

Wildlife In Need Emergency Response of Pennsylvania Nonconformance Policy

- I. Purpose of rules and regulations
 - A. Promotes safety of wildlife, volunteers and the public
 - B. Facilitates the ability of the Wildlife In Need Emergency Response of Pennsylvania (WIN) to accomplish its mission reliably, effectively and efficiently
 - C. Increases the willingness of the public and other entities to enlist WIN to aid wildlife
 - D. Builds and maintains WIN's positive reputation thereby fostering cooperation with Pennsylvania Game Commission, wildlife rehabilitators, regulatory agencies, funding sources and the public

- II. Purpose of Nonconformance Policy
 - A. Assists in identifying incidents of nonconformance
 - B. Provides framework for addressing and resolving incidents of nonconformance
 - C. Provides insight into causes of nonconformance
 - D. Suggests adjustments to policies and protocols to reduce lapses in nonconformance
 - E. Facilitates appropriate adjustments to policies and protocols

- III. Examples of nonconformance
 - A. Failure to properly crate wildlife for transport resulting in injury of animal or human
 - B. Failure to submit completed task reports via GoCanvas or other approved method
 - C. Wantonly exposing wildlife to a domestic animal or pet
 - D. Knowingly violating WIN policies and regulations as described in the manual and training
 - E. Violating Pennsylvania Game Commission (PGC) or Rehabilitators' policies and regulations
 - F. Failure to ensure that wildlife is immediately transported to a licensed veterinarian or licensed rehabilitator unless instructed otherwise by a licensed veterinarian, licensed rehabilitator, WIN Dispatch, WIN Officer or PCG Officer.
 - G. Keeping or rehabbing wildlife without PGC-issued license or permit
 - H. Deliberately causing needless pain or death of an animal
 - I. Delivering wildlife to persons who do not possess a PGC-issued license or permit
 - J. Unprofessional and/or abusive behavior toward the public, rehabilitators, PGC wardens, WIN volunteers, law enforcement, etc.

- IV. Prevention of nonconformance
 - A. Effective and thorough initial training
 - B. Ongoing review of initial training
 - C. Continuing relevant education
 - D. WIN Protocols and PGC Regulations
 - a. Readily available to WIN's volunteers
 - b. Regularly reviewed and updated by members of WIN's Board of Directors
 - E. Volunteers encouraged to ask questions when in need of assistance regarding:
 - a. Care of wildlife – consult with a wildlife rehabilitator

- b. Natural behavior and capturing – contact WIN Mentor
 - c. WIN protocols – contact WIN’s President
 - d. PCG Regulations – contact PA Wildlife Rehabilitation and Education Council (<https://pawr.com/pa-wildlife-rehabilitation-and-education-council/>)
 - F. Capture and Transport (C&T) volunteers maintain unexpired, PCG-validated C&T permit
 - G. Conduct regular audit and oversight protocols
- V. Initial reports of nonconformance are directed to WIN’s President via WIN’s mobile number (814-853-7468)
- VI. WIN’s President initiates investigations and opens Nonconformance Reports
- A. Completes all sections of Nonconformance Report
 - 1. Issue/Nonconformance title
 - 2. Classification of incident of nonconformance (minor, major)
 - 3. Description of the incident of nonconformance or issue
 - 4. Details of where, when and how the incident or issue was identified
 - 5. Operations, entities or people affected
 - 6. Associated problems and risks
 - 7. Actions taken or recommended
 - 8. Additional relevant documents and files
 - B. Notifies WIN’s Board of Directors at a regularly scheduled or emergency board meeting that an incident of nonconformance has occurred and investigation has been opened
 - C. Conducts Investigation
 - 1. Notifies involved persons and entities that investigation has been opened and conduct interviews
 - a. Reporter of incident of noncompliance or issue (when appropriate)
 - b. “Non-compliant” WIN Volunteer
 - c. Witnesses
 - d. Rehabilitator (when appropriate)
 - e. Regulatory agency (when appropriate)
 - D. Recommends or takes corrective action, examples:
 - 1. Temporary removal from WIN Capture & Transport or Courier Schedule (and restoration when appropriate)
 - a. Notify other WIN Volunteers (reason not given)
 - b. Notify Rehabilitators (when appropriate)
 - 2. Remediation
 - 3. Mentoring
 - 4. Equipment up-grade or adjustment
 - 5. Permanent removal from WIN Capture & Transport or Courier Schedule
 - a. Notify other WIN Volunteers (reason not given)
 - b. Notify Rehabilitators (when appropriate)
 - 6. Removal from position in WIN’s organization
 - E. Recommends Preventative Measures, examples:
 - 1. Upgrade communications procedures

2. Adjust training
3. Adjust standard operating procedures
4. Adjust resource support
5. Adjust auditing and oversight

F. Reports Outcome

1. WIN's Board of Directors (via board meeting)
 - a. The Secretary of adds the Nonconformance Report to the meeting's minutes
 - b. Decides outcome for "Noncompliant" Volunteer when appropriate
 - c. Discusses root and organizational causes of noncompliance
 - d. Determines and implements preventative measures

Note: In the case of an ongoing PCG investigation involving the incident of nonconformance, ONLY WIN's Board of Directors receives the Nonconformance Report or any other information pertinent to the incident including but not limited to communications in all forms (i.e. fact-to-face, telephone, text messaging, social media, etc.) and/or hard and/or digital copy of all documents, photos, video and/or audio recordings, etc. All forms of discussion, communication, and action by the Board of Directors specifically regarding the incident are strictly confidential for the duration of the ongoing PCG investigation. WIN's President will share information relevant to the PCG's investigation with the PCG upon request by the PCG.

2. "Non-compliant" Volunteer
3. Reporter of Nonconformance (when appropriate,)
4. Rehabilitators (when appropriate)
5. Pennsylvania Game Commission (when appropriate)
6. Regulatory agencies and oversight entities (when appropriate)

VII. Minor incidents of nonconformance

A. Investigation by WIN's President

1. Opens Nonconformance Report and Conducts Investigation
2. WIN's President resolves issue
 - a. Determines and addresses underlying causes and/or issues
 - b. Addresses misunderstandings related to protocols, other volunteers, entities, etc.
 - c. Determines if "Noncompliant" Volunteer is willing and able to comply with protocols, rules and regulations
 - i. If negative
 1. Removes "Noncompliant" Volunteer from WIN's Schedule
 2. If "Noncompliant" Volunteer wishes to appeal removal, presents Nonconformance Report to WIN's Board of Directors for consideration and ruling at a regularly-scheduled or emergency meeting
 - d. Assigns remediation and corrective measures

- e. Determines that Volunteer satisfies remediation requirements

VIII. Major incidents of nonconformance

A. Citation from PGC

1. Investigation by WIN's President
 - a. Opens Nonconformance Report and conducts investigation
 - b. Contacts "Noncompliant" Volunteer
 - i. Immediately puts Volunteer on hold from participating in calls
 - ii. Discusses complaint with Volunteer
 - iii. Informs Volunteer that citation may be disputed with PGC through Volunteer's personal lawyer if so desired
 - c. Informs WIN's Board of Directors of citation at a regularly scheduled or emergency meeting
 - d. Informs WIN's volunteer community that the "Noncompliant" Volunteer has been removed from WIN's Schedule (reason not given)
2. PGC investigates and decides outcome of citation
 - a. PGC permanently revokes "Noncompliant" Volunteer's C&T permit
 - i. WIN's President does not return Noncompliant Volunteer to WIN's Schedule
 - ii. WIN's President informs "Noncompliant" Volunteer of permanent removal from WIN's Schedule
 - b. PGC validates Volunteer's permit
 - i. WIN's President returns re-validated Volunteer to WIN's schedule if Volunteer desires
 - ii. WIN's President informs WIN community that the volunteer has returned to WIN's Schedule (when appropriate)

B. Complaint from Rehabilitator (and other major incidents of nonconformance)

1. Investigation by WIN's President (teamed with a member of WIN's Board of Directors who is also a rehabilitator in cases of complaints from a Rehabilitator)
 - a. Opens Nonconformance Report and conducts investigation
 - b. Contacts "Noncompliant" Volunteer
 - i. Immediately puts Volunteer on hold from participating in calls
 - ii. Informs and interviews "Noncompliant" Volunteer regarding complaint/incident of nonconformance
 - iii. Informs "Noncompliant" Volunteer of investigative protocol
 - b. Contacts Rehabilitator issuing complaint (or, when appropriate, the Person/Entity reporting the incident of nonconformance)
 - i. Informs that "Noncompliant" Volunteer is on hold from participating in WIN's calls when appropriate
 - ii. Discusses incident with Rehabilitator issuing complaint (or with Person/Entity reporting the incident of nonconformance)
 - c. Contacts Witnesses to discuss complaint/incident of nonconformance

- e. Informs WIN's volunteer community that the "Noncompliant" Volunteer has been removed from WIN's Schedule (reason not given)
2. Resolution
- a. WIN's President resolves the issue (teamed with a member of WIN's Board of Directors who is also a rehabilitator in cases of complaints from a Rehabilitator)
 - i. Determines and addresses issues underlying nonconformance
 - ii. Addresses misunderstanding between Rehabilitator issuing complaint (or Person/Entity reporting the incident of nonconformance) and "Noncompliant" Volunteer when relevant
 - iii. Determines if "Noncompliant" Volunteer is willing and able to comply with protocols, rules and regulations
 - 1. If negative, makes "Noncompliant" Volunteer's removal from WIN's Schedule permanent
 - a. Informs "Noncompliant" Volunteer that removal is permanent
 - 2. If "Noncompliant" Volunteer wishes to appeal removal, WIN's President (or investigating team) presents the Nonconformance Report to WIN's Board of Directors for consideration and ruling at a regularly-scheduled or emergency meeting
 - iv. Assigns remediation and corrective measures when appropriate
 - v. Determines that "Noncompliant" Volunteer satisfies remediation requirements
 - vi. Lifts hold on "Noncompliant" Volunteer upon her/his satisfying all requirements
 - vii. Informs WIN's volunteer community that the "Noncompliant" Volunteer has been restored to WIN's Schedule when appropriate
 - b. WIN's Board of Directors discusses and resolves issue
 - i. WIN's President and, when appropriate, a Board member who is a rehabilitator present the Nonconformance Report to WIN's Board of Directors at a regularly scheduled or emergency meeting
 - ii. The Secretary of WIN's Board of Directors enters the Nonconformance Report into the meeting's minutes
 - iii. Hears and rules on appeal of permanent removal from WIN's Schedule when appropriate
 - iv. Assigns remediation and corrective measures when appropriate
 - v. Determines that "Noncompliant" Volunteer satisfies remediation requirements
 - vi. Lifts hold on "Noncompliant" Volunteer upon her/his satisfying all requirements
 - vii. Makes "Noncompliant" Volunteer's removal from WIN's Schedule permanent when necessary