Policy Title: Financial Irregularities		
Policy #:	PRE-FA-001	
Responsible Office:	VP for Finance and Administration	
Responsible Administrator:	President's Office	
Date Reviewed:	August 2014	**Revisions Made?** Yes ___ No_X_
Date of Next Review:	August 2019	

PURPOSE

The University is committed to the highest standards of moral and ethical behavior. Employees of the university are expected to report known or suspected financial irregularities. Oregon University System (OUS) Policy requires the institution to designate an administrator responsible for reporting known or suspected financial irregularities to the OUS Internal Audit Division.

Employees reporting known or suspected financial irregularities in good faith must feel safe and protected from retaliation. The Whistleblowers Protection Law defined in ORS 659.545 protects employees disclosing fraud in good faith. Employees found to have been making frivolous claims under the policy will be subject to disciplinary action.

The purpose of this policy statement is to provide a formal protocol for communication among relevant parties. Responsible units may wish to adopt policy or procedures that provide specific guidance on the appropriate lines of communication within their unit.

AUDIENCE

WOU employees

DEFINITIONS

Financial Irregularities are intentional misstatements or omissions of information related to financial transactions that are detrimental to the interests of the campuses or system. These may include violations of relevant Federal, State, OUS or campus laws, rules, and procedures.

These acts include, but are not limited to embezzlement, fraud, and forgery or falsification of reports, documents, or computer files to misappropriate assets.

- Suspected Financial Irregularity is a reasonable belief or actual knowledge that a financial irregularity is occurring or has occurred.

- Responsible Unit is a recognized functional or budgetary unit within the organizational structure of the institution.
- Unit administrators are appointed by the president or designee. They include: Vice Presidents; Provost; Deans; Directors; Division and Department heads; as well as other managers authorized to determine and assign duties to University employees. Department authority and responsibility for management of financial matters is vested in Unit Administrators.
- Institutional Designated Administrator is the individual designated by the institution to serve as a point of contact for known or suspected financial irregularities.
- Financial Irregularity Advisory Committee is a standing committee consisting of the following membership and other staff as deemed appropriate or necessary:

Vice President for Finance and Administration
Provost and Vice President for Academic Affairs
Director of Business Services
Director of Human Resources
Director of Campus Public Safety
Fiscal Auditor

Contacts:

Institutional Designated Administrator
Darin E. Silbernagel
Director of Business Services
Phone: 503-838-8176
Email: silbernd@wou.edu

Oregon University System
Internal Audit Division
Phone 541-737 - 2193
http://www.ous.edu/dept/intaudit/fc

POLICY STATEMENT

All employees of the University are expected to report known or suspected financial irregularities within their responsible unit at the time they become aware of the incident. The responsible unit is expected to forward the report to the Institutional Designated Administrator. The Institutional Designated Administrator (see definitions) is responsible for ensuring appropriate communication occurs with:

1. Financial Irregularity Advisory Committee (see definitions) 2. Responsible unit administrators (see definitions) 3. OUS Internal Audit Division

All parties involved with a financial irregularity, must handle the reporting and investigating with utmost confidentiality and objectivity.

References
OUS Policy on Financial Irregularities
Oregon Revised Statutes Chapter 659.505 to 659.545 Oregon Whistleblower Law
Oregon Revised Statutes Chapter 297 Investigating Loss of Public Funds or Property 297.120
Department of Administrative Services Policy Manual Number 125-7-203 Issuing Division-Risk Management Division Employee Dishonesty Policy

PROCEDURES

1. Employee believes a financial irregularity has occurred

When an employee believes a financial irregularity has occurred the employee is expected to report such instances along with relevant information at the time they become aware of the incident. The normal reporting protocol is as follows:

- Employee reports to responsible unit according to the unit's reporting hierarchy.
- Responsible unit reports known or suspected financial irregularities to the Institutional Designated Administrator.

In the event the responsible unit's administrator is suspected to be involved or has not taken appropriate action, employees are expected to contact the Institutional Designated Administrator.

2. Evaluation of appropriate measures

The Institutional Designated Administrator is responsible for contacting and consulting with the Financial Irregularities Advisory Committee, responsible unit administrators, and OUS Internal Audit Division as appropriate to determine course of actions. Further actions may include:

- Determining if further investigation is warranted;
- Determining who should appropriately conduct further investigation;
- Conducting investigation;
- Determining appropriate contacts and communications with relevant internal and external parties.

3. Completion

At the completion of the investigation, OUS Internal Audit Division will report results of investigations to institution management and ensure relevant system and external reporting requirements are met.

The Institutional Designated Administrator will ensure appropriate institutional communication occurs.

Institution management will determine appropriate corrective or disciplinary actions based on report findings and recommendations including but not limited to seeking loss recovery.

FINANCIAL IRREGULARITIES PROCEDURE SUMMARY

Responsible Party	Responsibility
Employee	• Report known or suspected financial irregularity within responsible unit or other parties as appropriate.
Responsible Unit	• Report known or suspected financial irregularity to Institutional Designated Administrator. • Provide data for investigation procedures as necessary.
Institutional Designated Administrator	• Ensure OUS and University Financial Irregularities Policy is followed. • Contact and consult with Financial Irregularities Advisory Committee, responsible unit administrators and Internal Audit regarding suspected financial irregularity and appropriate measures. • Assist Internal Audit Division in investigation. • Complete or provide data for investigation procedures as necessary. • Ensure appropriate institutional communications occur.
Financial Irregularities Advisory Committee	• Advise, inform and assist Institutional Designated Administrator, Internal Audit Division and relevant parties as appropriate.
OUS Internal Audit Division	• Ensure OUS Financial Irregularities Policy is followed. • Consult with Institutional Designated Administrator and relevant campus representatives regarding appropriate measures. • Complete investigation procedures as necessary. • Report results of investigations to institution management. • Ensure relevant system and external reporting requirements are met.
All parties	• Maintain confidentiality and objectivity throughout the investigation.

FORMS

N/A
AUTHORITY Name & URL of authority: Vice President for Finance and Administration (https://www.wou.edu/admin/budget/index_staff.php#)
RESPONSIBILITY The VP for Finance and Administration is responsible for this policy and may be contacted at 503-838-8459 or yahnkee@wou.edu.

Alternate formats of this policy may be requested from the Office of Human Resources.