

The Experiment Station Associates  
“Whistleblower” Policy  
June 13, 2022

The Experiment Station Associates (ESA) has a “Whistleblower” policy and methods for investigation and reporting fraudulent activities. In accordance with the ESA mission to support scientific research and to provide information to state residents, it is imperative that stakeholders have trust in the information reported by the ESA and in the operations of the associates. The ESA is governed by a Board of Directors

The pursuit of the association’s purpose shall at all times be in accordance with state and federal laws and regulations. Moreover, it is expected that all policies will be followed. Any charge of egregious violation of the foregoing brought to the attention of the Board of Directors by any individual (“Whistleblower”), including members of the ESA or those engaged by the ESA in contractual agreements, shall be thoroughly investigated by an impartial committee formed by this Board of Directors. If an impartial committee cannot be convened, the Board of Directors shall request the services of a qualified, impartial third person or party. This third person or party shall appoint a committee composed of qualified persons who are not affiliated with the ESA to investigate.

Procedures for investigation shall be as follows:

1. The person receiving the “Whistleblower” complaint must report to the President of the ESA that a verbal or written complaint has been made. All complaints must be reported to the Board of Directors. The President will initiate an investigation and make inquiries to determine if fraud has or may have occurred.
2. If a preliminary inquiry reveals that fraud may have occurred, the Board of Directors shall appoint an impartial committee consisting of an odd number of at least 3 qualified people to conduct a thorough investigation to determine whether the allegation or related issues warrant further action.
3. The investigative committee shall elect a chairperson.
4. The investigative committee shall have access to any records
5. They shall make all necessary inquiries and fact-finding procedures to collect and thoroughly examine evidence. They may hold an informal hearing if deemed necessary. 6. The investigative committee shall prepare a formal finding of fact.
7. The investigative committee shall implement an appropriate disposition of the matter.
8. The investigative committee shall provide for adjudication if necessary.

Consistent with current ESA policy, all persons involved in the investigation are expected to cooperate and provide truthful information. The Chairperson of the investigative committee shall notify the “Whistleblower” and the accused not more than 30 business days after receipt of charges and not less than 7 business days prior to either an informal hearing or a finding that the

charges are valid or unsubstantiated without merit. If charges are found to be valid, appropriate actions shall be taken immediately to correct the problem and to administer discipline. Pursuant to Connecticut General Statutes (Sec. 4-61dd), fraudulent actions must be reported to the state auditors of public accounts. The identity of the “Whistleblower” shall be kept confidential unless required to be disclosed by state or federal law. Pursuant to the Whistleblower Protection Act, “Whistleblowers” shall be protected from retaliation, including but not limited to harassment, demotion, or wrongful termination for reporting fraud.

If the investigative committee finds that an allegation is unsupported but submitted in good faith, no further action shall be taken except to notify all parties (the accused and the “Whistleblower”) in writing regarding the findings and conclusions. However, if a “Whistleblower” is found to have made false charges knowingly and maliciously, the Board of Directors reserves the right to authorize appropriate disciplinary action against that “Whistleblower.”

The decision of the investigative committee may be appealed to the ESA Board of Directors. Such an appeal shall be limited to the body of evidence previously presented during the investigations. The decision of the Board of Directors shall be binding but shall not preclude grievances, arbitration, or litigation following the decision.

Verbal or written complaints should be brought to the attention of the current President of ESA.. Written complaints may also be mailed to the following address:

The Experiment Station Associates  
% CT Agricultural Experiment Station  
123 Huntington Street  
New Haven, CT 06511