



**THE GEORGE  
WASHINGTON  
UNIVERSITY**  
WASHINGTON, DC

**Responsible University Official:**  
Compliance Officer  
**Responsible Office:** Compliance Office  
**Last Revised Date:** March 6, 2008

## **REPORTING FINANCIAL IRREGULARITIES**

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### **Policy Statement**

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All members of the George Washington University community have a responsibility to report known or suspected financial irregularities to the university's Compliance Office.

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### **Reason for Policy**

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The university must safeguard its financial assets from theft and misappropriation. Known or suspected financial irregularities must be immediately identified, reported and investigated in order to reduce the university's risk of financial losses and negative publicity.

Financial irregularities and misappropriations of funds may result in criminal charges being brought against the responsible individual(s). If external funds are involved, the university may be responsible for the repayment of funds as well as any fines and penalties associated with the illegal activity.

This policy establishes a central collection point for reporting all known or suspected financial irregularities so that financial and system controls can be thoroughly and consistently reviewed, evaluated and modified in order to prevent similar irregularities in the future.

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### **Who is Governed by this Policy**

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Faculty, staff and students

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## Policy

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### Reporting and Investigating a Financial Irregularity

When an instance of suspected or documented Financial Irregularity is uncovered by any member of the university community, it must be immediately reported to the appropriate department head who will then notify the university’s Compliance Office. Alternatively, the person who uncovers the alleged irregularity may choose to report their suspicions directly to the university’s Compliance Office (202-994-3386, [comply@gwu.edu](mailto:comply@gwu.edu)) or use the [University’s Regulatory Compliance Help and Referral Line](#) (1-888-508-5275, 24 hours a day, toll free, anonymous). The individual reporting the suspicious activity and/or department head must take no action to resolve the irregularity before consulting the Compliance Office. The Compliance Office will notify the appropriate individuals who will undertake the investigation.

The university investigates all allegations; the manner and process is dependent on the nature and subject of the allegation. Reports and investigations of Financial Irregularities are handled in a confidential manner until a determination is made on the university’s course of action. After this determination, the university reserves the right to make disclosures as necessary. Only the university’s Office of the Senior Vice President and General Counsel may determine that a matter is to be referred to a law enforcement agency.

The Senior Associate Vice President and Chief Compliance Officer will determine that each matter is being adequately investigated and resolved. If there is

sufficient evidence of wrongdoing, the Senior Associate Vice President and Chief Compliance Officer will communicate the findings internally to the Executive Vice President & Treasurer, the Senior Vice President and General Counsel and the Finance and Audit Committee of the Board of Trustees.

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## Definitions

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**Financial Irregularity:** An intentional misstatement or omission of information related to financial transactions. Includes embezzlement, fraud, misuse of university assets, misappropriations of assets, falsification of records or noncompliance with laws or regulations.

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## Related Information

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[Conflict of Interest Policy for Non-Faculty Employees](#)

[Financial Management Responsibility Policy](#)

[Non-Retaliation Policy](#)

[Personal Purchases Policy](#)

[Policy on Conflicts of Interest and Commitment for Faculty and Investigators](#)

[The George Washington University Statement of Ethical Principles](#)

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## Contacts

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Contact	Telephone	Email
Compliance Office	202-994-3386	<a href="mailto:comply@gwu.edu">comply@gwu.edu</a>

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## Document History

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- **Last Reviewed Date:** May 10, 2018
- **Last Revised Date:** March 6, 2008
- **Policy Origination Date:** February 4, 2004

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## Who Approved This Policy

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Board of Trustees, Committee on Finance and Audit

Louis H. Katz, Executive Vice President and Treasurer

Beth Nolan, Senior Vice President and General Counsel

*This policy, as well as all [university policies](#), are located on the [Compliance Office website](#).*