

**I. POLICY and SCOPE**

The College at Old Westbury, as part of the State University of New York (SUNY) system, is committed to upholding the highest standard of honest behavior, ethical conduct, and fiduciary responsibility with respect to SUNY funds, resources, and property. As such, the College seeks to prevent and detect any fraud or irregularities and will diligently pursue any instance that involves SUNY-related activities or business.

These procedures apply to any fraud and irregularities involving SUNY employees, officers or trustees, vendors, consultants, contractors, funding sources, or any other parties with a relationship to the College, SUNY, the Auxiliary Services Corporation, Alumni Association, Student Government Association, the Old Westbury College Foundation, and other campus-related entities.

**II. PROCEDURES**

**A. GENERAL**

The College has adopted in entirety, SUNY's policies and procedures regarding reporting and reviewing suspected or detected fraud and irregularities. Fraud and irregularities include activities that are (1) a misappropriation of assets; (2) in violation of or non-compliant with any SUNY, New York State, or federal law, regulation, policy or procedure; (3) economically wasteful; (4) an indication of gross misconduct or incompetency; or (5) an unethical, improper, or dishonest act.

All members of the College Community are required to:

- comply with all SUNY, New York State, and federal laws, regulations, policies and procedures;
- practice honesty and integrity in fulfilling their responsibilities;
- observe high standards of business and personal ethics in the conduct of their duties and responsibilities;
- help ensure the prevention and detection of fraud and irregularities;
- be familiar with the types of fraud and irregularities that might occur in their area;
- be alert for any indication that fraud or irregularities might exist in their area; and
- promptly report any known or suspected fraud or irregularities involving SUNY or affiliated entity funds, resources, property, or employees.

All complaints will be reviewed objectively and without regard to the suspected individual's length of service, position, title, or relationship with SUNY. Employees and individuals who lawfully report suspected fraud, waste, or abuse shall not suffer discharge, demotion, suspension, threats, harassment, discrimination, or other forms of retaliation for making such reports.

**B. REPORTING DETECTED OR SUSPECTED FRAUD AND IRREGULARITIES**

Individual Reporting Process: All members of the College community are expected to report any known or suspected fraud or irregularities. Generally, an individual may discuss the concern directly with a supervisor; however, if the individual is not comfortable speaking with the supervisor, the individual is not satisfied with the supervisor's response, or the individual does not have a supervisor (such as a trustee or student), the individual may report the concern to the campus' designated officer, any campus fraud hotline, or SUNY's System Administration fraud hotline. Individuals who want to report suspected fraud or irregularities directly to SUNY System Administration may utilize the fraud hotline maintained by the Office of the University Auditor.

These individuals may report in the following ways:

**Old Westbury Designated Officer:**

Contact: William P. Kimmins  
Assistant to the President for Administration  
Email: [kimminsw@oldwestbury.edu](mailto:kimminsw@oldwestbury.edu)  
Fax: (518) 876-3209

**SUNY Designated Points of Contact:**

Website: <http://system.suny.edu/universityauditor/report-fraud/>  
Email: [university.audit@suny.edu](mailto:university.audit@suny.edu)  
Fax: (518) 320-1564  
Voice mail: (518) 320-1539  
Mail: University Auditor, State University Plaza, Albany, NY 12246

Individuals have the option of either providing contact information or reporting the information anonymously. While not required, providing contact information will enable the reviewer to contact the individual to clarify the information being provided. At a minimum, individuals should provide key information such as a description of the incident; individual(s) involved; and financial loss, if any. When requested, the College and SUNY will make every effort to handle all information received confidentially, to the extent permitted by law. Consistent with New York State laws, employees or other persons who lawfully report suspected improprieties shall not suffer discharge, demotion, suspension, threats, harassment, discrimination, or other retaliation as a result of making such report.

**C. CAMPUS REPORTING PROCESS**

The College is required to forward a report to the Office of the University Auditor when sufficient facts and circumstances exist to create a reasonable suspicion that a fraud or irregularity has occurred, or where a review of the incident has commenced. The report should include key information such as a description of the incident; individual(s) involved; financial loss, if any; and applicable rules, regulations, and procedures (see Form A – Fraud Incident Report). The Campus must also report to the Office of the University Auditor any contact from the New York State Attorney General, the Inspector General, or any other outside agency regarding any investigation. Pending SUNY’s Fraud Committee’s review of the matter, the College should work with Campus counsel and the Office of the University Auditor to determine appropriate action.

**III. LINKS TO ADDITIONAL RESOURCES**

- A. **Fraud Incident Report - Form A** <http://system.suny.edu/media/suny/content-assets/documents/compliance/Form-Reporting-Suspected-Fraud-FORM-A.docx>
- B. **Fraud Hotline** <http://system.suny.edu/compliance/fraud-reporting/suny-fraud-hotline/>
- C. **SUNY Fraud Policies and Procedures:**
  - 1. [Fraud and Irregularities, Policy on Fraud and Irregularities - Document Number: 9002](#)
  - 2. [Fraud and Irregularities, Procedure on Reporting and Reviewing Fraud and Irregularities Document Number: 9001.](#)