

TO: Executive Committee

FROM: Nancy English, Staff

DATE: October 23, 2009

The WIB executive committee will meet on Wednesday, November 4, 2009 at 11:30 a.m. in Lawton. The meeting will be in the Wichita Room, Building 100, Great Plains Tech Center, 4500 Southwest Lee Boulevard.

Please call or e-mail Nancy by 12:00 p.m. Tuesday, November 2 and let her know if you will attend.

Agenda is attached.

**SOUTH CENTRAL OKLAHOMA WORKFORCE INVESTMENT BOARD
EXECUTIVE COMMITTEE MEETING
11:30 A.M. WEDNESDAY NOVEMBER 4, 2009
WICHITA ROOM BUILDING 100 GREAT PLAINS TECHNOLOGY CENTER
4500 SOUTHWEST LEE BOULEVARD LAWTON, OK.**

- I. Call to Order and Welcome - Chris Pittman, chair
- II. Approval of May 29 and September 3 Executive Committee Minutes - Chris Pittman
- III. Composition of Executive Committee – Chris Pittman
- IV. Consider, Review, and Act Incident Reporting Policy – Ray Friedl
- V. Discussion on Nomination of SCOWIB Director from Healthcare Industry – Ray Friedl
- VI. Discuss / Appointment to Executive Committee – Chris Pittman
- VI. Staff Activities – Blaine Smith, staff
 - Trade Adjustment Act Funding
 - Workforce Investment Act Dislocated Worker Funding
 - Report on Monitors' Visit
 - Funding Methodology for Training and Support Services for Customers
 - Manufacturing and Healthcare Symposiums
- VII. New Business
- VIII. Adjourn

MINUTES OF SPECIAL EXECUTIVE COMMITTEE MEETING
1:00 P.M. FRIDAY MAY 29, 2009
ROOM 623b, GREAT PLAINS TECHNOLOGY CENTER
4500 SOUTHWEST LEE BOULEVARD LAWTON, OK.

(Notice of the special meeting was given by letter to the Stephens County Clerk dated May 20, 2009. Agenda was posted at ASCOG, 802 Main, Duncan, Oklahoma at 8:30 a.m. Thursday, May 28, 2009 and on the web site.)

IN ATTENDANCE

Pat Beck
Bill Cunningham
Diane Denham
Chris Pittman
Jeff Simpson

ABSENT

Rodney Love

STAFF

Blaine Smith
Brian Churchman
Nancy English
Ray Friedl
Lisa Thomas

The meeting was called to order by Chris Pittman, chair. The minutes of the April 1, 2009 special executive committee meeting were approved on motion by Jeff Simpson and seconded by Pat Beck. Those voting “aye” were Beck, Cunningham, Denham, Pittman and Simpson.

Ray Friedl led a discussion on revising SCOWIB’s Individual Training Account policy to increase amount of funds awarded to eligible customers. The current ITA funding limit, set in 2000, is \$4,000 for a two-year period at any institution. The tuition and fee structure has risen over the past several years and current ITA funding levels are inadequate. After a lengthy discussion, Jeff Simpson moved that an ITA level of two years and \$4,000 for technology centers or private schools, \$7,000 for two-year colleges, and \$18,000 for four-year colleges be incorporated into SCOWIB’s Individual Training Account Policy and recommend the new funding levels to SCOWIB. Chris Pittman seconded and those voting “aye” were Beck, Cunningham, Denham, Pittman and Simpson.

The ARRA summer youth work program will run from June 1 through July 31 and serve 90 youth. Youth will receive \$7.25 per hour for up to 40 hours per week. SCOWIB grants will pay the hourly wage and workers compensation for the youth and cost of training. Goals are to provide participating youth workplace skills, work readiness credentials, an Oklahoma Career Readiness Certificate, a reference for follow-on job interviews and money to assist youth with current and future needs.

The summer youth budget requires SCOWIB approval before expenditure and will be launched July 1 before the start of the new program year. The ARRA Youth Grant is \$526,732.

The current budget of \$392,436 plans for 110 youth; however, 30 more could be served if they can be recruited and documentation before the first week of classroom training is completed. Of the current \$392,436 budgeted, 77.9 percent will directly benefit the youth on the program. On motion by Jeff Simpson and second by Pat Beck, the executive committee approved the ARRA Summer Work Program Budget and will recommend the budget to SCOWIB for approval. Those voting “aye” were Beck, Cunningham, Denham, Pittman and Simpson.

Brian Churchman presented the 2010 budget. Although there was a reduction in WIA funding, ARRA moneys to be received will keep the budget at the current level. After a lengthy discussion Jeff Simpson moved to approve and recommend SCOWIB approve the budget. Pat Beck seconded and those voting “aye” were Beck, Cunningham, Denham, Pittman and Simpson.

Proposals for an Adult and Dislocated Worker Service Provider for the program year beginning July 1 were recently solicited. Only one proposal submitted by the Association of South Central Oklahoma Governments was received and evaluated. The proposal was awarded a sufficient number of points by the review committee to be considered for a contract. Staff for the Southwest Oklahoma Workforce Investment Board (SWODA) facilitated the procurement process. Pat Beck moved that the executive committee accept and recommend to SCOWIB that a contract be awarded to ASCOG for the upcoming year. If required, the agreement of the governor and chief local elected official could be sought if required. Diane Denham seconded and those voting “aye” were Beck, Cunningham, Denham, Pittman and Simpson.

Three proposals for youth service provider were received and will be evaluated next week.

There being no further business, the meeting was adjourned.

Bill Cunningham – Secretary

Blaine H. Smith, Jr.
Executive Director

MINUTES OF EXECUTIVE COMMITTEE MEETING
11:30 A.M. WEDNESDAY SEPTEMBER 2, 2009
WICHITA ROOM, BUILDING 100, GREAT PLAINS TECH CENTER
4500 SOUTHWEST LEE BOULEVARD LAWTON, OK.

(Notice of the meeting was given by letter to the Stephens County Clerk dated December 1, 2008. Agenda was posted at ASCOG, 802 Main, Duncan, Oklahoma at 8:30 a.m. Tuesday, September 1, 2009 and on the web site.)

IN ATTENDANCE

Pat Beck
Bill Cunningham
Diane Denham
Rodney Love
Chris Pittman
Jeff Simpson

STAFF

Ray Friedl
Lisa Thomas
Clark Southard

The meeting was called to order by Chris Pittman, chair. Approval of May 29, 2009 Executive Committee Minutes was tabled as the minutes were not attached to the agenda to be reviewed.

Ray Friedl updated the committee on the status of the Youth Service Provider Contract for Program Year 2009. Since the June 11, 2009 regular South Central Oklahoma Workforce Investment Board (SCOWIB) meeting, information about funding for the youth program changed. Funding was less than originally anticipated. Although two proposers were eligible to receive contracts, only one contract was awarded. ARBOR E&T, LLC was awarded a contract in the amount of \$304,402.00. ARBOR's proposal included all eight counties in the south central Oklahoma area, whereas the other proposer included only one county.

Discussion of the current SCOWIB committee structure ensued. Chris Pittman indicated that the committee structure needs to be looked at. He suggested that SCOWIB, at its October 8, 2009 meeting, review, consider and act on the committee structure that is appropriate for the needs of the board.

At the October 8, 2009 SCOWIB meeting, after a committee structure has been approved, a call for volunteers for each of the committees will be presented.

Ray Friedl briefly discussed the requirement for the board to submit a one-year extension of Local Plans for Year Five of the Strategic Five-Year Local Plan for Program Year 2009. This requirement is pursuant to Oklahoma Employment and Training Issuance (OETI) #18-2009 and is due to the Oklahoma Employment Security Commission (OESC) by October 1, 2009. Motion was made by Diane Denham and seconded by Rodney Love to authorize board staff to write the document and then coordinate review with executive committee members via e-mail to include a

specific suspense date. Those voting “aye” were Pat Beck, Bill Cunningham, Diane Denham, Rodney Love, Chris Pittman and Jeff Simpson.

Minutes of Meeting

-2-

September 2, 2009

Lengthy discussion of draft OETI #XX-XXXX (#19-2009 – Recent Numbering) and the elements it requires ensued. It was suggested that the strategic planning committee review the final OETI and provide some guidance to board staff as to what to include in the Board Certification packet. Pat Beck says she thinks the strategic planning committee should look at this requirement. The strategic planning committee will review the document and provide guidance to the staff for preparation and approval by the executive committee and SCOWIB.

Ray Friedl recommends that the strategic planning committee take a look at the board’s current strategic plan. The last time it was revised was in 2006. Bill Cunningham indicated that he was on the committee that recommended revisions in 2006 and there were many changes to bring the board’s strategic vision and plan into alignment with the Governor’s Plan and the Governor’s Council goals. Pat Beck agreed since the Governor’s Council goals have drastically changed since 2006.

Discussion of SCOWIB’s Demand Occupation List was tabled. Board staff will present the board with information concerning possible changes to the policy methodology at its October 8, 2009 regular meeting.

Action on transfer of funds and suspension of special eligibility categories was tabled as the need for this action no longer exists.

Ray Friedl presented a brief final update of the American Recovery and Reinvestment Act Summer Works Intern Program to the executive committee. Clark Southard briefly updated them on the BRAC contract and the recently held Manufacturing Symposium.

There being no further business, the meeting was adjourned.

Bill Cunningham – Secretary

Blaine H. Smith, Jr.
Executive Director

ISSUE INFORMATION

South Central Oklahoma Workforce Investment Board Meeting
March 13, 2008

1. **SUBJECT:** South Central Oklahoma Workforce Investment Board (SCOWIB) Incident Reporting Policy (Agenda Item No. IV)
2. **PURPOSE:** To obtain the Executive Committee's approval of the SCOWIB Incident Reporting Policy, a new policy.
3. **DISCUSSION:**
 - a. The Oklahoma Employment Security Commission (OESC) recently released Oklahoma Employment and Training Issuance (OETI) #12-2009, which requires local workforce investment boards to develop policy that provides for the reporting of fraud, waste, abuse, and/or mismanagement of Workforce Investment Act or American Recovery and Reinvestment Act Funds.
 - b. The requirements could be addressed by modifying existing policies and procedures or developing a stand-alone policy. A stand-alone policy appeared to be the most efficient and effective method of meeting state requirements.
 - c. U.S. Department of Labor and state requirements provided definitions of the types of actual or suspected offenses and a reporting system that begins at the local workforce board level going through state and USDOL levels to ultimately arrive at the Office of the Inspector General, USDOL; or, directly from the person suspecting an offense to the Office of the Inspector General. Additionally, a local point of contact was required to be determined. Nancy English was designated to fill that role.
4. **RECOMMENDATION:** That the WIB approve the Executive Committee approve the Incident Reporting Policy provided as Attachment 1.

For more information or comment, please contact the following SCOWIB staff member:

Ray Friedl
Phone: 580.252.0595 or 800.658.1466
E-Mail: frie_ra@ascog.org

SOUTH CENTRAL OKLAHOMA WORKFORCE INVESTMENT BOARD, INC.

POST OFFICE BOX 1647
Duncan, Oklahoma 73534-1647
580-252-0595 / 800-658-1466
Fax: 580-252-6170

SUBJECT: Workforce Investment Act (WIA) and American Recovery and Reinvestment Act (ARRA) Incident Reporting Procedures

PURPOSE: The purpose of this policy is to provide procedures for reporting incidents, including but not limited to, criminal fraud, criminal abuse, or other criminal activities and non-criminal complaints, such as waste of WIA and/or ARRA funds to the South Central Oklahoma Workforce Investment Board. This policy applies to all sub-recipients, contractors, and integrated workforce system partners funded by or working in the area's Workforce Oklahoma Centers.

BACKGROUND:

A. WIA regulations, Title 20 CFR Section 667.630, require that information and complaints involving criminal fraud, waste, abuse, other criminal activity, and non-criminal complaints regarding mismanagement and gross waste of funds be reported immediately.

B. Oklahoma Employment and Training Issuance #12-2009 provides Local Workforce Investment Boards (LWIBS) specific procedures for reporting known or suspected incidents of fraud, malfeasance, misapplication of funds, gross mismanagement, or other criminal activities in Employment and Training Administration (ETA) funded programs. (For purposes of this policy, ETA funded programs are those programs enacted by: Workforce Investment Act and the American Recovery and Reinvestment Act.) The reports submitted by the LWIBs serve a dual purpose. They provide information on fraudulent activities which may be prosecutable and they provide information on other types of incidents which allow ETA to identify trends and patterns occurring throughout the state.

C. Provided for general information and for the purpose of completing an Incident Report definitions for fraud, misfeasance, nonfeasance or malfeasance, misapplication of funds, gross mismanagement, and employee or participant misconduct are explained below. These definitions are intended to be illustrative and are not intended to be either fully inclusive or restrictive.

1. Fraud, Misfeasance, Nonfeasance, or Malfeasance should be considered broadly as any alleged, deliberate action which is apparently in violation of federal statutes and regulations. This category includes, but is not limited to, incidents of bribery, forgery, extortion, embezzlement, theft of participant checks, kickbacks from participants, intentional payments to a contractor without the expectations of receiving services, payments to ghost enrollees, misuse of appropriated funds, and misrepresenting information in official reports.

2. Misapplication of Funds should be considered as any alleged use of funds, assets,

Caddo County, Grady County, McClain County, and City of Chickasha Labor Market Area
Comanche County, Cotton County, Tillman County, and City of Lawton Fort Sill Labor Market Area
Jefferson County, Stephens County, and City of Duncan Labor Market Area

or property not authorized or provided for under WIA or ARRA or regulations, grants, or contracts. This category includes, but is not limited to, nepotism, political patronage, use of participants for political activities, ineligible participants, conflict of interest, failure to report income from federal funds, violation of contract/grant procedures, and the use of federal funds for other than specified purposes.

3. Gross mismanagement should be considered as actions or situations arising out of management ineptitude or oversight, leading to major violations of WIA or ARRA processes, regulations, or contract/grant provisions which could severely hamper the accomplishment of program goals. These include situations which lead to waste of government resources and could jeopardize future support for a particular project. This category includes, but is not limited to, unauditible records, unsupported costs, highly inaccurate fiscal or program reports, payroll discrepancies, payroll deductions not paid to the Internal Revenue Service, and the lack of good internal control procedures.

4. Employee/Participant Misconduct should be considered as actions occurring during or outside work hours that reflect negatively on the United States Department of Labor, the State of Oklahoma, or the South Central Oklahoma Workforce Investment area or WIA or ARRA programs. It may include, but is not limited to, conflict of interest or the appearance of conflict of interest involving outside employment, business, professional activities, the receipt of giving of gifts, fees, entertainment, favors, misuse of federal property, misuse of official information, and such other activities as might adversely affect the confidence of the public, as well as, serious violations of federal and state laws.

Note: For Incident Reporting purposes, the Office of Inspector General, USDOL will focus only on those incidents reported under Categories “1” and “2.” USDOL Employment and Training Administration will use the information reported on the other types of incidents in order to identify trends and patterns occurring throughout the state for management information purposes.

POLICY:

A. The South Central Oklahoma Workforce Investment Board (SCOWIB) designates Nancy English, Director of Administration, ASCOG, as the Incident Reporting Representative for the South Central Oklahoma Workforce Investment Area (SCOWIA).

B. The Incident Reporting Representative is responsible for receiving allegations regarding fraud, program abuse, or criminal misconduct in WIA and ARRA programs from SCOWIB directors and staff; SCOWIA elected officials and fiscal agent staff; sub-recipients of WIA or ARRA grants; WIA and ARRA contractors; and partners in the area’s integrated Workforce Oklahoma Centers and report and track “Incidents” to OESC, USDOL Region IV, and USDOL, OIG as provided for in Attachment A—SCOWIB Incident Reporting Instructions.

C. SCOWIB staff will read and understand the Incident Reporting Policy, prominently display the USDOL, OIG Hotline poster and phone number in its place of business, and post the name and contact information for SCOWIB’s Incident Reporting Representative and the USDOL, OIG Incident Reporting Hotline phone number on its website to notify the staff,

D. sub-recipients, contractors, and the public of the availability of the USDOL, OIG Hotline to provide information confidentiality. SCOWIB staff will include Incident Reporting Policy familiarity in their monitoring policy and procedures.

E. SCOWIB staff will provide each Workforce Oklahoma One Stop Center manager and the directors or managers of the fiscal agent, sub-recipients, and contractors with an electronic copy of this policy.

F. Workforce Oklahoma One Stop Center managers and the directors or managers of the fiscal agent, sub-recipients, and contractors are responsible for disseminating this information and procedures to their staff. Familiarity with this policy will be included in monitoring and/or oversight visits conducted by SCOWIB.

ATTACHMENT

Attachment A – SCOWIB Incident Reporting Instructions

INCIDENT REPORTING INSTRUCTIONS

1. Any person, SCOWIB director or staff member, SCOWIA elected officials or fiscal agent staff, any staff member from a SCOWIA sub-recipient or contractor, or partner in a SCOWIA Workforce Oklahoma Center, who is aware of any incident of fraud, misfeasance, nonfeasance or malfeasance, misapplication of funds, gross mismanagement, employee/participant misconduct pertaining to Workforce Investment Act or American Recovery and Reinvestment Funds must immediately report the “Incident” to Nancy English, Director of Administration, ASCOG by calling 1.800.658.1466 or by e-mail: engl_na@ascog.org; or, you may confidentially call the United States Department of Labor, Office of Inspector General Hotline – 1.800.347.3756 or by e-mail: hotline@oig.dol.gov.

2. SCOWIB Incident Reporting Representative upon receiving a report will:

a. Submit two copies of U.S. Department of Labor Incident Report (DL- 1-156) Office of Inspector General to Anna Johnson, Director, OESC Department of Internal Audits, PO Box 52003, Oklahoma City, OK 73152-2003.

b. Submit one copy of U.S. Department of Labor Incident Report (DL- 1-156) Office of Inspector General to Joseph Juarez, Regional Administrator, U.S. Department of Labor/ETA, 525 Griffin Street Room 317, Dallas, TX 75202.

c. Report the incident to USDOL, Office of Inspector General in one of the following ways:

1. Submit one copy of U.S. Department of Labor Incident Report (DL- 1-156) Office of Inspector General to Office of Inspector General, United States Department of Labor, 200 Constitution Ave., N.W. Room S-5514, Washington, D.C. 20210;

2. Complete the online USDOL Office of Inspector General hotline form at the following link: www.oig.dol.gov/hotlineform.htm; or,

3. Call the USDOL, Office of Inspector General’s Hotline Number at 1.800.347.3756.

d. Maintain a file copy of the Incident Report.

ENCLOSURES

Enclosure 1 - U.S. Department of Labor Incident Report (DL- 1-156) Office of Inspector General

Enclosure 2 – Use and Preparation of DL Form 1-156, Incident Report

Attachment A

U.S. Department of Labor Incident Report
[DL I-156]
Office of Inspector General

For Official Use Only (When Filled In)

1. Date of Report _____	2. Agency designation Code (Yrs.) (Agency) (Report No.) _____	3. File Number (For IG use) _____
4. Type of Report: <input type="checkbox"/> Initial <input type="checkbox"/> Supplemental <input type="checkbox"/> Final <input type="checkbox"/> Other (Specify) .. _____ _____		
5. Type of Incident: <input type="checkbox"/> Conduct Violation <input type="checkbox"/> Criminal Violation <input type="checkbox"/> Program Violation		
6. Allegation against: <input type="checkbox"/> Board Staff <input type="checkbox"/> Service Provider <input type="checkbox"/> Program Participant <input type="checkbox"/> Fiscal Agent <input type="checkbox"/> One-Stop Operator <input type="checkbox"/> Other (Specify) _____ Give name and position of employee(s), contractor(s), grantee, etc. List telephone number, OWCP or other Claim File Number, if applicable, and other identifying data: _____ _____		
7. Location of Incident (Give complete name(s) and address(es) of organization(s) involved): _____ _____		
8. Date and Time of Incident/Discovery: _____		
9. Source of Complaint: <input type="checkbox"/> Public <input type="checkbox"/> Service Provider <input type="checkbox"/> Grantee <input type="checkbox"/> Program Participant <input type="checkbox"/> Audit Name of Investigative Law Enforcement Agency _____ Other (Specify) _____ Give telephone number so additional information can be obtained: _____		
10. Contacts with law enforcement agencies (Specify name contacted and results) _____		
11. Expected concern to DOL: <input type="checkbox"/> Local <input type="checkbox"/> Regional <input type="checkbox"/> National <input type="checkbox"/> Media Interest <input type="checkbox"/> Executive Interest <input type="checkbox"/> GAO/Congressional Interest Other (Specify) _____		
12. DOL Agency Involved: .. SFCY <input type="checkbox"/> FSA <input type="checkbox"/> IFA <input type="checkbox"/> ILAB <input type="checkbox"/> LMSA <input type="checkbox"/> MSHA <input type="checkbox"/> OASAM <input type="checkbox"/> OIG <input type="checkbox"/> OSHA <input type="checkbox"/> SOL <input type="checkbox"/> ASP <input type="checkbox"/> BLS <input type="checkbox"/> NCEP <input type="checkbox"/> WB <input type="checkbox"/> OIPA <input type="checkbox"/> Other (Specify) _____ Amount of Grant/Contract (if known) \$ _____ Amount of Subgrant/Subcontract (if known) \$ _____		
13. Persons who can provide additional information (Include Custodian of Records) Name: _____ Grade _____ Position/Job Title _____ Employment ¹ _____		
¹ Enter one of these codes: U=Unemployed G=Grantee C=Contractor D=DOL F=Other Federal Employee P=Program Participant or Claimant		

Use and Preparation of DL Form 1-156, Incident Report

A. Purpose

Form DL 1-156 should be used for reporting to OESC and Region IV incidents of program abuse, fraud, or other criminal violations involving ETA-funded programs and operations.

B. Responsibilities of Governors

Governors are responsible for reporting all actual or suspected violations to the Regional Administrator using the Incident Report, DL 1-156. While such information may be phoned directly to Region IV, these telephone reports should be supplemented by submission of the Incident Report within 72 hours.

C. Use of the Incident Report, Form DL 1-156

1. As an Initial Report

The DL 1-156 is designed primarily as an initial report of actual or suspected violations to inform the Regional Administrators that a violation or apparent violation has occurred. It should also be used to initially inform the Regional Administrator of cases involving employees, programs, and operations being investigated by or reported to other investigative agencies.

2. As a Supplemental Report

The DL 1-156 should also be used to submit supplemental information not available at the time the original report was submitted. Form DL 1-156 should be used as indicated below:

- It is determined that the matter cannot be resolved at the agency level and the case is administratively closed.
- Supplemental reports should be submitted without awaiting the results of adjudication.

3. As a Final Report Form DL 1-156 should be used as indicated below.

- An incident is resolved or otherwise settled.
- Final adjudication or imposition of administrative/disciplinary action against the person or organization involved is initiated. When adjudication results become known, the final report should be sent to Region IV indicating the results.

D. Completion of the Incident Report - Form DL 1-156 should be completed as follows:

Block 1. Enter the date the form is actually signed by the responsible agency official.

Block 2. Enter the fiscal year (e.g., October 1, 2009 — September 30, 2010) in which the report is being submitted, the two letter State abbreviation, and a number to indicate the

chronological sequence of the report (e.g. 09-OK-001 would show that the report was submitted in Fiscal Year 2009, by Oklahoma, and was the first report submitted in FY 2009).

Block 3. Leave Blank. For use by OIG only.

Block 4. Indicate the type of report being submitted by checking the appropriate block. If the report is both an "Initial" and a "Final" report, then place a check in both the initial and final blocks.

Block 5. Check appropriate block. Block 6. Check appropriate block.

Block 7. Enter the name of the person, recipient, or subrecipient, if applicable, and the location where the incident occurred. A general geographic (city, town) location or mail address should be used.

Block 8. Complete as necessary.

Block 9. Check appropriate block(s). Public includes press.

Block 10. Any information requested by any law enforcement agency should be reported here. Identify the officer and/or agency that made the request. In Block 14, describe what information was requested from and offered to the outside agency.

Block 11. Indicate the type of interest/publicity that the incident may generate, or actually has generated, by placing a check in the appropriate block(s). If necessary, a brief statement of explanation may be included in Block 14.

Block 12. Check appropriate block.

Block 13. Complete as necessary.

Block 14. Synopsis — This is a clear, concise statement of the incident which should include:

- When — Identify the time and date when the incident occurred; when it was discovered; when it was reported to supervisory personnel, OIG, or other law enforcement agency; and whether an inventory was conducted to determine the extent of loss.
- What — Describe the complete incident in as much detail as is available and necessary to give a complete picture of what happened. Cost/value figures should be shown in the appropriate place in Block 12.
- Who — Enter the names of those principal personnel who are listed in Block 7 and Block 13, as well as other personnel whose identities are necessary to complete the narrative and give the reader a complete picture of what happened. Include, when applicable, complete identities of persons/agencies to whom the incident is reported or referred. If needed for purpose of clarification, include the reason(s) why non-principal personnel were involved (e.g., fire department personnel who made

pertinent determinations in a suspected arson incident).

- Where — Clearly specify the location where the incident occurred (e.g., a certain building, an area/room within a building, a particular contractor, grantee location). If the direction and distance from an identifiable point of reference (e.g., building, street, intersection, bridge) is known, this should be indicated.
- Why — Frequently the motive for an incident is not readily discernible (e.g., a suicide or property destruction) or it must be deduced from the existing facts and circumstances. If the "why" for an incident is known or suspected, it should be reported. When a suspected motive is reported, the basis/rationale for the suspicion should be noted.
- How — Report the manner/method by which an incident actually or probably was committed and discovered. "How" an incident was discovered and committed should be reported in sufficient detail to assist proper authorities in the development of preventive measure.

Block 15. Identify the name, title, address, and telephone number of the official completing the report.

Block 16. All copies should be signed by the responsible official for the reporting office.

Block 17. Self-explanatory.

Block 18. Self-explanatory.

Continuation. Entries requiring additional space may be continued at the end of the synopsis entry in Block 14 or on a separate sheet(s) of bond paper. Each continuation sheet should be headed "Continuation" and indicate the Activity Identification Code from Block 2.

E. Supporting Documentation

All documentation (e.g., photographs, drawings) pertinent/relevant to the incident or necessary to clarify the attendant facts should be forwarded with the DL 1-156, if not already provided.

F. Transmission of Reports Mail copies of the DL 1-156 to Region IV as shown on the following page.

Note: The copies sent to Region IV should be in a sealed envelope within the mailing envelope. In no event should reports be electronically transmitted.