



TEXAS TECH UNIVERSITY™

Operating Policy and Procedure

OP 10.14: Reporting Suspected Wrongdoing

DATE: March 9, 2020

PURPOSE: Texas Tech University is committed to ensuring compliance with all applicable laws, rules, regulations, policies, and procedures. This Operating Policy/Procedure (OP) sets forth the procedures for employees to safely and appropriately report allegations of wrongdoing.

REVIEW: This OP will be reviewed in March of even-numbered years by the Texas Tech University System Chief Audit Executive, the Texas Tech University Associate Vice President for Financial and Business Services, the Vice President for Administration & Finance and Chief Financial Officer, and the Vice Chancellor and General Counsel with substantive revisions forwarded to the President.

POLICY/PROCEDURE

Texas Tech University is committed to including its employees in the process of ensuring that the Texas Tech University System operates in an ethical, honest, and lawful manner. It is, therefore, the policy of Texas Tech University to require employees to report, or cause to be reported, and to cooperate in any investigation by persons authorized or responsible for such matters, known or suspected violations of laws, rules, policies, or regulations, or improper activities.

Reporting and Investigating Allegations of Wrongdoing:

1. Each administrator is responsible for the adequacy of financial and other internal controls within her/his area of responsibility. This responsibility requires acting prudently and inquisitively while being aware of activities and locations where wrongdoing is likely to occur. Administrators should report incidents of wrongdoing through appropriate administrative channels in accordance with Texas Tech University policies. Supervisors and administrators may direct questions regarding the appropriate manner in which to address concerns regarding employee wrongdoing to the Office of Human Resources, the Texas Tech Police Department, or the Office of Audit Services.
2. Employees are to report allegations of wrongdoing of any kind, including allegations of illegal or fraudulent activity, violations of the university's ethics policy or policy relating to employee conduct, financial misstatements or accounting irregularities, audit matters, or violations of other laws, rules, or regulations to the individual's immediate supervisor, through other appropriate administrative or law enforcement processes and procedures defined by Texas Tech University policy, or through the Texas Tech Fraud and Misconduct Hotline.
3. Employees are encouraged to address allegations of wrongdoing through the university's normal administrative channels. However, if an employee is not comfortable reporting the situation through traditional administrative channels or desires to maintain anonymity in reporting, the

individual should report the situation to the Texas Tech Fraud and Misconduct Hotline online at www.ethicspoint.com or by the toll-free telephone number, 866.294.9352. Alternatively, reports can also be made using the Texas State Auditor's Office Fraud Hotline at the toll-free telephone number, 800.TX.Audit (800.832.8328), via an online report form at <https://sao.fraud.state.tx.us/Hotline.aspx>, or by mail at:

State Auditor's Office
ATTN: SIU
P.O. Box 12067
Austin, TX 78711-2067

Reporters may also report suspected criminal wrongdoing to an appropriate law enforcement authority.

4. The Texas Tech Fraud and Misconduct Hotline is operated 24 hours per day, 365 days per year. Reports will be handled by a trained professional. If the report is made through the toll-free number, the operator will ask the reporter various questions that will assist the university in addressing the matter. Individuals can maintain anonymity in reporting allegations of suspected wrongdoing; however, certain reports may not be actionable, or action by the university may be limited, without disclosure of the reporter's identity.
5. Although any type of report can be made through the hotline, it is not intended for handling allegations of sexual harassment; discrimination; faculty or staff grievances, such as complaints concerning working conditions, performance evaluations, hours of work, wages, or merit raises; matters relating to tenure and promotion of faculty; student matters; or allegations of misconduct in research. For these types of complaints, the individual should talk with her/his supervisor or address the matter through other appropriate administrative processes and procedures as defined by Texas Tech University policy.
6. Employees shall be truthful in the reporting of allegations of wrongdoing and are expected to be cooperative in assisting in any investigation of an allegation of wrongdoing. Although cooperation in any investigation is expected, making a report does not entitle an employee to be involved in an investigation nor to be advised of the status or disposition of a matter.
7. No disciplinary or retaliatory action shall be taken against any Texas Tech University employee who, in good faith, reports or causes to be reported suspected wrongdoing or who assists in an authorized investigation of alleged wrongdoing. The prohibition against disciplinary action does not extend to disciplinary action for self-reported violations.
8. All reports will be investigated and addressed, as appropriate, by the proper administrative departments and/or offices.