



THE GEORGE
WASHINGTON
UNIVERSITY
WASHINGTON DC

Responsible University Official:
Assistant Vice President for University
Compliance and Privacy
Responsible Office: Compliance and
Privacy
Origination Date: October 1, 2004

AUDIT NOTIFICATION POLICY

Policy Statement

No information should be provided to anyone claiming to be an auditor who has not established a working relationship with the department to be audited or from whom information is requested until the auditor’s authority to review the records has been properly confirmed by the Compliance and Privacy Office. Any notifications of audits of University records must be immediately forwarded to the Compliance and Privacy Office.

Reason for Policy/Purpose

To confirm the identity of persons claiming to be auditors and the propriety of any audit requests, and to protect confidential information.

Who Needs to Know This Policy

Faculty and staff

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Policy/Procedures

Through the normal course of business, the University generates and collects a significant amount of confidential information about current and former faculty, staff, students, and patients, as well as about University operations. The purposes of this policy are to promote safeguarding of, and controlling access to, confidential information; to prevent inadvertent disclosure of confidential information; and to protect the privacy of individuals and the integrity and reputation of the University. The primary purpose of this policy is to make sure that the University does not inadvertently disclose confidential information.

Access to and disclosure of confidential information held by the University must be allowable, appropriate, necessary, and for a clearly defined purpose. No information may be provided to any person claiming to be an auditor who has not established a working relationship with the department to be audited or from whom information is requested until the auditor's authority has been properly confirmed by the Compliance and Privacy Office.

The Compliance and Privacy Office will identify all internal and external auditors who request to review information, and will verify the propriety and scope of the proposed audit.

Auditors who have not previously established a working relationship will be introduced to the manager(s) of the department(s) that are to be audited or from whom information is being requested. Introductions may be done either by phone or in person by a member of the Compliance and Privacy Office. Where possible, the purpose and scope of the audit and the nature of the information requested will be discussed.

When appropriate, the Compliance and Privacy Office will notify and work with the Office of the Senior Vice President and General Counsel and/or the Office of the Comptroller.

The Compliance and Privacy Office must be notified when any auditor (whether internal or external) arrives unannounced. Once the propriety of the audit is confirmed, the department should make every effort to provide the requested information.

Website Addresses for This Policy

[GW University Policies](#)

AUDIT NOTIFICATION POLICY

Contacts

Subject	Contact	Telephone	Email
Audits	Compliance and Privacy Office	(202) 994-3386	Comply@gwu.edu

Definitions

Auditors	Individuals who request to review and/or audit University records. Auditors include, but are not limited to: Auditors that are University employees or agents (such as PriceWaterhouseCoopers, and Beers & Cutler); as well as auditors that are not University employees or agents (such as District of Columbia auditors, sales tax auditors, or federal agencies.)
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Related Information

[Privacy of Student Records \(FERPA\) Policy](#)
[The George Washington University Privacy Policy](#)
[Health Information Privacy \(HIPAA\) Policy](#)
[Data Classification Security Policy](#)

Who Approved This Policy

Louis H. Katz, Executive Vice President and Treasurer
Beth Nolan, Senior Vice President and General Counsel

History/Revision Dates

Origination Date:	October 1, 2004
Last Amended Date:	October 10, 2008
Next Review Date:	August 1, 2010