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## Connecticut Early Childhood Professional Registry: **Fraud**

### Fraud Policy

The Connecticut Early Childhood Professional Registry (the Registry) recognizes fraud as the intentional misrepresentation, manipulation, or withholding of information to gain an unfair advantage over an individual or a system. Examples of fraud within the Registry include but are not limited to:

- Falsified application information
- Document distortion or manipulation

All Registry staff members and participants are obligated to report any suspicion of fraudulent practices within the system to the Registry Manager.

Registry staff members are trained in document verification processes and have collaborative relationships with accrediting bodies, licensing, training organizations, higher education institutions and vendors in order to assist in the verification process. Documents must clearly identify the name of the participant, the name of the granting institution, date(s) and relevant information in a manner consistent with the institution. Staff of the Registry reserves the right to request additional information as needed to verify authenticity of a document or application information.

The suspicion of fraud will be handled on an individual basis, though several common procedures will be used to investigate fraud.

- Any suspicion of fraud will be researched by Registry staff. Failure to authenticate the information will be noted within the Registry in the participant's file.
- A *Not Accepted for System Use* correspondence will be sent to the individual in writing via the participant's contact information available in the Registry. It is the responsibility of the participant to provide additional information that will show accuracy or authenticity of the document / information in question within 30 days. Requested information may include but is not limited to original transcripts/certificates or statement of accuracy from the trainer/employer/higher education institution, etc.
- If fraud is not substantiated, a notation will be made in the Registry in the participant's file.
- If suspicion of fraud is substantiated or the participant cannot produce documentation to support questionable information, the original information will not be accepted for determination. Any additional corrective action warranted for submission of fraudulent information will be decided on a case by case basis with input from a Registry review team and communicated to the participant in writing via the participant's contact information available in the Registry.
- The participant can appeal any determination of fraud by following the appeal process.



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Registry staff members seek to resolve all issues with the participant informally as the first step in an appeal process, and seek to be responsible to participants by involving them. If a mutually satisfying decision cannot be made, the participant may appeal a decision through the process outlined.

### Fraud Appeals Process

1. A participant may appeal a fraud notation in their account or corrective action taken after fraud is substantiated **ONLY** under the following circumstances:
  - a. New supporting documentation is provided to authenticate the document / application information in question and reverse the fraud determination, or
  - b. New documentation can be provided to show the fraud was not the result of the participant's actions or intent.
2. Process: If the participant believes one of the above is accurate, the participant may then appeal the fraud decision through the following steps:
  - a. **Informal Dispute Resolution:** Registry staff members seek to resolve all issues with the participant informally as the first step. A participant may informally request a review of a decision made by a Registry staffer by email or direct call to the staff member to discuss the decision. These informal actions are the first step in an appeal process and do not jeopardize the participant's right to a formal appeal.
  - b. **Formal appeal:**
    - i. Within 30 days of the decision, upload the appeal to your account (log in > Participant Files > Upload New Documents > Standard Documents > Appeal). It is strongly suggested that an appeal request and any other documentation be sent in a manner that provides proof of delivery, such as certified mail – return receipt requested.

The appeal must include:

      - a dated and signed cover letter indicating which of the above circumstances is being argued; the individual's name, Registry ID#, address, phone number and email address; the request for appeal and a rationale.
      - copies of all documents involved;
      - copies of all correspondence between the individual and the OEC Registry staffer handling the transcript review; and
      - any new documentation to support the claim.
    - ii. Upon receipt of the appeal packet and verification that the appeal meets one of the approved circumstances, a review will be provided within 30 days.
    - iii. The information on which the Registry staff made the initial decision will be made known to the individual upon receipt of the appeal packet if the information was not already disclosed.



- iii. The review team will be appointed by the Registry Manager. The team will make a decision based upon the information presented in the appeal packet and the resources of the OEC used in making Registry determinations. The determination will be shared with the participant.
- iv. Final Decision: The determination by the review team is the final determination to be afforded to the Registry participant.