

# HOWARD UNIVERSITY POLICY

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**Policy Number:** 400-004 Governance, Risk and Compliance  
**Policy Title:** Hotline and Whistleblower Policy and Procedures  
**Responsible Officer:** Chief Audit and Compliance Officer  
**Responsible Office:** Office of Audit and Compliance (OAC)  
**Effective Date:** October 2022 – Interim  
July 5, 2023 - Final

## I. POLICY STATEMENT

It is the policy of Howard University (“the University” or “HU”) to assure the responsible stewardship of Howard University resources and adherence to the Code of Ethical Conduct. Therefore, the University maintains a Compliance Hotline for reporting suspected violations of policies, the Code of Ethical Conduct, and/or allegations of fraud, waste, abuse, mismanagement of resources in the University community.

As stated in the University’s Code of Ethical Conduct, every member of the University community has a duty to report reasonably suspected violations of this Code of Ethical Conduct to the University’s Chief Audit and Compliance Officer. To encourage employees, students, contractors, grantees, and recipients of HU funds to come forward with credible information on illegal practices or violations of adopted policies, it is also the University’s policy to protect the individual from retaliation. Retaliation for a good faith report is a violation of University policy and may result in disciplinary action up to and including termination. However, filing a report that is not made in good faith will not insulate an employee from appropriate disciplinary action up to and including termination.

## II. RATIONALE

It is the University’s position to ensure efficient and effective use of its assets and resources by: (a) preventing fraud, waste, abuse, and mismanagement of its resources; and (b) ensuring compliance with applicable laws, regulations, and policies.

## III. ENTITIES AFFECTED BY THIS POLICY

This policy applies to all University employees, contractors, grantees, students, and entities that use or receive HU resources. Employees, students, alumni, and members of the general University community may report allegations of fraud, waste, abuse, or mismanagement via the Compliance Hotline.

#### IV. DEFINITIONS

For the purposes of this policy and procedure, the following definitions apply:

- A. Fraud - an act or instance of spending or using carelessly or inefficiently.
- B. Abuse - an act or instance of wrongful or improper use of authority.
- C. Mismanagement - an instance or act of wrongly or incompetently carrying on a business or organizational affair.
- D. Anonymous Complainant – persons who make allegations and are known only to Office of Audit and Compliance (OAC) employees. A complainant may choose to be anonymous.
- E. Confidential Complainant – persons who make allegations and, at the discretion of the Chief Audit and Compliance Officer or the General Counsel, may be known to others on a need-to-know basis. A complainant may choose to be confidential.

#### V. POLICY PROCEDURES

Persons who would like to report a concern may take one of the following actions:

- A. Report concerns to the Compliance Hotline by calling (844) 944-3408, available 24/7
- B. Submit an online report to [www.howard.ethicspoint.com](http://www.howard.ethicspoint.com)
- C. Visit, write to, or call the Office of Audit and Compliance located at 2400 Sixth Street NW, Room 428, Washington, DC 20059. Phone: (202) 806-2511
- D. Send an email to [compliance@howard.edu](mailto:compliance@howard.edu)

Persons who make allegations (complainants) may choose to:

- A. Remain *anonymous* and known only to Office of Audit and Compliance (OAC) employees, or
- B. Be *confidential* and known to OAC employees and others who have a need-to-know in the opinion of the Chief Audit and Compliance Officer or the General Counsel of the University.

Persons who choose to remain anonymous must understand that the OAC may not be able to obtain sufficient information to properly, timely, and completely audit or investigate the allegation(s). The same situation may apply to confidential complainants, but to a lesser degree.

For internal office tracking purposes, all allegations will also be recorded on an Allegation Report Control Log. Allegation Reports will be retained by OAC for a period of seven years. A control number will be placed on each Allegation Report which is the principal tracking mechanism for allegations.

Allegation Reports will be given to the Chief Audit and Compliance Officer or the General Counsel, who will decide that one of the following two (2) actions will be taken:

1. Take no further action on the allegation(s) if: (a) insufficient information was provided by the complainant and follow-up requests for additional information rendered no results; (b) the report appears to have no merit.
2. Refer the allegation(s) to the responsible party that has the authority and ability to investigate and/or implement corrective action, and/or conduct an audit or investigation of the allegation(s). Audits or investigations will be performed in accordance with OAC policies and procedures, and a report will be generated. The Chief Audit and Compliance Officer or his/her designee, with consultation appropriate for the situation, will determine the distribution of the report.

The Chief Audit and Compliance Officer will review the Allegation Report Control Log with the General Counsel on a quarterly basis. If anyone employed by the OAC or OGC is the target of an allegation, the review of that allegation shall be done by external counsel.

## **VI. SANCTIONS**

Failure to follow this policy or any other approved University policy shall result in disciplinary action, up to and including termination of employment.

## **VII. HYPERLINKS**

[Howard University Policy Website](#)

[Office of Audit and Compliance \(OAC\)](#)

[Howard University Code of Ethical Conduct](#)

[Howard University Employee Handbook](#)

## **HISTORY**

Effective date: April 24, 2009

Amended: January 18, 2012

Amended: October 2022 (Interim)

Revised: July 5, 2023