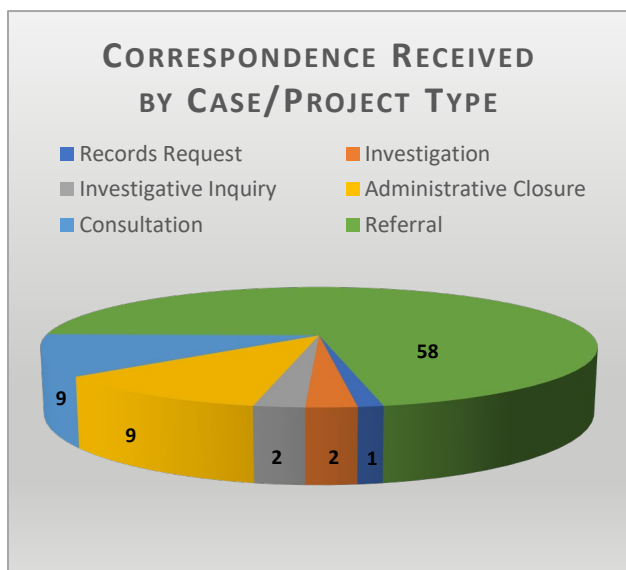


Office of Inspector General

Report of OIG Activity, 4th Quarter 2022

During Q4 2022, the Office of Inspector General (OIG) received 81 correspondences.

Four correspondences initiated cases (2 Investigations, 2 Investigative Inquiries). Seventy-seven correspondences were addressed as Administrative Projects. Of the 81 correspondences received, 62 were categorized as a complaint.



Correspondence Received by Type			
	2020	2021	2022
Discrimination/Harassment	4	3	4
Ethics	2	3	7
Misconduct	18	10	27
Mismanagement	9	4	4
Background Screening	59 ¹	2	1
Other	47 ²	4	15
Records Request	-	-	4
Customer Inquiry/Complaint	Included In Other	76	145
Vendor Improprieties	6	0	7
Total	145	102	214

¹The post-hire background screening project led to an increase in the number of correspondences for this category. The 59 correspondences represent interactions with staff or vendor and do **not** represent an arrest or conviction.

²The OIG and *TellCitizens* Awareness Campaign in 2020 led to a significant number of correspondences received by OIG which were more appropriately addressed by other Citizens' business units. Additional measures have been implemented to ensure individuals contacting Citizens reach the proper department.

Cases/Substantive Projects Initiated in Q4/2022

Four cases/substantive projects (2 Investigations, 2 Investigative Inquiries) were initiated.

The case involved allegations of Ethics Violations, Discrimination/Harassment and Misconduct.

Cases/Substantive Projects Closed Q4/2022

Five cases/substantive projects (1 Investigation, 3 Investigative Inquiries, 1 Audit) were closed.

The cases closed involved allegations of Misconduct. These cases impacted the Claims, Human Resources and Enterprise Operations Divisions. There were two *Supported* findings. The employee involved with the supported findings resigned prior to the conclusion of the investigation.

Office of Inspector General

Definitions

A **Correspondence** is an inbound communication, often a complaint or request for review, which is received and tracked by the OIG.

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 coordinated and confirmed with the General Counsel and 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.