

**STATE OF OKLAHOMA**  
**EMERGENCY DROUGHT COST-SHARE PROGRAM**  
**2022-2024**  
**ABUSES AND FRAUD GUIDANCE DOCUMENT**

The Emergency Drought Cost-Share Program (EDCSP) is a taxpayer-funded program requiring conservation districts (districts) with the support of the Emergency Drought Commission (Commission) and the Oklahoma Conservation Commission (OCC) to address any complaints or concerns regarding abuses or fraudulent activity in the program. Districts shall investigate any complaints and concerns appropriately and promptly. The Commission has put the following guidance together to assist districts with this responsibility.

**OCC Point of Contact.** All contact and questions regarding the investigation and actions of EDCSP abuses and frauds should be made to:

Tammy Sawatzky, Conservation Programs Division Director  
 Email: [Tammy.Sawatzky@Conservation.ok.gov](mailto:Tammy.Sawatzky@Conservation.ok.gov)  
 Office Number: 405-521-4823

**Investigative Guidance Process.** This process has been created as a tool to assist districts in conducting an investigation. Once a complaint or concern arises about potential abuse of the EDCSP, the district shall investigate the complaint or concern.

- Review the applicable EDCSP documents to understand the conservation practice requirements, the location of the practice(s), the paperwork submitted, and any other pertinent information.
- Report by email to OCC Point of Contact that the district has received a complaint or learned of a concern that the district will be investigating and provide her with the following information:
  - How the District became aware of the suspected fraud, including the name of any complaining party
  - Date the issue was raised or reported
  - Conservation district(s) involved
  - Cost-share participant(s) involved
  - Type of conservation practice(s) installation in question
  - Nature of the suspected abuse or fraud.
- Contact the complaint source, if known or applicable, to gather information on the complaint.
- Conduct a site visit to look at the installation or actions taken by the participant on the conservation practice, if applicable.
- Determine if the participant is the landowner, renter, or lessee.
- Interview key individuals, if needed.
- Review the evidence once everything is gathered.
- Keep OCC updated on the progress of the investigation.
- Prepare and submit an Investigation Report (see attached template) for action by the District Board with a copy emailed to OCC.

**Possible Actions for District Board Consideration.** Based on the conclusions in the Investigation Report the district board can take a variety of actions.

- Warning Letter. If issuing a warning letter then the districts should set out remedial actions that are needed to properly remedy issues with an installed practice. (Example: A pond clean out was done but the soil removed was placed in an area where it would wash back into the pond. The district could require that the soil be moved to an appropriate area.)
- Violation Letter. A violation letter shall be sent to a participant if abuse or fraud is found. The violation letter shall set out the district's findings and demand the return of the EDCSP funds.
- File Criminal Complaint. In addition to a violation letter and demand for the return of the funds, a district board may also file a criminal complaint with the local DA's Office.

**Collections.** If a participant ignores or refuses to return EDCSP funds after receiving a violation letter then the district board shall look at possible collection options with the assistance of their local DA's Office and choose the best option to recover the funds.

- Small Claims. The district could file in small claims court for the return of the funds and the payment of any and all filing fees.
- Other Legal Remedies. The district can seek other legal remedies available: liens on the property, garnishments, etc.

**Updates.** Keep the OCC Point of Contact updated on actions taken, funds recovered, and other important updates, so that this information can be shared with the Commission.