

 PA TURNPIKE COMMISSION POLICY <i>This is a statement of official Pennsylvania Turnpike Policy</i>		NUMBER: 3.11 APPROVAL DATE: 10-18-2011 EFFECTIVE DATE: 11-02-2011 REVISED DATE: 08-06-2018
POLICY SUBJECT: Fraud and Abuse Tip-Box	RESPONSIBLE DEPARTMENT: Compliance	

A. PURPOSE:

To establish a uniform policy and define the responsibilities of the Chief Compliance Officer (“CCO”) for the review, investigation, analysis, and oversight of the Fraud and Abuse Tip-Box established by the Pennsylvania Turnpike Commission and to set guidelines and expectations for employees reporting fraud and abuse of Pennsylvania Turnpike Commission resources.

B. SCOPE:

This policy applies to all members of the Pennsylvania Turnpike workforce, including full-time, part-time, temporary, supplemental, interns, independent consultants, summer, and contract employees and any acts of alleged wrongdoing reported through the Fraud and Abuse Tip-Box established by the Pennsylvania Turnpike Commission.

C. GENERAL POLICY:

Employees, the general public, and anyone doing business with the Commission can and should report suspected wrongdoing involving fraud, abuse or irregular activity in accordance with this policy.

D. DEFINITIONS:

Fraud- In considering whether a situation is potentially fraudulent, there must be an intentional misrepresentation where the following conditions are alleged: (1) a cause of deception; (2) an intentional misrepresentation of fact; and (3) the violator stands to gain financially from the deception and misrepresentation.

Abuse:- Abuse differs from fraud in that it describes incidents and practices of an individual that are inconsistent with sound business or fiscal practices, which are considered inappropriate, but not knowingly or intentionally misrepresented in order to obtain payment or a financial benefit.

Examples of fraud and abuse include, but are not limited to, the following:

- theft or abuse of Commission property or resources, such as supplies and equipment.
- excessive or unnecessary purchases made purportedly on behalf of the Commission.
- falsification of official documents, such as timesheets, travel vouchers, etc.
- contract fraud.
- inappropriate expenditures and embezzlement.

E. PROCEDURES:

Employee Orientation/Awareness: New Pennsylvania Turnpike employees shall be made aware of this policy by the Compliance Department.

Procedure for Reporting Fraud, Abuse or Irregular Activity: Employees reporting suspected fraud, abuse or irregular activity shall follow the procedures listed below:

- State circumstances about the incident, including estimated loss amount and frequency of occurrence.
- Provide the names of all individuals involved.
- Identify all available documentation and location (copies of supporting documentation may be enclosed or if emailed-send to the address below).
- Provide the dates and times that the incident(s) occurred and where the incident occurred.
- Identify the names and address and telephone numbers (if known) of any credible witness(es).
- If the incident was previously reported, identify to whom it was reported and when.
- Provide a password and use this password when requesting information regarding this matter.
- Provide your name, address, and phone number (optional).

Reporting Fraud, Abuse, or Irregular Activity: Fraud or abuse can be reported in the following ways:

- Call the toll-free tip-line at (888) 317-3110
- Write to the PTC Tip-Box, P.O. Box 19, Highspire, Pennsylvania 17034-1019
- Send an email to tip_box@paturnpike.com

The reporting party need not provide his or her name, however, be advised that your Internet address will be submitted to the Commission if e-mail is used to report alleged wrongdoing. All information will remain confidential.

Employee Protection in Reporting: All employees reporting in accordance with this Policy Letter shall be afforded protection under the Act of 1986, known as the Whistleblower Law.

Reports of Suspected Violations: Any employee, member of the general public, and anyone doing business with the Commission can report suspected wrongdoing involving fraud or abuse to the CCO to initiate a formal complaint process. Violations will be investigated by the Office of Special Investigations. When appropriate, the CCO may, in the exercise of his or her discretion, request assistance and cooperation from other departments of the Commission. Individuals found to be in violation of this policy may be subject to disciplinary action, up to and including termination.

This Policy Letter supersedes all previous Policy Letters on this subject.