



WHAT A DEAN NEEDS TO KNOW ABOUT... FISCAL COMPLIANCE AND THE MSU COMPLIANCE HOTLINE

FISCAL COMPLIANCE

There are many fiscal policies and procedures that accounting staff should be aware of, however, the results of noncompliance with many of these are not overly significant:

- State of Montana Operations Manual (MOM): <http://mom.mt.gov/>
- BOR Section 900 – Financial Affairs: <http://www.mus.edu/borpol/borgoo/borgoo.asp>
- MSU Policies and Procedures – Financial Affairs: <http://www.montana.edu/policy/>
 - [Business Procedures Manual](#)
 - [Principal Investigator Guide](#)
 - [Acceptance and Processing of Gifts Policy](#)

Fiscal misconduct can lead to disciplinary actions, including loss of employment, as well as the potential of civil or criminal actions as may be appropriate. Fiscal Misconduct is a deliberate act, or failure to act, regarding fiscal matters that violates laws, regulations or policies.

| Area | Risk | Controls |
|-----------------------------|---|--|
| Purchasing card | Use of purchasing card for personal (or other unallowable) expenses | <ul style="list-style-type: none"> • Unit-level review of purchasing card reports • Purchasing card only used by cardholder |
| Revenue collection | Revenue collected is misappropriated | <ul style="list-style-type: none"> • Duties are segregated or compensating controls are implemented (e.g., collection from deposit preparation) • Records of initial receipt must be retained |
| Conflict of interest | Private interest negatively impacts an employee's university activities | <ul style="list-style-type: none"> • Conflicts of interest are disclosed • Conflict management plans are developed and followed |
| Sponsored programs | Costs charged to sponsored programs are unallowable | <ul style="list-style-type: none"> • PIs are knowledgeable of grant rules • Grant accountants are empowered to question allowability of costs |
| Property management | Misappropriation of equipment | <ul style="list-style-type: none"> • Property Management Office is contacted for compliant disposition of property • Maintain a listing of minor and sensitive equipment and conduct biennial physical inventories |

MSU Fiscal Misconduct – Affiliated Campuses Policy:
http://www.montana.edu/policy/fiscal_misconduct/

Any employee or student associated with the University who knows of, or suspects, fiscal misconduct should promptly notify his or her supervisor or one of the Responsible Officials for his or her campus [Director of Audit Services, Legal Counsel, or Director of University Police]. If a supervisor is notified of suspected fiscal misconduct, he or she will promptly notify a Responsible Official.

MSU COMPLIANCE HOTLINE

The university has selected a private contractor, EthicsPoint, to provide an independent avenue for confidential reporting of concerns about suspected legal, regulatory or policy violations. The MSU Compliance Hotline does not supersede existing channels of communication. The university encourages any employee to discuss suspected legal, regulatory or policy violations with his or her supervisor, Human Resources or other administrators responsible for the program that is the cause of concern. www.msucompliancehotline.ethicspoint.com

MSU Policy on Reporting Suspected Legal, Regulatory or Policy Violations:
<http://www.montana.edu/policy/reporting-violations/>

200.10 Acting in good faith. Anyone reporting suspected legal, regulatory or policy violations must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of law, regulation or policy.

200.30 Retaliation. No individual who reports suspected legal, regulatory or policy violations in good faith will suffer harassment, retaliation, or adverse employment consequences because they made the report. Any person who retaliates against any individuals because they made a report may be subject to disciplinary action, up to and including termination.

200.40 False allegation. Any employee or volunteer who knowingly or with reckless disregard for the truth gives false information or knowingly makes a false report of wrongful conduct or a subsequent false report of retaliation may be subject to disciplinary action, up to and including termination. Any student who makes false allegations in the non-employment setting will be subject to charges under the student conduct code. Allegations that are not substantiated yet are made in good faith are not subject to corrective action.

WHO TO CONTACT SHOULD AN ISSUE ARISE:

Daniel Adams
Director, Office of Audit Services
Culbertson 336
danieladams@montana.edu
406-994-1805