



## MEMORANDUM

TO: PHDC EMPLOYEES  
FROM: DAVID S. THOMAS, PRESIDENT AND CEO  
SUBJECT: PHDC WHISTLE BLOWER POLICY  
DATE: DECEMBER 6, 2023

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An employee of any non-Federal employer, such as the Philadelphia Housing Development Corporation (“PHDC”), receiving Community Development Block Grant (“CDBG”), HOME Investment Partnerships Program (“HOME”) and/or American Recovery and Reinvestment Act of 2009 (“ARRA”) funds may not be discharged, demoted or otherwise discriminated against as a reprisal for disclosing, including a disclosure made in the ordinary course of an employee’s duties, to an inspector general, the U.S. Comptroller General, a member of Congress, a State or Federal regulatory or law enforcement agency, a person with supervisory authority over the employee (or such other person working for PHDC or one of its contractors who has authority to investigate, discover or terminate misconduct), a court or grand jury, the head of a Federal agency, or their representatives, information that the employee reasonably believes is evidence of:

- (a) gross mismanagement of any PHDC contract or grant relating to CDBG, HOME and/or ARRA funds;
- (b) a gross waste of CDBG, HOME and/or ARRA funds;
- (c) a substantial and specific danger to public health or safety related to the implementation or use of CDBG, HOME and/or ARRA funds;
- (d) an abuse of authority related to the implementation or use of CDBG, HOME and/or ARRA funds; or
- (e) a violation of law, rule or regulation related to any PHDC contract (including the competition for or negotiation of any such contract) or any grant awarded or issued relating to CDBG, HOME and/or ARRA funds.

A person who believes that the person has been subjected to a reprisal prohibited by the aforesaid policy may submit a complaint regarding the reprisal to the appropriate U.S. Office of the Inspector General.

