

Office of Inspector General

Complaint and Activity Data – 3rd Quarter 2016 Report

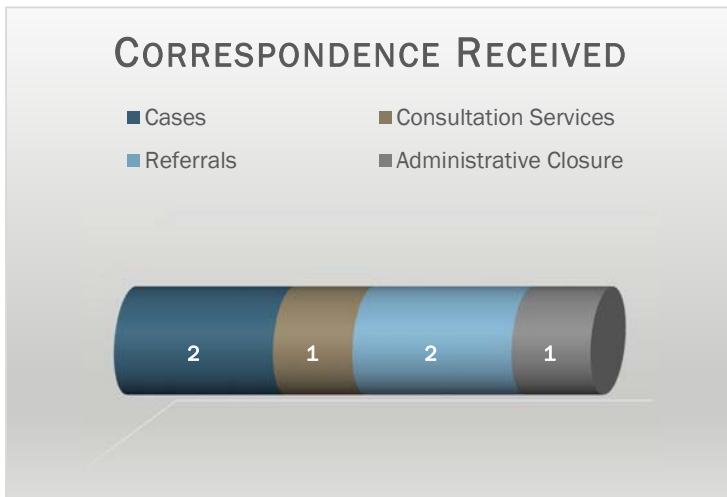
A report of activity between July 1, 2016 and September 30, 2016.

Office of Inspector General

Complaint and Activity Data – 3rd Quarter 2016 Report

During the 3rd Quarter of 2016, the Office of Inspector General (OIG) received six correspondences. A correspondence is an inbound communication, often a complaint or request for review, which is received and tracked by the OIG.

Two of the six correspondences initiated Cases while four correspondences were addressed as Administrative Projects. OIG cases are higher level projects such as Investigations, Investigative Inquiries, Compliance Reviews and Process Reviews. OIG Administrative Projects include Consultation Services, Opinions, and Referrals¹.



	Administrative Projects	Cases
Open at the Beginning of Quarter	5	5
Received During Quarter	4	2
Closed During Quarter	4	4
Open at the End of Quarter	5	3

¹ Definitions for Administrative Closure, Consultation Services, Investigations, Investigative Inquiries and Referrals are on page 3.

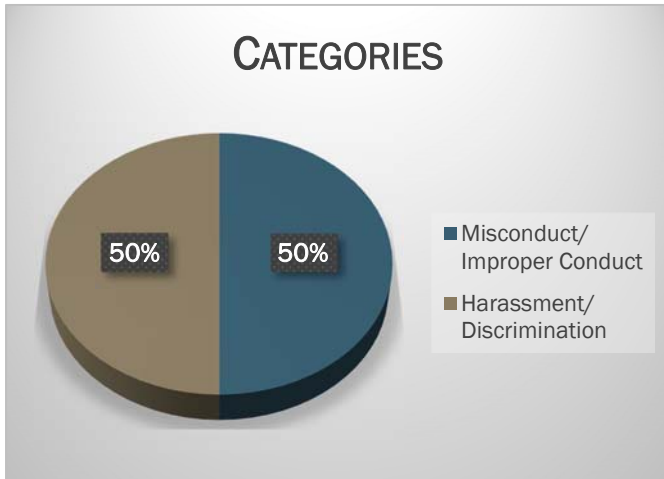
Triage Process

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.

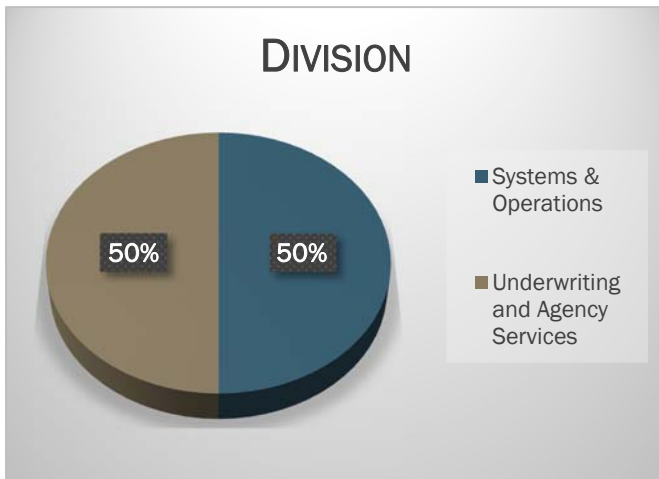
Cases Initiated in 3rd Quarter 2016

Of the two opened cases (two Investigations) initiated during the 3rd Quarter of 2016, one involved allegations of Improper Conduct and one involved allegations of Discrimination/Harassment.



Category	Quantity
Misconduct/Improper Conduct	1
Harassment/Discrimination	1

The two opened cases impacted two Citizens divisions; Systems & Operations and Underwriting and Agency Services.



Division	Quantity
Systems & Operations	1
Underwriting and Agency Services	1

Cases Closed 3rd Quarter 2016

During the 3rd Quarter of 2016, four cases were closed. The average closure time for a case was 90 calendar days.



Definitions

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.

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 criminal prosecutions or terminations.

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. For example, an employee may file a complaint and subsequently withdraw the complaint. This scenario would require inquiry and documentation by the OIG with a memorandum of activities and results; however, the scenario likely would not lead to a full investigation proving or disproving the original allegation. 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.

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.