

# RADFORD UNIVERSITY

<b>Policy Title: Fraud, Waste, and Abuse Policy</b>	<b>Effective Date: 7/1/2017</b>
<b>Policy Number: GEN-PO-1003</b>	<b>Date of Last Review: 8/7/2020</b>
<b>Oversight Department: Office of Audit and Advisory Services</b>	<b>Next Review Date: 8/1/2023</b>

## 1. PURPOSE

The *Fraud, Waste, and Abuse Policy* for Radford University (University) establishes requirements and responsibilities concerning the reporting and investigation of suspected fraud, waste, and abuse of University resources.

## 2. APPLICABILITY

The *Fraud, Waste, and Abuse Policy* primarily applies to all University employees; however, some aspects of the policy apply to other members of the University community.

## 3. DEFINITIONS

**Abuse**: Excessive or improper use of University resources or policies, using something in a manner contrary to the natural or legal rules for its use, or extravagant or excessive use of one's position or authority. Abuse, which may occur in financial or non-financial settings, includes but is not limited to intentional destruction, diversion, manipulation, misapplication, mistreatment, or misuse of resources.

**Fraud**: The intentional deception perpetrated by a person(s) or organization(s), either internal or external to the University, which could result in a tangible or intangible benefit to themselves and/or could cause detriment to the University. Fraud includes a false representation of a matter of fact, whether by words or by conduct, by false or misleading statements, or by concealment of that which should have been disclosed, that deceives or is intended to deceive.

**Good Faith Report**: A report of fraud, waste, and abuse, which is made without malice. The person making the report has reasonable cause to believe it is true.

**University Community**: For the purposes of this policy, all persons who are employees, students, contractors, volunteers, and visitors, including invited guests, of the University.

**University Employee (Employee)**: Any person employed by the University as a teaching faculty, administrative or professional faculty, classified employee, part-time or wage employee, student employee, work/study employee, or any other person paid through the University's payroll process.

**Waste:** The thoughtless or careless expenditure, consumption, mismanagement, use, or squandering of University resources to the detriment or potential detriment of the University. Waste, which may be intentional or unintentional, also includes incurring unnecessary costs because of inefficient or ineffective practices, systems, or controls.

#### 4. POLICY

- A. As stated in the *Radford University Code of Ethics*, the University is “committed to maintaining the highest ethical standards and to upholding the public’s trust.” Accordingly, the University does not tolerate or condone any fraud, waste, and abuse of University resources in any manner.
- B. In keeping with this commitment to high ethical standards, employees as well as other members of the University community should report any incidents of suspected fraud, waste, and abuse in accordance with this policy.
- C. The Office of Audit and Advisory Services is assigned primary responsibility for investigating all suspected incidents of fraud, waste, and abuse. Other members of the University community should not conduct investigations or interviews/interrogations related to any suspected incident of fraud, waste, and abuse. All allegations of fraud, waste, and abuse will be given serious consideration and will be pursued to the extent allowed by the quality of the information provided and evidence available.
- D. Substantiated incidents of fraud, waste, and abuse will be reported to the appropriate authorities by the Office of Audit and Advisory Services including, as appropriate, University management and the Business Affairs and Audit Committee of the Board of Visitors.
- E. In accordance with Code of Virginia Chapter 30.1 (§ 2.2-3009 et al) and § 40.1-27.3, the University prohibits any member of the University community from attempting to identify, intimidate, or take retaliatory action, directly or indirectly, against any person who makes a good faith report of any incident of suspected fraud, waste, and abuse. Additionally, the University prohibits attempts to interfere, directly or indirectly, with an investigation of any incident of suspected fraud, waste, and abuse.

#### 5. PROCEDURES

- A. The University community is encouraged to report instances of fraud, waste, or abuse to the Office of Audit and Advisory Services via mail, fax, email, or in person (see [Contact Information](#)). The Office of Audit and Advisory Services will investigate these reports, treating all information received confidentially.
- B. The University community and citizens of the Commonwealth of Virginia may also anonymously report suspicious activities to the [State Fraud, Waste, and Abuse Hotline](#), operated by the Office of the State Inspector General (OSIG). Additionally, reports may be made to OSIG under the [Commonwealth of Virginia’s Fraud and Abuse Whistle Blower Protection Act \(WBPA\) program](#), and persons making such reports may be eligible for a reward. However, anonymity and confidentiality are not guaranteed when making a report under the WBPA. The Office of Audit and Advisory Services may perform investigations of reports made to OSIG and provide investigation results to OSIG.

## 6. EXCLUSIONS

None.

## 7. APPENDICES

None.

## 8. REFERENCES

[Code of Virginia, § 30-138](#), “State agencies, courts, and local constitutional officers to report certain fraudulent transactions; penalty.”

[Code of Virginia, Chapter 30.1. \(§ 2.2-3009 et al\)](#), “The Fraud and Abuse Whistle Blower Protection Act.”

[Code of Virginia, § 40.1-27.3](#), “Retaliatory action against employee prohibited.”

[Executive Order No. 52 \(2012\)](#), “State Fraud, Waste, and Abuse Hotline”

[Office of the State Inspector General: State Fraud, Waste and Abuse Hotline Policies and Procedures Manual](#)

[Office of the State Inspector General: The Fraud and Abuse Whistle Blower Protection Act Regulations, Policies, and Procedures Manual](#)

## 9. INTERPRETATION

The authority to interpret this policy rests with the President of the University and is generally delegated to the University Auditor.

## 10. APPROVAL AND REVISIONS

The newly developed *Fraud, Waste, and Abuse Policy* was submitted to and approved by the President’s Cabinet at the meeting held on June 28, 2017. President Hemphill signed the new policy on July 5, 2017.

The *Fraud, Waste, and Abuse Policy* was reviewed by the oversight department and the Office of Policy and Tax Compliance in August 2020. Only minor editorial changes were made that did not alter the scope or application of the policy.

**For general information concerning University policies, contact the [Office of Policy and Tax Compliance](#) – (540) 831-5794. For questions or guidance on a specific policy, contact the Oversight Department referenced in the policy.**