

FINANCIAL IRREGULARITIES POLICY

I. Policy Statement

Portland State University is committed to the highest standards of moral and ethical behavior. All employees of Portland State University are expected to report known or suspected financial irregularities at the time they become aware of the incident or activity. Retaliation against persons reporting known or suspected financial irregularities is strictly prohibited.

II. Reason for Policy/Purpose

This policy establishes a uniform protocol for reporting and responding to such concerns. Departments may establish procedures that provide additional guidance on the appropriate lines of communication within the department.

III. Applicability

This policy applies to all University employees.

IV. Definitions

Financial Irregularity: An intentional misstatement or omission of information related to University financial transactions. 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: Reasonable belief or actual knowledge that a financial irregularity is occurring or has occurred.

Retaliation: Retaliation means any adverse treatment (beyond a petty slight or trivial annoyance) that is based on a retaliatory motive and is reasonably likely to deter protected activity.

Responsible Unit: Recognized functional or budgetary department or unit within the organizational structure of the institution.

Unit Administrator: Employee within each unit with authority and responsibility for management of financial matters, as well as other managers authorized to determine and assign

duties to University employees, such as: vice presidents, provost, vice provosts, deans, directors, division and department heads.

Internal Audit Office (IAO): Internal Audit Office (IAO) refers to the IAO of Portland State University.

V. Policy & Procedure

1. Employee Reporting Obligation. In order to fulfill this mandatory reporting obligation, an employee has three options for reporting a known or suspected financial irregularity:

1.1 The employee may report to the Unit Administrator according to the unit's reporting hierarchy.

1.2 The employee may report to the Vice President of Finance and Administration (VP of FADM) in the event the Unit Administrator is suspected to be involved or has not taken appropriate action.

1.3 The employee may report to the Fraud, Waste & Abuse Hotline, accessible either via telephone or the web. The report can be made anonymously to:

PSU Fraud, Waste & Abuse Hotline: 1 (888) 304-7810

Web: <http://www.pdx.edu/fadm/fraud-waste-and-abuse-hotline>

2. Unit Administrator Obligation. The Unit Administrator must forward any report received to the VP of FADM and assist as directed. The VP of FADM, in consultation with the University's Office of Human Resources, will determine if an employee should be put on leave pending conclusion of the investigation.

3. VP of FADM's Obligation. When fraudulent activity or a financial irregularity is identified, the VP of FADM should consult with the IAO. An investigative plan should be developed, guided by the IAO, to ensure all records are secure, necessary parties are informed and care is given to the investigation process.

Actions may include:

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

4. Suspected or Identified Criminal Conduct. If criminal fraud is suspected or apparent, the VP of FADM should contact the University's Office of the General Counsel and Campus Public Safety to determine what outside notifications are necessary. The Office of the General Counsel is responsible to ensure appropriate notices are made.

5. Conclusion of Investigation. Following conclusion of the investigation, the VP of FADM will ensure appropriate institutional communication occurs.

5.1 The IAO will report results of investigations to institution management and ensure relevant system and external reporting requirements are met.

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

6. Confidentiality. The University will protect the confidentiality of an employee reporting a known or suspected financial irregularity, to the extent appropriate and allowed by law.

7. Unbiased Investigation. Involved parties are expected to remain objective, and to maintain confidentiality throughout the investigation to the extent appropriate and allowed by law.

8. Non-Retaliation. No person shall retaliate against an individual for reporting a known or suspected financial irregularity, or for participating in an investigation under this policy, regardless of the outcome of the investigation.

Any act of retaliation or reprisal violates this policy and will be treated as a separate matter. Anyone found to have retaliated against someone making use of this policy will be subject to corrective action, up to and including severance of any relationship with the University.

VI. Links To Related Polices, Procedures, or Information

[Code of Ethics, Policy, Ethics Guide for Public Employees](#)

ORS 659A.203 (Public employee state whistleblower protection law)

EthicsPoint - <http://www.pdx.edu/fadm/fraud-waste-and-abuse-hotline>

VII. Contacts

Vice-President for Finance and Administration: (503) 725-4444

E-mail: fadmdesk@pdx.edu

Portland State University Internal Audit Office (503) 725-5916

Fraud, Waste & Abuse Hotline: 1 (888) 304-7810

VIII. History/Revision Dates


History: Originated July 1, 2003; Amended March 17, 2009


Adoption Date: March 12, 2014

Revision Date: March 6, 2015

Next Review Date: March 6, 2020

IX. Policy Revision Approvals

Approved  Date 3/10/15
PORTLAND STATE UNIVERSITY PRESIDENT

Approved  Date 3/16/15
PORTLAND STATE UNIVERSITY GENERAL COUNSEL