

February 6, 2018

To Whom It May Concern:

The government wide financial assistance award condition implementing the "Pilot Program for Enhancement of Recipient and Subrecipient Employee Whistleblower Protection" which was originally set to expire on January 1, 2017 was amended December 14, 2016 in Public Law 114-261 to change the pilot program to a permanent one.

The enclosed updated *Enhancement of Employee Whistleblower Protection for Federal Grants and Contracts* policy reflects this modification. This revised document also clarifies that this policy applies to personal services contractors compensated for services on federal awards in addition to other applicable individuals.

I certify that the enclosed **Enhancement of Employee Whistleblower Protection for Federal Grants and Contracts** policy is in place to enhance whistleblower protection for contractor and grantee employees and in accord with public law 114-261.

Sincerely,



David E. Ash
Vice President for Research and Dean of Graduate Studies

Enclosure

Central Michigan University
Office of Research and Graduate Studies

Enhancement of Employee Whistleblower Protection for Federal Grants and Contracts

The National Defense Authorization Act (41 USC 4712) Enhancement of Contractor Employee Whistleblower Protections requires CMU to notify employees working on federal awards (and employees of sub-contractors or sub-grantees or personal services contractors) of the following:

1. Employees may not be discharged, demoted or otherwise discriminated against as a reprisal for whistleblowing.
2. The program defines whistleblowing as making a disclosure that the employee reasonably believes is evidence of:
 - Gross mismanagement of a federal contract or grant;
 - Gross waste of federal funds;
 - Abuse of authority relating to a federal contract or grant;
 - Substantial and specific danger to public health or safety; or
 - A violation of law, rule or regulation related to a federal contract (including competition for or negotiation of a contract) or grant.

If you believe you have evidence of any of the above, please contact CMU's ethics hotline at 1-866-294-9379 or through the secure CMU Internal Audit website:

https://www.cmich.edu/office_president/IA/Pages/CMU_Ethics_Hotline.aspx

You may also contact any other CMU office that has administrative responsibility, such as Internal Audit, Human Resources, Faculty Personnel Services, General Counsel, the college deans and other senior officers.

You may also make the disclosure to:

- A member of Congress or a representative of a Congressional Committee;
- An Inspector General;
- The Government Accountability Office;
- A federal employee responsible for contract or grant oversight or management at the relevant federal agency;
- An authorized official of the Department of Justice or other law enforcement agency; or
- A court or grand jury.

The program also provides a process for filing a complaint if an employee believes that he or she has been retaliated against as a result of disclosing information about a grant or contract to one of the individuals or entities listed above. In this case, the complaint must be submitted to the Inspector General of the federal agency that issued the contract or grant. Complaints must be filed no more than three years after the date on which the alleged reprisal took place.

For additional information, please refer to the statute at:

[http://uscode.house.gov/view.xhtml?req=\(title:41%20section:4712%20edition:prelim\)](http://uscode.house.gov/view.xhtml?req=(title:41%20section:4712%20edition:prelim))

Finally, CMU employees are reminded that the University has a Fraud and Fraudulent Activity Policy and a university-wide policy against retaliation https://www.cmich.edu/office_president/general_counsel/Documents/p03004.pdf