

New York State Community Action Association (NYSCAA)

Whistleblower Policy

If any Director, Officer, Employee, volunteer or other individual affiliated with NYSCAA becomes aware of, or in good faith suspects, that any action against NYSCAA is illegal, fraudulent, in violation of adopted NYSCAA policy, or is against the best interests of NYSCAA, he or she (the “Whistleblower”) shall immediately, or as soon as practicable, report such conduct to the NYSCAA Board President and/or Chair of the Finance Committee. Alternatively, to facilitate reporting of such conduct, any Whistleblower may report such conduct anonymously by submitting a written statement to any individual holding the positions listed above. (Please see addendum for the contact information for the NYSCAA Board President and Chair of the Finance Committee).

When information is disclosed pursuant to the Whistleblower Policy, the person such information is disclosed to shall promptly investigate the matter and bring the matter to the attention of other necessary parties as applicable (including, but not limited to, NYSCAA Board President, and/or Chair of the Finance Committee). NYSCAA shall then take all necessary steps to remedy the matter if one is found, and contemporaneously document, in detail, the investigation and resolution.

No Whistleblower who in good faith reports such conduct shall suffer intimidation, harassment, discrimination, other retaliation, or adverse employment consequences. Any Director, Officer, or Employee who retaliates against a Whistleblower shall be subject to immediate discipline, up to and including termination of employment, removal from the Board or removal of affiliation from NYSCAA.

Any and all information disclosed pursuant to the Whistleblower Policy shall be kept confidential to the greatest extent practicable to allow for proper investigation. (The subject of a whistleblower complaint is prohibited from being present at or participating in board or committee deliberations and voting on the matter related to the complaint.)

The CEO shall be designated to administer the Whistleblower Policy, shall be vested with the discretion to delegate certain duties or responsibilities under the Whistleblower Policy, and shall report to the President and/or Chair of the Finance Committee, as necessary, any matters arising under the Whistleblower Policy. In the CEO’s absence, his or her unwillingness to administer the Whistleblower Policy, or if he or she is involved in a matter arising under the Whistleblower Policy, the President shall be designated to administer the Whistleblower Policy during such time, and shall report to the Board any matters arising under the Whistleblower Policy.

If any information disclosed or discovered relates in any way to NYSCAA’s accounting practices, internal controls, financials, or any internal or external audit, the CEO or the President, as

applicable, shall immediately notify the Audit and Finance Committee, shall work with the Audit and Finance Committee until the matter is resolved, and shall work with the Audit and Finance Committee to implement procedures to help prevent the reoccurrence of any such matter.

Any Whistleblower who is found to have reported unsubstantiated information that is found to be made maliciously or knowingly false shall be subject to immediate discipline, up to and including termination from employment, removal from the Board or removal of affiliation from NYSCAA.

A copy of the Whistleblower Policy shall be (i) distributed to all Directors, Officers, and Employees, and all volunteers who provide substantial services to NYSCAA, (ii) posted in NYSCAA's office in a conspicuous place, and/or (iii) published on NYSCAA's publicly available website.

Addendum

New York State Community Action (NYSCAA) Whistleblower Policy

Report any conduct to one or more of the following:

NYSCAA's Board President:

Laura Rossman
Chief Executive Officer
Pro Action of Steuben & Yates, Inc.
117 E Steuben Street
Bath, NY 14810
(607) 776-2125 ext. 320
rossmanl@proactioninc.org

NYSCAA's Finance Committee Chair:

Denis Wilson
Chief Executive Officer
Fulmont Community Action Agency, Inc.
Park Street, County Annex Building
Fonda, NY 12068
(518) 853-3011 or (518) 853-8353
capdirector@yahoo.com