

The Audit Insight



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Don't Forget to Disclose

This is a friendly reminder to complete your annual COI disclosure within the assigned 30-day window.

In accordance with CWUP 2-40-065 Conflict of Interest – All Employees, the University requires all employees to annually disclose any personal or business interests and relationships that reasonably could give rise to a perceived, potential, or real conflict of interest. The COI disclosure is accomplished through an electronic process called Osprey Compliance Software, which is administered by Internal Audit.

On January 3, 2024, you received an email from “Compliance@cwu.edu” containing a link for you to answer a few questions about any conflicts you may have.

If you haven't completed your disclosure, look for the weekly email reminder with a link in your Outlook inbox OR you can click on this direct link to complete your form:

<https://cwu.coiriskmanager.com>

This reminder is intended to assist all employees to be compliant with the University's policies and procedures. Hence, all University employees can do their part to help CWU achieve this goal. If you have any questions or concerns regarding the disclosure process, please contact Jesús Baldovinos, Internal Audit Manager.

NEW Conflict of Interest 2nd Edition Training Video!

Knowing what to disclose on your annual Conflict of Interest Disclosure can be confusing. To help combat this common issue, we made a 2nd Edition training video to explain how to recuse yourself from a situation when a conflict of interest arises. In our video, we cover a common example and provide examples of other types of conflict of interest, as well as explain why disclosing these conflicts are important to the integrity of our University. Have a look at Conflict of Interest 2nd Edition Training Video!

Computing Assets Inventory Reconciliation

Information Services – Computer Support Services and CWU Internal Audit are working together to reconcile computing assets in the Finance and Administration Division. Student employees from Computer Support Services will be scheduling visits to your respective department to physically identify CWU computing assets. They will be utilizing computing asset reports originating from our official inventory database for reconciliation.

Our students will be identifying:

1. The property tag number of all computing devices in your possession.
2. A computer use designation for each computing device, i.e., primary, secondary, shared device, or display computer.
3. Custodian's and user's name for computer asset.
4. Building name and room location.
5. Department ID.
6. Department Name

It has been several years since any official computing asset reconciliation has taken place. The information gathered will be used to update the asset database and institute practices that will allow us to maintain a more dynamic asset inventory.

We will be asking for your help during this important project. Please take note of computing inventory you are currently using and be prepared to report this information to our student employees when they physically arrive at your location.



How are Audits Selected?

Audits are selected by utilizing a risk assessment process. There are several factors affecting the activities, departments, functions, or units selected to be audited. Internal audit assesses the risk or exposure to loss that any given activity, department, function, or unit represents to the University. This assessment is also used to determine the order in which they are selected. Additionally, audit requests may originate from internal sources or external sources, such as our external auditors. All organizations directly or indirectly managed by the University can be subject to review by the Department of Internal Audit.



Getting Ahead of the Curve

Knowing what you need to disclose on your Conflict of Interest Disclosure can be confusing. Luckily, we have compiled a few common examples to refer to when you are completing your COI Disclosure form.

Conflict of interest examples

The following provide some examples of situations where a conflict of interest may, or may not, arise or exist, and what to do for disclosure:

Personal relationships between employees and students

Situation: I am an employee of CWU and my daughter is both a CWU student and a student employee.

Answer: This situation has the potential to create a conflict.

Example of how to mitigate and manage this situation:

- 1) I do not participate in decisions involving a direct benefit to my daughter.
- 2) In my role I do interact with departments university wide; however, a department head is always involved and day to day operations are closely monitored by my supervisor.

Financial conflicts of interest

Situation: My wife and I have a rental property.

Answer: This situation has the potential to create a conflict if tenant is affiliated with CWU.

Example of how to mitigate and manage this situation:

- 1) We use a property rental company to manage our rental.
- 2) We have no direct contact with tenants as all services and communication goes through the property manager.

Check out our past trainings!

- Unsure what to do when you receive an audit recommendation? No worries, the [How to Respond to Audit Recommendations training video](#) provides tips on what to do and what to avoid when writing a solid response.
- Take a look at our [Conflict of interest training video](#) to learn what constitutes a conflict of interest, how to avoid them, and how to proceed if employees recognize one.
- Check out our [Giving and Receiving Gifts training video](#) and learn both the basics and the finer points of how to better understand giving and receiving gifts in a work setting.
- Make sure to have a look at our [Travel and entertainment training video](#) to get a better understanding of travelling in a work setting and reducing potential risks.
- Need help deciding on what to do when something doesn't feel right? The [reporting misconduct](#) training video has you covered!
- The [Avoiding retaliation training video](#) covers various resources and strategies to minimize and eliminate retaliation in the workplace.

Challenge Question

True or False - Consider the following scenario:

Situation: I am an employee of CWU and my daughter is both a CWU student and a student employee.

Does this situation have the potential to create conflict?

- a. True
- b. False

Send responses to Jesús Baldovinos at jesus.baldovinos@cwu.edu by Thursday, February 29th, 2024. Correct responses will be entered into a drawing for a \$15 Wildcat Shop gift card.

CWU SPEAK UP

Internal Audit Hotline

www.cwu.edu/internal-audit/hotline

The Hotline is intended for faculty, staff, students and others to report suspected fraud or irregular activities such as improper transactions, suspected thefts, losses, misuse, or inappropriate action involving public funds, equipment, supplies, or other assets. To report a violation, click [Hotline](#).

Key characteristics of the internal audit hotline:

- Online reporting at cwu.edu/internal-audit/hotline
- Discrete and confidential treatment of concerns to the extent possible under applicable laws.
- Employees may provide their names and contact information or may choose to remain anonymous.

Issues you may want to report through the internal audit hotline:

- Fraud/theft
- Conflict of interest
- Waste and/or misuse of university resources
- Financial policy violations
- Operational policy violations
- Other regulatory violations

Any employee who brings an issue to the university's attention through the Hotline should be aware that university policy prohibits retaliation against employees who in good faith report apparent violations.



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