

## Questions and Answers

ACUA webinar March 12, 2020

Expanding on the Kickstarter for Investigations: Misappropriation of Assets

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Any union or policy issues with viewing cameras?

We're a public institution and don't have unions. We've never had policy issues with viewing camera footage because the stance is that the employees are aware of the cameras, and what's done on state property can be reviewed.

Do you have any tips for identifying faculty that are on leave but not reporting it since at our college they are not required to complete timecards? I think I answered this question on the webinar, but the best I can suggest is random office checks or reviewing camera footage, or asking people who may know his/her habits and whereabouts. I would also see if you could identify their car/parking spot, and check to see if it's there during work hours.

How do you handle other improper or illegal acts found during an investigation that are not part of the specific allegation investigated? In Virginia, there is a statute that says we MUST report any reasonable likelihood of fraud to the Office of the State Inspector General, Virginia State Police, and Auditor of Public Accounts. So even if it wasn't originally in the allegation, we still report it to those 3 parties in a memo, and there is determination on who will investigate it (VSP he has first rights to investigate it, then the OSIG, then APA, then us).

How do you hold someone who reported something maliciously if the hotline is anonymous? Great question. In short, we can't. We have to treat every allegation as if it were true and investigate it as such. But we are working the Office of the State Inspector General to add that reporting these allegations is serious and should be treated as such.

If an individual owes the University for misappropriated funds, do you allow them to payroll deduct to pay it back? I don't know that we've ever garnished wages or anything, but that may be a question for Legal. We've only adjusted leave banks and allowed the employee to pay back what should have been leave taken.

If the University has no compliance office, which department or unit would be appropriate to update the policies re. Fraud, Ethics, and code of conduct? We are also an institution without a compliance office, so I think HR should be the lead on policies, with Legal reviewing and Internal Audit assisting in the Fraud policy.

Tip: Doing these kinds of investigations I have had success working with IT on tracking a subject's access to the university's Wi-Fi as they move around campus. This is a FANTASTIC tip! I wish I saw this comment on the webinar so I could've said it out loud to everybody.

What does OSIG stand for? The Office of the State Inspector General

What is the protocol for getting access to employee's emails? I usually first start at the CIO or highest level of IT (cc my Director of Audit), and explain why we need to see someone's emails. Then they will put me in touch with someone in their department who can access that person's emails. Remember, because Audit is independent, objective, and has rights to all records (per your charter), they cannot refuse that information to you.

What is your policy for obtaining access to email accounts to substantiate fraud? See response above. Work email is considered state property, so we may review it.

What is your stance/practice when an employee resigns during an investigation - do you continue the investigation or stop in place? I guess it depends. We will definitely try to conclude the investigation with all the facts to the best of our ability. But if we can no longer get information because the subject resigned, we'd try to enlist the help of the Office of the State Inspector General or Virginia State Police because they can get access to records that we can't.

What would be your advice to publicize and communicate an Ethics Hotline to the rest of Institution and student employees aside from email blasts while assuring people they will not face retaliation? I think talking about it frequently in meetings and any speaking engagements/presentations that Internal Audit does would be really helpful. I also have the fraud, waste, and abuse hotline number and email (and link to the OSIG's website, since they administer it) on my email signature. Also, post flyers in public places with that specific verbiage.

Would the use of University systems such as review of email, building access, or parking be considered violation of privacy? We haven't had that issue as a public institution because all those resources are considered state property. But be sure to check your local laws!