



WHISTLEBLOWER PROTECTION & REPORTING POLICY

AMVETS Hawaii Suicide Prevention Program (AHSP)

FY27 Staff Sergeant Parker Gordon Fox Suicide Prevention Grant Program
 FAIN OSPI-000276-27 | Grant ID HI-SSG-4100-27 | Federal Award \$683,905
 Period of Performance: September 30, 2026 – September 30, 2027

Policy Owner	President & CEO / Authorized Signatory
Program Administrator	Project Director, AHSP
Financial Compliance	Chief Financial Officer
Governance Oversight	AMVETS Hawaii Service Foundation Corp. Governing Board
Applies To	Board members, officers, employees, grant-funded staff, contractors, consultants and volunteers

1. Policy Statement

AMVETS Hawaii Service Foundation Corp. is committed to lawful, ethical, transparent, and accountable administration of the AHSP federal award. Individuals are encouraged to report in good faith suspected fraud, waste, abuse, gross mismanagement, misuse of federal funds, conflicts of interest, bribery, gratuity violations, false claims or statements, substantial and specific dangers to public health or safety, violations of law or regulation, participant-safety concerns, privacy/security violations, or material noncompliance with the grant.

No individual may be discharged, demoted, threatened, harassed, discriminated against, or otherwise retaliated against for making a protected disclosure or participating in a lawful review or investigation. This policy supplements, and does not limit, rights or reporting channels available under federal or state law.

2. Matters That Should Be Reported

- Fraud, theft, embezzlement, falsification of records, false claims, or deliberate material misstatements.
- Misuse, diversion, unauthorized expenditure, duplicate charging, or improper drawdown of federal grant funds.
- Undisclosed or improperly managed conflicts of interest, bribery, kickbacks, or gratuities.
- Gross mismanagement, waste, serious internal-control failures, or intentional circumvention of grant requirements.
- Participant-safety violations, failure to follow suicide-risk escalation procedures, or concealment of a serious incident.
- Unauthorized access, disclosure, loss, or misuse of participant PII or other sensitive information.

- Retaliation or threatened retaliation against an individual for raising a good-faith concern.
- Material violations of the executed VA Grant Agreement, 38 CFR Part 78, applicable 2 CFR Part 200 requirements, or other controlling laws and regulations.

3. Internal Reporting Channels

A concern may be reported to any appropriate level that is not implicated in the concern. Reports may be made to:

- President & CEO / Authorized Signatory — Donovan A. Lazarus.
- Project Director — Alim H. Shabazz.
- Chief Financial Officer — Cydney Shabazz, particularly for financial, accounting, procurement, reimbursement, or federal-funds concerns.
- An authorized member or officer of the AMVETS Hawaii Service Foundation Corp. Governing Board when executive management is implicated or when direct Board reporting is appropriate.

Reports should include, when known: the nature of the concern; relevant dates; persons or entities involved; affected program, transaction, participant, or record; available supporting documents; and whether immediate safety, financial, privacy, or evidence-preservation action is needed. A reporter is not required to prove misconduct before making a good-faith report.

4. External Federal Reporting

Nothing in this policy requires an individual to report internally before contacting an authorized government entity. The executed award identifies the VA Office of Inspector General (OIG) as an authorized recipient of disclosures concerning matters such as gross mismanagement of a federal grant, fraud, waste of federal funds, abuse of authority, substantial and specific danger to public health or safety, or violations of law, rule, or regulation related to a federal grant.

VA OIG Hotline	1-800-488-8244
Online	VA Office of Inspector General Hotline web form
Mail	VA Inspector General Hotline (53H), 810 Vermont Ave., NW, Washington, DC 20420
Award Program Contact	Sandra Foley, SSG Fox SPGP Director / VASSGFoxGrants@va.gov

5. Mandatory Disclosure by the Organization

When AMVETS Hawaii has credible evidence, in connection with the federal award or activities/subawards under it, of a violation of federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations, or a violation of the civil False Claims Act, responsible leadership will promptly make the disclosures required by the executed award and 2 C.F.R. § 200.113 to the appropriate federal entities, including the federal agency and agency Office of Inspector General, as applicable.

Potential mandatory-disclosure matters must be escalated immediately to the President & CEO and CFO, unless either is implicated, in which case the matter must be elevated to an unimplicated Governing Board authority and appropriate external authorities.

6. Non-Retaliation

- Retaliation is prohibited against any person who makes a good-faith report, seeks guidance, refuses to participate in suspected misconduct, assists an authorized inquiry, or makes a protected disclosure.

- Prohibited retaliation includes termination, demotion, reduction in hours or duties, threats, intimidation, harassment, adverse scheduling, exclusion from opportunities, or other discriminatory treatment motivated by the protected activity.
- A retaliation allegation is treated as a separate compliance matter and may be escalated directly to the Governing Board or an authorized government entity.
- Knowingly making a deliberately false allegation is not protected misconduct; however, a good-faith report that is ultimately unsubstantiated remains protected.

7. Intake, Triage and Investigation Procedure

1. Receive and log the concern using a restricted-access Whistleblower/Compliance Report Log.
2. Immediately assess whether participant safety, evidence preservation, financial loss, privacy/security, or other urgent harm requires protective action.
3. Assign review responsibility to an impartial person or external professional who is not implicated in the allegation.
4. Preserve relevant records, electronic data, communications, financial documentation, and other evidence. No person may alter, destroy, conceal, or retaliate regarding relevant evidence.
5. Determine whether immediate notification to VA, VA OIG, law enforcement, another regulator, insurer, legal counsel, or the Governing Board is required.
6. Conduct a fair, documented review using need-to-know access and appropriate confidentiality safeguards.
7. Document findings, required corrective action, responsible owner, due date, federal reporting obligations, and closure verification.
8. Report material findings and corrective-action status to the Governing Board at the appropriate level of confidentiality.

8. Confidentiality and Anonymous Reports

AMVETS Hawaii will protect the identity of a reporter to the extent reasonably possible and consistent with a fair investigation, participant safety, legal obligations, and required federal disclosures. Information will be shared only with persons who need it to evaluate, investigate, respond to, or report the matter. The VA OIG award language states that reports are treated as sensitive and submitters may decline to provide their names if they choose to remain anonymous.

9. Governing Board Responsibilities

- Ensure an independent reporting path exists when executive management is implicated.
- Receive notice of material substantiated findings, significant unresolved allegations, retaliation claims, and corrective-action status.
- Ensure management does not interfere with protected reporting or required federal disclosures.
- Require corrective action, restitution/recovery, policy changes, discipline, training, or referral to authorities when warranted.
- Monitor recurring compliance trends and verify closure of significant corrective actions.

10. Records Retention

Whistleblower reports, investigation records, evidence, findings, corrective-action documentation, and required disclosure records are maintained securely and retained in accordance with the federal award's records-retention requirements and any longer period required because of litigation, claims, audit, fiscal review, investigation, property rules, or other controlling law.

11. Employee Notice and Acknowledgment

AHSPP employees and applicable contractors will be informed in writing of whistleblower rights and protections. This policy will be included in onboarding and compliance training and made reasonably accessible throughout the period of performance.

Appendix A — Whistleblower / Compliance Report Form

Date of Report	_____
Reporter Name (optional)	_____
Preferred Contact (optional)	_____
Person/Entity Involved	_____
Date(s) of Event	_____
Type of Concern	☐ Fraud ☐ Waste ☐ Abuse ☐ Conflict ☐ Safety ☐ Privacy/ Security ☐ Retaliation ☐ Other
Immediate Risk?	☐ No ☐ Yes — describe below
Description	
Supporting Documents / Witnesses	
Requested Confidentiality	☐ Yes ☐ No
Received By / Date	_____

Appendix B — Management Review / Corrective Action

Case / Log Number	_____
Triage Level	☐ Routine ☐ Significant ☐ Critical
Assigned Reviewer	_____
External Notification Required	☐ No ☐ VA ☐ VA OIG ☐ Law Enforcement ☐ Other
Finding	☐ Substantiated ☐ Partially Substantiated ☐ Unsubstantiated ☐ Referred
Corrective Action	
Target / Closure Date	_____
Board Review / Reference	_____

Policy Approval

Role	Name	Signature	Date
President & CEO / Authorized Signatory	Donovan A. Lazarus	_____	_____
Project Director	Alim H. Shabazz	_____	_____
Chief Financial Officer	Cydney Shabazz	_____	_____