

### **Policy Concept Form**

As part of the University of Oregon Policy development process, all new Policy proposals, as well as proposals for the revision or repeal of existing Policies, must be submitted via this form to the University Secretary (the policy custodian). The Secretary will forward completed concept forms to the President's Policy Advisory Council for consideration pursuant to the University's Policy on University Policies. Please remember:

A Policy is "a high-level, broadly stated overall plan embracing general goals, principles and procedures of the university with intent to guide decisions, actions and other matters; characterized by defining 'what' needs to be done rather than 'how' to do it; a policy has the force of establishing rights, requirements and responsibilities."

[Complete the following information as thoroughly as possible; response boxes will expand as filled.]

#### CONCEPT SUBMITTED BY:

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ORGANIZATION:	Office of the Secretary – on behalf of VPFA and Internal Audit

#### **POLICY CONCEPT SUBJECT MATTER (including existing policy number if appropriate):**

Repeal of "financial irregularities" policy - 06.00.09

## STATEMENT OF NEED FOR THIS POLICY CONCEPT (i.e. What is the problem this concept seeks to address, and how does this proposal do so?):

This policy is no longer necessary given the revisions and edits to the Code of Ethics, Fraud and Ethics Reporting, and Internal Controls policies (simultaneously summited to the PAC). All content of this is included in those policies with regard to ethical behavior, and reporting fraud and ethics issues through the hotline or to management. Those policies also represent protections in ORS Chapter 659 (whistleblowers). The one item not included in a new policy from 6.00.09 is the Financial Irregularities Advisory Committee. This committee was formed prior to institutional governance. The UO now has an Office of Internal Audit which is responsible for investigating allegations, working with leadership on management responses to irregularities, ensuring the appropriate people (e.g. VPFA, Controller) know of financial irregularities; etc. Keeping this on the books only

serves to confuse employees and the campus community about the appropriate steps to talk when fraud or ethical issues are suspected.

# WHO OR WHT MIGTH BE AFFECTED BY THIS POLICY CONCEPT, AND HOW? List all individuals, groups, etc. that would be impacted by this concept and the nature of any possible impacts (both positive and negative).

All university employees must abide by the principles in the policy, but as noted above, those are transferred to and clarified within the proposed revisions to other policies.

### WHAT COSTS MIGHT BE ASSOCIATED WITH THIS CONCEPT, BOTH IMPLEMENTATION AND RECURRING?

None

### WHAT OTHER RESOURCES (HUMAN, PHYSICAL, OPERATIONAL, FINANCIAL, TECHNOLOGICAL, ETC.), WILL BE NEEDED TO IMPLEMENT AND MAINTAIN COMPLIANCE WITH THIS POLICY?

None

### DOES THE PROPOSED CONCEPT IMPACT EXISTING POLICIES, GUIDELINES OR PROCEDURES? DOES THE PROPOSED CONCEPT RELATE TO A MATTER WITHIN A UNION CONTRACT? IF SO, PLEASE LIST.

Yes (see above)

#### ADDITIONAL INFORMATION YOU WISH TO SHARE?

The repeal of this policy was vetted by Internal Audit, VPFA, Controller. It is currently in the Office of General Counsel and a review will be completed before the next PAC meeting.

#### PLEASE PROVIDE ANY SUGGESTED LANGUAGE AS AN ATTACHMENT TO THIS FORM.

FOR OFFICE USE ONLY

Date Received: