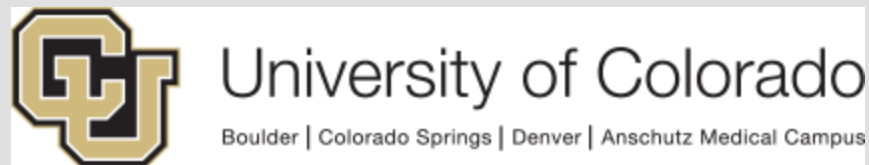


Art of Scoping the Investigation

Kevin Sisemore CPA CFE CIA

University of Colorado

Executive Director of Internal Audit



COMPLIANCE WEEK 2014
POWERFUL INSIGHTS, PRACTICAL IDEAS, REAL SOLUTIONS

Art of Scoping the Investigation

31 Years Experience in Audit and Investigations

20 Years Corporate

11 Years Higher Ed

Certified Public Accountant

Certified Fraud Examiner

Certified Internal Auditor

Fraud Examination Educator and Writer

Art of Scoping the Investigation

UNIVERSITY OF COLORADO

\$3 Billion Annual Budget

27,500 Employees – 3rd Largest Employer in Colorado

NCAA Division 1 University

\$770 Million in Research Funding

Medical Campus

Medicine

Nursing

Dentistry

Pharmacy

Art of Scoping the Investigation

The First Step

Compliance Investigations Policies

- Definitions
- Reporting Requirements
- Investigative Roles and Responsibilities
- Remedial Actions (Consequences)

Art of Scoping the Investigation

Investigation Response Team

Compliance Office

Internal Audit

Legal Counsel

Human Resources

Finance

Security/Police

Internal SMEs

External SMEs

Appropriate Level of Management

Art of Scoping the Investigation

When Definitely to Consult Internal Audit

- Appearance of a Personal Benefit
- A Control or Process Issue
- Clear Financial Impact
- Effort to Conceal

Art of Scoping the Investigation

When to Consider Consulting Internal Audit

- A Matter of Policy Interpretation
- A Dispute over Applicability
- No Effort to Conceal