



Effective: August 20, 2018

Last Revised: Initial Draft

Responsible University Office:

Office of Equity and Compliance

Responsible University Administrator:

Sr. Advisor to the Chancellor

Policy Contact:

Mary Chinnock Petroski, Chief Compliance/Title IX Officer

petroskimj@unk.edu

Kayla James, Internal Auditor

jamesk@unk.edu

Reporting Fraud/Misconduct Policy

POLICY CONTENTS

Scope

Policy Statement

Procedures

Definitions

Additional Contacts

History

Scope

This policy provides guidelines for reporting known or suspected fraud/misconduct at UNK and protection from retaliation for individuals who make good faith reports.

Policy Statement

All individuals may, and all UNK employees shall, report known or suspected instances of fraud/misconduct. Suspected fraud/misconduct is a reasonable belief or actual knowledge that fraud/misconduct has occurred or is occurring in the areas of Academic Matters, Accounting and Financials, Athletics, Human Resources, Information Technology, Medical, Research, Risk and Safety Matters, and others.

Two reporting mechanisms are available for good faith reports of known or suspected fraud/misconduct.

1. **Confidential** good faith reports may be made to senior administrators, academic deans or department chairs, unit directors, compliance officer or internal auditor. Individuals who identify themselves and make a good faith report of suspected fraud/misconduct are protected from retaliation and UNK will maintain their confidentiality to the extent possible under law.
2. **Anonymous** reports may be made via EthicsPoint—an independent third-party contractor—at (844) 348-9584 or www.nebraska.ethicspoint.com.

Procedures

- 1) **Confidential** good faith reports may be made directly to senior administrators, academic deans or department chairs, unit directors, the chief compliance officer or internal auditor—who are obligated to report/refer the matter for investigation to appropriate university officials e.g., Chief Compliance Officer/Title IX Officer, Vice Chancellor, Chief Research Officer, Police Chief, Internal Auditor. All are obligated to maintain confidentiality of individuals making good faith reports to the extent possible under law and protect those individuals from retaliation.
- 2) **Anonymous** good faith reports may be made via EthicsPoint—an independent third-party vendor—at (844-348-9584) or www.nebraska.ethicspoint.com. EthicsPoint routes anonymous reports to either the Chief Compliance Officer or appropriate university official with notification to the Chief Compliance Officer. The Chief Compliance Officer is able to monitor the progress of all reports and investigations.
 - (a) If the Chief Compliance Officer is implicated in a report, the matter will be reported to the Internal Auditor.
 - (b) If the Internal Auditor is also implicated, the matter will be reported to the Senior Advisor to the Chancellor who will ensure appropriate investigation by a UNK/UNCA/independent official.

Definitions

Fraud consists of some deceitful practice or willful device, resorted to with intent to deprive another of their right, or in some manner to do them injury and/or to receive financial gain.

Misconduct includes behavior that is unethical or illegal.

Additional Contacts

Subject	Contact	Phone	Email
Mary Chinnock Petroski	Chief Compliance and Title IX Officer	308-865-8400	petroskimj@unk.edu
Kayla James	Internal Auditor	308-865-8222	jamesk@unk.edu
Neal Schnoor	Sr. Advisor to the Chancellor	308-865-8715	schnoor@unk.edu

History

Initial draft 7/2018.