



Policy Title:
Fraud and Irregularities, Policy on Fraud and Irregularities

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This policy item applies to:
State-Operated Campuses
Statutory Colleges

Category:
Internal Audit
Legal and Compliance

Responsible Office:
[University Auditor](#)

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Summary

The State University of New York (SUNY) is committed to upholding the highest standard of honest behavior, ethical conduct, and fiduciary responsibility with respect to SUNY funds, resources, and property. As such, SUNY seeks to prevent and detect any fraud or irregularities and will diligently pursue any instance that involves SUNY-related activities or business.

Policy

It is the policy of SUNY that all members of the SUNY community:

- comply with all SUNY policies and procedures; and New York State and federal laws, and regulations,
- practice honesty and integrity in fulfilling their responsibilities;
- observe high standards of business and personal ethics in the conduct of their duties and responsibilities;
- help ensure the prevention and detection of fraud and irregularities;
- be familiar with the types of fraud and irregularities that might occur in their area;
- be alert for any indication that fraud or irregularities might exist in their area; and
- promptly report any known or suspected fraud or irregularities involving SUNY or affiliated entity funds, resources, property, or employees.

It is the policy of SUNY that employees and individuals who lawfully report suspected fraud, waste, or abuse shall not suffer discharge, demotion, suspension, threats, harassment, discrimination, or other forms of retaliation for making such reports in good faith.

Definitions

Fraud and irregularities include activities that are (1) a misappropriation of assets; (2) in violation of or non-compliant with any SUNY, New York State, or federal law, regulation, policy or procedure; (3) economically wasteful; (4) an indication of gross misconduct or incompetency; or (5) an unethical, improper, or dishonest act.

Other Related Information

SUNY, SUNY System [Compliance Initiative Website - Fraud Policy and Procedure Webpage](#).

[New York State Labor Law § 740, Retaliatory personnel action by employers; prohibition](#). (whistleblower protection)

[New York State Civil Service Law § 75-b, Public Sector Whistleblower Law](#). (whistleblower protection)

[New York State Public Officers Law §73, Business or professional activities by state officers and employees and party officers](#).

[New York State Public Officers Law §73a, Financial Disclosure](#).

[New York State Public Officers Law §74, Code of Ethics](#).

Procedures

[SUNY Procedure on Reporting and Reviewing Fraud and Irregularities. Policy Document No. 9001](#). - Fraud and Irregularities, Procedure on Reporting and Reviewing Fraud and Irregularities

Forms

None.

[Note: There is a Form related to the corresponding procedure, via the Procedure Section of this policy, above.]

Authority

[Trustees' Resolution 2013-012 \(dated March 19, 2013\) Fraud and Irregularities Policy and Procedure](#).

History

Memorandum to Presidents from the Senior Vice Chancellor, dated November 22, 1993, established protocol with regard to fraud investigations and audits that affect SUNY.

On March 19, 2013, the Board of Trustees [adopted a Fraud Policy and revised Procedure through a resolution](#) which updated the previous Fraud Procedure, [Policy Document 9001](#), Procedures for Suspected Fraud or Irregular Activities.

Appendices

There are no appendices relevant to this policy.