

Office of Inspector General

Complaint and Activity Data – 1st Quarter 2020 Report

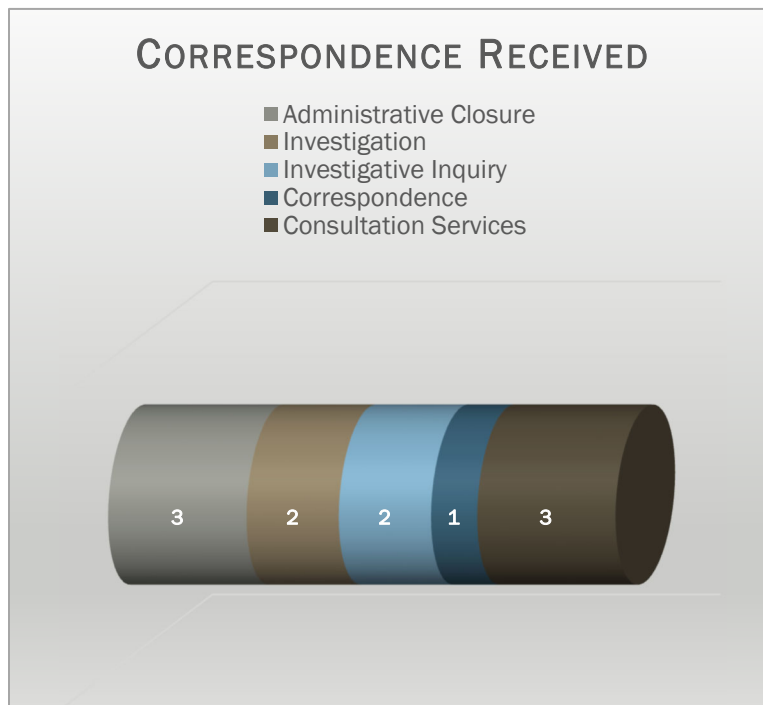
A report of activity between January 1, 2020 and March 31, 2020.

Office of Inspector General

Complaint and Activity Data – 1st Quarter 2020 Report

During the 1st Quarter of 2020, the Office of Inspector General (OIG) received eleven correspondences. A correspondence is an inbound communication, often a complaint or request for review, which is received and tracked by the OIG.

Four of the eleven correspondences initiated cases (2 Investigations, 2 Investigative Inquiries). Six correspondences were addressed as Administrative Projects¹. One correspondence was not categorized prior to the close of the reporting period, it is now Administratively Closed.



¹ Definitions can be found on page 3.

Triage Process

The Inspector General will convene a meeting to triage complaints received through Citizens' Complaint Reporting Hotline, *Tell Citizens*, or other mechanisms to discuss the merits of the complaint and collaboratively assign the complaint as appropriate for handling.

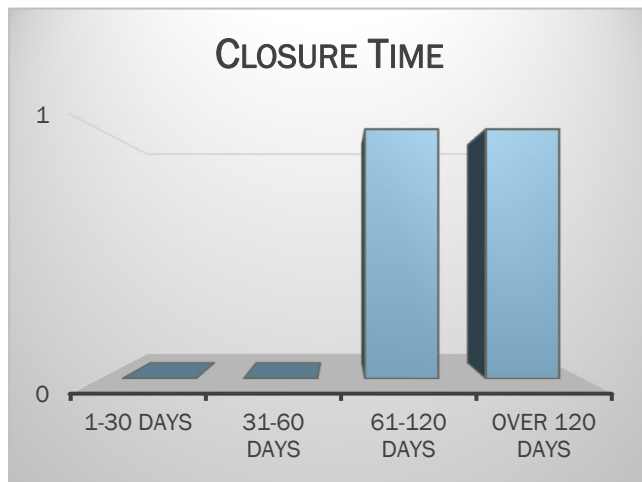
Inspector General investigations, inquiries, or reviews requested by the Chair of Citizens' Board of Governors, the Financial Services Commission, Citizens' President/CEO and Executive Director, an Executive Leadership Team member, or initiated independently by the Inspector General will not be subject to a triage meeting. However, the Chief of Internal Audit will be promptly notified of non-triaged investigations.

Cases/Substantive Projects Initiated in 1st Quarter 2020

Four cases/substantive projects (2 Investigations, 2 Investigative Inquiries) were initiated during the 1st Quarter of 2020. The cases involved allegations of Misconduct, Ethics Violations and Discrimination/Harassment. These cases impacted the Claims Division.

Cases/Substantive Projects Closed 1st Quarter 2020

During the 1st Quarter of 2020, two cases were closed. The average closure time for a case/substantive project was 116 calendar days.



Definitions

CASES

An **Investigation** is conducted when the Inspector General has determined that the highest level of review by the OIG is necessary. Investigations typically consist of multiple interviews of the complainant, witnesses, and other subjects, as well as detailed analysis of Citizens and non-Citizens documents, communications, data, and business processes and systems. Investigations often stem from complaints involving alleged employee or vendor misconduct, which if proved, could result in significant action against the employee or vendor. Investigations may result in terminations or criminal prosecutions.

An **Investigative Inquiry** is a lower level of review conducted by the OIG. An investigative inquiry is conducted when circumstances dictate that an alternative to a full investigation is prudent. The purpose of an investigative inquiry is to provide an appropriate level of review in situations where a full, detailed analysis and conclusion typically associated with an investigation is unwarranted or impractical.

SUBSTANTIVE PROJECTS

A **Compliance Review** attempts to determine if a specific Citizens Business unit, function, action, or process is compliant with applicable laws, rules policies, and procedures.

A **Process Review** analyzes a particular Citizens business unit's processes and attempts to determine if the actual or outlined processes are effective and efficient, or in need of improvement.

ADMINISTRATIVE PROJECTS

Administrative Closures occur on occasion when no additional investigative activity is warranted for a particular matter or the matter falls outside of the OIG's jurisdiction to handle or refer.

Consultation Services are provided to any Citizens individual or business unit upon request. This is an OIG engagement whereby best practices, appropriate responses, or necessary actions to ongoing corporate issues are discussed and analyzed. Care is taken to ensure that any OIG input is provided in a discretionary, advisory manner so as not to impair OIG independence.

Opinions are proactive determinations provided by the Inspector General to inquiries made by Citizens staff or business partners. Opinions promote assurance that inquiries or concerns have been received and documented by the Office of Inspector General and appropriate guidance is provided to facilitate compliance. The most common form of opinion is an ethics opinion; rendering of ethics opinions are always coordinated and confirmed with the Ethics and Compliance Officer.

Referrals can be made to internal Citizens business units or external parties. A referral is a request from the OIG for the recipient to review the matter, address the matter as appropriate, and advise the OIG of the intended response prior to the matter being closed. The most common referrals are open door matters, job performance or grievance complaints which are typically referred to Human Resources for handling.