



Collaborative Center Whistleblower Policy

NMCAA is committed to the deterrence, detection and correction of misconduct and dishonesty. The discovery, reporting and documentation of such acts provides a sound foundation for the protection of innocent parties, as do the taking of disciplinary action against offenders up to and including dismissal where appropriate, the referral to law enforcement agencies when warranted by the facts, and the recovery of assets.

Definition of Misconduct and Dishonesty

For purposes of this policy, misconduct and dishonesty include, but are not limited to:

- Acts which violate Head Start Program Performances Standards, State of Michigan Licensing Rules, or the Collaborative Center Agreement (commonly referred to as the Contract).
- Theft or other misappropriation of assets including assets of NMCAA, our clients/customers, funders, suppliers, or others with whom we have a relationship.
- Misstatements and other irregularities in NMCAA or Collaborative Center records, including intentional misstatement of the result of operations.
- Wrongdoing
- Forgery or other unauthorized alteration of documents.
- Fraud and other unlawful acts
- Any similar acts

NMCAA specifically prohibits these and any other illegal activities in the actions of its employees, managers, executives, and others responsible for carrying out Agreed upon activities.

Collaborative Center Responsibilities

1. The Collaborative Center will not retaliate against a Whistleblower who makes a good faith report under the Collaborative Center Whistleblower Policy.
 - a. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, poor work assignments and/or threats of physical harm.
 - b. The right of the Whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

NMCAA Responsibilities

1. NMCAA will not retaliate against a Whistleblower who makes a good faith report under this policy.
2. Any employee or other reporting individual (Whistleblower) will be protected. Whistleblower protections are provided in two important areas – confidentiality and against retaliation. Insofar as practicable, the confidentiality of the Whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense.

I understand that it is my responsibility to immediately report any suspected misconduct or dishonesty to the Collaborative Center Services Coordinator or the Collaborative and Early Head Start Center-based Manager or the Early Childhood Programs Manager.

Staff Signature: _____

Date: _____

Supervisor Signature: _____

Date: _____