

DEPARTMENT POLICY

Virgin Islands Department of Education

ComplianceLine Policy

June 5, 2023

Office of the Commissioner
Policy and Procedures



THE VIRGIN ISLANDS DEPARTMENT OF
EDUCATION

POLICY NAME	VIDE ComplianceLine Policy		POLICY NO.	1.0
EFFECTIVE DATE	June 5, 2023	DATE OF LAST REVISION	VERSION NO.	1
ADMINISTRATOR RESPONSIBLE	Internal Audit Division	CONTACT INFORMATION	340-773-1095 ext. 7012	
APPLIES TO				
GROUP 1	All VIDE Personnel	GROUP 2	Members of the ComplianceLine Committee	GROUP 3
GROUP 4		GROUP 5		GROUP 6

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR


APPROVAL AND REVIEW

Division Head

 Roseann Mondy

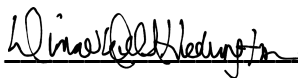
Date: 6/5/2023

Legal Counsel

 Cynthia B. Moore

Date: 6/5/2023

Commissioner

 Dr. Dionne Wells-Hedington

Date: 7/7/2023

SCOPE

This policy applies to members of the Commissioner’s Office, specifically members of the ComplianceLine Committee.

POLICY STATEMENT

This document establishes the handling of cases that originate through the Virgin Islands Department of Education (VIDE) ComplianceLine (CL) platforms (telephone, web portal, or text message).

TERMS AND DEFINITIONS

TERM	DEFINITION
CL	ComplianceLine is the name of the Department’s hotline
CL Review Committee	Select members of the Commissioner’s Office who have access to all cases and are charged with addressing each one from its inception to resolution.
Ethico	The vendor who provides confidential reporting services
GVI	Government of the Virgin Islands
MyCM	My Case Management Portal is a web-based repository of all cases, from intake to resolution.
VIDE	Virgin Islands Department of Education

EXCEPTIONS

No exceptions.

RELATED POLICIES, LOCAL/FEDERAL STATUTES, AND OTHER REFERENCES

This procedure is guided by provisions included in the following:

1. Sexual Abuse and Misconduct by Departmental Employees or Contractors Involving Students (Policy Memorandum No. 005-94), dated July 28, 1993.
2. U.S. Virgin Islands Compilation of School Discipline Laws and Regulations, dated June 30, 2022
3. Virgin Islands Code 5 § 2533 – Persons Mandated to Report Suspected Abuse, Sexual Abuse, and Neglect
4. Virgin Islands Code 5 § 2539 – Failure to Report
5. Collective Bargaining Agreement

ROLES AND RESPONSIBILITIES

ROLE	RESPONSIBILITY
Director of Internal Audit Division	Creation of the policy
Director of Safety & Disaster Recovery	Input
Office of Legal Counsel	Input for legal sufficiency
VIDE Assistant Commissioner	Pre-Approval of the policy
VIDE Commissioner	Approval of the Policy

CONTACTS

SUBJECT	CONTACT	PHONE	EMAIL
Policy	Roseann Mondy	340-773-1095 / 7012	roseann.mondy@vide.vi
Input	Irvin Mason	340-774-0100 / 8059	irvin.mason@vide.vi
Input	Cynthia B. Moore	340-774-0100 / 8007 (STT) 340-773-1095 / 7063 (STX)	cynthia.moore@vide.vi
Input	Alvincent Hutson II, Esq.	340-774-0100 / 8108	alvincent.hutson@vide.vi
Pre-Approval	Victor Somme III	340-773-1095 / 7060	victor.somme@vide.vi
Approval	Dionne Wells-Hedrington, Ed.D	340-774-0100 / 8034	dionne.wells@vide.vi

COMPLIANCELINE POLICY SECTIONS

PURPOSE

This document establishes the handling of cases that originate through the Virgin Islands Department of Education (VIDE) ComplianceLine (CL) via telephone, web portal, or text message.

Ethico logs each concern in the Case Management Portal (“MyCM”) when a case is opened via telephone, web portal, or text message.

VIDE understands the importance of providing a safe and ethical space for our students, employees, and the broader community to report concerns. We have concerted efforts to provide avenues to report safety, ethics, harassment, abuse, or compliance concerns.

PROCEDURES

- I. Upon receipt of a report via telephone, web portal, or text message, Ethico will enter all pertinent information collected into the Case Management Portal (MyCM).
- II. Ethico categorizes the severity of all cases as a level 1, 2, or 3 as defined below:
 - a) Level 1 (High)- a serious, imminent threat to person, property, or environment, or one that just occurred,
 - b) Level 2 (Medium) - a serious allegation, but it is not imminent and/or happened in the past,
 - c) Level 3 (Low) – all other cases

III. If a case has a severity level of 1 or 2, Ethico will telephone the Commissioner’s Office – CL Review Committee members.
Email notifications of all cases (levels 1, 2, and 3) will be sent to the CL Review Committee member individually.

IV. Case Handling

The actions taken in response to a report through VIDE’s ComplianceLine will depend on the nature of the concern expressed. Some concerns may be resolved by agreed action without the need for investigation. Initial inquiries will be made to determine whether an investigation is appropriate and the form it should take. Further information may be sought from the complainant. Subject to legal constraints, individuals reporting through VIDE ComplianceLine will receive information about the outcome of the complaint, including any investigation.

Severity Level 1: A member of the CL Review Committee will notify other members that he/she is leading the case and perform the following steps within 24 hours:

- a) Call 911 for all life-threatening events.
- b) Complete the Referral Form ([see Appendix I](#)) and notify fellow GVI agencies listed below, depending on the nature of the case ([see Appendix II](#)).
 1. Attorney General of the Virgin Islands
 2. Virgin Islands Police Department
 3. Department of Human Services
 4. Virgin Islands Fire Services
 5. Virgin Islands Territorial Emergency Management Agency
 6. Department of Health
 7. Department of Property and Procurement
- c) Notify the Commissioner of Education
- d) Conduct an emergency committee meeting to review the case, assign tasks and timelines.

Severity Level 2: The CL Review Committee will conduct an emergency meeting within 72 hours to review the case, assign tasks and timelines.

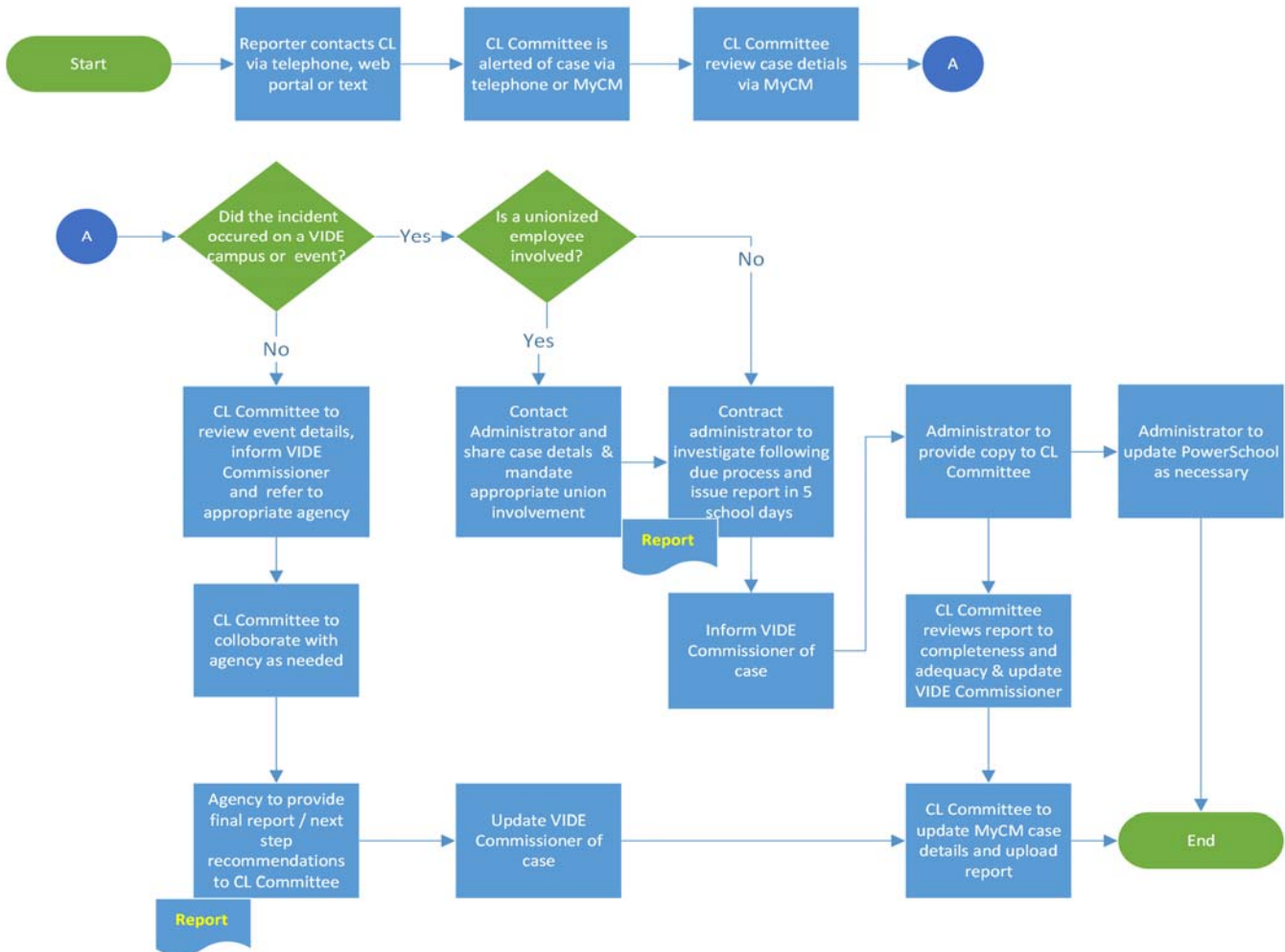
Severity Level 3: The CL Review Committee will conduct a meeting within 14 school days to review the case and assign tasks and timelines.

All Cases:

When assessing cases, the CL Committee is to apply professional judgment¹, consider the decision tree below, and factor VIDE’s established due process standards which entail but are not limited to:

- Investigation by school-based personnel
- Investigation by Superintendent’s Office
- Review by Commissioner’s Office

1 Professional judgement involves applying relevant training, knowledge, and experience within the context provided by relevant professional and technical standards, as applicable in making informed decisions about a course of action that are appropriate in the circumstances.



- V. A member of the CL Review Committee will acknowledge receipt of each case after receipt via MyCM, leaving a note to the reporter within 24 hours (Level 1) to 72 hours (Level 2). All other cases are to be acknowledged within 14 school days.
- VI. If the call involves Senior Leaders, a serious financial or accounting matter, or any other issue that may seriously damage VIDE’s reputation, the Virgin Islands Department of Justice or the Inspector General Office will be contacted, as necessary.
- VII. A member of the CL Committee is to update MyCM after each meeting with:
 - a) Case notes
 - b) If necessary, add follow-up questions for the reporter
 - c) Add updates for the reporter noting whether the investigation is ongoing or has closed.

- VIII. The results of any investigation are documented and maintained in MyCM. In addition, the results may be reported to VIDE Senior Leadership as appropriate, Virgin Islands Department of Justice, the Inspector General Office, or the U.S. Department of Education.
- IX. The CL Review Committee would notify VIDE Leadership if the investigation determined that corrective action should be taken to address and implement preventative or detective controls to address the circumstances identified in the report.
- X. VIDE prohibits and will not knowingly permit retaliation against any person or by VIDE for using the ComplianceLine as set forth above, or for assisting or participating in any manner in any investigation or proceeding of any type related to the use of the ComplianceLine. Anyone who feels they have been subjected to any type of retaliation because of using the ComplianceLine in good faith or assisting or participating in any investigation or proceeding relating to the use of the ComplianceLine should immediately contact:

VIDE's Human Resources Office
(340) 774-0100 (STT/J)
(340) 773-1095 (STX)

Or

ComplianceLine
Call or text "REPORT" to 1-800-403-2461
Visit www.vide.complianceline.com



Any report of retaliation to someone lodging a complaint in accordance with the procedures outlined above will be reasonably, promptly, objectively, and thoroughly investigated as appropriate under the circumstances in accordance with VIDE's investigation procedure outlined above. If a complaint of retaliation is substantiated, appropriate disciplinary action will be taken, up to and including termination of employment or engagement.

NOTIFICATIONS

A copy of this policy will be provided to all individuals responsible for administering VIDE's ComplianceLine. This policy supersedes all previously written memorandums and policies. VIDE reserves the right to rescind, and/or amend this, and all its policies, at any time, with or without notice.

APPENDIX I: COMPLIANCELINE REFERRAL FORM



COMPLIANCELINE REFERRAL

Call or text **"REPORT"** to **1-800-403-2461**
or visit **www.videcomplianceline.com**

PART A - To be completed by VIDE ComplianceLine

Reason for Referral:	<input type="text"/>
Agency Referred To:	<input type="text"/>
Agency Point of Contact Name:	<input type="text"/>
Contact (Tel. No. and Email)	<input type="text"/>
Referral Date	<input type="text"/>

PART B - To be completed by agency case was referred to upon conclusion

Details of the case outcome:	<input type="text"/>
Date case concluded:	<input type="text"/>
Name of Case Owner:	<input type="text"/>
Contact (Tel. No. / Email)	<input type="text"/>

Upon conclusion of the case please return this form via email to internalaudit@vide.vi

APPENDIX II: GVI AGENCY POINT OF CONTACT BY CASE TYPE

	Agency Name	Name of Point of Contact (s)	Tel.	Case Type(s)
1	Attorney General of the Virgin Islands	Victim Service Coordinator Victim Advocate	(340) 774-5666 (340) 774-5666	Sexual Trafficking, Labor Trafficking, and Other
2	Virgin Islands Police Department	Chief of Police Deputy Chief of Police	(340) 277-3700 (340) 643-1319	Sexual assault, Self-harm/ suicide, Sexual Trafficking, Gun / Weapons Possession by Minor, Active Shooter, Other
3	Department of Human Services	St. Croix District Manager St. Thomas/John District Manager Administrator Assistant Commissioner	(340) 642-1239 (340) 642-6293 (340) 642-9299 (340) 642-8816	Abuse (Physical, Mental), Sexual Trafficking, Labor Trafficking, Other
4	Virgin Islands Fire Services	STT/STJ Fire Chief STX Fire Chief STX EMS Chief STT/STJ EMS Chief Director	(340) 774-7610 (340) 773-8050 (340) 773-8050 (340) 774-7610 (340) 774-7610	Active Shooter, Other
5	Virgin Islands Territorial Emergency Management Agency	Assistant Director Deputy Director of Operations	(340) 774-2244 / (340) 715-6801 (340) 773-2244 / (340) 690 - 9247	Active Shooter, Environmental, Other
6	Department of Health	Chief of Staff for Operational Purposes Deputy Commissioner of PH and Behavioral Health Deputy Commissioner for Human Resources Issues	(340) 626-4131 (340) 646-1642 (340) 277-0437	Environmental, Other
7	Department of Property and Procurement	Chief Legal Counsel Executive Assistant	(340) 774-0828 (340) 774-0828	Other