



Inter-American Development Bank (IADB)

Complaint Screening:

The Office of Institutional Integrity (OII) is responsible for investigating all allegations of [Prohibited Practices](#). These are: fraudulent, corrupt, coercive, collusive and obstructive practices.

When OII obtains information alleging misconduct, it conducts a threshold analysis to determine whether OII has jurisdiction to investigate. At this stage, 3 questions must be answered:

- **Does the information relate to an activity financed by the IDB group?**
- **Does the information involve a Prohibited Practice of the IDB group?**
- **Is the information credible?**

If one or more of these questions is answered negatively, the investigation concludes and the case is closed. In any other case, the investigation proceeds.

Investigation:

Once OII establishes that it has jurisdiction to pursue an investigation, it develops a case theory or theories identifying the alleged Prohibited Practice, as well as an investigation plan to gather evidence. During the course of an investigation, OII will, whenever possible, interview the subjects of an investigation, providing them with an opportunity to explain the facts and circumstances related to the investigation.

OII assesses its findings under the standard of the preponderance of the evidence and may conclude that a case is:

- **Unfounded:** The evidence is sufficient to support a finding that the alleged Prohibited Practice did not occur.
- **Unsubstantiated:** The evidence is insufficient either to confirm or deny that the alleged Prohibited Practice occurred
- **Substantiated:** The evidence is sufficient to support a finding that the alleged Prohibited Practice occurred.

In accordance with the IDB-Group Sanctions Procedures, a “preponderance of the evidence” means that “it is more likely than not that the subject of an investigation engaged in a Prohibited Practice”.

Sanctions Process

First Tier - Case Officer

If as a result of an investigation, the Chief of OII concludes that a case is substantiated, OII presents to the Case Officer a Preliminary Notice of Administrative Action against the subject of the investigation (the “Respondent”). If the Case Officer determines that the evidence is indeed sufficient to support a finding that the Respondent engaged in a Prohibited Practice, s/he will issue a Notice of Administrative Action (NAA), which includes a recommended sanction.

The Respondent may appeal the Case Officer determination, by submitting a response to the Secretary of the Sanctions Committee. If no response is submitted, the sanction recommended by the Case Officer becomes effective.

Second Tier - Sanctions Committee

When the Respondent appeals the Case Officer’s determination, the Sanctions Committee decides the case after granting OII and the Respondent an additional opportunity to submit written materials presenting their arguments and evidence. The Sanctions Committee may decide the case based on the written record or, at its discretion, may hold a hearing as it deems appropriate.

If the Sanction Committee finds that the Respondent engaged in a Prohibited Practice, it will impose a sanction. The decisions of the Sanction Committee are final.

Sanctions

The Case Officer or the Committee, as applicable, may decide upon a sanction or combination of sanctions from among the following:

- Reprimand
- Debarment
- Conditional Non Debarment
- Debarment with Conditional Release
- Other sanctions , including , but not limited to, the restitution of funds, and the imposition of fines representing reimbursement of the costs associated with investigations and proceedings.

For more information please refer to the [IDB Group Sanction Procedures](#).

Sanctions of other Institutions - Cross Debarment:

IDB Group may cross-debar parties that have been debarred by any of the other Participating Institutions in the [Agreement for the Mutual Recognition of Debarment Decisions or Cross-Debarment Agreement](#), and the other Participating Institutions may cross-debar parties that IDB Group has publicly debarred.