to do certain work according to one's own methods and without being subject to control of an employer except as to the product of one's work, such that the contracted agency prescribes what is to be done but not how it is to be done or who is to do it.

D. Subgrantee: Legal entities collecting monies from grants through a secondary grant source.

II. REFERENCES

A. HR-3-9 Internal Affairs

B. IC 4-2-6: Ethics and Conflicts of Interest

C. IC 4-2-7: The Inspector General

D. 42 IAC 1: Indiana Code of Ethics

III. POLICY

A. Any DCS employee (temporary staff, interns, and full-time staff) or independent contractor who misuses department services, funds, or property is subject to disciplinary action, up to and including dismissal. Any independent contractor and/or employee working for/or in conjunction with a contractor or provider who misuses department services, funds, or property may immediately have the contract terminated and is subject to disciplinary action, up to and including dismissal. Illegal activity will be referred to an appropriate LEA.

B. All reports of suspicious activity shall be investigated thoroughly and expeditiously to determine if disciplinary, financial recovery, and/or criminal action should be requested. Further, the Fraud Investigation Unit shall review the internal control procedures that were in place at the time of the occurrence to determine if the risk of another occurrence may be reduced.

Note: All reports involving a DCS employee will be forwarded to the Deputy Director within the employee's chain of command. Some reports of suspicious activity involving DCS employees may be investigated by the DCS Internal Affairs Unit (see policy HR-3-9 Internal Affairs).

C. All reports shall be handled under the strictest confidentiality. Only those directly involved in the investigation shall be given information.
D. Informants may remain anonymous, are encouraged to cooperate with the investigation, and shall provide as much detail and evidence of the suspicious activity as possible.
E. Any DCS employee or independent contractor who knowingly fails to report suspicious activity may face disciplinary action, up to and including dismissal.

IV. PROCEDURE

A. Any DCS employee or independent contractor who suspects fraudulent activity, as listed above, must report their concerns without delay by:
   1. Calling the DCS Fraud Line: (317) 233-7425 (leave a message about suspected fraud with contact information);
   2. Emailing the DCS Fraud Investigation Unit: FIU@dcs.in.gov;
   3. Mailing the DCS Fraud Investigation Unit:
      DCS Fraud Investigation Unit
      Chief Investigator
      Room W392, MS 54
      402 West Washington Street,
      Indianapolis, IN 46204

   4. Complete and submit an Anonymous Fraud Report.

B. Any DCS employee or independent contractor who receives a report of suspected fraudulent activity must report this information without delay. All reports may be made in confidence.
C. The Fraud Investigation Unit shall conduct investigations of DCS employees, DCS service recipients (any persons who have received services through DCS), providers, contracted agencies, employees of contractors, subcontractors, or subgrantees (e.g., a DCS contracted provider who has contracted with another company to serve DCS cases).
D. The Fraud Investigation Unit will forward all reports involving a DCS employee to the Deputy Director within the employee's chain of command.
E. The Fraud Investigation Unit will:
   1. Investigate all reports,
   2. Coordinate any necessary inter-agency and intra-agency communications,
   3. Provide the DCS Director with a written summary of the report, the investigation findings, and any disciplinary recommendations,
   4. Provide the DCS Director with a separate report detailing the existing internal control procedures and any recommendations to prevent future occurrences, and

5. Provide any required information, reports, or evidence to the Indiana State Ethics Commission, Indiana Office of Inspector General, or Internal Affairs Unit upon request.

F. The Internal Affairs Unit, Indiana State Ethics Commission, the Indiana Office of Inspector General, or Local LEA may make further determinations regarding additional legal actions needed.
G. Periodic communication should emphasize this policy and the channels to report suspected fraud.

V. FORMS AND TOOLS

Anonymous Fraud Report

APPROVED:
Date: 7/11/2022

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Department of Child Services