

TOP TEN LIST OF KEY BUSINESS AND COMPLIANCE ISSUES FOR ACADEMIC LEADERSHIP

Guiding Principle: “Don’t do something that you would not want to see on the front page of the local newspaper.”

1. **Understanding Your Business Related Responsibilities** - If you are a Financial Manager, you are ultimately responsible for the revenues and expenditures in your funds, even if you have authorized other employees to be Budget Authorities. It is important that you manage the business operations, not just the academic program. (*University Policy – U5320.03 Authorizing and Defining the Responsibilities of Financial Managers.*)
2. **Course Fee Revenues and Expenditures** – It is important to understand the purpose of each course fee and implement accounting and monitoring procedures to provide reasonable assurance that you are spending each course fee in accordance with its approved purpose. Course fee revenue must be spent to support the course, not the academic department’s operations. (*University Policies and Procedures – U1400.03 & U1400.04.*)
3. **Ethics In Public Service Act** – As Washington State employees you and your employees (including student employees) are subject to the Ethics In Public Service Act. As a supervisor, you have a duty to take action to stop known violations of the Ethics law. Human Resources offers an “Ethics 101” training course via Blackboard. A few specific sections in the law are:
 - **Consulting and Other Outside Compensated Activities** – It is important to understand the university and Ethics law requirements when performing outside work for remuneration. (*University Policies – U5400.17 Professional Staff Policy and U5400.18 Faculty Policy on Consulting and Other Outside Compensated Professional Activities.*)
 - **Using University Resources** – All employees need to be aware of the personal *de minimis* use and prohibited use rules which include outside work and consulting. (*University Policy – U5400.05 Using University Resources.*)
 - **Honoraria** - An employee may only accept an honorarium under certain circumstances and must always obtain approval beforehand. (*University Policy – U5400.19 Honoraria.*)
 - **Accepting Gifts** – Employees should not accept gifts or anything of value if it could be reasonably expected to influence your vote, judgment or action. If the employee can make purchasing decisions, the gifts that can be accepted are limited to a specific list. (See Internal Audit’s website for this list.)
 - **Conflicts of Interest** – Employees may not have an interest (financial or otherwise, direct or indirect) or engage in a business/professional activity that is in conflict with the proper discharge of the employee’s official duties at Western.
4. **Public Records Act** – Washington State law allows open public access to all state public records, except for those that are exempt. The university’s Public Records Officer (ext. 2728) must be notified immediately of all requests for university records (electronic and hard copy) received from the public.

5. **Cash Handling Expectations** – Financial Managers of cash handlers are responsible for knowing and following the university’s cash handling policies and procedures. All cash handlers must receive appropriate training. Money should be deposited with the University Cashier’s Office within 24 hours of receipt. (*University’s cash handling policies and procedures – U5351.01 to U5351.14.*) Also, university employees may not open outside bank accounts for university related business. (*University Policy U5310.04 Authorizing Banking and Investment Transactions.*)
6. **Payroll Work and Leave Time** – If you are responsible for approving university employee’s timesheet information, it is important to take the time to ensure that the information is accurate. Leave and overtime requests need to be approved in advance, except for some sick leave. A reasonable process is needed to match each employee’s leave and work time to the actual information entered onto each employee’s electronic timesheet. (*University Policy – U5410.05 Administering Work and Leave Time Reports.*) In addition, you should periodically review Banner payroll reports (NWRsABR report) to compare budget to actual pay information.
7. **State Employee Whistleblower Protection Act:** This law encourages state employees to report improper governmental actions to the State Auditor’s Office. The State Auditor’s Office investigates the allegations and maintains confidentiality of the complainant. The law protects the complainant and others that participate in the investigation against retaliation or reprisal. (*A university policy is currently being drafted.*)
8. **Reporting Known or Suspected Loss of Funds or Property or Other Illegal Activities:** – All Washington State governmental agencies are required to immediately report to the State Auditor’s Office all known or suspected loss of funds or other illegal activities, including known or suspected violations of the Ethics Law. University employees must not enter into repayment agreements with employees if there is known or suspected loss or other illegal activities and pertinent records must be protected from destruction. (*University Policy and Procedure – U5950.19 Reporting Loss of University Funds or Property.*)
9. **Confidentiality of Information:** The university maintains many records, both paper and electronic, that must be retained confidentially to comply with a variety of regulations. As a supervisor, it is important to know what sensitive data is maintained by your department and understand the security needed for each type of data. Staff should be trained on the appropriate way to secure confidential information and receive periodic reminders.
10. **Fiscal & Management Functions:** In addition to the topics listed above, the university’s many policies, procedures, manuals and catalogue outline expectations, including but not limited to: billing and collecting students and the public; appropriate purchasing procedures; separating incompatible duties; periodic monitoring of Banner financial information; responsible computing; appropriate human resources and equal opportunity programs; and student and faculty conduct. Don’t be satisfied with “The way we have always done things.” Especially in tough budget times, it is important to review your processes for inefficiency and duplication of efforts. The university’s policy and procedure web site is at <http://www.wvu.edu/policies/index.shtml>.

Please call the Office of the Internal Auditor if you have any questions or visit our website at <http://www.wvu.edu/depts/internalaudit/> for additional information and resources.

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