

OFFICE OF THE STATE INSPECTOR GENERAL



STATE FRAUD, WASTE, AND ABUSE HOTLINE *POLICIES AND PROCEDURES MANUAL*



Foreword

The State Employee Fraud, Waste, and Abuse Hotline began operating in October 1992 and has investigated over 14,000 cases. On October 9, 2012, through [Executive Order Number 52](#), the State Employee Fraud, Waste, and Abuse Hotline was expanded to all Commonwealth of Virginia citizens, not just state employees, and its name was changed to the State Fraud, Waste, and Abuse Hotline. This 2014 edition of the *State Fraud, Waste, and Abuse Hotline Policies and Procedures Manual (Manual)* reflects revisions consistent with [Executive Order Number 52](#).

The *Manual* was created to assist those involved in a State Fraud, Waste, and Abuse Hotline investigation (e.g., internal auditors, Hotline coordinators, agency heads) with meeting their responsibilities. It also provides guidelines for consistency in the management and performance of State Fraud, Waste, and Abuse Hotline investigations among state agencies.

The *Manual* functions as a living document and is subject to change as necessary. We encourage feedback and suggestions for improvement from *Manual* users and further ask those who conduct State Fraud, Waste, and Abuse Hotline investigations to inform the Office of the State Inspector General regarding effective and beneficial investigative techniques or approaches, so the information may be shared with others.

Please direct your suggestions and comments to:

State Fraud, Waste, and Abuse Hotline
State Fraud, Waste, and Abuse Hotline Manager

☎ 804-625-3269

✉ COVHotline@osig.virginia.gov

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OFFICE OF THE STATE INSPECTOR GENERAL State Fraud, Waste, and Abuse Hotline Policies and Procedures Manual	TOPIC NO. 1000
Topic: State Fraud, Waste, and Abuse Hotline—Overview	Date: September 15, 2014

1000: State Fraud, Waste, and Abuse Hotline—Overview

History

In 1990, the Commission on Efficiency in Government recommended the establishment of a State Employee Fraud, Waste, and Abuse Hotline. The 1992 General Assembly introduced a House Bill to establish a statewide, toll-free hotline for state employees to report instances of fraud, waste, or abuse in state government, which did not pass. However, the Governor authorized implementation of the State Employee Fraud, Waste, and Abuse Hotline by issuing an Executive Order. This placed the State Employee Fraud, Waste, and Abuse Hotline under the Governor's authority. The Division of State Internal Audit ([DSIA](#)), formerly a division of the Department of Accounts ([DOA](#)), implemented the State Employee Fraud, Waste, and Abuse Hotline on October 1, 1992.

Office of the State Inspector General and the Hotline

As of July 2012, under [Executive Order No. 52](#), the Office of the State Inspector General ([OSIG](#)) was designated to oversee the State Fraud, Waste, and Abuse Hotline (Hotline), which serves all Commonwealth of Virginia (Commonwealth) citizens. OSIG administers the Hotline program with the assistance of statewide agency and institution Internal Audit Programs ([IAP](#)). The agency Internal Audit Director ([IAD](#)) and agency Hotline Coordinator ([HC](#)) are responsible for conducting Hotline investigations. Agencies may not restrict, limit, interfere with, or impede the conduct of Hotline investigations.

Objectives

The Hotline's major objectives include providing a confidential method for Commonwealth citizens to report suspected occurrences of fraud, waste, and abuse in state agencies and institutions; investigating such occurrences to determine their validity; and, if valid, making appropriate recommendations to eliminate these occurrences.

Toll-Free, Anonymous Number

The Hotline's non-traceable, toll-free number (800-723-1615) protects the confidentiality of the caller, making the Hotline completely anonymous. Under no circumstances should anyone attempt to identify any person who contacts the Hotline. If a caller is identified or suspected, there will not be retribution or retaliation taken against the caller.

Cases

For agencies that have IAPs, OSIG typically assigns Hotline cases to the agency IAD. When an agency does not have an IAP, the head of the agency must designate a qualified individual within the agency to serve as the agency HC.

The OSIG will manage Hotline cases under certain circumstances, as later defined in [“What Hotline cases does OSIG investigate?”](#)

Responsibilities

- Ensure timely investigations and resolutions are undertaken in response to allegations received through the Hotline.
- Determine an allegation's authenticity.
- Work with agency IAPs and HCs to investigate and resolve reported allegations in the most cost-efficient manner.
- Ensure appropriate recommendations are made to rectify any substantiated situations of fraud, waste, or abuse.
- Review investigative work to assure quality and thoroughness and to provide suggestions for improvement with future investigations.
- Provide training to investigators upon request.

What Hotline cases does OSIG investigate?

- All Hotline investigations involving improprieties allegedly committed by executive branch agency heads, appointed officials, and internal auditors. In situations where an agency has an HC, OSIG may assist the HC or conduct the investigation independently.
- All Hotline investigations involving agencies that do not have an IAD or an HC.
- The OSIG may participate in an agency's Hotline investigation if the nature of the allegation warrants it, or if the agency head or IAD requests the OSIG's participation.
- Any investigations the OSIG deems appropriate, necessary, and within the OSIG's statutory scope.
- If the OSIG receives a complaint from any source that alleges fraud, waste, abuse, or corruption by a public institution of higher education or any of its officers or employees, the OSIG shall refer the complaint to the IAP of the public institution of higher education for investigation unless the complaint concerns the president of the institution or its IAP, in which case the investigation shall be conducted by OSIG.

Authority—Authority for the State Fraud, Waste, and Abuse Hotline is derived from Governor's Executive Order No. 52 (2012)

Commonwealth of Virginia

Office of the Governor

Executive Order No. 52 (2012)

State Fraud, Waste, and Abuse Hotline

Importance of the Initiative

Efficiency and economy in government and wise stewardship of taxpayer dollars demand constant vigilance to prevent fraud, waste, and abuse in the operation of state government. The State Fraud, Waste, and Abuse Hotline (formerly known as the State Employee Fraud, Waste, and Abuse Hotline) was previously available only to state employees. Because of its usefulness in helping to ensure efficiency in state government, the hotline will now be expanded and available to all citizens of the Commonwealth. By virtue of the authority vested in me as Governor under Article V of the Constitution of Virginia and under the laws of the Commonwealth, including but not limited to Chapter 1 of Title 2.2 of the *Code of Virginia*, and subject to my continuing and ultimate authority and responsibility to act in such matters, I hereby direct the State Inspector General to continue the anonymous State Fraud, Waste, and Abuse Hotline (hereinafter referred to as the "Hotline") to encourage the state's employees and its citizens to report situations where fraud, waste, or abuse

may be occurring in Virginia's executive branch agencies and institutions, including institutions of higher education.

All citizens of the Commonwealth, including state employees, now have the opportunity to report possible instances of fraud, waste, or abuse anonymously and without fear of retribution by using the Hotline. The State Inspector General shall be responsible for administering the Hotline. Through the Hotline, the State Inspector General shall:

- Provide assistance to executive branch agency heads in fulfilling their responsibilities for maintaining appropriate internal controls to protect against fraud, waste, and abuse.
- Make available to state employees and all citizens of the Commonwealth a variety of means to report fraud, waste, and abuse in the Commonwealth's government business, one of which will be an anonymous toll-free telephone number, and also including, but not limited to, any other be an anonymous toll-free telephone number, and also including, but not limited to, any other communications through the Governor's office, Cabinet Secretaries, agency heads, USPS, fax, and the Internet.
- Make appropriate efforts to publicize the availability of the hotline and ways of accessing it.
- Implement a process for handling allegations of fraud, waste, and abuse received via the Hotline.
- Deliver ongoing training to State agency heads and managers on prevention of waste, fraud, and abuse.
- Ensure that instances of potential criminal conduct are referred forthwith to the appropriate law enforcement agency.

The State Inspector General shall e-mail all State employees at least annually to advise them of the Hotline and other means of reporting such problems.

The State Inspector General, through the executive branch's network of internal auditing programs and agency fraud, waste, and abuse coordinators, shall ensure that investigation and resolution activities are undertaken in response to allegations received through the Hotline.

The State Inspector General may allow an internal auditing program at an executive branch agency to contract with a private firm in order to perform the investigations in a timely manner. Any such private firm shall comply with the applicable policies and procedures and the work must be supervised and approved by the contracting internal auditing program.

The State Inspector General shall undertake investigation and resolution activities in the most cost-effective manner possible. Responsibility for investigation or resolution activities shall be assigned to other investigative staffs when appropriate to avoid unnecessary duplication. executive branch agencies responsible for promulgating central administrative (e.g., personnel) policies will provide input on the interpretation of the policies applicable to investigations in order to ensure consistent and proper application of those policies so that appropriate conclusions are reached and recommendations made.

The State Inspector General shall review the reported corrective actions taken to rectify an actual fraud, waste, or abuse identified. If corrective actions are deemed insufficient, then the State Inspector General will conduct such follow-up as may be necessary to ensure that acceptable corrective actions are developed.

The State Inspector General shall conduct follow-up reviews to ensure that corrective action has been implemented. The results of such reviews shall be reported to the Governor's Chief of Staff and to the relevant cabinet secretary.

All executive branch agencies of the Commonwealth shall cooperate with and assist the State Inspector General and all investigators to the fullest extent. During the course of a Hotline investigation, investigators will have access to electronic and paper files, records, and documents, as well as personnel, facilities, property, and any other things necessary to conduct an investigation (*Code of Virginia* §2.2-310). This includes access to electronic and paper files maintained by the Virginia Information Technologies Agency (VITA) for other executive branch agencies as well as access to administrative investigative reports generated by an agency's in-house investigative unit that are germane to the hotline investigations.

Under no circumstances shall anyone directly or indirectly interfere with a Hotline investigation, or induce or coerce others not to cooperate with investigators. Any attempt to directly or indirectly interfere with a Hotline investigation is also prohibited and is subject to appropriate disciplinary action under the Standards of Conduct promulgated by the Department of Human Resource Management.

Under no circumstances shall anyone, directly or indirectly, attempt to identify or retaliate against someone suspected of calling or cooperating with the Hotline. This includes threatening to effect any reprisal; or taking, or directing others to take, or recommending, processing, or approving, any personnel action, or any other retaliatory actions, or attempts to do the same. Any such actions will be subject to appropriate disciplinary actions under the Standards of Conduct.

The Governor's Chief of Staff shall be responsible for addressing any instances of alleged interference with an investigation or retaliation against employees using the Hotline.

This Executive Order rescinds Executive Order Number Fifteen (2010), State Employee Fraud, Waste, and Abuse Hotline.

Effective Date of the Executive Order

This Executive Order shall be effective upon its signing and shall remain in full force and effect unless sooner amended or rescinded by further executive order.

Given under my hand and under the Seal of the Commonwealth of Virginia this 9th day of October 2012.

/s/ Robert F. McDonnell, Governor

Attest:

/s/ Secretary of the Commonwealth

HC	Hotline Coordinator—Conducts Hotline investigations assigned to the agency
IAD	Internal Audit Director—Head of the agency’s IAP
IAP	Internal Audit Program—Independent and objective evaluation and review to improve an organization’s function and risk management.
JLARC	Joint Legislative Audit and Review Commission
MFCU	Medicaid Fraud Control Unit
OAG	Office of the Attorney General
OEES	Office of Equal Employment Services
OFMS	Office of Fleet Management Services
OSIG	Office of the State Inspector General
SNAP	Supplemental Nutrition Assistance Program
TANF	Temporary Assistance for Needy Families
USPS	United States Postal Service—Preferred delivery method for documents mailed to the Hotline
VDACS	Virginia Department of Agriculture and Consumer Services
VDEM	Virginia Department of Emergency Management
VDH	Virginia Department of Health
VDOT	Virginia Department of Transportation
VEC	Virginia Employment Commission
VITA	Virginia Information Technologies Agency
VRS	Virginia Retirement System
VSDP	Virginia Sickness & Disability Program
VSP	Virginia State Police
WIC	Women, Infants and Children

Guide to State Policies, Laws, and Regulations

Reference Matrix

Some frequently used state policies, laws, and regulations are listed below. This matrix is provided for quick reference use only and does not include all applicable state codes, policies, and regulations. Hotline investigators should refer to the regulations below for additional information and must also consider internal policies and procedures.

Topic	Reference	Summary
Hours of work	<i>Department of Human Resources Management Policies and Procedures Manual</i> Policy Number: 1.25 - Hours of Work	<ul style="list-style-type: none"> • Work schedules • Alternate work schedules • Overtime hours • Lunch periods • Breaks

Topic	Reference	Summary
Compensatory leave—exempt employees	<i>Department of Human Resources Management Policies and Procedures Manual</i> Policy Number: 3.10 - Compensatory Leave	<ul style="list-style-type: none"> • Additional work hours for an exempt employee must be specifically authorized in advance by the agency head, or his/her designee. • Additional work hours are intended only to relieve specific peak workload needs and shall not be authorized to provide for continuous workload requirements. • Additional work hours do not include extra hours that an exempt employee independently determines are necessary to carry out his/her job responsibilities.
Outside employment	<i>Department of Human Resources Management Policies and Procedures Manual</i> Policy Number: 1.60 - Standards of Conduct	<ul style="list-style-type: none"> • Employees obtain approval from supervisor prior to accepting outside employment. • Employees complete a telework agreement that is kept on file in the agency.
Phone policy	<ul style="list-style-type: none"> • <i>Commonwealth Accounting Policies and Procedures Manual, Topic No. 20310, Topic: Expenditures</i> • VITA/Contracting vendor. 	<ul style="list-style-type: none"> • The agency head or designee must authorize the acquisition and use of cell phones. • Recurring monthly billings must be received in the agency fiscal office. • The VITA's general phone procedures state that Commonwealth-provided phone services are to be used for conducting official business only, and should not be used for personal or private purposes.
Phone policy	<ul style="list-style-type: none"> • <i>Commonwealth Accounting Policies and Procedures Manual, Topic No. 20310, Topic: Expenditures</i> • VITA/Contracting vendor. 	<ul style="list-style-type: none"> • The agency head or designee must authorize the acquisition and use of cellular phones. • Recurring monthly billings must be received in the agency fiscal office. • The VITA's general phone procedures state that Commonwealth-provided phone services are to be used for conducting official business only, and should not be used for personal or private purposes.
State vehicle	Office of Fleet Management Services (OFMS)	<ul style="list-style-type: none"> • Fleet vehicle use. • Commuting with fleet vehicles. • Enterprise contract vehicles.
Petty cash	<i>Commonwealth Accounting Policies and Procedures Manual, Topic No. 20330, Topic: Petty Cash</i>	<ul style="list-style-type: none"> • Policy. • Restrictions.

Topic	Reference	Summary
State travel policy	<i>Commonwealth Accounting Policies and Procedures Manual</i> , Topic No. 20335 , Topic: State Travel Regulations	<ul style="list-style-type: none"> • Business meals. • Commuting mileage. • Conference procurement. • Disallowed expenses. • Lodging reimbursement rates. • Meals and incidental travel expenses. • Mileage rates. • Overtime meals. • Rental car. • Travel charge cards. • Travel in personal vehicle. • Travel reimbursement requirements.
State travel policy	<i>Commonwealth Accounting Policies and Procedures Manual</i> , Topic No. 20335 , Topic: State Travel Regulations	<ul style="list-style-type: none"> • Business meals. • Commuting mileage. • Conference procurement. • Disallowed expenses. • Lodging reimbursement rates. • Meals and incidental travel expenses. • Mileage rates. • Overtime meals. • Rental car. • Travel charge cards. • Travel in personal vehicle. • Travel reimbursement requirements.
Small purchase charge card	<i>Commonwealth Accounting Policies and Procedures Manual</i> , Topic No. 20355 , Topic: Purchasing Charge Card	<ul style="list-style-type: none"> • Purchasing card security. • General requirements.
Small purchases	Agency Procurement and Surplus Property Manual , Chapter 5, Small Purchases	Department of General Services (DGS)—small purchases
Competitive procurements	Agency Procurement and Surplus Property Manual : <ul style="list-style-type: none"> • Chapter 6, Competitive Sealed Bidding • Chapter 7, Competitive Negotiation 	DGS—competitive procurements
Sole source procurements	Agency Procurement and Surplus Property Manual : Chapter 8, Sole Source Procurement	DGS—sole source procurements

Topic	Reference	Summary
Emergency procurements	Agency Procurement and Surplus Property Manual : Chapter 9, Emergency Procurement	DGS—emergency procurements
Standards of conduct	<i>Department of Human Resources Management Policies and Procedures Manual</i> Policy Number: 1.60 - Standards of Conduct	Standards for professional conduct
Procurement—ethics	<ul style="list-style-type: none"> • Code of Virginia • Ethics in Public Contracting 	<ul style="list-style-type: none"> • Code of Virginia § 2.2-4300 ... All procurement procedures be conducted in a fair and impartial manner with avoidance of any impropriety or appearance of impropriety ... • Code of Virginia § 2.2-4368 ... A procurement transaction means all functions that pertain to the obtaining of any goods, services or construction, including description of requirements, selection and solicitation of sources, preparation and award of contract and all phases of contract administration ... • Code of Virginia § 2.2-4371 ... No public employee having official responsibility for a procurement transaction shall solicit, demand, accept, or agree to accept from a bidder, offeror, contractor or subcontractor any payment, loan, subscription, advance, deposit of money, services or anything of more than nominal or minimal value ...
Procurement	Agency Procurement and Surplus Property Manual : Chapter 3, General Procurement Policies; Section 3.22, Standards of Conduct	State procurement policy requires that ... all state employees having official responsibility for procurement transactions shall conduct business with vendors in a manner above reproach in every respect ...
State and local government Conflict of Interests Act.	Code of Virginia § 2.2-3106 [A], the State and Local Government Conflict of Interests Act.	No officer or employee of any governmental agency shall have a personal interest in a contract with the governmental agency of which he is an officer or employee, other than his own contract of employment.
Hiring	<i>Department of Human Resources Management Policies and Procedures Manual</i> , Policy Number: 2.10 - Hiring	Includes recruitment, screening, and selection.

Topic	Reference	Summary
Compensation	<i>Department of Human Resources Management Policies and Procedures Manual</i> , Policy Number: 3.05 - Compensation	Encompasses all pay practices to include starting pay, temporary pay, role changes, and in-band adjustments.
Expenditures	<i>Commonwealth Accounting Policies and Procedures Manual</i> , Topic No. 20310 , Topic: Expenditures	Expenditures that are not considered to be proper charges against state funds.

References

- The Institute of Internal Auditors, *International Standards for the Professional Practice of Internal Auditing*, Code of Ethics.
- *Guide to Fraud Investigations*, Practitioners Publishing Company, Fort Worth, Texas.
- Governor’s [Executive Order No. 52 \(2012\)](#), The State Fraud, Waste, and Abuse Hotline.
- DOA—*Commonwealth Accounting Policies and Procedures Manual*.
- DGS—*Agency Procurement and Surplus Property Manual*.
- DGS—Office of Fleet Management Services, Rules & Regulations governing the use, operation and maintenance of state-owned fleet vehicles.
- DHRM—*Department of Human Resources Management Policies and Procedures Manual*.

Subject Cross References

- *Code of Virginia*, [§ 30-138](#), state agencies, courts, and local constitutional officers to report certain fraudulent transactions to the Virginia State Police ([VSP](#)) and the Auditor of Public Accounts ([APA](#)).
- *Code of Virginia*, [§ 2.2-3705.3](#), Virginia Freedom of Information Act; exemptions.
- *Code of Virginia*, [§ 2.2-307](#), et seq., Office of the State Inspector General.

Records Retention

Copies of Hotline reports and Hotline working papers are to be maintained by the agency IAD or HC and OSIG for three years after the case is closed. OSIG annually informs IAPs and agency HCs of case files that shall be destroyed. See the Library of Virginia’s [Records Retention and Disposition Schedule, General Schedule No. GS-101](#).

Further Information

Retaliation

Issues involving retaliation for calling the Hotline should be reported to OSIG for investigation. OSIG shall notify the Governor’s Chief of Staff of all investigations involving retaliation and the investigation outcome.

Calls Not Involving Fraud, Waste, or Abuse

Hotline callers with issues involving employee grievances or discrimination complaints are referred to the Office of Employee Dispute Resolution ([EDR](#)) or the Office of Equal Employment Services ([OEES](#)) within

the Department of Human Resources Management ([DHRM](#)). Additional examples of complaints not within the purview of the OSIG include, but are not limited to, allegations against legislative or judicial branch employees, local governments, and private citizens or entities. In such instances, callers are referred to the appropriate state agencies or authorities.

Subject Cross References

- [Executive Order No. 52 \(2012\)](#)
- *Code of Virginia* § 30-138
- *Code of Virginia* § 2.2-3705.3

Publicizing

State employees are informed of the Hotline through annual announcements in a statewide email to executive branch employees, Hotline posters on employee bulletin boards, and periodic messages on Payline or employee payroll check stubs. Citizens have access to information about the Hotline through the OSIG's website: <https://www.osig.virginia.gov>. Opportunities to publicize the Hotline are occasionally offered during television, radio, or press interviews with the State Inspector General or other staff as authorized by the State Inspector General.

OSIG Hotline Manager Contact Information

☎ 804-625-3269

✉ covhotline@osig.virginia.gov (Attn: Hotline Manager)

OFFICE OF THE STATE INSPECTOR GENERAL State Fraud, Waste, and Abuse Hotline Policies and Procedures Manual	TOPIC NOs. 1001.1–1001.3
Topic: Document Security, Inquiries, and Freedom of Information Act Requests	Date: September 15, 2014

1001.1–1001.3: Document Security, Inquiries, and Freedom of Information Act Requests

Policy 1001.1: Confidentiality and Security

Confidentiality

All Hotline investigations and inclusive documents require strict adherence to confidentiality standards.

- Hotline cases should not be discussed except by the IAD, HC, OSIG-authorized personnel, or others included on a “need-to-know” basis.
- Hotline Investigative/Complaint Report sheets shall not be shared, except among individuals conducting the investigation.
- Hotline case numbers are strictly confidential. Case numbers will be transmitted by encrypted message to appropriate Hotline investigators and managers. Further dissemination of Hotline case numbers is prohibited.
- The State Inspector General or designee is authorized to distribute or release Hotline reports.
- All documents, working papers, notes, and reports dealing with an investigation shall be marked “Confidential State Fraud, Waste, and Abuse Hotline Document.”
- Interviews and investigation information should not be shared, discussed, or given to anyone who does not have a legitimate need for access.
- Strict confidentiality must be maintained throughout the entire Hotline investigation.

Physical Security

All Hotline documents must be maintained in a secured environment. All custodians of Hotline documents, such as IADs, HCs, and OSIG staff shall maintain all information supporting Hotline investigations in a secured location. All such information, documentation, etc. is the property of the OSIG and shall be identified as such. The OSIG may request that supporting information and documentation accompany formal reports.

Written Communications

- The OSIG encourages sending written communications regarding Hotline cases in an envelope marked “Confidential,” either sent by United States Postal Service ([USPS](#)) or hand delivered.
- Commonwealth inter-agency mail should never be used to send Hotline information/documents.
- Email and fax communications are permitted under certain circumstances only after prior discussion with the OSIG.
- Hotline reports and other sensitive documents may be transmitted electronically between the OSIG and state agencies that possess digital encryption capabilities.

Policy 1001.2: Answering Hotline Calls for Information

The OSIG uses the following process when responding to phone calls requesting information about Hotline cases.

Hotline Inquiry Call	
Step	Description
1	The OSIG Hotline Investigator answers phone call.
2	Caller asks the OSIG Hotline Investigator about a Hotline case.
3	The OSIG Hotline Investigator asks the caller to provide information about the case to confirm the caller is the original complainant. This should be information that would only be known to the original Hotline caller, such as the case number, the name of the subject, the nature of the allegation, etc.
4	Once the OSIG Hotline Investigator is reasonably certain the caller is the original complainant, the caller is advised of the case's status, either completed or in progress.
5	The OSIG Hotline Investigator cannot provide any further information by phone.
6	If the requestor asks for further information on a closed case, the OSIG Hotline Investigator should inform the caller how to make a request for case information under the Virginia Freedom of Information Act (FOIA).
7	If the caller continues to request information, the OSIG Hotline Investigator should refer the caller to the OSIG Hotline Manager or OSIG Management.

Policy 1001.3: Hotline FOIA Requests

Only the OSIG is authorized to provide requestors information about Hotline cases. All such requests should be referred to the OSIG, and should not be processed by other agencies. The OSIG shall respond to such requests in compliance with the FOIA provisions of *Code of Virginia*, [§ 2.2-3700](#), et seq.

Under the *Code of Virginia* [§ 2.2-3700](#) and [§ 2.2-3705.3](#) (7), the OSIG must disclose the following information on completed Hotline cases:

If allegation is ...	Then OSIG must disclose ...	Therefore the agency/institution report to OSIG must include ...
Substantiated (Corrective action taken against the subject)	<ul style="list-style-type: none"> • Name of agency • Identity of the person(s) who is/are the subject(s) of the complaint • Nature of complaint • Corrective actions taken 	<ul style="list-style-type: none"> • All relevant information in Hotline responses. • Administrative or adverse personnel actions planned, or taken, involving a case, such as grievances, etc.
Unsubstantiated, or unsubstantiated, but has recommendations (No corrective action)	If no corrective action is taken, the identity of the person who is the subject of the complaint may be released only with the subject's consent.	Name, address, and phone number of the subject of the complaint for cases where no corrective action was taken, only if authorized by the subject of the investigation.

Hotline FOIA Handling Process

The OSIG handles FOIA requests received by phone, USPS, fax, or email using the following procedures.

Step	Responsible Party	Actions Taken
1	OSIG Hotline Manager or designee	<ul style="list-style-type: none"> • Receives FOIA request by phone, USPS, email, or fax. • Informs the FOIA requester whether or not the case is closed. • Informs FOIA requester for the request to be fulfilled, a name and a valid Virginia postal address is required.
2	OSIG Hotline Manager and FOIA-Responsible Officer	<ul style="list-style-type: none"> • In coordination with the FOIA-Responsible Officer, reviews and redacts the case report based on whether or not the allegation was substantiated. • The subject's name is redacted in cases where allegations are not substantiated, unless the subject consents to having name released. • Witnesses' names and identifying information are redacted.
3	OSIG Hotline Manager	<ul style="list-style-type: none"> • Prepares and mails, emails, or faxes the FOIA response within five business days unless otherwise agreed to by the requester. • FOIA requests handled in accordance with the <i>Code of Virginia</i> and responses are retained for three years as required by the Library of Virginia's Records Management Policy.

Other Agencies and Hotline FOIA Requests/Inquiries

Agencies should not provide any information to requestors concerning Hotline calls or investigations under any circumstances. Doing so could seriously jeopardize the integrity and the confidential nature of the Hotline.

- If an agency receives a request for information regarding a Hotline investigation, the requestor should be referred to the OSIG.
- Only the OSIG is authorized to provide copies of Hotline investigative reports to fulfill FOIA requests.
- Only the OSIG is authorized to release investigative notes (working papers) from Hotline investigations to those authorized by the *Code of Virginia* [§ 2.2-3705.3](#) (7).

OFFICE OF THE STATE INSPECTOR GENERAL State Fraud, Waste, and Abuse Hotline Policies and Procedures Manual	TOPIC NOs. 1002.1–1002.7
Topic: Call Procedures	Date: September 15, 2014

1002.1-1002.7: Call Procedures

Policy 1002.1: Hotline Investigative/Complaint Reports (Case Write-up Sheets)

An OSIG Hotline Investigator documents Hotline calls on an Investigative/Complaint Report sheet (informally referred to as a “Case Write-up Sheet”).

Step	Description
1	Each OSIG Hotline Investigator is assigned 100 sequential case numbers to attribute to Investigative/Complaint Report sheets (yellow case write-up sheet).
2	The OSIG Hotline Investigator answers a Hotline call and interviews the caller to gather facts and information regarding the allegation.
3	The OSIG Hotline Investigator records the allegations and supporting information on the Hotline Investigative/Complaint Report sheet.
4	<ul style="list-style-type: none"> • The OSIG Hotline Manager evaluates each case by reviewing the case and determining whether it should be assigned for investigation or “screened-out” (1003.1–1003.3: Hotline Call Screening) and forwarded to the agency IAD or HC. • The OSIG management conducts periodic reviews of the screened-out cases and may reassign a screened-out case to be investigated.
5	The OSIG sends the Hotline Investigative/Complaint Report sheet via USPS or encrypted email to the applicable agency IAD or HC for investigation.
6	The agency IAD or HC investigates the allegation(s) reported in the Hotline Investigative/Complaint Report sheet.

Cautions/Warnings

- **Do not provide** copies of Hotline Investigative/Complaint Report sheets to investigation subjects or witnesses.
- The information contained in the Hotline Investigative/Complaint Report sheet can compromise the caller’s identity because:
 - The OSIG Hotline Investigator prepares the Hotline Investigative/Complaint Report sheet verbatim from the caller’s description of the situation. The caller may only be referred to as the Caller or Complainant and the caller’s gender is not revealed for confidentiality.
 - Confidential information is contained in the Hotline Investigative/Complaint Report sheet, such as the names of individuals who witnessed the alleged fraud, waste, or abuse.
 - Other information such, as the time and date of the call, can provide clues to the caller’s identity, which shall not be disclosed.

Confidentiality

The OSIG takes precautions (Policy 1001.1: Confidentiality and Security) to ensure the identities of state employees and citizens who report alleged incidents of fraud, waste, or abuse are protected and remain anonymous.

The Hotline Investigative/Complaint Report sheets are handled by the OSIG under strict levels of confidentiality and are marked “Confidential State Fraud, Waste, and Abuse Hotline Document.” (Policy 1001.1: Confidentiality and Security)

Agency IADs and HCs Hotline Documents/Calls Confidentiality Guidelines

- Agency IADs and HCs are required to follow the OSIG’s confidentiality guidelines (Policy 1001.1: Confidentiality and Security) for Hotline documents in order to maintain the integrity of the Hotline program.
- State IADs and HCs involved in Hotline investigations **should not share** Investigative/Complaint Report sheets with anyone except those individuals who are directly involved in conducting the investigation. IADs and HCs are responsible for ensuring anyone provided this information fully understands the confidentiality requirements and maintains full compliance.
- If for investigative purposes **it is necessary to disclose** the nature of the allegation(s) to the subject, the disclosure should be done by providing the subject with a summary of the allegation(s). Investigators should not provide the subject with any information that would compromise the identity of the individual who called the Hotline or other witnesses, or irresponsibly lead the subject to conclude the identity of the Hotline caller or witness.

Policy 1002.2: Hotline Operations Parameters

Introduction

The conversation with a caller is an important part of the Hotline process, since this is usually the only opportunity to fully understand and document the caller's concern(s) and gather relevant details.

Parameters

- Hotline toll-free number: 800-723-1615.
- Hours of operation: 8:00 am to 5:00 pm, Monday through Friday (not including weekends and state holidays)
- After-hours: A recorded message announces the Hotline hours and advises callers to call back during business hours.
- The after-hours message is used to announce case numbers for which additional information is needed and ask callers to call back during work hours.
- The OSIG Hotline Manager answers the Hotline and forwards the calls to OSIG Hotline Investigators who interview the callers and gather information about allegations.
- In accordance with keeping calls anonymous, callers cannot leave recorded messages.
- Hotline allegations are typically communicated by phone. In addition, the OSIG receives complaints by:
 - **USPS:** Office of the State Inspector General
Attention: State Fraud, Waste, and Abuse Hotline
101 N. 14th Street, 7th Floor, Richmond VA 23219
 - **Fax:** 804-371-0165
 - **Email:** COVHotline@osig.virginia.gov

Policy 1002.3: Answering Hotline Calls

Step	Responsible Party	Actions Taken
1	OSIG Hotline Manager or designee	Answers call and reads the following script: “You have reached the State Fraud, Waste, and Abuse Hotline. Please do not disclose your identity. If you are calling back about a case that you have previously reported, please hold and I will connect you with an investigator.”
2	OSIG Hotline Investigator	Listen to the particulars of the allegation(s) and record the following: <ul style="list-style-type: none"> • Time, date, and location • Name of the state agency and department or division • Subject(s) of the allegation(s)
3	OSIG Hotline Investigator	While discussing the allegation with the caller, make a preliminary determination of whether the allegation falls under the Hotline’s authority and scope and whether it involves fraud, waste, or abuse of state resources. <ul style="list-style-type: none"> • If yes, go to Step 4. • If no, redirect the caller to the appropriate agency or investigative authority using the Level 1 Call Screening Criteria Sheet.
4	OSIG Hotline Investigator	Continue to interview the caller, to obtain relevant, detailed, and specific information about the allegation(s).
5	OSIG Hotline Investigator	Is the write-up complete? <ul style="list-style-type: none"> • If yes, go to Step 6. • If no, inform the caller that additional relevant information is needed and to call back after obtaining the information.
6	OSIG Hotline Investigator	Assign a sequential case number and provide the case number to the caller. Tell the caller: “Please call the Hotline number again, no sooner than three weeks from today after 5 p.m. When you hear our after-hours message, please listen to the recording. A listing of case numbers will follow the after-hours Hotline message. If you hear your case number you should call back during business hours so that we can speak to you further about the allegation you reported.”

What if a caller makes more than one allegation?

Issue a case number and prepare an Investigative/Complaint Report sheet with each allegation listed and numbered separately.

Policy 1002.4: Interviewing a Caller

Questions to Ask Callers

OSIG Hotline Investigators should seek to obtain the factual information surrounding each allegation. As a general rule, OSIG Hotline Investigators should ask the “who, what, when, where, why, and how” of the allegation. In addition, OSIG Hotline Investigators should ask:

- How the complainant knows of the situation.
- Whether the allegation has been reported elsewhere, or if it has been previously investigated.
- Whether the complainant tried to resolve the matter within the agency by reporting the situation through the chain of command or to management.

- The names of any witnesses aware of the situation who would be willing to speak with Hotline investigators.
- Whether the subject’s supervisor or others in authority are aware of the allegation(s).
- Why the caller thinks the situation is fraud, waste, or abuse, and which policy applies (Note: Institutions of higher education may have separate policies governing their instructional, administrative, and professional faculty).
- Whether the caller has documentation that supports the allegation.
- The estimated loss, if known.
- The frequency of the occurrence.

Common Allegations Received by the OSIG / Related OSIG Hotline Investigator Questions

If the allegation is ...	Then ask the following questions (if applicable) ...
<p>Leave abuse</p> <p><i>Examples</i></p> <ul style="list-style-type: none"> • Takes long lunches or other excessive breaks • Arrives late or leaves early • Fails to turn in leave slips for absences • Not working an eight-hour day 	<ul style="list-style-type: none"> • Name(s) of the agency/division/unit involved. • Name(s) of subject(s) and position(s). Is this a classified employee? • Subject’s scheduled work hours, lunch break, and other breaks. • Date(s) and time(s) of the occurrence(s). • Frequency of the occurrence(s). • Location(s) of the occurrence(s). • Names of any witnesses. • Is there electronic access to the parking area? • Is there a sign-in or sign-out sheet? • Is there electronic access to the work location? • Is there a time clock? • Do you know where the subject went? • Did the subject depart in a vehicle, and, if so, do you have the license plate number and a description of the vehicle? Was anyone with the subject? • Were leave slips turned in? How do you know this? • Subject’s supervisor/Is the supervisor aware of this situation? • Was this situation reported to anyone else? • Are there any documents to support this/these allegation(s)? • Does the agency have written policies and procedures that address this issue? • Does the agency allow alternative work schedules?
<p>State vehicle abuse</p> <p><i>Examples</i></p> <ul style="list-style-type: none"> • Commuting between office and home • Improper or unnecessary use • Personal use 	<ul style="list-style-type: none"> • Name(s) of the agency/division/unit, etc. involved. • Name(s) of subject(s) and position(s). • Subject’s supervisor; location(s) of the occurrence(s). • Date(s) and time(s) of the occurrence(s). • Frequency of the occurrence(s). • License plate number of the vehicle or any other numbers or emblems. • Description of the vehicle (color/make/model). • Exact location of the vehicle (e.g., county, city, route number, street address). • If the car was in a parking lot, exact location within the lot. • Description(s) of the driver(s).

If the allegation is ...	Then ask the following questions (if applicable) ...
<p>(... State vehicle abuse continued)</p> <p><i>Examples</i></p> <ul style="list-style-type: none"> • Commuting between office and home • Improper or unnecessary use • Personal use 	<ul style="list-style-type: none"> • Number of passengers and description(s). • Where was the vehicle driven from and to (approximate distance)? • Names of any witnesses. • Is the subject's supervisor aware of this situation? • Was this situation reported to anyone else? • Are there agency policies and procedures that address this situation? • Is/Are the individual(s) in travel status or on call?
<p>Misuse or waste of funds/resources</p> <p><i>Examples</i></p> <ul style="list-style-type: none"> • Unnecessary purchases • Excessive spending • Wasteful use of state property or equipment • Malfeasance, such as failure to properly manage departmental budget 	<ul style="list-style-type: none"> • Name(s) of the agency/division/unit, etc. involved. • Name(s) of subject(s) and position(s). • Subject's supervisor. • Nature of fraud/waste/abuse. • Why is it considered wasteful? • Amount and account name(s)/number(s) of funds involved. • Description(s) and value(s) of the property. • Location(s) of the funds or property. • Date(s) and time(s) of the occurrence(s). • Frequency of the occurrence(s). • Names of any witnesses. • Is the subject's supervisor aware of this situation? • How did you become aware of this information? • Was this situation previously investigated by anyone else? • Is there any documentation or other evidence to support this allegation? • Does the agency have written policies and procedures that address this issue? • Are there any other circumstances that contributed to this situation?
<p>Violation of state hiring policy and practices</p> <p><i>Examples</i></p> <ul style="list-style-type: none"> • Unfair hiring practices • Pre-selection of candidates • Selection of unqualified employee(s) <p>(If the caller is an aggrieved employee, the caller should be referred to the EDR or the OEES within the DHRM)</p>	<ul style="list-style-type: none"> • Name(s) of the agency/division/unit, etc. involved. • Is the person a classified employee? • Job title/position number/classification (full-time). • Name of individual hired. • Position's supervisor. • When did the situation occur? • Names of any witnesses. • Was this situation reported to anyone else? • Are there any documents or is there other evidence to support this allegation? • Does the agency have written policies and procedures that address this issue? <p><i>Issues for review regarding specific allegations:</i></p> <p>Unfair hiring practices</p> <ul style="list-style-type: none"> • How was the hiring practice unfair? • Review screening process documents. • Name of the hiring authority for the position. • Date job posted/closed or date successful applicant started in the position.

If the allegation is ...	Then ask the following questions (if applicable) ...
<p>(... Violation of state hiring policy and practices continued)</p> <p><i>Examples</i></p> <ul style="list-style-type: none"> • Unfair hiring practices • Pre-selection of candidates • Selection of unqualified employee(s) <p>(If the caller is an aggrieved employee, the caller should be referred to the EDR or the OEES within the DHRM)</p>	<p><i>Pre-selection of candidate(s)</i></p> <ul style="list-style-type: none"> • Why was the person pre-selected? • Who was the person pre-selected by and was that person on the interview panel? • How do you know this person was pre-selected? • How can this information be verified? • Is this person qualified for the position? <p><i>Unqualified candidate</i></p> <ul style="list-style-type: none"> • Why is the person unqualified? • What duties and responsibilities assigned to this position cannot be performed by the candidate? • Has there been a documented incident to verify this allegation?
<p>State phone/fax abuse</p> <p><i>Examples</i></p> <ul style="list-style-type: none"> • Personal calls on state phones, including cell phones • Using state fax machine for personal documents • Charging personal long distance phone calls to the state 	<ul style="list-style-type: none"> • Name of the agency/division/unit, etc. involved. • Name(s) of subject(s) and position(s). • Subject's supervisor. • Phone number(s) involved. • To what account names/numbers are the calls being charged? • Date(s) and time(s) of calls. • Frequency and duration of calls. • How do you know the calls are not state business-related. • Do you know the name(s) and number(s) of the party/parties called? • Where is/are the party/parties located (local vs. long distance)? • If long distance, do you know the area code? • How do you know the subject is not using a personal calling card? • Does the agency permit employees to make long distance calls and reimburse the agency for them later? • Does the agency monitor employee phone calls? • Is the subject's supervisor aware of this situation? • Does the agency have a written phone/cell phone/fax policy? <p><i>Fax misuse</i></p> <ul style="list-style-type: none"> • Where is the fax machine located? • What is the fax number? • What type of document(s) did the subject(s) send or receive? • Do you have a copy of those documents? If so, please provide. <p><i>Work cell phone misuse</i></p> <ul style="list-style-type: none"> • Name of cell phone vendor. • Can you provide the names of any witnesses? Has this situation been reported to anyone? • Are there any documents to support the allegation?

If the allegation is ...	Then ask the following questions (if applicable) ...
<p>Procurement violation</p> <p><i>Examples</i></p> <ul style="list-style-type: none"> • Unnecessary/excessive purchases/construction • Over-priced purchases/construction • Conflict of interest • Noncompetitive procurement 	<ul style="list-style-type: none"> • Name(s) of the agency/division/unit, etc. involved. • Name(s) of the subject(s) and position(s). • Description(s) of goods and/or services • The name(s) of the vendor(s) and the agency account name(s)/number(s) charged? • Frequency of occurrence. • Date(s) of purchase for goods and/or services. • The dollar amount(s) of the purchase(s). • Goods: Where are the goods currently located? • Services: Were the services performed? If not, what is the status? • Who authorized the purchase? • Was this within the authorizer’s purchasing authority? • How this purchase violated procurement laws? • Has the agency paid the vendor for the goods or services? • Why do you consider this purchase to be unnecessary? • Why do you consider this purchase to be excessive? • Names of witnesses. • Is the subject’s supervisor aware of this situation? • How did you find out about this situation? • Was this situation reported to anyone else? • What documents or other evidence can we use to prove that this happened? <p><i>Other questions regarding specific allegations</i></p> <ul style="list-style-type: none"> • Special treatment and/or acceptance of bribes, gifts, or kickbacks. • How was one vendor given special treatment over other vendors? • How was this special treatment able to occur? • Explain why this purchase was a conflict of interest. • Did the subject have a special interest in the transaction? • Did the subject accept a gift, bribe, or kickback from a vendor? • What was the nature of the gift, bribe, or kickback? • Do you know the value of the gift, bribe, or kickback? • Why did the subject act in this manner?

If the allegation is ...	Then ask the following questions (if applicable) ...
<p>Conducting outside business in a state office</p> <p>and/or ...</p> <p>Using state resources for non- state business purposes</p> <p><i>Examples</i></p> <ul style="list-style-type: none"> • Using state resources for an outside (private/personal) business • Conducting outside business from a state office • Selling products, preparing tax returns, selling real estate 	<ul style="list-style-type: none"> • Name(s) of the agency/division/unit, etc. involved. • Name(s) of subject(s) and position(s). • Date(s) and time(s) the situation(s) occurred. • Does/Do the subject(s) come in early, work late, have approved telework arrangements, or come in on weekends to make up for time spent on personal business? • Where did the situation occur? • The name of the outside business. • Describe the nature of the outside or personal business that is conducted from the state office. Do you have a business card, brochure, etc? • How much state time is involved? • How often does this occur? • How long has this been occurring? • How do you know that the subject(s) is/are not making up the time? • What state resources are being used for outside business purposes? (Computer, copier, phone, paper, fax machine, Internet). • Is/Are the subject(s) receiving and/or making non- state business-related phone calls? • How do you know the calls are not related to state business? • Is/Are the subject(s) conducting outside business during state work hours, or during lunch or after work hours? • Do you have any evidence, such as copies of documents? • Can you provide the names of any witnesses? • Is the subject’s supervisor aware of this situation? • How did you find out this information? • Has this situation been reported to others?

If the allegation is ...	Then ask the following questions (if applicable) ...
<p>Travel abuse</p> <p><i>Examples</i></p> <ul style="list-style-type: none"> • Inflated reimbursement expenditures • Unnecessary attendance at conference/class • Excessive travel 	<ul style="list-style-type: none"> • Name(s) of the agency/division/unit, etc. involved. • Name(s) of subject(s) and position(s). • What type of travel abuse occurred? • What were the dates and times of travel? • Travel destination(s) or location(s) of the occurrence(s). • What was the purpose of the travel? • Did anyone else travel with the subject? If so, please identify. • Can you provide the names of any witnesses? • Is the subject's supervisor aware of this situation? • How did you find out this information? • Was this situation reported to others? • Is there evidence or other documentation to support this allegation? • What account name(s)/number(s) was/were the travel charged to? • Does the agency have written policies and procedures that address this issue? • What types of expenditures were inflated (mileage, lodging)? • How was this done? • What was the amount of the inflated expenditures? • Was travel by air, auto, state vehicle, etc.? • Why do you consider attendance of the seminar, conference, etc. unnecessary? • What was the cost of the travel? • Who approved attendance at the conference? • What was the frequency of the travel? • Does the subject's position require travel? • For what purposes does this position require travel?

If the allegation is ...	Then ask the following questions (if applicable) ...
<p>Abuse of state computers</p> <p><i>Examples</i></p> <ul style="list-style-type: none"> • Unauthorized use of a state computer • Unnecessary or idle computer • Unnecessary software • Misuse of the Internet • Personal use of the email system 	<ul style="list-style-type: none"> • The name(s) of the agency/division/unit, etc. involved. • Name(s) of subject(s) and position(s). • Date(s) and time(s) of the occurrence(s). • Frequency of the occurrence. • Subject's supervisor. • Does/Do the subject(s) come in early, work late, have approved telework arrangements or come in on weekends to make up for time spent on personal use? • Is the subject making up the time? • Can you provide the names of any witnesses? • Is the supervisor aware of this situation? • How did you obtain this information? • Does the agency have written policies and procedures addressing this issue? • Was this situation reported to others? • Was this done on state time, or after hours or during lunch? • Is there any other evidence to support this allegation? <p><i>Computer Description</i></p> <ul style="list-style-type: none"> • What was the computer supposed to be used for? • Is it a desktop or a laptop computer? • Where is the computer located? • What was the cost of the computer? • When was the computer purchased? • Who authorized the purchase of the computer? <p><i>Description of involved personal documents</i></p> <ul style="list-style-type: none"> • How much time was spent using or preparing the personal documents? • What type of software was used to prepare the documents? (Word, WordPerfect, Excel, Adobe, etc.)? • What are the documents about (subject)? Any specific organization? • Do you have a copy of the documents? If so, please provide them to us. • Where are the documents saved (e.g., hard drive, CD, DVD, diskette, network)? <p><i>If personal email/Internet usage:</i></p> <ul style="list-style-type: none"> • Email: Frequency, sent to/received from, if sent outside of the agency, where? • Internet: What Internet sites are accessed? Email and Internet: Does the agency monitor computer usage?

Policy 1002.5: Post-Screen Hotline Calls Process

The OSIG Hotline Investigator ends the call and performs the following tasks.

Step	Responsible Party	Actions Taken
1	OSIG Hotline Investigator	<ul style="list-style-type: none"> • Research Personnel Management Information System (PMIS), Internet, State Employee Directory, Payline, etc. to verify the applicable information in the allegations. • Write up the case on an Investigative/Complaint Report sheet. • Attach interview notes to the Investigative/Complaint Report sheet. • Provide all Hotline documents to the OSIG Hotline Manager.
2	OSIG Hotline Manager	<ul style="list-style-type: none"> • Perform a Level 2 screening (Policy 1003.3: Level 2 Screening) of Hotline cases. • Determine what level of investigation is warranted, including whether or not the OSIG should conduct the investigation.
3	OSIG Hotline Investigator	<ul style="list-style-type: none"> • Prepare Hotline letters for distribution to the appropriate state agency IAD or HC. • Hotline documents may only be emailed when email encryption is used.

Policy 1002.6: Calls Requiring Special Handling (Exceptions)

Special processes are required for the following calls.

If the Allegation Involves ...	Then ...
An IAD or IAD staff, a state agency head, or gubernatorial appointee.	<p>Investigation is usually assigned to the OSIG.</p> <p>Promptly notify the OSIG Hotline Manager, Director of Investigations, Deputy State Inspector General, or the State Inspector General and provide an explanation of why the OSIG should conduct the investigation.</p>
Allegation involves a time sensitive issue or some other urgent matter.	<p>Immediately notify the OSIG Hotline Manager, Director of Investigations, the Deputy State Inspector General, or the State Inspector General.</p> <p>The OSIG Hotline Manager will expedite the handling of the case, as warranted.</p>
Alleged wrongdoing involves criminal activity.	<p>Promptly notify the OSIG Hotline Manager, the Director of Investigations, Deputy State Inspector General, or the State Inspector General.</p> <p>The OSIG Hotline Manager or the Director of Investigations will expedite the handling of the case as considered appropriate, including forwarding the allegation to the VSP.</p>
Alleged wrongdoing involves immediate threat to life or state property.	<p>Immediately notify appropriate law enforcement authority (e.g., VSP).</p>

If ...	Then ...	Further Steps
Caller wants to mail information to the Hotline.	<ul style="list-style-type: none"> • Provide mailing address to caller, and tell caller to mark the envelope "Confidential." • Advise the caller that any documents provided become the property of the Hotline. • Request that the caller follow up with the OSIG Hotline Investigator to ensure documents were received. <p><i>Mailing address:</i> State FWA Hotline James Monroe Building, 7th Fl. 101 N. 14th Street Richmond, VA 23219</p>	<p><i>For Hotline mail opened by OSIG Hotline Investigators:</i></p> <ul style="list-style-type: none"> • Record the case number on the documents (not on the outside of the envelope). <p><i>For Hotline mail opened by the OSIG Hotline Manager:</i></p> <ul style="list-style-type: none"> • Date stamp the document(s). • Verify the case number or assign a new case number. • Summarize the information in the case write up. • File the original document(s) in the case file and provide a copy to the investigator.
Complaint concerns the manner in which a Hotline case was investigated.	Refer the caller to the OSIG Hotline Manager.	The OSIG Hotline Manager will coordinate through the OSIG chain of command to resolve the situation as deemed appropriate.
Caller thinks he/she is the victim of retaliation because he/she reported allegations of fraud, waste, or abuse to the Hotline.	Refer the caller to the OSIG Hotline Manager.	<ul style="list-style-type: none"> • The OSIG will investigate the allegation. • Notify the Director of Investigations. • Prepare a formal notification letter for the Governor's Chief of Staff.

Policy 1002.7: Handling Hotline Allegations Received by Mail, Fax, or Email

Process for Hotline allegations received by mail, fax, or email.

Step	Responsible Party	Actions Taken
1	OSIG Hotline Manager	Receives the Hotline allegation by mail, fax, or email.
2	OSIG Hotline Manager	Reviews the content of the mail, fax, or email and performs Level 1 Screening (Policy 1003.2: Level 1 Screening) and Level 2 Screening (Policy 1003.3: Level 2 Screening).
3	OSIG Hotline Manager	Assigns a sequential case number to the allegation or disseminates the allegation to Hotline staff for write up.
4	OSIG Hotline Manager	Summarizes the allegation on an Investigative/Complaint Report sheet.
5	OSIG Hotline Manager	Prepares a Hotline 60-day letter or email for distribution to the appropriate IAD or agency HC, provided the allegation is not screened-out.

OFFICE OF THE STATE INSPECTOR GENERAL State Fraud, Waste, and Abuse Hotline Policies and Procedures Manual	TOPIC NOs. 1003.1–1003.3
Topic: Call Screening	Date: September 15, 2014

1003.1-1003.3: Call Screening

Policy 1003.1: Cost-Effective Investigations

The OSIG shall undertake its investigation and resolution activities in the most cost-effective manner available.

Overview

The OSIG developed screening criteria based on information gathered by contacting other states with similar Hotline programs and by researching other relevant sources. This screening process helps to:

- Reduce the time and expense of investigating complaints.
- Ensure that a subject outside of the Hotline’s authority is not accepted as a case.
- Minimize the amount of time and effort spent on minimal or less significant allegations that indicate a negligible burden on the Commonwealth.

Investigative Authority

The OSIG administers the Hotline program under the authority of [Executive Order No. 52](#), which covers executive branch state agencies and institutions of higher education and some non- state agencies.

Independent, judicial, and legislative branch agencies of the state government (such as the Supreme Court, the State Lottery, and the APA) voluntarily participate in the Hotline program.

Hotline Call Screening

The OSIG screens Hotline calls using two different levels:

- Level 1 Screening—While talking to a caller, the OSIG Hotline Investigator identifies if the call/allegation is outside of the Hotline’s authority.
- Level 2 Screening—After a Level 1 Screening, the OSIG Hotline Manager reviews the case report to determine the seriousness of the allegation(s) and if there is sufficient information to perform an investigation.

Policy 1003.2: Level 1 Screening

The OSIG Hotline Investigator interviews the caller to identify the nature of the complaint and to determine:

- If the nature of the allegation falls within the Hotline program’s authority.
- If the nature of the allegation involves fraud, waste, or abuse of state resources.

Level 1 Screening Methodology

If the subject of the allegation ...	Then ...
Falls under the executive branch of state government or other voluntarily participating non executive branch agencies and involves alleged fraud, waste, or abuse of state resources	Accept the case by issuing a case number.
Falls outside of the executive branch or other voluntarily participating non executive branch agencies	Refer the caller to the APA or other appropriate authority.
Does not involve a state agency or institution and/or does not involve state business	<ul style="list-style-type: none"> • Refer caller to the appropriate authority by referring to the following: <ul style="list-style-type: none"> ○ Level 1 Screening Criteria Sheet (below) ○ State Agency Search (online directory) ○ Consult with the OSIG Hotline Manager, Director of Investigations, or the Deputy State Inspector General
Deals with a personnel-related issue, such as disciplinary or corrective action or termination	Refer caller to DHRM.
Involves unemployment benefits fraud	Refer caller to the Virginia Employment Commission (VEC).
Involves Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF) benefits fraud	Refer caller to the Fraud Benefits Division of the Department of Social Services.
Involves a subject unfamiliar to the investigator	Let the caller know additional time is needed to research the issue and ask the individual to call back later (within a reasonable time period).
Involves a criminal matter	Notify the Director of Investigations to refer the caller to the appropriate law enforcement agency.

Illustration: Level 1 Call Screening Criteria Sheet

Non-Hotline Topics	Refer Caller Directly	Phone Number
Department of Alcoholic Beverage Control (ABC) violations (non- state employee violations)	ABC	866-437-3155
APA staff	Record allegation and send case write-up to APA Director of Administration and Finance	804-225-3350
Citizen reports a driver in a state vehicle	Department of General Services	804-367-6526
Citizen reports other issues	Refer to applicable agency	Varies
City/county/town employee/function (e.g., local police officers, school teacher, etc.)	As applicable: city/county mgr, internal audit, school board, city/town council, board of supervisors	Varies

Non-Hotline Topics	Refer Caller Directly	Phone Number
Constitutional Officers (e.g., Commonwealth Attorney, Commissioner of Revenue, Sheriff) and legislative branch employees (except APA)	APA (for financial matters only)	804-225-3350
Driver's license or ID card fraud	Dept. of Motor Vehicles (DMV) Zero Fraud Hotline	877-ZERO-FRAUD (877-937-6372)
Employee Relations Advice Line (workplace mediation and/or grievance); includes the following common conflicts: communication difficulties, discrimination, termination, harassment, discipline, management/work styles	<ol style="list-style-type: none"> 1. Agency's DHRM Contact 2. Agency Workplace Mediation Coordinator 3. EDR 	<ol style="list-style-type: none"> 1. Varies by agency 2. Contact agency DHRM 3. 888-232-3842
Federal tax fraud	Internal Revenue Service	800-829-0433
General Assembly member	<ol style="list-style-type: none"> 1. Clerk of the House 2. Clerk of the Senate 	<ol style="list-style-type: none"> 1. 804-698-1619 2. 804-698-7400
Healthcare providers complaints	Department of Health Professions (DHP)	800-533-1560
Health plans: <ul style="list-style-type: none"> • Medical • Drug • Dental • Behavioral health • Employee Assistance Program (EAP) 	<ol style="list-style-type: none"> 1. Anthem 2. Blue Card 3. Medco 4. Delta Dental 5. Value Option 	<ol style="list-style-type: none"> 1. 800-552-2682 2. 800-810-2583 3. 800-355-8279 4. 888-335-8296 5. 866-725-0602
Identify a state government license tag to determine agency	DGS	804-367-6525
Identity theft	Federal Trade Commission	877-382-4357
Incident Weather Policy complaints (Hotline accepts calls alleging violation of policy; refer only disagreements with policy)	Director, DHRM Employee HR	804-225-3465
Insurance fraud (including Worker's Compensation)	VSP	877-623-7283
Judges (<i>Code of Virginia</i> § 17.1-902) and staff	Judicial Inquiry and Review Commissioner	804-786-6636

Non-Hotline Topics	Refer Caller Directly	Phone Number
Legislative branch—APA	Director of Joint Legislative Audit and Review Commission (JLARC)	804-786-1258
Lottery Hotline	Internal Audit	804-692-7123
Medicaid fraud (providers or recipients)	1. Provider fraud—Office of the Attorney General (OAG) Medicaid Fraud Control Unit (MFCU) 2. Recipient fraud—Department of Medical Assistance Services (DMAS)	1. 800-371-0824 2. 866-486-1971
Occupational License (issues)	Department of Professional and Occupational Regulation (DPOR)	804-367-8500
Payroll errors/questions	1. Agency payroll office 2. DOA	1. Varies 2. 804-225-2245
Personnel matters (refer callers alleging employment discrimination based on any of the following: race, color, gender [including sexual harassment], age, veteran status, national origin, religion, political affiliation, or disability)	1. Agency DHRM 2. OEES	1. Varies 2. 800-533-1414
Private sector business/charity	Virginia Department of Agriculture and Consumer Services (VDACS) Consumer Protection	804-786-2042 800-552-9963
Public Defenders	Virginia Public Defender's Office (9th and Franklin)	804-225-4330
Retirement benefits misuse (state) and complaints regarding Unum (Virginia Sickness & Disability Program [VSDP]) including alleged misuse of state disability benefits (short term and long term)	Virginia Retirement System (VRS) For Unum complaints only, refer caller to VRS Product Administrator. For disability fraud, refer caller to the VRS IAD or VRS Director	888-VARETIRE (888-827-3847) or 804-649-8059 804-344-3120

Non-Hotline Topics	Refer Caller Directly	Phone Number
Road problems/conditions (road and traffic conditions, report unsafe road conditions, request state-maintained work)	Virginia Department of Transportation (VDOT)	511 800-367-7623
Social Security Number fraud	United States Social Security Administration	800-269-0271
State Fraud, Waste, and Abuse Hotline	OSIG	800-723-1615 (voicemail, no caller ID) 804-371-0165 (fax)
State-owned vehicle roadside assistance	Department of General Services	866-857-6866
Supreme Court	Record allegation and send case write-up to John Rickman, Supreme Court	804-786-6455
Terrorist-related threats and activities; health-related threats, suspicious symptoms, outbreaks, and other actions, including those involving labs, private hospitals, and physicians; technology incidents or threats; and transportation events or threats	1. Virginia Department of Emergency Management (VDEM) 2. VSP Terrorist Tip Hotline	1. 804-897-6510 2. 877-4VA-TIPS (877-482-8477)
Unemployment insurance abuse	Record allegation and send case write-up to VEC IAD	804-786-4445
Virginia tax fraud (if state employee, take call and forward information to Tax IAD)	Department of Taxation	804-367-8031 tax-taxpayercomplaintreferral@tax.virginia.gov
VITA Customer Care Center	VITA	866-637-8482
Women, Infants and Children (WIC) fraud	Virginia Department of Health (VDH)	877-835-5942 tellwic@vdh.virginia.gov
Workers' Compensation (if employee is victim) Also see insurance fraud section above.	1. Agency DHRM 2. Workers' Compensation Commission	1. Varies 2. 877-664-2566

Policy 1003.3: Level 2 Screening

The OSIG Hotline Manager performs a Level 2 Screening within two business days after a call is received.

Consistent with the procedures in this manual and with guidance from the Director of Investigations, the OSIG Hotline Manager will determine the seriousness of an allegation and classify it as either:

- Serious or significant, to be investigated within 60 days.
- Not significant, to be screened-out.

Purpose

To ensure sufficient information is gathered in order to minimize investigative efforts and associated costs of investigations for allegations that appear insignificant, or of “de minimus” nature, based on established screening criteria.

Level 2 Screening Process

The OSIG Hotline Manager screens new Hotline cases and completes the Screening Assessment Sheets, which indicate whether cases meet the criteria for further investigation.

Step	Description
1	The OSIG Hotline Investigator forwards new cases to the OSIG Hotline Manager.
2	The OSIG Hotline Manager prepares the Screening Assessment Sheet and determines whether a case is consistent with the screening criteria.
3	The OSIG Hotline Manager enters the results of the screening assessment on the Screening Assessment Sheet and identifies the screened-out cases.
4	Screened-out cases are distributed to the IAD or HC on a monthly basis and may be investigated at the IAD’s or HC’s discretion. If a screened-out case is investigated, the IAD or HC is required to follow established Hotline case investigative procedures. The original Investigative/Complaint Report sheet and Screening Assessment Sheet are filed by case number in the Hotline files.
5	Cases meeting the screening criteria are assigned to the respective agency’s IAD or HC within two business days.

Level 2 Screening Methodology

The following methodology is used for Level 2 Screening assessments to determine if cases warrant investigation.

Criteria	Methodology	Action
Scope	Normally, a case is not referred for investigation unless the allegation falls within the scope of the Hotline’s authority.	<ul style="list-style-type: none"> • Determine if the subject of the allegation is identified. • If the subject of the complaint is not clearly identified with sufficient detail, it is not deemed practical to conduct an investigation, and the case will be screened-out.

Criteria	Methodology	Action
Seriousness (violation of law, policy, or procedure)	<p>If there is an alleged violation of Federal or state law, the case will be referred to the OSIG Investigations Division or the appropriate law enforcement authority for investigation.</p> <p>An alleged violation of statewide policy will be considered for referral, depending on other criteria.</p>	<p>Consider the seriousness of the allegation:</p> <ul style="list-style-type: none"> • Does the complainant allege a violation of law, policy, or procedure? • A violation of a law would rank as a more serious issue than a deviation from an agency procedure.
Materiality	<p>Allegations of explicit loss of state funds or property, abuse of state time or property, or loss of productivity or inefficiency may be referred for investigation depending on other criteria.</p>	<ul style="list-style-type: none"> • Generally, those allegations with an estimated loss of \$200 or more will be referred for investigation if a sufficient level of detail is provided. • Normally, estimated losses of less than \$200 will not be referred for investigation unless other criteria warrant an investigation. • Those cases with estimated losses between \$200 and \$2,000, or those cases whose losses are not estimated, will be referred on a case-by-case basis.
Timing	<p>Generally, if the time elapsed since the alleged wrongdoing occurred has been more than one year, the case will not be referred for investigation; however, the frequency of the alleged wrongdoing will also be considered.</p>	<p>Consider the timing and frequency along with other criteria.</p>
Level of Detail	<p>If the subject of the allegation is not identified and sufficient detailed information or documentation is not provided or identified, the case will not be referred for investigation.</p>	<p>Determine the amount of tangible evidence submitted or identified by the complainant:</p> <ul style="list-style-type: none"> • For example, copies of official documents such as timesheets, payroll checks, emails, purchase orders, vendor invoices, computer listings, memos on letterhead, or journal entries <p>Determine the degree of detail and specificity contained in the allegation. Generally, the more details provided the more credible the allegation:</p> <ul style="list-style-type: none"> • Did the complainant provide the date? • Nature, timing, description, name, location, method of concealment, or dollar amount of wrongdoing, etc.?

Criteria	Methodology	Action
Related Issues	<p>If the caller states the allegation was previously investigated and found unsubstantiated, as a general rule, the case will not be referred for investigation unless the caller provides additional information or other significant facts.</p> <p>If the allegation concerns a matter that has a reasonable probability of adverse publicity and likely undermine the confidence of the public in executive branch operations, the case should be referred for investigation.</p>	<ul style="list-style-type: none"> • Compare the complaint to other Hotline complaints of a similar nature made in the past 12 months. <ul style="list-style-type: none"> ○ If these cases were found unsubstantiated, determine whether any new information is contained in the complaint. ○ If not, the case should be considered for screening-out. • Try to determine the quality and thoroughness of previous investigations and the credibility of the caller.

Illustration: Level 2 Screening Assessment Sheet

Office of the State Inspector General State Fraud, Waste, and Abuse Hotline Level 2 Call Screening Criteria

Case #: _____ Initials: _____ Date: _____

I	Scope: Does the allegation fall within the Hotline parameters?	No – Stop	Uncertain	Yes
II	Seriousness: Is there an immediate threat to life or state property?	No	Uncertain	Yes
	Is there an alleged violation of federal or state law?	No	Uncertain	Yes
	Is there an alleged violation of state or agency policy?	No	Uncertain	Yes
III	Materiality: Is there an allegation of explicit loss of state funds or property?	No	Uncertain	Yes
	Is there an allegation of abuse of state time or property?	No	Uncertain	Yes
	Is there an allegation of loss of productivity or efficiency?	No	Uncertain	Yes
	Total estimated amount of alleged loss, if quantifiable. If none, check here: __ NQ	<\$200	\$200 – \$2,000	>\$2,000
IV	Timing: How frequently has the alleged wrongdoing occurred?	Once	Several times	Continuously
	Time elapsed since the wrongdoing occurred?	>1 Year	1 Month – <1 Year	Ongoing
V	Level of Detail: Is the subject/agency/function identified?	No	Some ID provided	Name/Title
	Did the caller provide dates, times, witnesses, description, location, method of concealment?	No	Some data provided	Very detailed

	Was any documentation provided or identified?	No	Some identified	Evidence provided
VI	Related Issues: Did the caller report this elsewhere?	No	Reviewed by objective parties	Reviewed by involved parties
	Any other complaints of a similar nature reported within past 12 months?	No	Yes, unsubstantiated	Yes, in progress or substantiated
	Is the allegation a topic with a risk of adverse publicity?	No	Low	High

Case Reviewer Recommendation: ___ No Investigation ___ Investigate 60 Days

Review Comments: Initials _____

OSIG Hotline Manager Approval: Yes ___ No ___ Initials: _____ Date: _____

Comments:

OFFICE OF THE STATE INSPECTOR GENERAL State Fraud, Waste, and Abuse Hotline Policies and Procedures Manual	TOPIC NOs. 1004.1–1004.5
Topic: Case Assignment	Date: September 15, 2014

1004.1-1004.5: Case Assignment

Policy 1004.1: Methodology

The OSIG uses the statewide network of IAPs and agency HCs to investigate the validity of Hotline allegations (not including allegations independently investigated by the OSIG) and to ensure that appropriate corrective actions are taken to rectify those situations where fraud, waste, or abuse were identified.

Case Assignment Methodology

Step	Description
1	As a general rule, within two business days of receipt of the Hotline call, the OSIG reviews and evaluates the seriousness of the allegation(s) using a structured screening process, and assigns the case accordingly. Occasionally, exceptions to the two-business days time frame are required. For example, allegations may necessitate consultation with the OAG or the VSP and require more than two days to complete.
2	The OSIG determines who shall conduct the investigation.
3	The OSIG assigns the case to: <ul style="list-style-type: none"> • Agency IAP • Agency HC • OSIG
4	For cases assigned to the OSIG, the OSIG Hotline Manager assigns the case to an OSIG Hotline investigator.
5	For cases assigned to agencies, the OSIG prepares a transmittal letter to the respective agency's IAD or HC and attaches a copy of the Hotline Investigative/Complaint Report sheet.
6	The OSIG files a copy of the transmittal letter and attachment.
7	<ul style="list-style-type: none"> • The OSIG affirms that there is a 60-day (calendar year) reporting requirement. (Note: This reporting requirement also applies to investigations conducted by the OSIG.) • One, 60-day extension will be granted upon request, i.e., 120 days to complete an investigation. • Upon request, an additional 60-day extension may be granted in circumstances with written justification (email acceptable), i.e., up to 180 days. • In some circumstances, an extension may be approved beyond 180 days on a case-by-case basis with the approval of the Deputy State Inspector General or State Inspector General, i.e., up to 240 days.
8	The OSIG sends the Hotline transmittal letter and any attachments to the agency via USPS and marks the envelope "Confidential." Hotline documentation may also be transmitted via encrypted email.
9	A copy of the Hotline transmittal letter and the Hotline Investigative/Complaint Report sheet are secured in a locked filing cabinet by the OSIG Hotline Manager.

Who conducts the investigation?

The OSIG assigns a Hotline investigation using the following guidelines:

If ...	The Hotline investigation is assigned to ...	Comment
The subject of the allegation involves an agency head, the agency IAP, or an “at-will” employee	OSIG	The OSIG is authorized to investigate officials in accordance with the <i>Code of Virginia</i> . Note: The OSIG is authorized to investigate any Hotline case at its discretion.
Agency does not have an IAP or an HC.	OSIG	OSIG performs the investigation.
The agency only has a designated HC.	Agency HC Heads of Agencies that do not have an IAP shall designate a qualified individual within the agency to coordinate the investigation and resolution of complaints.	Depending on the complexity of the allegation, the OSIG may assist and/or supervise the agency HC in the investigation.
All other cases	Agency IAP or the agency HC	Exception: The OSIG may conduct the investigation if ... <ul style="list-style-type: none"> • The allegation is uniquely time sensitive. • Requested to do so by the IAD or agency head. • The allegation involves more than one state agency. Note: The OSIG may investigate any Hotline case at its discretion.

Cases Assigned to Agency IADs

The OSIG recognizes that in some large agencies with locations throughout the Commonwealth, the IAD may delegate Hotline investigations to other responsible members of agency management.

Investigations Delegated to Others

For cases delegated by the IAD to other responsible members of the management team, the IAD shall:

- Ensure the person conducting the investigation is properly trained to conduct a Hotline investigation.
- Ensure that others conduct Hotline investigations in the same confidential manner as those conducted by the internal auditors.
- Ensure the person is in a position to be objective and unbiased.

- Remain ultimately responsible to the OSIG for the proper conduct of investigations.
- Review the work performed by others and provide a conclusion as to whether or not the allegation(s) is/are substantiated.
- Approve the objectives and questions that need to be answered or develop them and provide that information to the investigator.
- Determine how much information to provide those outside the investigative process. Those involved in the investigative process must be familiar with investigative techniques, confidentiality requirements, and Hotline policies. If sufficient investigative personnel are not available, the IAD may consider delegating the investigation to another qualified employee. The IAD will ensure the person conducting the investigation is familiar with the Hotline policies and procedures herein.
- Request assistance from the OSIG in instances of insufficient investigative resources.

Policy 1004.2: Investigator Responsibilities

Agency IADs and HCs are responsible for conducting Hotline investigations. Investigators shall not be restricted, limited, or impeded by anyone during the conduct of Hotline investigations.

Confidentiality

Hotline investigations must adhere to strict confidentiality standards. Related documents and correspondence must not be distributed to anyone other than the investigator, IAD, HC, or the agency head, without the OSIG's consent.

Copies of memorandums, reports, etc. pertaining to Hotline investigations will only be provided to the individual assigned to conduct the Hotline investigation as well as the IAD or HC. Documents must be marked "Confidential State Fraud, Waste, and Abuse Hotline Document."

Agency IADs and/or HCs shall not share Hotline Investigative/Complaint Report sheets with anyone except the individual conducting the investigation.

If an investigator deems that for investigative purposes it is necessary to disclose the nature of the allegation(s) to the subject, they may do so by providing them with a summary of the allegation(s). However, careful effort must be made not to provide any information that would compromise the identity of the "anonymous" Hotline caller. Only the nature of the allegations may be disclosed to the subject during the interview process.

Policy 1004.3: Hotline Investigative/Complaint Report Sheet

Sensitive Information

The information contained on the Investigative/Complaint Report sheet can compromise the caller's identity:

- The OSIG Hotline Investigators prepare Hotline Investigative/Complaint Report sheets verbatim from the caller's description of the situation.
- Confidential information is contained in the Hotline Investigative/Complaint Report sheet, such as the reported names of individuals who witnessed the alleged fraud, waste, or abuse.
- Other information such as the time and date of the call can provide clues to the caller's identity.

Confidentiality and Security

The OSIG assures callers they will be anonymous and that OSIG takes procedural steps to protect callers' identities. The OSIG employs many precautions to ensure the identities of state employees and citizens who report alleged fraud, waste, or abuse to the Hotline are kept confidential.

The Hotline Investigative/Complaint Report sheet is handled by the OSIG under strict levels of confidentiality (Policy 1001.1: Confidentiality and Security) and marked "Confidential State Fraud, Waste, and Abuse Hotline Document." Agency IADs and HCs are required to provide the same level of confidentiality for Hotline documents to maintain the integrity of the Hotline program.

Agency IAD and HCs and others involved in Hotline investigations are prohibited from disclosing the Investigative/Complaint Report sheet with anyone except individuals conducting the investigation.

Policy 1004.4: Hotline Transmittal Letters

The OSIG uses the following types of transmittal letters to assign cases for investigation. A copy of the Hotline Investigative/Complaint Report sheet is attached to the transmittal letter.

Assigned Case Transmittal Letter Example

DATE:

TO: Agency Internal Audit Director or Hotline Coordinator

FROM: OSIG Hotline Manager

SUBJECT: State Fraud, Waste, and Abuse Hotline

The attached complaint regarding Case No. XXXX was received by the OSIG and is referred to your unit for investigation.

A report of investigation should be sent to this the OSIG within 60 days. If additional information is needed to investigate this/these case(s), you should notify the OSIG within 10 days of the date of this memo so that we can make further contact with the complainant. Hotline Policies and Procedures can be found at the following website: <http://www.osig.virginia.gov>. Please ensure that all required elements are included in your report.

Strict confidentiality must be maintained over the entire investigation. You should ensure that all documents, working papers, notes, and reports dealing with this investigation are marked "Confidential State Fraud, Waste, and Abuse Hotline Document." In addition, all written communication with the OSIG about this or any other Hotline case should be similarly marked and sent through the USPS. All envelopes related to Hotline cases should be marked "Confidential" when sent to OSIG. If there are any questions regarding this matter or further information is needed, please contact me at 804-625-3269.

Attachment

Screened-Out Case Transmittal Letter Example

DATE:

TO: Agency Internal Audit Director or Hotline Coordinator

FROM: OSIG Hotline Manager

SUBJECT: State Fraud, Waste, and Abuse Hotline

As you are aware, the OSIG employs a structured call screening process to reduce time and expenses associated with Hotline calls that appear to be of little or no significance. During the past month, the OSIG received the attached complaint(s), Case No. XXXX. While these allegations meet the Hotline's definition of fraud, waste, or abuse, they do not meet the criteria used by the OSIG to determine if cases warrant investigation through the Hotline program. We have classified these cases as "Screened-out," and no investigation by your agency is required.

"Screened-out" cases involving your agency are provided to you for informational purposes on a monthly basis. You do not need to provide a response regarding this/these case(s). However, if you decide to investigate this/these matter(s), you should follow the procedures established by the OSIG for conducting Hotline investigations contained in the *State Fraud, Waste, and Abuse Hotline Policies and Procedures Manual*.

If you have any questions or require further information, please contact me at 804-625-3269.

Attachment

Policy 1004.5: Reporting Requirements

The OSIG requires a formal report of investigation within 60 calendar days. The report may be submitted electronically to the OSIG using encrypted email, or sent by USPS or fax (please notify the OSIG before sending a fax).

The OSIG will grant extensions to reporting deadlines upon request of IADs or HCs with reasonable justification.

OFFICE OF THE STATE INSPECTOR GENERAL State Fraud, Waste, and Abuse Hotline Policies and Procedures Manual	TOPIC NOs. 1005.1–1005.4
Topic: Hotline Call-Backs	Date: September 15, 2014

1005.1-1005.4: Hotline Call-Backs

Policy 1005.1: Hotline Call-Back Requirements

Background

Hotline callers generally call back regarding cases they have previously reported for one of these four reasons (also see Policy 1005.2: Hotline After-Hours Phone Recording):

- Caller’s case number was on the after-hours call-back message.
- Caller wants to know the results of the investigation.
- Caller wants to provide additional information to the case.
- Caller is calling back after three weeks, per our instructions, from the date he/she made the initial call.

Other Caller Questions

The remainder of call-backs usually ask one of the following questions:

- How was the investigation undertaken?
- Who conducted the investigation?
- How long did/does the investigation take?
- Was the case assigned for investigation? If not, why not?
- Was the allegation substantiated? (This information cannot be disclosed to the caller)
- What disciplinary action was taken against the subject of the allegation? (This information cannot be disclosed to the caller)
- It appears that nothing happened as a result of the call. Why not?
- Has the investigation been completed?
- Caller wants to mail in some additional information to the OSIG.
- How much longer will the investigation take?
- The allegation continues to occur.
- The caller would like a copy of the final report through the Virginia Freedom of Information Act.

The OSIG procedures for responding to these questions are presented later in this section (Policy 1005.4: Procedure for Responding to Caller’s Questions).

Requirements

- If the caller provides the Hotline case number or provides sufficient information about the case to enable the OSIG Hotline Investigator to identify the complaint, the OSIG Hotline Investigator **may only disclose** to the caller that the investigation is “in progress” or is “completed.” The OSIG Hotline Investigators shall not disclose any further information about Hotline case outcomes by phone or email.

- If the investigation is completed, the caller may make a FOIA request to receive a copy of the final report.

Note: Hotline cases that have been closed may be reopened upon receipt of new and relevant information not previously known to the OSIG.

Policy 1005.2: Hotline After-Hours Phone Recording

The after-hours recording left by the OSIG staff on the Hotline phone line provides a mechanism for OSIG Hotline Investigators to ask Hotline callers additional questions about the allegations that have been presented, while protecting the anonymity of the callers.

Call-Back Process

The following process is used for obtaining additional information from Hotline callers.

Step	Description
1	During the initial call the OSIG Hotline Investigator instructs the caller to call the Hotline back no sooner than three weeks after the date of the initial call to check the after-hours messages.
2	The OSIG informs the applicable agency IAD or HC of the initial call within two business days. At this time: <ul style="list-style-type: none"> • The OSIG instructs the IAD or HC to let the OSIG know within 10 business days if the IAD or the HC has additional questions for the caller. • If there are additional questions, or additional information is needed, the OSIG Hotline investigator documents the information in the Hotline database and in the Call-Back File.
3	When there are additional questions, the OSIG Hotline Investigator places the case number on the after-hours phone message to alert the caller there are additional questions and to call back during normal working hours.
4	The caller calls back after three weeks from the initial call date to listen to the after-hours message.
5	The caller should then call the Hotline during working hours to speak with an OSIG Hotline Investigator who will ask the questions submitted by the IAD or HC.
6	The OSIG relays the information to the IAD or HC.

Policy 1005.3: Answering a Hotline Call-Back

The following process is used with Hotline call-backs:

Step	Who Does it ...	Description
1	OSIG Hotline Investigator	OSIG Hotline Investigator answers the call and asks caller if they are calling back about a case they have previously reported.
2	OSIG Hotline Investigator	If no, see Policy 1002.3: Answering Hotline Calls. If yes, go to Step 3.
3	OSIG Hotline Investigator	Ask for the case number and then check the Hotline database and “Call-Back Message” file to see if the case has additional questions to be answered by the caller.
4	OSIG Hotline Investigator	If the case number is listed on the call-back message, refer to the first example under Policy 1005.4: Procedure for Responding to Caller’s Questions. If the case number is not on the “call-back message,” then the OSIG Hotline Investigator should ask the caller what can be done to help him/her.

Step	Who Does it ...	Description
5	Caller	Caller explains why s/he is calling back about a specific case. See examples provided earlier.
6	OSIG Hotline investigator	The OSIG Hotline Investigator provides assistance in response to the caller's questions. Specific questions are listed in Policy 1005.4: Procedure for Responding to Caller's Questions.

Policy 1005.4: Procedure for Responding to Caller's Questions

Confidentiality

Prior to disclosing any information about a Hotline case, the OSIG Hotline Investigator shall ask the caller to provide some details about the case that only the original caller would know. Ask the caller:

- When was the case reported?
- What was the nature of the allegation?
- What or who is the subject of the investigation?
- What state agency was involved?

Call-backs should be handled as follows:

If ...	Then ...	Process
The caller's case number was on the "call-back message"	<ul style="list-style-type: none"> • Retrieve the questions. • Cases on the call-back message are filed in the Hotline case files marked "Cases on After-Hours Message." A note will be attached to the case containing the specific questions to be asked. • Contact the IAD or HC to let them know that the additional information was received. Delete the Hotline case number from the call-back message. 	<ul style="list-style-type: none"> • Document the caller's response on the Investigative/Complaint Sheet, below the questions. • Provide the form to the OSIG Hotline Manager. • Send the form to the IAD/HC which provides the additional information to assist the assigned investigator in the investigation.
The caller wants to know the status of the case	<ul style="list-style-type: none"> • Review the case write-up in the Hotline database. • OSIG Hotline Manager/Hotline Investigators may only disclose that the case is either "in progress" or "completed." • No other information shall be provided to the caller. 	No action is required.
The caller wants to provide additional information on an existing case	<ul style="list-style-type: none"> • Review the case write-up in the Hotline database. • Take the new additional information from the caller. 	<ul style="list-style-type: none"> • Write the additional information on an Investigative/Complaint Report sheet. • Provide the Investigative/Complaint Report sheet to the OSIG Hotline Manager for review and processing.

If ...	Then ...	Process
The caller is calling three weeks after the initial call, per OSIG guidance	<ul style="list-style-type: none"> • Review the Hotline database and “Cases on Overnight Message” file to determine if the caller’s number is included. If so, then follow the call-back process. • If not, advise the caller that we do not have any further questions for him/her. 	<ul style="list-style-type: none"> • Refer to the first type of call-back process documented in this section; and • No action is required.
The caller wants to know how the case was investigated	Advise the caller that Hotline investigations are conducted in a confidential manner and that investigative methods are generally not disclosed.	Refer the caller to the OSIG Hotline Manager or the Director of Investigations if the caller is not satisfied with the handling of the case.
The caller asks who conducted the Hotline investigation	Advise the caller that investigations are conducted in a confidential manner utilizing the statewide network of IAPs under the direction of the OSIG. The name of the investigator should not be disclosed.	Refer the caller to the OSIG Hotline Manager or the Director of Investigations, if the caller is not satisfied.
The caller asks if his/her case was assigned for investigation If not, why not?	<ul style="list-style-type: none"> • Review the Hotline database. • Respond that the case was either assigned for investigation or screened-out. • If the case was screened-out, explain the reason why it was not investigated. • Advise the caller that if s/he wishes to provide more details about the allegation, the OSIG will re-consider investigating the case. 	<ul style="list-style-type: none"> • If not investigated and the caller wants to add information, complete a Case Continuation sheet. • Provide the new information to the OSIG Hotline Manager. • The new information will be re-evaluated to determine if an investigation is warranted. Refer to the Screened-Out Section (1003.1–1003.3: Hotline Call Screening).
The caller asks if the allegation was substantiated	<ul style="list-style-type: none"> • The OSIG Hotline Manager/OSIG Hotline investigators may only disclose whether a case is in progress or completed. • No other information shall be provided to the caller unless authorized by the Director of Investigations, Deputy State Inspector General, or the State Inspector General. 	Refer the caller to the OSIG Hotline Manager or Director of Investigations if the caller is not satisfied.
The caller asks what disciplinary action was taken against the subject of the allegation	Advise the caller that investigations are conducted in a confidential manner and that the results of the investigation are generally not disclosed. However, if the case is closed, s/he may request a copy of the report under FOIA.	Refer the caller to the OSIG Hotline Manager or Director of Investigations if the caller is not satisfied with the outcome of the investigation.

If ...	Then ...	Process
<p>The caller states that nothing happened as a result of his/her call</p> <p>Why not?</p>	<p>Review the case write-up in the Hotline database:</p> <ul style="list-style-type: none"> • If the case is still under investigation, inform the caller the case is still under investigation. • If the allegation was unsubstantiated, document the caller's concerns that the alleged fraud, waste, or abuse is still occurring and refer the information to the OSIG Hotline Manager or Director of Investigations to determine if a new case should be opened. • If the case was substantiated, consider whether or not the caller's new allegation should be issued a new case number. Explain that it may take time for corrective action to be noticeable. • Point out that personnel disciplinary actions imposed on an employee by agency management are confidential and may not be disclosed. 	<ul style="list-style-type: none"> • No action is required. • Document the conversation on an Investigative/Complaint Report sheet. • Provide the Investigative/Complaint Report sheet to the OSIG Hotline Manager. • Either a new case number is assigned, or no action is taken. • Advise the caller to call back again in two weeks if corrective action has not been observed. • The OSIG Hotline Manager may wish to contact the agency IAD to inquire if corrective action has, or will be taken by management.
<p>The caller wants to mail some additional information to the Hotline</p>	<p>Provide the following directions:</p> <ul style="list-style-type: none"> • Mail via USPS to: State FWA Hotline 101 N. 14th Street, 7th Floor Richmond, VA 23219 • Mark the envelope "Confidential." • Write the case number on all documents. • Mark all documents Confidential State Fraud, Waste, And Abuse Hotline Document • Fax documents to 804-371-0165. • Email documents to covhotline@osig.virginia.gov. • Advise the caller that any documents provided to the Hotline become the property of the OSIG. • Request that the caller follow-up via the Hotline to ensure the OSIG received the documents. 	<p>No further action is required.</p>
<p>The caller wants to know how much longer the investigation will take</p>	<p>Advise the caller that Hotline cases may take up to 60 days to investigate and extensions may be granted. Specific information about the length of time involved in the investigation cannot be disclosed.</p>	<p>No further action is required.</p>
<p>The caller wants to add a new allegation</p>	<p>Take the allegation, but issue a new case number.</p>	<p>Follow the new case procedures.</p>

OFFICE OF THE STATE INSPECTOR GENERAL State Fraud, Waste, and Abuse Hotline Policies and Procedures Manual	TOPIC NOs. 1006.1–1006.10
Topic: Conducting a Hotline Investigation	Date: September 15, 2014

1006.1-1006.10: Conducting a Hotline Investigation

Background

This section is to provide guidance and suggestions for internal auditors and others, including OSIG staff, assigned to conduct Hotline investigations.

Hotline investigations will be conducted thoroughly with due diligence, using acceptable investigative and interview techniques appropriate for the situation. The OSIG is available to assist in the development of appropriate investigative steps, interview questions, and techniques. All investigative procedures will be documented and maintained as indicated below. The OSIG may, from time to time, review investigative working papers regarding the quality and appropriateness of investigations and provide suggestions for improvement in future cases.

Objectives

An investigation should be undertaken to:

- Determine if there is any validity to the allegation(s), and whether fraud, waste, or abuse occurred. IAD and HC should make the agency head or applicable management aware of the Hotline investigation, but not provide the specific facts and nature of the case.
- Determine if the fraud, waste, or abuse took place and the conditions and circumstances that contributed to the fraud, waste, or abuse.
- Determine and propose corrective actions and internal controls be put into place to prevent future instances of the fraud, waste, or abuse from occurring and/or to remediate the condition, such as recovering the loss.

Policy 1006.1: Confidentiality and Security

[Executive Order No. 52](#) requires that strict confidentiality be maintained over the entire Hotline investigation (Policy 1001.1: Confidentiality and Security). All documents, working papers, notes, and reports associated with investigations shall be marked Confidential State Fraud, Waste, and Abuse Hotline Document and properly secured.

Written Communications

- Written communications with the OSIG about Hotline cases are to be sent via USPS or delivered by hand.
- Envelopes containing Hotline information should be marked "Confidential" when sent to the OSIG.
- Under certain circumstances, communications may be sent via encrypted email or by fax. Contact the OSIG prior to using these methods of communication.
- Hotline reports and other sensitive documents may be transmitted electronically between the OSIG and state agencies that possess digital encryption capabilities.

Hotline Document Custodians

- State IADs and HCs shall maintain all investigative documentation in a secure locked file or location, including encrypted electronic working paper databases.
- All such information, documentation, etc., is the property of the OSIG and shall be so identified.
- The OSIG may request that supporting information accompany investigative reports when submitted.

Policy 1006.2: Assignment of Hotline Case Investigations

IAD

Hotline cases are assigned by the OSIG to the respective agency IAD in cases where the agency has an IAP.

HC

For Agencies that do not have an IAP, the agency head shall designate a qualified individual within the agency to conduct Hotline investigations or to coordinate (the HC) the Hotline investigation and the resolution of complaints involving the respective agency. This individual should have appropriate background or training in conducting administrative investigations. The individual's name, position, address, and phone number shall be provided to the OSIG annually.

Exception

When an agency head, a Gubernatorial Appointee, or a member of internal audit staff is the subject of an investigation, the OSIG will investigate the case.

Large State Agencies

The OSIG authorizes the IAD of a large agency with locations throughout the Commonwealth to delegate Hotline investigations to other responsible members of the agency management team.

Delegated Hotline Investigations

For cases delegated by the IAD to other responsible members of the management team, the IAD shall:

- Take careful consideration of how much information to provide those outside the investigative process.
- Delegate those individuals familiar with investigative techniques, confidentiality requirements, and Hotline policies.
- Contact the OSIG if sufficient investigative personnel are not available

Policy 1006.3: Subject of the Allegation

Hotline investigators should avoid alerting the subject of the allegation until they have completed reasonable steps to gather relevant evidence. The Hotline investigator should interview the subject of the allegation if the evidence corroborates the allegation, or if additional information from the subject will likely resolve the situation.

What are the subject's rights?

Hotline investigators should remember that an anonymous tipster initiated the investigation and the information provided could be false. Therefore, the Hotline investigator should conduct a certain amount of investigative work to determine whether or not the allegation appears to be factual, prior to interviewing the subject.

The Hotline investigator should:

- Maintain strict confidentiality to protect the reputation of the subject, especially for unfounded allegations.
- Be cognizant of the rights of the subject; however, keep in mind these are administrative reviews and not legal proceedings.

Legal Counsel

As a matter of OSIG policy, subjects of administrative Hotline investigations are not permitted to have attorneys or legal counsel present during investigative interviews. The OSIG is available to assist investigators in responding to such requests.

Policy 1006.4: Structure of a Hotline Investigation

The following structure should be used for Hotline investigations.

Objective: Did fraud, waste, or abuse (of state resources) occur?

Step	Action	Comments/Suggestions
1	<p>Review the Hotline Investigative/ Complaint Report sheet to determine what alleged fraud, waste, or abuse occurred and who the subject of the complaint is.</p> <p>Some examples of Hotline allegations include:</p> <ul style="list-style-type: none"> • Theft of cash • Diverting cash receipts • Financial fraud • Lapping of accounts receivable payments • Stealing or forging checks • Theft of inventory or equipment • Overstated work hours • Leave abuse • Falsified travel reimbursement vouchers • Unnecessary purchase/spending <p>(... Hotline allegation examples continued)</p>	<p>(... Hotline allegation examples continued)</p> <ul style="list-style-type: none"> • Unnecessary or excessive travel • Embezzlement • Waste • Mismanagement • Conflicts of interest • Manipulation of financial records • Contract and procurement fraud • Malfeasance • Misappropriation of assets • Misuse of funds • Bribes • Kickbacks • Forgery <p>Note: Highlight the allegation (s) within the Investigative/Complaint Report sheet.</p>
2	<p>Determine if any further information is needed from the caller to conduct the investigation. If so, contact the OSIG Hotline Manager.</p>	<ul style="list-style-type: none"> • The OSIG will place the Hotline case number on the after-hours message. • Once the complainant calls back, the OSIG will gather the additional information, if available, and provide it to the IAD or HC.

Step	Action	Comments/Suggestions
3	Research if law, regulation, state, and/or internal agency policy governs the allegation.	State references should include a review of the CAPP manual, PMIS, agency internal policy manuals, DHRM policy manual, and others as appropriate.
4	Set the scope of the investigation, considering the evidence identified or provided by the complainant such as: <ul style="list-style-type: none"> • Documentation • Witnesses • Method of concealment • Date of occurrence 	<ul style="list-style-type: none"> • Develop investigative strategies to gather sufficient information about the details provided in the complaint to substantiate/refute material allegations • Decide what investigative techniques shall be used to corroborate or refute the allegations. Some examples of how to investigate allegations are provided below.
5	Prepare a written work plan.	An effective work plan will: <ul style="list-style-type: none"> • Guard against omitting important steps. • Keep the investigation organized and focused. • Track evidence and documents.
6	Conduct a discrete and thorough investigation to obtain evidence and other documents to establish a reasonable basis for any opinion rendered regarding findings and recommendations for corrective action. Onsite investigations are preferable.	<ul style="list-style-type: none"> • Avoid alerting the subject during the early stages of the investigation. Hotline investigators may accomplish this by reminding those interviewed they should keep the information discussed confidential. • Never divulge the name of the subject of the investigation. That is, while it may be necessary to ask about X's activities, never tell a witness that X is the subject of a Hotline investigation. • Be alert to receiving misleading information. • Exercise caution to avoid disclosure of the nature of the Hotline investigation to unauthorized individuals. • Remember that an anonymous tipster initiated the investigation and the allegation(s) could be false. Hotline investigators should maintain strict confidentiality to protect the reputation of the subject, especially for unfounded allegations. • Respect the rights of the subject. • Gather evidence: <ul style="list-style-type: none"> ○ Trace accounting entries. ○ Recognize patterns in documents. ○ Search electronic databases. ○ Identify documents that appear forged or reconstructed. ○ Conduct interviews of witnesses and subjects. • Maintain a high level of professionalism during the course of the investigation.
7	Evaluate evidence obtained to date and decide whether additional information is needed to meet the investigation objective. If necessary, search for and accumulate additional evidence.	If the information gathered does not support the Hotline allegations, discontinue the investigation. (Remember, Executive Order No. 52 states that investigations be undertaken in the most cost-efficient manner.)

Step	Action	Comments/Suggestions
8	Evaluate the evidence and determine what it means in relation to the suspected fraud, waste, or abuse activity. Carefully assess the relevance of all gathered evidence.	Gathered evidence should enable the Hotline investigator to answer the following questions: <ul style="list-style-type: none"> • Did fraud, waste, or abuse occur? • When did it occur? • What assets or accounts were involved? • How was it committed? • What is the amount? • Who else may have been involved?
9	Reach a conclusion based on the evidence gathered on whether fraud, waste, or abuse occurred, and, if necessary, make recommendations to management to prevent improper incidents from recurring.	Be alert internal control weaknesses that could allow fraud to occur. If significant internal control weaknesses are detected, consider performing additional tests to detect other fraudulent transactions.
10	If fraud, waste, or abuse occurred: <ul style="list-style-type: none"> • Make recommendations to agency management to rectify the fraud, waste, or abuse identified in the Hotline allegation. • Make recommendations to prevent similar future occurrences of fraud, waste, or abuse from occurring. • Although recommendations that Agencies consider corrective measures may be included, the OSIG does not propose or suggest disciplinary actions. • Make recommendations for recovery of any monies owed the Commonwealth. • If there is a reasonable suspicion that a fraudulent transaction occurred, refer to <i>Code of Virginia</i> § 30-138 for reporting requirements. 	<ul style="list-style-type: none"> • Report information to the OSIG following established reporting guidelines (1007.1—1007.4: Reporting). • The OSIG does not prescribe specific reporting guidelines for IADs or HCs to follow when reporting Hotline results and recommendation(s) to agency management. IADs or HCs should provide Hotline recommendations to senior agency management in the same manner other strictly confidential matters are reported. • All reports resulting from Hotline investigations are to be marked “Confidential State Fraud, Waste, and Abuse Hotline Document.” • A copy of all reports issued by management that address Hotline recommendations shall be provided to the OSIG. • IADs and HCs are the custodians of all working papers and any other documents relating to the Hotline investigation. These documents are to be maintained until the OSIG informs IAD that the documents may be destroyed in accordance with the Library of Virginia record retention guidelines. To maintain confidentiality of the documents, IAD and HC staff should perform the destruction of the documents. • All Hotline documents, reports, and other information relating to a Hotline investigation are the property of the OSIG.
11	Report results of the investigation to the OSIG, rendering an opinion on whether or not the allegation was substantiated or unsubstantiated, partially substantiated, or inconclusive.	See reporting section (1007.1—1007.4: Reporting) for more details.

Policy 1006.5: Gathering Evidence

Various types of investigative techniques are used to gather the necessary evidence needed to substantiate or refute a Hotline allegation.

What evidence is needed?

A Hotline investigator must find sufficient evidence to lead a reasonable person to substantiate, confirm, or refute an allegation.

What investigative techniques are involved?

Investigators should select the type of investigative techniques based on the following:

- Effectiveness—Is it likely to uncover fraud, waste, or abuse?
- Ease of use—Investigator’s knowledge and comfort in the chosen method.
- Costs—The selected method may be cost-prohibitive in terms of time and resources, given the potential dollar amount of the allegation.
- Confidentiality—Ability to gather evidence while maintaining the confidential nature of the investigation.

Evidence Types

Evidence	Definition	Examples of Investigative Technique(s)
Documentary	Written evidence on paper or electronic medium.	<ul style="list-style-type: none"> • Examination of paper and electronic records and computer databases to obtain the documents. • Examinations, recompilations, and financial analyses of records. Sample transactions and documents. Extraction of data from databases.
Testimonial	Evidence obtained from the statements of individuals.	Interviews of witnesses and/or subjects.
Observational	Evidence of actions or behavior seen or heard by the Hotline investigator.	<ul style="list-style-type: none"> • Observing a scene where alleged fraud, waste, or abuse is expected to occur and recording observations of: <ul style="list-style-type: none"> ○ Physical facts ○ Acts ○ Movement on paper, tape, or film • Physical examination and confirmations with third parties.
Covert investigative techniques are prohibited, absent compelling or exigent circumstances	Gathering evidence by following or “tailing” subjects, through covert electronic surveillance, and through undercover operations.	Consult with the OSIG Hotline Manager for guidance. (Agency security cameras and electronic building access monitoring equipment are not considered covert devices.)

Evidence	Definition	Examples of Investigative Technique(s)
Special physical or forensic evidence (Special OSIG authorization required)	Evidence gathered by using scientific techniques (e.g., fingerprints or handwriting analysis).	Consult with the OSIG Hotline Manager for guidance.

Policy 1006.6: Gathering Testimonial and Documentary Evidence

Discovery Sampling for Documentary Evidence

Discovery sampling allows the auditor to examine fewer than all items in a population and quantify the risk of error/fraud in the entire population. This technique is appropriate when it is too time consuming or expensive to manually evaluate all documents in an area unless there is evidence that fraud exists.

Personal Observations

The Hotline investigator makes a log of the date, day, time, and location of observation; the name of the observer and any witnesses; all movements and activities observed; and the identity of the persons observed (e.g., openly observing activity within a warehouse).

Testimonial Evidence: Witness Interview

Interview is an important investigative technique. In the Hotline context, it is generally a non-accusatory structured question and answer session held for a specific purpose. An interview is usually conducted to obtain new or corroborating information from neutral individuals or witnesses who are not suspected of involvement in the alleged fraud, waste, or abuse. The questions are usually about agency policies, procedures, and controls; any deviations observed and who deviated from the policies and procedures; leads or tips about possible suspects; information about other possible witnesses. Note: Never divulge the name of the subject of the investigation. That is, while it may be necessary to ask about X's activities, never tell a witness that X is the subject of a Hotline investigation.

Testimonial Evidence: Subject Interview

Interview is a carefully controlled conversation with a subject. The purpose is to obtain information from the subject that cannot be obtained elsewhere; for example, a confession or evidence the suspect is not involved in the allegation. It is recommended that two investigators be present, with one serving as a witness.

Policy 1006.7: Planning and Conducting an Interview

The objective of an interview is to obtain truthful and complete disclosure of information with as little inconvenience to the interviewee as possible.

Planning an Interview

Step	Action
Timing	The Hotline investigator should schedule the interview as soon as practicable, but not before gathering sufficient evidence and information on which to base interview questions.

Step	Action
Advance notice	The amount of notice given to the interviewee should be carefully determined. Some circumstances provide the interviewee some advance notice so they can be better prepared to give informed answers and/or gather any supporting documents. Potentially adversarial interviews are frequently held on an unannounced basis.
Preparation	The investigator should gather as much information as possible about the allegation and the person being interviewed before the interview (Policy 1006.5: Gathering Evidence) This will help the interviewer structure questions.
Physical location	The interview should be conducted in a quiet setting. The room should offer privacy away from interrupting coworkers and other distractions. Rooms should not be viewed as confining, and subjects and interviewees should feel free to leave at any time.
Room arrangement	The Hotline investigator should be seated in a place that allows for the best eye contact and proximity to the interviewee. Also, the investigator should not block the interviewee's ability to exit the room at anytime during the interview.
Other considerations	The Hotline investigator should only interview one person at a time, both for privacy purposes and because one person may influence another.

Conducting an Interview

Opening	Perform introductions and state the purpose of the interview. Do not divulge information that may identify the caller or other witnesses.
Middle	Obtain information about the allegation by asking questions. These types of questions are usually nonthreatening and non-confrontational and serve to obtain factual and unbiased information. Questions may be open-ended, closed, or leading depending on the level of information the investigator is gathering.
Closing	Ask closing questions to summarize key facts and statements made during the interview to ensure they are correct. For example, start with "Let me summarize what we have discussed..." Give the interviewee a business card or number to call if they have questions or follow-up information.
Written statements	Written statements by interviewees present valuable investigative evidence. Hotline investigators retain the discretion to request written statement from interviewees. It is recommended statements be written by the interviewee and signed and dated by the interviewee and the investigator.
Summary	Summarize the results of the interview in writing as soon as possible after concluding the interview.

Things to Consider

If interviewee is ...	Then consider ...
Friendly (helpful, volunteers information)	That the interviewee may sincerely want to help, or the interviewee may: <ul style="list-style-type: none"> • Be seeking revenge against the suspect. • Be trying to deflect the investigator's attention. • Be offering biased, false, or irrelevant information.
Neutral	That the interviewee is providing the most unbiased information. It may advisable to interview the neutral witness first.

If interviewee is ...	Then consider ...
Hostile	<p>That the interviewee may:</p> <ul style="list-style-type: none"> • Be associated with or friends with the suspect. • Need to be persuaded to be interviewed. • Need to be reminded that they are not suspected of involvement. • Need to be reminded that the interview is an important use of their time. <p>The interviewer should:</p> <ul style="list-style-type: none"> • Display professional and nonjudgmental attitude. • Minimize facts that can make someone reluctant to be interviewed or inhibit an interview.

Policy 1006.8: Documenting an Interview

Hotline investigators should use interview forms that contain the name of the interviewee, date, time, and location of the interview, as well as the [Opening Interview Statement](#) below. Interviewees' responses to the Hotline investigator's questions are also recorded on the interview form. It is important to take good notes and to record as closely as possible the interviewee's responses verbatim. This is one reason for having two investigators conduct interviews, so that one can take detailed notes. If an interview is conducted in person, it is recommended a Hotline investigator get the interviewee's signature or initials on the interview form.

Complex Cases

A Hotline investigator may want to digitally or tape record an interviewee's responses in the event:

- An investigation concerns a sensitive issue.
- Reason to believe there is risk of possible denial by the interviewee.
- Questions have complex responses.

In such instances, request the interviewee's consent before recording and have them acknowledge their consent on the recording at the beginning of the interview.

Opening Interview Statement

The following statement should be read to all interviewees to clarify the level of confidentiality expected from the interviewee:

"We are conducting a confidential review on behalf of the State Fraud, Waste, and Abuse Hotline in accordance with [Executive Order No. 52](#). We will ask you to respond to some questions pertaining to this review and to provide any other information that you consider relevant. We request that you not discuss with anyone what we talk about during this interview. If you do so, you might compromise the confidential nature of this investigation. We ask for this confidentiality in order to protect you, other witnesses, and the subject(s). The information that you provide to us will be treated in the same way as any other information gathered during this review. We appreciate your cooperation and taking the time to meet with us and respond to our questions.

Interview Questions

Generally, witnesses are asked questions that will provide factual information related to the allegation. The following are typical interview questions for different types of allegations.

Allegation	Typical Interview Questions
Purchases	<p data-bbox="402 176 639 203"><i>Procurement Violations</i></p> <ul data-bbox="418 212 1154 506" style="list-style-type: none"> • What was purchased and what was the cost? • Who authorized the purchase? • Have the goods/services been received? • Has the agency paid the vendor for the goods or services? • What account name/number was the purchase charged to? • Did the procurement or purchase meet all state requirements?
Leave abuse	<ul data-bbox="407 527 1425 1308" style="list-style-type: none"> • Are alternate work schedules allowed? • Based on your observations, what is the subject's set work hours? • When does the subject take lunch and breaks? • Physically, are you in a position to observe the subject when s/he enters or leaves her/his office? Is anyone else in a position to observe this? • Does the employee arrive late/leave early? If so, how often does this occur and how long has it been going on? Are there other individuals who may have observed this? • Can you provide specific times and dates of leave abuse? • Are there sign-in/sign-out sheets, time clocks, electronic building/parking deck access records, or computer log on/off records? Are there any other records available to determine when the subject arrives or leaves? • If the subject leaves early, do you know where the subject goes? • If surveillance will be conducted, then also ask: <ul data-bbox="428 989 1386 1308" style="list-style-type: none"> ○ What type of vehicle does the subject drive (make, model, color, and license plate number)? ○ Are there assigned parking spaces? Where does the subject normally park? ○ Describe the subject. Ask for the approximate height, weight, hair color, etc. Ask for any available photos of the individual such as from an office party or a website. ○ Where does the subject live? Do you know the route they go to/from work? ○ How do you know whether leave forms are turned in? ○ Does the subject work extended hours, nights, or weekends? ○ Is there a compensatory time policy? ○ Does the agency have a telework policy?
State vehicle abuse	<ul data-bbox="418 1325 1432 1883" style="list-style-type: none"> • Is the subject permanently assigned a vehicle? If not, how does s/he obtain access to a state vehicle? • Describe the state vehicle (make, model, color, license plate number). • For what business purpose would the subject need to use a state vehicle? • Does the subject drive the vehicle to and from work? If so, estimate the approximate distance of roundtrip travel? • Does the subject reimburse the Commonwealth for commuting miles? • If the vehicle is used for personal purposes, how is it used (e.g., subject drives to lunch, shops at the mall, etc.)? Obtain specific details. • Provide specific dates of when the vehicle abuse occurred and frequency. • If necessary, interview the agency Transportation Officers. • What is the agency policy regarding vehicle use?

Allegation	Typical Interview Questions
Travel	<ul style="list-style-type: none"> • What was the date and time of the travel? • What was the travel destination or location of the occurrence? • What was the purpose of the travel? • Did anyone else travel with this individual? If so, please identify. • Was a travel claim voucher filed and reimbursement made? • Was the travel approved in compliance with policy?
Phone/cell phone/fax abuse	<p><i>Phone/cell phone calls</i></p> <ul style="list-style-type: none"> • What are the processes for monitoring employee use of an agency phone? • How do you know the phone calls are not related to state business? • Do you know who the subject is calling and the phone number called? • Are the phone calls long distance or local calls? • What evidence exists? • How long is the subject spending on personal phone calls? • Is the subject using the state-owned phone or a personal cell phone? <p><i>Faxes</i></p> <ul style="list-style-type: none"> • What fax machine is the subject using (fax number and location)? • What types of documents is the subject sending and/or receiving? • Do you know the fax number the subject is sending/receiving documents to/from? • Do you have a copy of the documents? If so, please provide.
Private/personal business on state time or use of state resources	<ul style="list-style-type: none"> • Does the subject have an outside business or part-time job that s/he is working on while at work? • Describe the nature of the outside or personal business that is being conducted while at work. • What is the name of the business? Do you have a business card, pamphlet, or any other materials? If so, please provide. • How much time does the subject spend on this business each day? How long has this been going on? • Is the subject conducting the outside business during state working hours, on lunch break, or after working hours? • Does the subject come in early, work late, have an approved telework agreement, or work on weekends to make up the time? • What state resources is the subject using for outside business purposes (e.g., computer, copier, paper, fax machine, Internet, etc.)? • Is the subject receiving and/or making phone calls? If so, to whom? How do you know the calls are not related to state business? • Do you have any evidence, such as copies of documents prepared or faxes? • Does the subject use other staff to assist in the work?

Allegation	Typical Interview Questions
Computers	<p><i>Unauthorized use of a state computer</i></p> <ul style="list-style-type: none"> • Does the subject prepare personal documents on his/her computer? • Is this done during state working hours, on lunch break, or after working hours? • Describe the documents that were used or prepared. How much time was spent using or preparing the documents? • What is the subject of the documents? • Do you have copies of the documents? If so, please provide them to us. • Where are the documents saved (hard drive, CD, DVD, network)? • Were there any other state resources used in preparing these documents, such as a copy machine or printer?
Internet abuse	<ul style="list-style-type: none"> • Does the subject have a separate logon to access the Internet? • What types of sites does the subject access? • Do you know of any specific site addresses? • Is the Internet access through the agency network or a private service provider?

Policy 1006.9: Hotline Investigative Techniques

The following are some examples of investigative techniques used by Hotline investigators to address specific allegations.

Allegation	Symptoms	Detection Techniques
Leave abuse	<ul style="list-style-type: none"> • Late arrivals, early departures, extended lunch breaks. • Failure to turn in annual or sick leave request forms. • Unable to keep up with workload. • Poor performance. • Official records indicate little or no use of annual or sick leave. • No set work hours. 	<ul style="list-style-type: none"> • Personal Observation. • Interview witnesses. • Search time and attendance records for patterns. • Monitor time of day of computer log on/off. • Monitor building access or parking lot access. • Review building access or parking lot access records.
Abuse of phone	<ul style="list-style-type: none"> • Increased number and duration of phone calls. • Out-of-state calls. • Poor agency system of reviewing and monitoring employee phone calls. • No internal agency phone policy. 	<ul style="list-style-type: none"> • Search phone records. • Interview witnesses. • Search phone message pads, if applicable. • Obtain records from the VITA/contracted vendor as needed. • Identify parties called as provided by the VITA/contracted vendor.
Theft of cash	<ul style="list-style-type: none"> • Cash receipts differ from normal or expected patterns. • Unusual amounts or patterns of cash overages/shortages. • Increased use of the petty cash fund or the inappropriate use of petty cash. 	<ul style="list-style-type: none"> • Conduct surprise cash counts. • Make observations. • Interview witnesses. • Review supporting documentation, etc.

Allegation	Symptoms	Detection Techniques
Unfair hiring practices	<ul style="list-style-type: none"> • Poor or insufficient documentation of the stages of the hiring process, such as the screening of applications. • Qualified applications are screened-out so that the favored applicant scores meet criteria for an interview. • Documents are missing, such as interview notes. • Screening criteria are not related to the position description. 	<ul style="list-style-type: none"> • Examination of personnel and recruiting records. • Review the initial scoring of applications. • Interview all panel members. • Interview witnesses. • Review the qualifications of selected individuals. • Do agency employees believe that the individual is adequately performing the job duties?
Theft of inventory	<ul style="list-style-type: none"> • Inventory discrepancies. • Inventory is lower than expected. • Inventory records are missing. • Poor internal controls over the inventory. • Inventory is not in the state's fixed assets system (FAACS). 	<ul style="list-style-type: none"> • Make inventory comparisons. • Observe the inventory on site. • Perform surprise physical inventory counts. • Compare the current inventory report to the procurement and usage reconciliation records, and then compare it to the actual inventory.
Theft of tablet computers, laptop computers, or cell phones	<ul style="list-style-type: none"> • Missing Laptop computers, tablet computers, or cell phone inventory records. • Poor internal controls over the laptop computers, tablet computers, and cell phone inventory. • Tablet computers and cell phones are not in the state's fixed assets system. • No internal inventory system. • No sign-out sheets are completed or required when taking a laptop or tablet computer home. 	<ul style="list-style-type: none"> • Compare purchase records to the physical inventory. • Interview witnesses. • Perform surprise physical inventory counts. • Review inventory control records and requirements.
Inflated hours on time sheets	<ul style="list-style-type: none"> • Sloppy, altered, or forged records. • No records. • Unable to keep up with workload. 	<ul style="list-style-type: none"> • Review the records. • Interview witnesses. • Search time and attendance records for patterns. • Monitor the time of day of the computer log on and log off. • Monitor the time of day of outgoing phone calls. • Monitor the building access or the parking lot access.
Procurement kickbacks	<ul style="list-style-type: none"> • Improper segregation of duties. • Poor internal controls over purchasing. • No code of ethics or internal policy prohibiting certain types of gifts, etc. 	<ul style="list-style-type: none"> • Interview witnesses. • Review employee's statement of economic interest form. • Review agency policies.

Policy 1006.10: Reaching a Conclusion Based on Evidence

Once the appropriate documentation and evidence has been gathered and reviewed and all necessary interviews have been conducted, a conclusion should be reached regarding whether the allegation is substantiated or unsubstantiated. When there is more than one allegation, it may be necessary to conclude that some of the allegations are substantiated, while others are unsubstantiated. It is important to look at each allegation individually when drawing final conclusions.

Intent

To conclude that there was waste or abuse does not require that it be intentional. Therefore, this should not be considered when determining whether the allegation was substantiated or unsubstantiated. However, mitigating circumstances may be considered when determining corrective action.

Preponderance of the Evidence

The standard of proof for substantiating allegations is called a “preponderance of the evidence”; that is, there is more evidence than not that substantiates the allegation. It is not necessary to have proof beyond a reasonable doubt. The factual and accurate evidence is enough to cause a reasonable person to believe that the subject committed the offense or was responsible for the outcome.

Witness Statements

When determining whether an allegation has merit, all evidence gathered should be weighed, including witness statements. Absent supporting documentation or evidence to prove the allegation is true, reliance on witness statements, by themselves, can be risky. Normally, witness statements should lead to other evidence that can be proven, such as records or documents. While witness statements alone will not make the case, they can provide additional corroborating evidence that the allegation is true.

In cases involving the word of one witness against another, it will be difficult to substantiate an allegation. However, this does not prevent the investigator from stating in the report what each witness said. The Hotline investigator should refrain from offering an opinion as to which witness was the most truthful.

Unsubstantiated, but Recommendations Made

Hotline investigators may find that the allegation is unsubstantiated, but that policy changes or improvements in internal controls may help avoid future problems. In such cases, Hotline investigators may find the allegation unsubstantiated, but make appropriate recommendations as a part of the Hotline report.

OFFICE OF THE STATE INSPECTOR GENERAL State Fraud, Waste, and Abuse Hotline Policies and Procedures Manual	TOPIC NOs. 1007.1–1007.4
Topic: Reporting	Date: September 15, 2014

1007.1–1007.4: Reporting

This chapter addresses agency IADs’ and HCs’ responsibilities for submitting Hotline reports to the OSIG and appropriate management, including Boards of Visitors at state universities.

Policy 1007.1: Summary Reports

As a general rule, Hotline reports should not be released to anyone, except to the OSIG. However, it may be prudent in some cases to issue summary reports for Hotline cases. For example, it may be necessary to supply such a report to the agency’s Governing Board in order to keep them notified of significant events, or it may be necessary to issue such a report to agency management in order to effect corrective and/or disciplinary actions. In such instances, summary reports should disclose no more information than is necessary. It is imperative that the callers’ and witnesses’ identities are protected and that summary reports do not disclose information that may compromise their identities.

As a general rule, summary reports should follow these guidelines:

- The summary report should be limited to a statement that an investigation was completed. The summary report should state the finding(s) and the recommended corrective action(s).
- It is permissible, though not required, to make recommendations for corrective actions in the summary report.
- As is the case with Hotline investigative reports, Hotline summary reports shall not include recommendations regarding disciplinary or adverse personnel actions.
- Summary reports and support documents may be issued to agency management and/or grievance hearing officers to effect and review corrective and/or disciplinary actions.
- The summary report should be carefully prepared to exclude information that may reveal the identity of witnesses. Moreover, the summary report should not include the Hotline allegation or other information that may compromise the identity of the “caller.” The summary report should not include the case number, date of call, or other information that might identify the caller or witnesses.
- The summary report does not require the “Confidential State, Fraud, Waste, and Abuse Hotline Document” stamp. (Policy 1007.4: Confidentiality Stamp Use)

Policy 1007.2: Report Guidelines

Due Date

Hotline cases impose a report due date of 60 days from the assignment of the case; however, extensions may be granted (Policy 1004.1: Methodology).

Report Format

While there is no particular format for the report to be submitted to the OSIG, the content of all reports should be similar. Agency IADs or HCs will provide a report to the OSIG that includes the information contained in this section.

Required Report Elements

- **Case number**—Five digit number that is included on the case referral form provided to investigators (confidential, protected from disclosure).
- **Amount of funds**—Funds involved in the identified and confirmed fraud, waste, or abuse.
- **Nature of the complaint**—Hotline referrals are written in a narrative form that closely corresponds to the actual conversation that was held during the original Hotline call, and, as such, includes allegations and other information related to the investigation. Hotline investigators should include the specific allegations in clear and concise narrative form, or in a list.
- **Investigative techniques or scope**—The Hotline investigator should include a statement of the investigative techniques used. These statements may be broken down by allegation or included in a separate section. If there are more than three related allegations in one case, it is generally more effective to separate the investigative techniques by allegation. This section may either be in narrative form or completed as a list; however, it should be specific. It should include all of the steps taken to investigate the case.
- **Results of the investigation, savings identified, and recoveries and/or restitution expected to be received**—The results of the investigative section should include the Hotline investigator’s observations and conclusions made throughout the course of the investigation, including other internal control or compliance issues not specifically related to the allegations and any recommendations.
- **Hotline investigator’s conclusions**—Cases should be concluded as “substantiated,” “partially substantiated,” “unsubstantiated,” or “inconclusive.” (The Hotline adheres to the “preponderance of evidence” legal standard).
 - A substantiated allegation reflects evidence that indicates that fraud, waste, or abuse occurred. The Hotline investigator’s conclusion must go beyond merely confirming whether information contained in the allegations is factual. Substantiated “conclusions” mean the facts disclosed during the investigation confirm the allegation of wrongdoing presented by the complainant.
 - In a case involving allegations of wrongdoing based on facts which are accurate, and are confirmed as true by the Hotline investigation, but the activity is determined to be within policy, the conclusion should be “unsubstantiated”.
 - If the case contains more than one allegation, there should be a conclusion for each allegation investigated.
- **Internal control weaknesses identified**—If the investigator is unable to reach a conclusion regarding an allegation, yet internal control weaknesses or compliance issues are identified, the investigator should identify the weaknesses in the report and provide recommendations to address these issues.
- **Corrective actions recommended, planned, or taken (no disciplinary recommendations)**—Absent a compelling reason not to do so, reports should be submitted after corrective action has been recommended and agreed to by management. Corrective action need not be taken as of the report date, since some corrective actions are implemented over a period of time. Hotline

investigators should obtain a commitment from agency management as to when corrective action will be taken. The Hotline investigator should document the same in the Hotline report.

- **Name**—The name of the subject of the complaint.
- **Internal control weaknesses identified and corrected**—The report should address the conditions that gave rise to “substantiated” fraud, waste, or abuse. The report should address weaknesses in the system of internal controls and the recommendations to correct those weaknesses. The disclosures about internal control weaknesses and recommended corrective actions should be specific.
- **Cost of investigation (including man-hours)**—The report must contain a summary of the cost of the investigation. This summary should include all investigative costs for all phases of the investigation as practical. The reported cost does not need to be broken down or include specific detail, but the Hotline investigator should have a documented basis for the reported costs included with the investigative notes. Fringe benefits and/or administrative costs should be included. Reasonable estimates are acceptable when necessary.
- **Funds identified**—The report should state the amount of lost funds identified as the amount directly attributed to the fraud, waste, or abuse. The amount of funds involved should be reported to include three components:
 - *Finding*—The amount of fraud, waste, or abuse identified. For example, this may be the dollar value of leave abused.
 - *Recovery*—The funds that were recovered as a result of the investigation. For example, restitution. Restitution may include leave slips processed for back leave owed, or payment made by the subject for state resources taken or a state vehicle driven for personal use.
 - *Savings*—The amount of savings to the Commonwealth as a result of implementing recommended corrective actions. This amount may be estimated. The basis for these estimates should be documented in the investigative notes. There should also be an estimate of the time period for any reported future savings, i.e., over what time period will the savings be realized.
- **Case closure**—A case investigated by an agency IAD or HC is considered closed when the OSIG has received, reviewed, and accepted the investigative report. A case investigated by the OSIG is considered “closed” when a response to the investigative report has been received and accepted by the OSIG. Investigations involving recommendations for corrective action impose an obligation to follow up, preferably within six to nine months, to determine that the recommended corrective actions have been taken by management. Appropriate steps should be taken by the IAD, HC, or OSIG to ensure the corrective actions have been properly addressed and documented.
- **Quarterly Report**—Each calendar quarter the OSIG will send IADs and HCs a list of cases remaining open longer than 60 days. IADs and HCs are asked to review the list and identify discrepancies between their records and the OSIG’s. Such conflicts may include open cases the agency did not receive or cases for which a report was submitted, but has not been closed by the OSIG.
- **When fraud has occurred, agency head’s responsibility**—In those instances where there is a reasonable possibility that fraud has occurred, as defined above or in *Code of Virginia* [§ 30-138](#), the agency head or designee is required to notify the APA and VSP, as well as the OSIG.

Note (disciplinary action): It is not the investigator’s responsibility to recommend disciplinary action or follow up to determine if disciplinary action was taken. Reference to disciplinary action taken should not be included in the report.

Policy 1007.3: Documentation and Confidentiality

Information/Documentation Maintenance and Ownership

All information/documentation supporting Hotline investigations and any corrective actions taken shall be maintained at the agency in a secure manner. All such information, documentation, etc. is the property of the OSIG and shall be so identified. The OSIG may request that supporting information accompany formal reports. All supporting documentation and information must be stamped or identified as “Confidential State Fraud, Waste, and Abuse Hotline Document.”

Investigations, interviews, and information relating to investigations are not to be shared, discussed, or given to anyone not authorized to be involved in the Hotline investigation or its review (Policy 1001.1: Confidentiality and Security).

Information Requests

If an agency should receive a request for information regarding a Hotline investigation, either through FOIA or other means, the requestor should be referred to the OSIG. Under no circumstances should the agency provide any information to the requestor.

Policy 1007.4: Confidentiality Stamp Use

Strict confidentiality must be maintained during the entire Hotline investigation (Policy 1001.1: Confidentiality and Security). All documents, working papers, notes, and reports associated with the investigation are to be marked “Confidential State Fraud, Waste, and Abuse Hotline Document.” Electronic records should include a header or footer with this statement. The only exception to this policy is the summary report provided to a Governing Board or agency management. The summary report does not require the “Confidential State Fraud, Waste, and Abuse Hotline Document” footer. This exception serves to accommodate the unique management needs of multiple boards and agencies. (The summary report does not contain the detailed or specific information addressed in the full investigative report and therefore, does not require secure handling).

Hotline documents that are transmitted by digital encryption are considered “secure” and do not require the confidentiality stamp. However, in the event Hotline documents are removed from an encrypted file, they must be stamped confidential.

OSIG Contact

Please contact the OSIG for any further information regarding this manual.

OSIG Hotline Manager

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