## **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 Internal Audit, VPFA)

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

Fraud and Ethics Reporting (repeal and replace of former OUS IMD 5)

## 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?):

Oregon University System (OUS) Internal Management Directive (IMD) #5, related to fraud, waste and abuse reporting. This IMD needs to be updated and it is easier – given the need to rename and renumber the policy plus the volume of new information needed – to do it as a repeal and replace. The new policy, "Fraud and Ethics Reporting" seeks to incorporate best practices as identified by the Office of Internal Audit relating to fraud and ethics reporting. The policy adds definitions to more clearly articulate meanings throughout the policy; those definitions are consistent with standard audit and financial reporting lingo. The proposed language regarding confidentiality mirrors that in other university policy. Lastly, the policy proposal removes the IMD's reference to ORS Chapter 297, which is no longer applicable to the University of Oregon (see ORS 352.033 and 352.183(3)).

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 are impacted by the policy, but the changes here are meant to provide greater clarity for a policy which already exists and impacts them.

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.
See above re IMD5
This policy proposal was proposed by the Office of Internal Audit. Language has been vetted with the offices of: Internal Audit, the VPFA, the Controller, Human Resources and General Counsel. Two versions are attached for your reference: one is a clean copy of the new policy; the others is a red- (and green-) lined version of the IMD for those wishing to track changes. Green simply indicates large swaths of new language in a less vibrant color; the use of a different color means nothing different than the red tracks.
PLEASE PROVIDE ANY SUGGESTED LANGUAGE AS AN ATTACHMENT TO THIS FORM.
FOR OFFICE USE ONLY
Date Received: