

Nassau County Office of the Inspector General



2025 ANNUAL REPORT

Jodi Franzese, Inspector General

This report is available on our website <https://www.nassaucountyny.gov/4747/Inspector-General>

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A Message from the Nassau County Inspector General



The Nassau County Office of the Inspector General (OIG) is pleased to present the 2025 Annual Report, our seventh annual report since the inception of the office in 2019. As the County's first Inspector General, it has been my privilege to serve the people of Nassau County in this capacity since that time.

Only with a collective effort can OIG continue on a path toward success. The cooperation of County employees and officials, contractors and vendors, and members of the public is essential to fulfilling our mission. Accordingly, I would like to recognize the Office of the Nassau County Executive, the Nassau County Legislature, the Nassau County Comptroller, and the County's employees for supporting our office.

This report highlights OIG's achievements and priorities during 2025, all in a continuing effort to preserve the integrity of County government, including:

- vetting contractors/vendors seeking to do business with the County;
- reviewing allegations of misconduct by County contractors/vendors;
- reviewing allegations of misconduct involving County officials and employees;
- safeguarding the integrity and effectiveness of the County procurement process.

Over the past seven years, OIG has provided the County Legislature with objective analyses in a wide variety of matters. Additionally, where appropriate, OIG has also referred matters to the Administration and other government agencies including the Nassau County District Attorney's Office and other inspector general offices.

I would also like to convey my deepest appreciation to Ned Schwartz. In April 2025, after 45 years of government service, Ned retired from the role of Deputy Inspector General and General Counsel. Like me, Ned has been with this office from the beginning. While he continues to support us on a part-time basis, OIG misses his daily counsel and friendship.

Finally, I would like to thank the members of this office for their dedication and professionalism in their work for making this report possible.

Sincerely,

Jodi Franzese
Inspector General

Welcome to the Seventh Annual Report of the Nassau County Office of the Inspector General



About the Nassau County OIG

Mandate and Mission

Nassau’s Office of the Inspector General (OIG) has a broad statutory mandate under the County Charter to prevent and detect fraud, waste, abuse and illegality impacting the County government or its funds. The mission of OIG is to foster and promote integrity, accountability, effectiveness, and efficiency in the administration of programs and operations of Nassau County government, with special emphasis on the County’s contracting and procurement processes.

Nassau County’s OIG accomplishes its mission through investigations, audits, reviews, and other activities designed to detect and prevent fraud, waste, abuse and illegal acts, and to enhance County government operations.

Some examples of the matters that OIG may evaluate are:

- Purchasing, bidding, or contracting irregularities.
- Fraud by contractors/vendors or others receiving County funds.
- False filings by entities seeking to do business with the County.
- Conflicts-of-interest or other ethics violations.
- Bribes, gratuities, or kickbacks involving County employees or officials.
- Theft of Nassau County funds or resources.
- Significant waste of County money or inefficiency.
- Adequacy of, and compliance with, controls and policies.
- Effectiveness and transparency of governmental processes.
- Compliance with laws.
- Employee misconduct.

- Whistleblower reprisal.

OIG is committed to fulfilling its mandate and accomplishing its mission by cultivating and safeguarding a transparent, honest, and accountable County government, and an environment in which the County's goods and services are acquired without fraud and in the public interest.

Enabling Statute

The statutory purpose of OIG is set out in Section 185 of the Nassau County Charter, entitled "Office Created and Established and Purpose of the Office." It provides:

There is hereby established an independent office of the Inspector General which is created in order to provide increased accountability and oversight of County operations, to detect and prevent waste, fraud, abuse and illegal acts in programs administered or financed by the County, particularly the County's contracting and procurement processes, to promote transparency, efficiency and integrity in the County contracting and procurement process, and to assist in increasing economy, efficiency, and effectiveness in the administration of the County government. The Inspector General shall initiate, conduct, supervise, and coordinate investigations, audits, reviews and examinations designed to detect, deter, prevent, and eradicate fraud, waste, mismanagement, misconduct and other abuses by elected and appointed County officials, officers, employees, agencies, departments, commissions, boards, offices and all other instrumentalities of the County as well as County vendors, contractors, and lower tier subcontractors, and other parties doing business with the County and/or receiving County funds. The aforementioned shall not be applicable to the County Legislature and the Office of Legislative Budget Review. The Inspector General shall head the Office of the Inspector General. The organization and administration of the Office of the Inspector General shall operate independently in such manner so as to assure that no interference or influence external to the Office of the Inspector General compromises or undermines the integrity, independence, fairness and objectivity of the Inspector General in fulfilling the statutory duties of the office or deters the Inspector General from zealously performing such duties.

Additionally, the Charter reflects the non-partisan nature of OIG. The Inspector General, who is neither an elected nor political official, is required by Charter provision to comply with the restrictions on political activity applicable to judges in the Rules of the Chief Administrative Judge of New York State.¹

¹ Nassau County Charter § 187 (19).

Authority, Powers and Functions

To accomplish its mission the County Charter² provides OIG with a set of authorities and powers, including in part:

- Authority to investigate, review, examine and audit past, present and proposed programs, activities, contracts, expenditures, transactions, and projects that are administered, overseen and/or funded in whole or in part by the County, including all aspects of the procurement process, including reviewing proposed contracts to be presented to the County Legislature for approval.
- Authority to recommend remedial actions.
- Authority to receive and investigate complaints.
- Authority to review vendor/contractor databases, filings, and financial disclosure forms.
- Authority to obtain full and immediate access to all County documents and records, and to issue directives requiring their production.
- Authority to receive the full cooperation of the County Executive, all appointed County officials, officers and employees, vendors, contractors, subcontractors, and other parties doing business with the County or receiving County funds, including submitting to interviews, providing sworn statements, and providing documents and records. The Charter also provides a criminal penalty for any person who knowingly interferes in, obstructs, or impedes an Inspector General investigation, audit, review or examination.
- Authority to subpoena witnesses and to issue subpoenas compelling the production of documents and other information.
- Requirement that the Inspector General be notified as part of the “approval path” of proposed contracts presented to the County Legislature for approval.
- Requirement for OIG to be notified in writing prior to meetings of procurement selection committees, and authority to attend such meetings.
- Requirement that the County Executive promptly notify the Inspector General of possible mismanagement of a contract constituting misuse or loss

² See especially Nassau County Charter § 187.

exceeding \$5,000 in public funds, as well as fraud, theft, bribery or other violations of law which may fall within the Inspector General's jurisdiction.

- Authority to hire its own staff.

The Charter also imposes various operational requirements on OIG. These include:

- Establish a hotline to receive complaints from both anonymous and identified persons.
- Develop outreach strategies to inform government officials and employees and the public of the authority and responsibilities of OIG. These include developing an OIG webpage linked to the County's website and posting information in common areas of County facilities.
- Establish internal policies and conduct its work in accordance with generally accepted government standards and, where applicable, the Principles and Standards for Offices of the Inspector General (also known as the Green Book), published by the Association of Inspectors General.
- Notifying appropriate law enforcement agencies of suspected possible criminal violations of state, federal, or local law.
- Following prescribed procedures for the issuance of certain finalized reports.
- Issuing an annual report (this document).

IG Independence

Framework for Independence

The County Charter established in 2017 a detailed framework to provide the Inspector General with the fundamental tool of independence, notably including a fixed term of office of four years, and the authority to exercise any of the powers granted under the Charter on his or her own initiative.³

Section 189 of the County Charter requires the County Legislature to have a committee⁴ for the purpose of maintaining general supervision of and liaison with OIG. Section 189 also

³ Nassau County Charter § 187 (8).

⁴ By law, the membership of the committee consists of the Presiding Officer, the Minority Leader, the Chairman of the Finance Committee, and one member each appointed by the Presiding Officer and Minority Leader, respectively.

provides that the Inspector General shall meet periodically with representatives of the Legislature to review prior activities and discuss plans and objectives.

The Inspector General is not, however, subject to supervision or control by the County Executive. Section 185 of the Charter provides that OIG shall operate independently such that no interference or influence compromises or undermines the integrity, independence, fairness and objectivity of the Inspector General or deters the Inspector General from zealously performing his or her duties.

OIG may receive requests from members of the Legislature or other officials to explore particular concerns. OIG independently assesses such requests in light of its mission and mandate, to determine whether it is appropriate for the office to undertake such inquiry.⁵ OIG also independently decides the manner, scope, and extent of the activities it elects to pursue. In all instances, OIG conducts its work objectively and impartially, without regard to partisan political considerations.

Term of Office

The Inspector General is by County Charter, appointed to a term of office by super-majority vote (at least 13 members) of the County Legislature and removable only for cause by super-majority vote. This is important because the ability of OIG to be an effective and credible oversight body is closely tied to having an Inspector General with a fixed term of office and operational autonomy.

Principles and Standards promulgated by the Association of Inspectors General (AIG) provides that, to establish and maintain the independence of Inspectors General, they should be appointed to a fixed term of office⁶. Moreover, "... AIG believes that the minimum term should be five years and recommends a longer period of seven years to provide stability in the function."⁷ Section 189 of the County Charter provides Nassau's Inspector General with a fixed term of office but of four years. As of this writing, the Inspector General is in holdover status, as her original four-year term of office ended in 2022 without reappointment by the Legislature.

⁵ The Inspector General's authority to conduct investigations, audits, reviews, and examinations does not apply to the Legislature.

⁶ AIG is a nonprofit and nonpartisan organization founded in 1996 "to strengthen public sector oversight through professional standards, training, and ethical leadership."

⁷ Commentary in Model Legislation, Association of Inspectors General website. Also, the model legislation language preceding the commentary provides that: "*The Inspector General is appointed for a term of five years, which may be renewed at the discretion of the appointing authority.*" Many Inspectors General do indeed serve terms of five years or more.

While the Inspector General remains committed to her mandated mission, having an OIG headed by a person serving with an uncertain future is contrary to the carefully delineated framework for independence established by Charter; a structure created to promote the exercise of independent judgment, as well as public confidence in, and the optimal functioning of, OIG. It is earnestly hoped that with bipartisan support the foundation of an IG serving under a fixed term will soon be restored to OIG.

Our History

Impetus for the creation of Nassau’s OIG might be traced to July 2015, when the Nassau County District Attorney’s Office (DAO) produced its *Special Report on the Nassau County Contracting Process*, documenting significant fraud and corruption vulnerabilities, as well as inefficiencies, in the County’s procurement process at that time. The report also detailed several recommendations for reform. One of the key recommendations in the DAO report was the creation of an independent Office of the Inspector General for Nassau County, envisioned as follows:

The Legislature should modify the County Charter to eliminate the position of Commissioner of Investigations due to its history of ineffectiveness,⁸ and replace it with an independent and adequately staffed County Inspector General . . . The Inspector General should be afforded broad investigative authority over executive departments and the procurement process, tasked with the comprehensive vetting of county contractors, and directed to refer possible criminal conduct to the appropriate agency for prosecution.

. . . .

Apart from the duties currently assigned to the Commissioner of Investigations, a new County Inspector General should periodically evaluate each department’s recordkeeping and procedure; respond to in-house tips of fraud, waste, and abuse; receive regularized reports of activity from the decentralized selection committees in the various County departments; provide secondary review of vendor performance[,] warehouse screening documentation, and evaluate personal and financial relationships.

⁸ The Commissioner of Investigations was an at-will appointee of the County Executive, with no fixed term or minimum qualifications under the Charter and not requiring confirmation by the County Legislature. Unlike the IG, the Commissioner’s objectives were not well-defined in the Charter (simply to make examinations “as he or she may deem to be for the best interest of the county”) and the Commissioner was not mandated to follow professional standards. As noted above, in 2017 the County Charter was amended to create an Inspector General who was independent of the County Executive. However, notwithstanding the District Attorney’s explicit recommendation to abolish the Commissioner of Investigations, that position was not eliminated from the Charter. While the post of Commissioner has remained vacant since the Inspector General’s appointment, at this writing the law authorizing a Commissioner remains in the Charter.

OIG came into operation in January 2019, becoming the first county-wide OIG in New York State.⁹ The Office was established by County legislation enacted on a bi-partisan basis in December 2017.¹⁰ The legislation provided, in part, a fixed term, minimum qualification standards, and enumerated powers and responsibilities, for the Inspector General.

Following a nationwide search in 2018 for Inspector General candidates, Jodi Franzese, then a Senior Inspector General in New York City and former prosecutor in Suffolk County, was selected by a bi-partisan committee. Her appointment was confirmed by unanimous vote of the County Legislature in December 2018, and she took office as the County’s first Inspector General on January 3, 2019. The Inspector General thereafter hired OIG’s staff members, making the office a fully operational reality.

The lineage of the Inspector General concept goes back to well before 2015. At its inception, the Nassau County OIG thus became part of an established, robust nationwide OIG community, with delineated professional standards, including those developed under the auspices of the AIG¹¹ and, at the federal level, the Council of the Inspectors General on Integrity and Efficiency (CIGIE).

Over the following years, as this report illustrates, OIG developed and grew from concept to full operation. During 2025, OIG in part initiated 157 contract reviews, issued 94 contract review statements, and attended 56 project progress meetings and sealed-bid openings for two contracts. OIG also monitored 120 meetings of vendor evaluation or technical review committees.

Staffing

The most crucial resource of an OIG is its staff. During 2025, OIG was comprised of staff members in the following positions:

- Inspector General
- Deputy Inspector General / General Counsel
- Assistant Inspectors General

⁹ Monroe County has had an OIG-like Office of Public Integrity since 2016, and Erie County has had a Medicaid Inspector General since 2012.

¹⁰ Nassau County Charter, Article I-C (Sections 185 – 196).

¹¹ Principles and Standards for Offices of Inspector General (“Green Book”), promulgated by the Association of Inspectors General.

- Investigative Counsel
- Oversight Specialist

In an independent, stand-alone oversight organization of relatively modest size, it is essential that it be comprised of persons collectively equipped with the variety of knowledge, skills and expertise that its multifaceted function requires. OIG staff members were carefully selected and are well qualified and credentialed to fulfill the many aspects of OIG's mission. OIG's 2025 team consisted of career professionals whose prior positions and experience reflect a range of pertinent disciplines and relevant skills: investigators, auditors, attorneys/prosecutors, federal agents, deputy inspector general and senior inspector general. The staff previously worked for a variety of respected governmental institutions including:

- New York City Department of Investigation
- Suffolk County District Attorney's Office
- New York County District Attorney's Office
- Federal Bureau of Investigation
- U.S. Department of Transportation, Office of Inspector General
- Metropolitan Transportation Authority, Office of the Inspector General
- New York City School Construction Authority, Office of the Inspector General
- Yonkers Office of the Inspector General
- Westchester County Attorney's Office
- National-Geospatial-Intelligence Agency, Office of Inspector General

Several persons are members of the Association of Inspectors General and/or the Association of Certified Fraud Examiners. OIG's team has completed a wide variety of specialized training, and attained advanced degrees and professional certifications, including:

- Certified Inspector General (CIG)
- Certified Inspector General Auditor (CIGA)
- Certified Inspector General Investigator (CIGI)
- Certified Public Accountant (CPA)
- Certified Fraud Examiner (CFE)
- Certified [Asset] Protection Professional (CPP)

- Certified New York Code Enforcement Officer
- U.S. Department of Defense Whistleblower Reprisal Investigations Course
- Admission to New York Bar
- Master's Degree



Complaints

Good government is everyone's business. OIG relies in part on concerned County employees, officials, vendors, and members of the public – including the readers of this report – to provide us with information regarding possible fraud, waste, abuse, corruption, and misconduct related to County agencies, projects, programs, contracts, activities, transactions, funds, or vendors. OIG is responsible for receiving – and investigating as warranted – complaints, and may also proactively conduct audits, investigations and other reviews, as it deems appropriate.

In 2025, OIG was contacted over 70 times.

OIG receives complaints and tips from members of the public, County employees, officials, and vendors via a variety of means including OIG's website, email, letter, telephone Hotline, and walk-in. OIG established these varied means of contact in recognition of the potentially sensitive nature of some of these communications and that the most convenient way of contacting the office may differ by individual need.

Complaints may allege fraud, corruption, waste of funds, abuse of position, or raise other concerns. All complaints and tips received by OIG are carefully reviewed to determine the appropriate disposition of each. Among other considerations, OIG evaluates each complaint or tip to determine whether it falls within OIG's jurisdiction and gauges its investigative viability. For example, a very vague anonymous complaint might not provide an adequate basis for further inquiry. Given OIG's need to manage its resources effectively, each complaint is also assessed in terms of its potential magnitude or significance, from individual and/or programmatic standpoints.

Some complaints may result in the initiation of a preliminary inquiry or a full investigation, audit, or other review by OIG. The Inspector General may close some complaints based on initial assessment or after a preliminary inquiry fails to substantiate the allegations or finds no viable issues to pursue. In some instances, the Inspector General may refer the matter to the

appropriate County department or other public agency for its appropriate action.

OIG forwards complaints to other organizations if its evaluation or preliminary inquiry reveals that the issues raised fall outside OIG's jurisdiction or would be more appropriately handled by another entity. During 2025, OIG accordingly referred over 30 matters to other entities.

Additionally, when OIG receives a contact about a matter for which OIG does not provide oversight (e.g., federal, state, city, town, or village-level issues), it often provides assistance by trying to help the complainant find a more appropriate entity to contact about their concern. OIG staff did so on over 25 occasions during 2025.

Examples of County-related issues that should be reported to OIG are:

- Contractor and vendor fraud (including the submission of inflated or false claims for payment, incomplete or substandard work, or failure to provide deliverables specified by the County).
- Purchasing or bidding irregularities.
- Construction-related fraud on public works projects.
- Employee misconduct, conflicts-of-interest, or corruption.
- Offer, payment, or acceptance of bribes or gratuities, or solicitation of kickbacks.
- Theft or misappropriation of County property, revenue, or other resources.
- Significant waste of County money or inefficiency.
- False documentation, certifications, licenses, qualifications.
- Whistleblower reprisal.
- Any other activity suggesting wrongdoing or impropriety involving Nassau County projects, programs, operations, grants, funds, revenue, employees, officials, contractors, vendors, or anyone who receives County money.

For more information about making complaints, please see the Frequently Asked Questions section in the Appendix following the body of this report.



Whistleblower Protection

Nassau County’s employees and officers are protected by law, as summarized below, against retaliatory personnel action for reporting to the Inspector General (or other specified entities) allegations of improper government action by a County officer, employee, or agent that violates a federal, state, or local law, rule, or regulation.

New York State Civil Service Law, Section 75-b, entitled *Retaliatory Action by Public Employers*, provides, in part, that:

A public employer shall not dismiss or take other disciplinary or other adverse personnel action¹² against a public employee regarding the employee’s employment because the employee discloses to a governmental body¹³ information:

(i) regarding a violation of a law, rule or regulation which violation creates and presents a substantial and specific danger to the public health or safety; or

(ii) which the employee reasonably believes to be true and reasonably believes constitutes an improper governmental action. "Improper governmental action" shall mean any action by a public employer or employee, or an agent of such employer or employee, which is undertaken in the performance of such agent's official duties, whether or not such action is within the scope of his employment, and which is in violation of any federal, state or local law, rule or regulation.¹⁴

Nassau County has additional whistleblower provisions, in section 22-4.4 of the County’s Administrative Code, entitled *Retaliatory action prohibited* (commonly known as the County Whistleblower Law). It provides, in part, that:

¹² “Personnel action” under Section 75-b means “an action affecting compensation, appointment, promotion, transfer, assignment, reinstatement or evaluation of performance.”

¹³ For purposes of Section 75-b, “Governmental body” means “(I) an officer, employee, agency, department, division, bureau, board, commission, council, authority or other body of a public employer, (ii) employee, committee, member, or commission of the legislative branch of government, (iii) a representative, member or employee of a legislative body of a county, town, village or any other political subdivision or civil division of the state, (iv) a law enforcement agency or any member or employee of a law enforcement agency, or (v) the judiciary or any employee of the judiciary.” See Section 75-b for additional pertinent definitions.

¹⁴ There are also certain whistleblower protections for employees in the private sector, under New York Labor Law, Section 740, entitled *Retaliatory action by employers; prohibition*. The protections of Section 740 were significantly broadened in 2022.

4. Use of authority or influence prohibited.
- (a) A government official may not, directly or indirectly, use or attempt to use his or her official authority or influence to intimidate, threaten, coerce, command, influence or attempt to intimidate, threaten, coerce, command or influence any individual in order to interfere with such individual's right to disclose information relative to improper government action.
 - (b) Use of official authority or influence shall include:
 - (i) Promising to confer any benefit (such as compensation, grant, contract, license or ruling) or effecting or threatening to effect any reprisal (such as deprivation of any compensation, grant, contract, license or ruling); or
 - (ii) Taking, directing others to take, recommending, processing or approving any personnel action. For purposes of this section, "personnel action" shall mean those actions set forth in paragraph (d) of subdivision (1) of section seventy-five-b of the New York Civil Service Law.

The Administrative Code was amended in 2019 in part to add the Nassau County Inspector General, for purposes of whistleblower protection, to the list of government officials to whom allegations of improper government actions may be reported. That section now provides in part that a County employee who has information about a government action which he or she reasonably believes to be true and reasonably believes constitutes an improper government action, may disclose such information to a supervisor, a Nassau County government official listed in the Code – including the Inspector General, or to a governmental body as defined in New York State Civil Service Law Section 75-b.¹⁵

The 2019 amendment of the County Whistleblower Law also removed the general requirement that the County employee must first report the alleged improper action to his or her supervisor or department head, in order to preserve the right to pursue a retaliation claim under Section 75-b of the State Civil Service Law.

County employees who reasonably believe they have been subject to retaliation for disclosing improper governmental action may bring a civil action in a court of competent jurisdiction within one year of the alleged retaliation.

Additionally, Section 196 of the County Charter provides a *criminal* penalty for retaliating, or attempting to retaliate, against any person for assisting, communicating or cooperating with the Inspector General. Section 196 states:

¹⁵ See Nassau County Administrative Code, Section 22-4.4, subdivision 3 (a). Subdivisions 3 (b) and (c) require that certain actions be taken by County officials who receive such information.

Any person who:

1. retaliates against, punishes, threatens, harasses, or penalizes, or attempts to retaliate against, punish, threaten, harass, or penalize any person for assisting, communicating or cooperating with the Inspector General; or
2. knowingly interferes, obstructs, impedes or attempts to interfere, obstruct or impede in any investigation, audit, review or examination conducted by the Inspector General, shall be guilty of an unclassified misdemeanor and subject to imprisonment for a term of no longer than one year and a fine of no more than ten thousand dollars, in addition to any other penalty provided by law. Any potential violation of this section shall be referred to the District Attorney for investigation and prosecution.



Duty to Report Corruption and Fraud

As stated in our prior annual reports, OIG believes that key methods for preventing and exposing acts of wrongdoing involve not only *protecting* but also affirmatively *encouraging* whistleblowers in the County government, the people who may know about problems. OIG believes this approach is foundational to a comprehensive system for the prevention and detection of conduct that is antithetical to good government. The concept is not novel; it has long existed in other jurisdictions, including both the State and City of New York.

The means of encouraging whistleblowers should include sending a clear message that for public servants, “looking the other way” is not acceptable behavior in Nassau, and that silence is not an option. OIG believes that each County public servant should have an explicit legal duty to report conduct involving corrupt, fraudulent or other unlawful activity affecting the County.

Indeed, the State of New York has adopted that principle, via a law imposing such affirmative duty on State employees and officers in the agencies under the jurisdiction of the State OIG. New York’s statute, codified at Executive Law § 55(1), provides:

Responsibilities of covered agencies, state officers and employees.

1. Every state officer or employee in a covered agency shall report promptly to the state inspector general any information concerning corruption, fraud, criminal activity, conflicts of interest or abuse by another state officer or employee relating to his or her office or employment, or by a person having

business dealings with a covered agency relating to those dealings. The knowing failure of any officer or employee to so report shall be cause for removal from office or employment or other appropriate penalty. Any officer or employee who acts pursuant to this subdivision by reporting to the state inspector general improper governmental action as defined in section seventy-five-b of the civil service law shall not be subject to dismissal, discipline or other adverse personnel action.¹⁶

In addition to bringing wrongdoing out of the shadows, such provisions normalize and reduce the stigma of reporting it and conveys the seriousness with which government regards such conduct.

Unlike employees and officers of the State of New York, employees and officers of Nassau County (other than the County Executive) are not generally obligated by law to affirmatively report to the Inspector General their knowledge of corruption, fraud, criminal activity, conflicts of interest or abuse. This is so even though the County's public servants are provided the same protection afforded to their State counterparts under the Civil Service law, as well as the additional provisions of the County's whistleblower law and Charter section 196, cited above.

Although the County Charter does require the County Executive to promptly notify the Inspector General of possible fraud, theft, bribery, contract mismanagement and other matters,¹⁷ a parallel obligation of individual County employees to likewise report such

¹⁶ This provision is not unique to New York State. For example, the City of Chicago has a similar statutory requirement for its public servants:

Duty to report corrupt or unlawful activity. Every city employee or official shall report, directly and without undue delay, to the inspector general, any and all information concerning conduct which such employee or official knows or should reasonably know to involve corrupt or other unlawful activity (a) by another city employee or official which concerns such employee's or official's employment or office, or (ii) by any person dealing with the city which concerns the person's dealings with the city. Any employee or official who knowingly fails to report a corrupt or unlawful activity as required in this section shall be subject to employment sanctions, including discharge, in accordance with procedures under which the employee may otherwise be disciplined.

Municipal Code § 2-156-018.

¹⁷ Nassau County Charter § 187 (5) provides in part that:

The County Executive shall promptly notify the Inspector General of possible mismanagement of a contract constituting misuse or loss exceeding \$5,000 in public funds, fraud, theft, bribery, or other violations of law which appears to fall within the jurisdiction of the Inspector General, and may notify the Inspector General of any other conduct which may fall within the Inspector Generals (sic) jurisdiction.

Pursuant to this provision and a supplemental directive issued by the Inspector General in accordance with § 187 (5), in 2019 the Deputy County Executive for Compliance issued a guidance memorandum to County

matters to the Inspector General largely exists not as law but in the form of a 2019 guidance memorandum (from the now-former Deputy County Executive for Compliance). The Countywide Procurement and Compliance Policy additionally provides that those public employees and elected officials “having responsibility for contracting procurement” shall “report waste, fraud, abuse and corruption and unethical practices” to the Inspector General. Finally, an executive order further requires that any individual who becomes aware of a violation of the “Zero Tolerance” prohibited gifts policy report it to the IG’s hotline. While these are significant measures, the scope of each is narrow, and in OIG’s view they do not provide the gravity or permanence of a statutory mandate, let alone cite a penalty for noncompliance.

The only other affirmative duty under law to report wrongdoing to the Inspector General is a limited one appearing in the County whistleblower law. It provides in sum that any county government official *receiving information from* a county employee concerning improper government action *shall review it*, and:

*if such review indicates an apparent improper government action, take appropriate corrective measures and where appropriate, refer such information to the appropriate investigative authority . . . [emphases added]*¹⁸

OIG believes that the responsibility of a County official receiving information concerning improper government action should be *to promptly notify* the Inspector General or other appropriate investigative authority of the information.

OIG accordingly suggests that Nassau County would benefit from updating and strengthening its reporting requirements; codifying its expectations into a law placing an affirmative duty on the County’s public servants to report information concerning fraud and corruption.¹⁹ New York State law provides a model worthy of consideration.



employees that they must (likewise) report such matters to the Inspector General. While clearly an appropriate and positive measure complying with § 187 (5) and the IG’s directive, this structure lacks the force of a law and so has neither the permanence nor gravity of a statute, particularly one having a stated penalty for non-compliance.

¹⁸ Nassau County Administrative Code § 22-4.4 (3)(b). The Inspector General is included among the appropriate investigative authorities in a non-exhaustive list following that text.

¹⁹ In adopting such law, it would also be important to ensure that whistleblower protection is broad enough to match the scope of all the information required to be reported, as it might extend beyond “improper government action,” e.g., fraud committed by vendors. It would also be essential to ensure that all County public servants are made aware of their disclosure obligations.

Reviews, Audits, and Investigations

OIG may conduct audits, reviews, and investigations into the conduct of County functions, transactions, contracts, programs, vendors, officials, employees, and departments. Audits focus on programs, organizations, or activities, in terms of such things as their effectiveness, economy, transparency, and internal controls/risk management. Reviews are conducted where a full audit or investigation is inappropriate or unnecessary and which may facilitate more immediate and timely feedback to decision makers. Investigations may concern potential violations of law or policies, or other possible irregularities. Unlike audits and reviews, which are typically conducted of operations or programs, and are usually general or systemic in nature, investigations are often more specific inquiries into particular actions, events or allegations or concerns of wrongdoing or deficiency, e.g., fraud, corruption, misconduct, waste, or abuse.

Matters investigated by OIG in 2025 included allegations of:

- Fraud by present and former County employees.
- Misuse of the County email system.
- Improper contacts occurring during a procurement process.
- Apparent alteration of a County purchase order by a prospective vendor.



Procurement/Contracting Oversight Activities

Background

Procurement, for purposes of this report, may be defined as the process by which goods and services are selected and acquired by the County for the benefit of the public. This includes the use of formal contracts as well as the issuance of purchase orders. As the County's procurement activities involve the expenditure of public funds, it is important that contracting/purchasing always reflects the best interests of the County. The County's processes and practices should be transparent and guided by considerations of competition, quality, value and price, and, of course, compliance with law.

OIG Oversight Activities

The majority of OIG's 2025 oversight work was in the area of contracting/procurement. While the Nassau County OIG shares the general oversight responsibilities common to most OIGs in the nation – to detect and prevent waste, fraud, abuse and illegal acts; to promote transparency, efficiency and integrity – the County Charter places particular emphasis on OIG pursuing those responsibilities within the specific context of the County's contracting and procurement processes. To accomplish those ends, OIG's oversight of the County's procurement/contracting activities may take a wide number of forms, including but not limited to:

- Reviewing proposed or awarded contracts/purchases/grants, e.g., for compliance, transparency, and justification of the award.
- Examining vendors' declarations in their Business History and Principal Questionnaire forms for accuracy, completeness, and information of concern, including matters potentially impacting business integrity.
- Providing Contract Review Statements and Contract Review Reports to the County Legislature for items submitted by the Administration for approval.
- Reviewing employee financial disclosure statements, contractor political contributions, and lobbying disclosures.
- Reviewing processes followed, e.g., for efficiency, effectiveness, compliance, and transparency.
- Observing the conduct of vendor selection (evaluation) committee meetings.
- Reviewing records of decision-making, e.g., for transparency and sufficiency.
- Reviewing invoices and payment applications.
- Reviewing contract specifications and change order requests.
- Reviewing vendor evaluations.
- Monitoring ongoing projects.
- Conducting site visits at locations where a vendor is performing or has performed services.
- Examining deliverables to verify specifications have been met and correct quantities have been provided.
- Reviewing materials-testing results/certifications.

- Reviewing reports of integrity monitors and regulatory agency records relative to vendors or prospective vendors.
- Notifying the Administration and/or Legislature of the discovery of potentially adverse information about current or prospective vendors.
- Conducting investigations, audits, preliminary inquiries, and other reviews as deemed appropriate.

Screening of Proposed Contract Awards

In 2025, OIG, as part of its oversight role, screened all proposed contracts and amendments prior to their approval by the Legislature. Of these proposed contracts, 159 were selected for further review. OIG provided to the Legislature, 96 Contract Review Statements conveying the results of particular reviews. OIG also monitored 196 meetings of vendor evaluation or technical review committees, pre-bid conferences, vendor presentations, Civil Service Commission and Board of Ethics meetings, capital projects and progress meetings, and sealed-bid openings for contracts.

Review of Vendor Disclosures

OIG reviews, on an oversight basis, proposed contracts and the entities (vendors) proposed to be awarded contracts. The standard for contract award under County procurement policy is in part whether the vendor is “responsible.” A responsible vendor is one which has the capability in all respects to fully perform the contract requirements and the business integrity to justify the award of public tax dollars. In furtherance of the County’s responsibility determination process, prospective vendors are required to submit to the Administration disclosure documents, including a Business History Form (company questionnaire) (BHF), and the principals of the vendor organizations must each submit an individual Principal Questionnaire Form (PQF).

While it is the operational responsibility of the County’s procuring departments to review and assess vendor disclosures, OIG independently examines and evaluates the disclosures, and may also perform additional checks as it deems necessary in screening for potential issues.²⁰ OIG is thereby able to provide information to assist in the County’s selection of appropriate, responsible vendors; entities which will be receiving public funds.

As indicated by the examples, it was not uncommon for OIG’s activities during 2025 to detect potential matters of concern, matters that apparently had not been identified in the course of the procuring department’s review. In such instances, OIG apprised the

²⁰ While OIG reviews proposed contracts and their disclosure forms on an oversight basis, the County’s operational determination of vendor responsibility resides with the Administration.

Administration and/or the Legislature accordingly. These concerns included apparent omissions of required information and/or discrepancies within vendors' BHF's and/or individual PQFs, or OIG's discovery of potentially adverse information. For example, OIG noted that proposed vendors apparently did not disclose:

- One or more principals of the company. (5 instances)
- A principal being the owner/officer of another business entity. (72 instances)
- Affiliation or sharing space with another entity. (22 instances)
- Political contributions by vendor. (8 instances)
- Political contributions by vendor principal. (12 instances)

OIG also identified the following concerns:

- Proposed vendors with outstanding tax warrants. (2 instances)
- Affiliate of proposed vendor had outstanding New York State tax warrant(s). (4 instances)
- A proposed vendor did not disclose OSHA violations. (8 instances)
- A proposed vendor or affiliated entity/entities of proposed vendor was debarred by the Workers Compensation Board. (3 instances)
- An out-of-state contract for a proposed vendor was cancelled as a result of a government audit.
- A proposed vendor paid a fine in excess of \$300,000 resulting from a federal investigation into allegations of failure to disclose support from a foreign government.
- A proposed vendor and its parent company entered into a Clean Air Act consent decree including payment of \$350,000 in civil penalties and implementation of corrective measures.
- A proposed vendor entered into a settlement with the U.S. Environmental Protection Agency to resolve alleged violations of the Resource Conservation and Recovery Act. The settlement included payment of a \$350,000 civil penalty.
- A proposed vendor's principal pleaded guilty to insider trading and was barred by the U.S. Security and Exchange Commission from association with any broker/dealer.
- A proposed vendor's insurance certificate(s) expired. (8 instances)

OIG brought the foregoing matters to the attention of the Administration and/or the Legislature for its information and appropriate action. Additionally, in 32 instances OIG alerted the Administration and/or the Legislature to missing documents or explanations, required by County policy, in the Legislative packages submitted.

Procurement/Contracting Monitoring

General Observations

As we first related in our inaugural annual report, the District Attorney's 2015 *Special Report on the Nassau County Contracting Process* described "serious systemic deficiencies that require the immediate attention of the County Executive and Legislature to protect taxpayers and prevent future scandal"²¹ and noted in part that "One of the greatest vulnerabilities of the County is its predominately decentralized procurement process."

The County still operates with a significant extent of decentralization. The Department of Shared Services, Office of Purchasing has central responsibility for procuring goods and certain non-personal services for County agencies. However, procurements for "personal services" are conducted within the departments requiring those services, each having its own Department Chief Contracting Officer (DCCO), rather than being centrally managed by a single procurement office.

Personal services are defined as services provided by independent contractors that require the consistent exercise of judgment or specialized skills. Examples of personal services include architecture, engineering, surveying, accounting, law, financial advisory and underwriting services, management consulting services, feasibility studies of a scientific or technical nature, and other services that require advanced education or professional licensing or certification.²²

Each department has its own Department Chief Contracting Officer (DCCO), who is responsible for all the department's procurement activities and acts as the department's primary liaison to the Chief Procurement and Compliance Officer. The individual procuring departments are each responsible for, among other things, pre-procurement

²¹ The report's executive summary also commented in part that: "Nassau's porous contracting process is the product of no one administration or political party, but instead the result of years of neglect, ineffectual surface-level reforms, and a regrettable failure to learn from past failings."

²² See, Countywide Procurement and Compliance Policy.

planning and scheduling, drafting specifications, and overseeing and evaluating contractor performance.²³

However, the County also has made important improvements since the state of affairs detailed in the District Attorney’s report of a decade ago. These include creation of the position of Chief Procurement Officer,²⁴ staffed by an experienced procurement professional, in part to establish and ensure compliance with uniform procurement policies and standardized procedures,²⁵ as well as the issuance of a Countywide Procurement and Compliance Policy (updated periodically), a series of supplemental policy enhancements, and the adoption of the Vendor Code of Ethics. The Vendor Code, as well as a number of the policy enhancements, were recommended by OIG. OIG continues to confer with the Chief Procurement Officer on a variety of procurement related matters.

Moreover, for the last seven years OIG has been providing independent oversight of the County’s contracting/procurement processes, via a range of activities as described in this report. The County Charter authorizes OIG to review any aspect of those processes.

Selection Committee Oversight

Per County policy, before a Request for Proposals (RFP) is issued, the department seeking to procure services must establish a selection committee to develop and apply criteria that will ensure that vendor proposals are evaluated objectively, fairly, equally and uniformly, and that the County selects the “best value” solution²⁶ from among the submitted proposals. Selection committees, also known as evaluation committees, are typically composed of at least three voting members, each with significant knowledge of the services to be procured. The County Charter provides that OIG is to be notified in advance of selection committee meetings.

OIG’s monitoring of procurement-related activity during 2025 included attending 109 selection committee meetings.²⁷

²³ See, Countywide Procurement and Compliance Policy.

²⁴ Now retitled as the Chief Procurement and Compliance Officer (CPCO).

²⁵ The Chief Procurement and Compliance Officer also provides monthly conference calls (updates), as well as annual in-person training session, to County employees having procurement and/or contract administration related responsibilities.

²⁶ “Best value” refers to the most advantageous combination of price, quality, and other relevant factors, such as the contractor’s qualifications and proposed approach.

²⁷ OIG attends selection committee meetings for monitoring purposes but does not participate in committee voting, which is an operational role of the Administration.

Task Order Award Oversight

While the Department of Public Works (DPW) awards contracts for specific projects, it also awards “on-call” contracts. An on-call contract is a master agreement in which a consultant firm is retained to provide DPW with professional services in a given technical category, such as design services or construction management, on an as-needed basis. Commonly, there are multiple firms holding on-call contracts within a given category (e.g., engineering services, construction management, or inspection). On-call contracts are typically of long duration and involve significant amounts of money.

Task orders for specific scopes of work are subsequently issued to firms that have been awarded on-call contracts. Task orders are awarded to these firms via a “mini-bid” competitive selection process, where only firms already holding an “on call” contract in the appropriate category can bid. While the underlying on-call contracts are subject to Legislative approval, the ensuing task order awards issued pursuant to those contracts do not themselves come before the Legislature for approval.

The mini-bid selection process entails the use of technical review committee (TRC) meetings. A technical review committee is a group of DPW personnel, sometimes assisted by consultant staff, that reviews the technical and cost proposals received for a given task order and selects, on a “best value” basis, the proposing firm(s) which will be assigned the task order.

In December 2021, the now-former Presiding Officer of the Legislature had requested that DPW’s Commissioner notify OIG of and give it access to future TRC meetings, to monitor the task order award process. This was done, and OIG thereafter expanded its oversight activities to include observing TRC meetings, similar to its attendance at selection committee meetings. During 2025, OIG monitored 11 TRC meetings.

Capital Project Oversight

Family and Matrimonial Courthouse Project

Among the matters that OIG monitored during 2025 was the ongoing Phase Two construction of the Family and Matrimonial Courthouse (FMC) complex (Family Court), one of Nassau County’s largest capital projects.

Project Background

This project is the conversion of a 239,000 square foot County-owned office building in Garden City, formerly used by the Department of Social Services, into a 255,000 square foot court complex. The now substantially completed Family Court consists of 23

courtrooms and hearing rooms and the Matrimonial Center and Integrated Domestic Violence Court consists of 13 courtrooms and hearing rooms. The facility also includes a sally port, holding facilities, judicial chambers, auxiliary offices, and interview rooms.

A general contractor was awarded an \$85.6 million contract for Phase Two, receiving the notice-to-proceed in April 2021.²⁸ Phase Two included a complete interior fit-out and new architectural, structural, HVAC, mechanical, electrical, and plumbing work, as well as vertical transportation, and fire protection and security systems. Phase Two work also included site improvements, such as new sidewalks, curbs, paving, drainage, and landscaping.

Also included in the overall courthouse project is a Family Justice Center (FJC), awarded under a separate contract and begun in 2025. This contract is for the interior fit-out of approximately 13,400 square feet of floor area on a portion of two levels (basement and first floor) within the new Family and Matrimonial court building. Work includes construction of a new staircase, partitions, ceilings, and all mechanical, electrical, plumbing, HVAC, and life safety systems. As of this writing, the FJC project is anticipated to be completed on June 9, 2026.

Project Cost and Schedule

As related in our previous reports, the contract completion date of Phase Two was originally scheduled for October 15, 2022. Phase Two's work, however, remained ongoing throughout 2025. As of this writing, there have been seven time extensions.

The FMC project continued during 2025 to face schedule and cost overruns. Although formal opening ceremonies took place on October 2, 2024, and July 2, 2025, and the building is now in full operation as a courthouse, punch list work and troubleshooting continue at this writing. As of the latest (March 2026) project progress report, DPW has approved over \$50 million in change orders to the original \$85.6 million contract.²⁹ According to the construction management firm, the FMC was 99% complete as of March 11, 2026. The projected final completion date is now June 12, 2026, which is 1,348 calendar days later than the original project completion date.

²⁸ The preceding Phase One involved work on the building core and shell, including interior demolition asbestos abatement, façade reconstruction, structural modifications, roof replacement and drainage improvements.

²⁹ Information from construction management firm's bi-weekly meeting minutes #136, dated March 11, 2026.

As of March 11, 2026, the Family Justice Center project (FJC) was 70% complete.³⁰ There has been one time extension of 161 days. As of the December 2025 project progress report, DPW has approved over \$400,000 in change orders to the original \$4.58 million contract. The FJC project is currently anticipated to be substantially completed on August 12, 2026.

Project Monitoring

OIG accordingly continued monitoring the project in 2025, including the progress of the construction management firm, the prime contractor, and DPW personnel. OIG's monitoring of the project during 2025 included attendance at all bi-weekly project progress meetings, and all bi-weekly "hot topics" meetings conducted by the construction management firm overseeing work. The meetings are attended by representatives of the NYS Office of Court Administration and the Nassau County Courts, with appearances by representatives of the county's Fire Marshal's office and Information Technology department. In addition, representatives of the Office of the District Attorney attend the biweekly meetings held to discuss the progress of the FJC project.

During progress meetings, OIG staff posed questions and sought clarifications regarding construction issues and overall project management. OIG's queries pertained to fire safety inspections and building code compliance, resulting in discussions addressing these issues.

OIG will continue to monitor the Family Court and FJC projects until each is fully complete (contract closeout).

Second Precinct Police Station House Replacement Project

OIG's capital construction monitoring activities during 2025 also included the project to replace the fire-damaged Police Department's Second Precinct station house, located at 7700 Jericho Turnpike in Woodbury.

Project Background

The Police Department's Second Precinct serves Bayville, East Norwich, Hicksville, Jericho, Lattingtown, Locust Valley, Oyster Bay, Plainview, Syosset, Westbury, and Woodbury. On November 26, 2022, a fire severely damaged the Second Precinct's station house. The building was deemed unsalvageable, and the County Executive declared an emergency to expedite the construction of a replacement station house.

³⁰ Information from construction management firm's bi-weekly meeting minutes #29, dated March 11, 2026.

The project includes demolition of the damaged building and construction of a new station house, as well as repair of the existing garage, replacement of the underground fuel storage tanks, and site improvements.

Status

Following a competitive bidding process, in August 2023 a construction contractor was awarded a contract with a base value of just under \$26.1 million. The Notice to Proceed was issued on August 23, 2023. Following abatement and demolition work, construction began in November 2023. The planned contract duration was 450 calendar days, with a scheduled completion date of November 15, 2024.

As of December 2025, the project had incurred delays totaling 187 days. Substantial completion was achieved at the main precinct building on July 7, 2025, and at the garage on October 13, 2025.³¹

One change order of approximately \$367,000 is anticipated based upon a negotiated delay claim. According to the Department of Public Works, no other change orders were necessary, as a contracted-for \$2.7 million allowance was used for project extras.

OIG’s monitoring activities relating to the project during 2025 included attending all bi-weekly project progress meetings. During these meetings, OIG staff posed questions and sought clarifications regarding construction issues and overall project management.

OIG will continue to monitor this project through its final closeout, which is presently anticipated to take place upon completion of the front-facing monument sign.

Other Activities

In addition to the various other activities described in this report, OIG during 2025 attended all Departmental Chief Contracting Officer teleconferences on procurement issues, the District Attorney’s Annual Statewide Labor Conference, and a countywide procurement policy training session at which OIG provided a segment of the training. OIG additionally met with the Chief Procurement and Compliance Officer monthly to discuss various procurement matters. As OIG’s mission includes oversight of boards and commissions, OIG staff also attended meetings of the Board of Ethics and the Civil Service Commission.

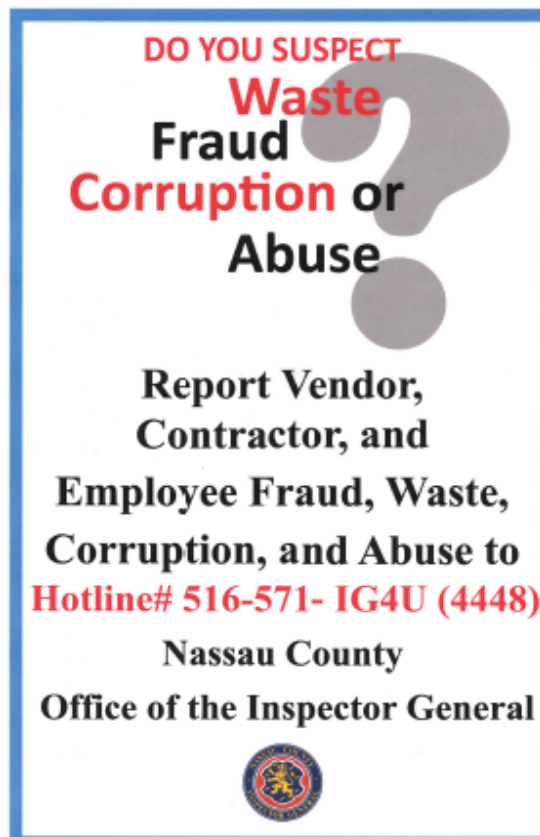


³¹ Information from Monthly Project Progress Report 15, January 10, 2025.

Stakeholder Training & Outreach

In October, OIG gave a live presentation, pertaining to fraud awareness, and improper contacts during procurements, to 49 County employees attending annual procurement training. OIG information cards were also distributed to attendees. OIG has similarly provided fraud-related training to County employees in prior trainings.

Year-round, OIG maintains a website with information about fraud, OIG and the matters falling within its jurisdiction, and the means of contacting OIG. Additionally, OIG's posters are on display at various County locations.



Example of signs posted throughout County facilities.



Join the Team; Be an Agent of Positive Change

Corruption and fraud have a profound effect on the efficiency and effectiveness of government; on how it serves its people. Corruption can result in the misallocation of limited resources, encourage wasteful and reckless spending of public funds, and adversely affect law-abiding businesses and employees. Fraud can result in your, the taxpayer's, hard-earned money being stolen.

Each bribe, each false document submitted, each collusive bid, each kickback, each conflict of interest, chips away at the integrity and public trust that are essential to good government. Fighting corruption and fraud, ensuring a level playing field, and maintaining strong ethics in government, are important responsibilities – responsibilities which are shared by all of us in Nassau County. Successfully fighting fraud and tackling corruption is a team effort. We encourage you to be part of the team; to help us by sending OIG your complaints, concerns, and suggestions.



... Other offenses violate one law while corruption strikes at the foundation of all law... If we fail to do all that in us lies to stamp out corruption we cannot escape our share of responsibility for the guilt.

Nassau County resident, President Theodore Roosevelt, 1903.

APPENDIX

- ◆ OIG CONTACT INFORMATION
- ◆ FREQUENTLY ASKED QUESTIONS ABOUT COMPLAINTS



Nassau County OIG
1 West Street
Mineola, NY 11501

Main

(516) 571-1470

Hotline

(516) 571- IG4U (4448)

Inspectorgeneral@nassaucountyny.gov

www.nassaucountyny.gov/4747/Inspector-General

Frequently Asked Questions about Complaints

You Can Be Part of the Solution

Good government is everyone's business. Anyone can help fight fraud, waste, abuse, and corruption in our County by reporting suspicious activity.

If you have a complaint or concerns involving a Nassau County agency, its employees, contracts, projects, or programs – or about any individual or entity that does business, or is seeking to do business, with the County – tell us about it. Your call, email, or letter could be the one that saves the County millions of dollars or helps put an end to abusive or wasteful practices.

Q: Who may file a complaint with OIG?

A: Anyone, including Nassau County employees, companies that do business with the County, and members of the public.

Q: What kind of complaints does OIG investigate?

A: Fraud, theft, waste of funds, abuse of resources or position, bribery, corruption, conflicts-of-interest, gifts from vendors, whistleblower reprisal, and serious misconduct or mismanagement affecting or involving County operations, programs, projects, contracts, or funds. OIG does not investigate routine personnel issues, such as grievances.

Q: Does OIG investigate individuals or companies that conduct business with the County?

A: Yes. OIG may investigate any individual or entity that either is doing business with Nassau County, receives funds from the County, or which, through the submission of a bid, proposal or application, expresses interest in doing business with the County.

Q: How do I file a complaint with OIG?

A: A complaint can be registered with OIG in several ways: via the online complaint form, email, fax, surface mail, in-person, or telephone:

Telephone Hotline: (516) 571-IG4U
(516) 571-4448

Email: InspectorGeneral@nassaucountyny.gov

Fax Number: (516) 571-0029

Mailing Address:

**Nassau County Office of the Inspector General
1 West Street, Room 341
Mineola, NY 11501**

Q: Can I request that my identity be kept confidential?

A: Yes. If you request confidentiality, we will not reveal your identity without your permission, unless required by law. You should also be aware that there are provisions of law that, under appropriate circumstances, protect employees from retaliation. If you believe that making a report to OIG will place you at risk of retaliation, you should inform us of that as well.

Q: Do I have to identify myself if I make a complaint to OIG?

A: No. You can remain anonymous in submitting an allegation to us. Note, however, that your information will be most useful if we have a way to contact you if follow-up questions are necessary. Information that is too vague or cannot be supported can result in closing your complaint without remedial action. If you remain anonymous, we also will not be able to acknowledge receipt of your complaint or later advise you if the matter is in open or closed status.

Q: What information should I include in my complaint?

A: Please provide as much information as you can. Information that is too vague or cannot be supported can result in closing your complaint without remedial action. Therefore, we also encourage you to give us at least one way to contact you should we have questions or need more information. In any event, please be as specific as possible in explaining the nature and details of your complaint. You may use the following list as a guide to the information to include:

- If a project or contract is involved, identify it.
- When and where did the event happen?

- Give dates, times; location; facility; work unit, etc.
- Who engaged in the misconduct?
 - Who else was involved?
- What exactly did he/she/they do?
- How do you know what you are reporting?
 - Did you witness it?
 - Hear about it from someone else?
- What proof exists to support or confirm your complaint?
- Who else witnessed it?
 - Who else is aware of the wrongdoing?
- Who else has further information?
 - What is their contact information?
- How was the fraud accomplished?
 - How was the scheme concealed?
- How many times has it happened?
 - How long has this situation existed?
- Who else have you reported this matter to?
 - When?
 - What action was taken?

The above list is only a guide; you may wish to include other/additional information.

Q: What should I do if I acquire more information after I have submitted a complaint?

A: Any additional information you acquire after making your report to OIG should be reported to us in a follow-up telephone call, email or letter.