



# The Study Hall, Inc.

## Fraud, Waste, and Abuse Reporting Policy & Procedures

### 1. Purpose

The purpose of this policy is to ensure that all staff, parents/guardians, and scholars of The Study Hall, Inc. are aware of their responsibility to report suspected fraud, waste, and abuse. This policy establishes clear procedures for reporting concerns and ensures protection from retaliation.

### 2. Definitions

- **Fraud:** Intentional deception or misrepresentation for personal or organizational gain (e.g., falsifying attendance, meal counts, or timesheets).
- **Waste:** Misuse of programming resources that results in unnecessary costs (e.g., over-ordering food, misuse of supplies).
- **Abuse:** Improper behavior that is inconsistent with sound practices (e.g., misuse of authority, inappropriate conduct, or misuse of program funds).

### 3. Scope

This policy applies to:

- All employees and contractors
- Volunteers
- Parents/guardians
- Scholars (students)

### 4. Policy Statement

The Study Hall, Inc. maintains a **zero-tolerance policy** for fraud, waste, and abuse. All individuals are required to report any suspected violations. Reports will be taken seriously, investigated promptly, and fully handled confidentially.



## 5. Examples of Reportable Concerns

- Falsification of attendance or academic records
- Inaccurate CACFP meal counts or food service claims
- Misuse or theft of program funds, supplies, or equipment
- Unauthorized use of program vehicles (e.g., mini-bus misuse)
- Time theft or falsified staff hours
- Inappropriate staff or scholar conduct
- Failure to follow safety or compliance regulations

## 6. Reporting Procedures

### For Staff

1. Report concerns immediately to:
  - Program Director
  - Executive Director
2. If the concern involves leadership, report directly to:
  - Board Chair or designated Board Member
3. Complete a **Fraud/Waste/Abuse Incident Report Form** (written documentation required within 24 hours).

### For Parents/Guardians

Parents may report concerns by:

- Email: [jhodges@thestudyhall.org](mailto:jhodges@thestudyhall.org)
- Telephone: 404-659-1415
- Submitting a written complaint at the program site (suggestion box of the front desk)

Anonymous reports are accepted.

### For Scholars (Students)

Scholars may report concerns by:

- Speaking to a trusted staff member
- Using a designated **“Safe Reporting Box”** (suggestion box of the front desk)
- Informing a parent/guardian to report on their behalf

Staff must document and escalate all scholar reports.



## 7. Confidentiality

All reports will be handled confidentially. Information will only be shared with individuals responsible for investigating and resolving the issue.

## 8. Protection Against Retaliation

The Study Hall, Inc. strictly prohibits retaliation against anyone who reports suspected fraud, waste, or abuse in good faith. Any act of retaliation will result in disciplinary action, up to and including termination or dismissal from the program.

## 9. Investigation Procedures

1. All reports are reviewed within **2 business days**.
2. An internal review or investigation will be conducted.
3. Findings will be documented.
4. Corrective actions will be implemented if necessary.

## 10. Corrective Actions

Depending on findings, actions may include:

- Staff disciplinary action (up to termination).
- Policy revisions or additional training.
- Financial restitution.
- Programmatic changes to prevent recurrence.

## 11. Recordkeeping

All reports and investigations will be:

- Documented and securely stored.
- Maintained for a minimum of **5 years** (or per funding requirements)



## **13. Compliance with Funding Requirements**

This policy supports compliance with:

- 21st Century Community Learning Centers (21st CCLC).
- Child and Adult Care Food Program (CACFP).
- USDA and state regulations.
- Nonprofit governance standards.

## **14. Acknowledgment**

All staff must sign an acknowledgment form indicating they have received, read, and understand this policy. (Handbook Acknowledgement Page)