

Office of Inspector General

Complaint and Activity Data – 4th Quarter 2016 Report

A report of activity between October 1, 2016 and December 31, 2016.

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During the 4th Quarter of 2016, the Office of Inspector General (OIG) received nine 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 nine correspondences initiated Cases (3 Investigations, 1 Investigative Inquiry). One correspondence initiated a Substantive Project (Process Review) and the remaining four correspondences were addressed as Administrative Projects.¹



	Administrative Projects	Cases/ Substantive Projects
Open at the Beginning of Quarter	5	3
Received During Quarter	4	5
Closed During Quarter	8*	5
Open at the End of Quarter	1	3

*Notification of 2 HR referral closures were received during 4th quarter. However, the HR referral closures took place in prior quarters.

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 4th Quarter 2016

Of the five opened cases/substantive projects (three Investigations, one investigative inquiry, and one process review) initiated during the 4th Quarter of 2016, one involved allegations of ethics/conflicts of interests, one involved allegations of discrimination/harassment, one involved allegations of falsification of records, one involved allegations of improper conduct, and one was a process review.



Category	Quantity
Ethics/Conflicts of Interests	1
Discrimination/ Harassment	1
Misconduct/ Falsification of Records	1
Misconduct/Improper Conduct	1
Other – Process Review	1

The five opened cases/substantive projects impacted five Citizens divisions. The three Investigations and one investigative inquiry impacted Claims, Financial Services, Legal Services and Purchasing and Underwriting and Agency Services, respectively. A process review was completed in the Office of Inspector General.



Division	Quantity
Claims	1
Financial Services	1
Legal Services and Purchasing	1
Office of Inspector General	1
Underwriting and Agency Services	1

Cases/Substantive Projects Closed 4th Quarter 2016

During the 4th Quarter of 2016, five cases/substantive projects were closed. The average closure time for a case/substantive project was 47 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 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. 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.