

## Portland State University

### Policy Statement

**Title:** Financial Irregularities

**Effective** July 1, 2003

**Last Revised** 03/17/09

#### **Who Should Read This Policy**

All Portland State University Employees

#### **Background & Purpose**

Portland State 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 Oregon University System Internal Audit Division.

Employees reporting known or suspected financial irregularities in good faith must feel safe and protected from retaliation. Portland State University and the Oregon University System will make every effort to provide an environment free 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 subjected 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 provides specific guidance on the appropriate lines of communication within their unit.

#### **Policy**

All employees of Portland State 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 the Financial Irregularity Advisory Committee (*see definitions*), responsible unit administrators (*see definitions*), and the 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

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#### Related 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. 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 GUS 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, GUS 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.

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**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, GUS 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; Vice Provosts; 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*: individual designated by the institution to serve as a point of contact for known or suspected financial irregularities.

Vice President for Finance and Administration

*Financial Irregularity Advisory Committee* a standing committee consisting of the following membership and other staff as deemed appropriate or necessary:

Vice President for Finance and Administration  
Vice Provost for Academic Personnel and Budget  
Associate Vice President for Finance and Planning  
Associate Vice President for Human Resources  
Director of Public Safety  
Director of Business Affairs

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**Contacts**

Institutional Designated Administrator:

Lindsay Desrochers

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

E-mail: [ldesrochers@pdx.edu](mailto:ldesrochers@pdx.edu)

NOTE: OUS has now established a hotline, accessible either via telephone or the web, which is available for reporting potential fiscal irregularities. Information about the new hot line, can be found at: <http://www.ous.edu/dept/intaudit/fc>

**1-888-304-7810**

Oregon University System Internal Audit Division Phone (541) 737  
- 2193

**Reviewed by the Cabinet on: June 25, 2003**

Approved by

Lindsay Desrochers  
Vice President for Finance and Administration

**Portland State University**

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**Effective** July 1, 2003

**Last Revised** March 17, 2009

Procedure Summary

<b>RESPONSIBLE PARTY</b>	<b>RESPONSIBLE</b>
Employee	<ul style="list-style-type: none"> <li>• Report known or suspected financial irregularity within responsible unit or other parties as appropriate.</li> </ul>
Responsible Unit	<ul style="list-style-type: none"> <li>• Report known or suspected financial irregularity to Institutional Designated Administrator.</li> <li>• Provide data for investigation procedures as necessary.</li> </ul>
Institutional Designated Administrator	<ul style="list-style-type: none"> <li>• Ensure GUS and University Financial Irregularities Policy is followed.</li> <li>• Contact and consult with Financial Irregularities Advisory Committee, responsible unit administrators and Internal Audit regarding suspected financial irregularity and appropriate measures.</li> <li>• Assist Internal Audit Division in investigation</li> <li>• Complete or provide data for investigation procedures as necessary.</li> <li>• Ensure appropriate institutional communications occur.</li> </ul>
Financial Irregularities Advisory Committee	<ul style="list-style-type: none"> <li>• Advise, inform and assist Institutional Designated Administrator, Internal Audit Division and relevant parties as appropriate.</li> </ul>
GUS Internal Audit Division	<ul style="list-style-type: none"> <li>• Ensure GUS Financial Irregularities Policy is followed.</li> <li>• Consult with Institutional Designated Administrator and relevant campus representatives regarding appropriate measures.</li> <li>• Complete investigation procedures as necessary.</li> <li>• Report results of investigations to institution management.</li> <li>• Ensure relevant system and external reporting requirements are met.</li> </ul>
All parties	<ul style="list-style-type: none"> <li>• Maintain confidentiality and objectivity throughout the investigation.</li> </ul>