

Office of Inspector General

Complaint and Activity Data – 2nd Quarter 2017 Report

A report of activity between April 1, 2017 and June 30, 2017.

Office of Inspector General

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During the 2nd Quarter of 2017, the Office of Inspector General (OIG) received ten correspondences. A correspondence is an inbound communication, often a complaint or request for review, which is received and tracked by the OIG.

Seven of the ten correspondences initiated Cases (2 Investigations, 5 Investigative Inquiries). The remaining three correspondences were addressed as Administrative Projects.¹



	Administrative Projects	Cases/ Substantive Projects
Open at the Beginning of Quarter	2	0
Received During Quarter*	3	9
Closed During Quarter	4	5
Open at the End of Quarter	1	4

*Note: 2 Correspondences received during the 1st quarter were not assigned as Cases/Substantive Projects until 2nd Quarter 2017.

¹ Definitions can be found on page 3.

Triage Process

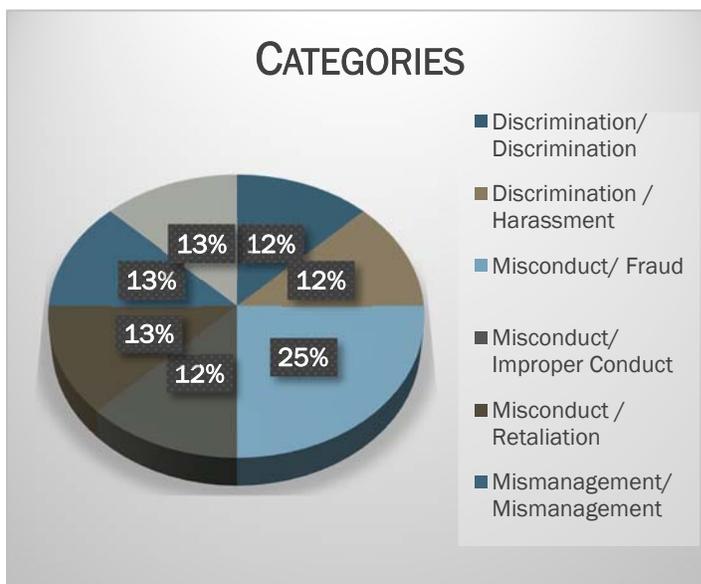
The Inspector General will convene a meeting to triage complaints received through Citizens' Complaint Reporting Hotline, *Tell Citizens*, or other mechanisms to discuss the merits of the complaint and collaboratively assign the complaint as appropriate for handling.

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 2nd Quarter 2017

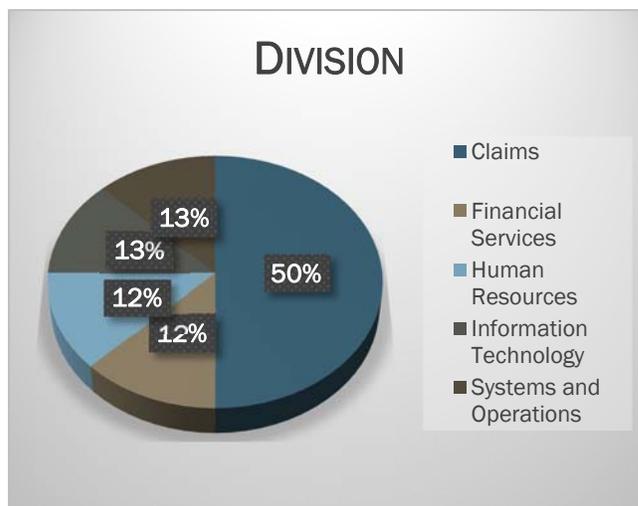
Of the eight cases (three Investigations and five Investigative Inquiries) initiated during the 2nd Quarter of 2017, one involved allegations of discrimination/discrimination, one involved allegations of discrimination/harassment, two involved allegations of misconduct/fraud, one involved allegations of misconduct/improper conduct, one involved allegations of misconduct/retaliation, one contained allegations of mismanagement/mismanagement and one involved allegations of vendor improprieties/improper conduct. In addition, one substantive project was opened, an audit worked in conjunction with Office of Internal Audit.

*Note: 2 Correspondences received during the 1st quarter were not assigned as Cases/Substantive Projects until 2nd Quarter 2017.



Category	Quantity
Discrimination/ Discrimination	1
Discrimination / Harassment	1
Misconduct/ Fraud	2
Misconduct/ Improper Conduct	1
Misconduct / Retaliation	1
Mismanagement/ Mismanagement	1
Vendor Improprieties/ Improper Conduct	1

The eight opened cases impacted five Citizens divisions. Information Technology, Systems and Operations, Financial Services and Human Resources were impacted by one case each. Claims was impacted by 4 cases



Division	Quantity
Claims	4
Financial Services	1
Human Resources	1
Information Technology	1
Systems and Operations	1

Cases Closed 2nd Quarter 2017

During the 2nd Quarter of 2017, five cases were closed. The average closure time for a case was 24 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.