

**The University of Connecticut
Office of Audit, Compliance and Ethics
Report on
Compliance with Faculty Consulting Policies**

BACKGROUND

Connecticut State Public Act (PA) 07-166, approved on June 19, 2007, provides legislative relief in relation to the State Ethics Laws as they pertain to faculty or a member of a faculty bargaining unit of a constituent unit of the state system of higher education. The legislation allows a faculty member to enter into a consulting agreement with a public or private entity, provided such agreement or project does not conflict with the member's employment as determined by policies established by the board of trustees for each constituent unit. Furthermore, PA 07-166 requires the implementation of policies which "(i) establish procedures for the disclosure, review and management of conflicts of interest relating to any such agreement or project, (ii) require the approval by the chief academic officer of the constituent unit, or his or her designee, prior to any such member entering into any such agreement or engaging in any such project, and (iii) include procedures that impose sanctions and penalties on any member for failing to comply with the provisions of the policies."

PA 07-166 requires that the Internal Audit Department (Audit) of each constituent unit perform a semiannual audit to assess compliance with faculty consulting policies. This audit is included in the annual Office of Audit, Compliance and Ethics (OACE) audit plan which has been approved by the University of Connecticut Joint Audit and Compliance Committee of the Board of Trustees (BOT).

OBJECTIVES AND SCOPE

Our audit objectives and scope were:

- To evaluate the effectiveness of the established faculty consulting activity policy and procedures
- To test University compliance with the faculty consulting policy and procedures
- To evaluate compliance with the annual consulting activity reconciliation reporting requirements

The number of Consulting Request Forms submitted to the Storrs and University of Connecticut Health Center (UCHC) Faculty Consulting Offices (FCOs) for the period July 1, 2008 through December 31, 2008 was 771 and 463 respectively.

CONCLUSION

Based on our audit work, we noted the reoccurrence of several observations that appeared in the previous audit, including: 1. consulting requests approved on or after the start date; 2. consulting requests approved without sufficient detail; 3. consulting activities performed while drawing summer salary; and 4. the lack of a sanctions and penalties policy. Due to the timing of the initial

faculty consulting audit report, issued in final form in November, 2008, the recommendations offered in the report were not addressed by management actions until January 1, 2009. As a result, the implementation of the corrective actions, including revisions to the Consulting Request Form and the creation of a “Sanctions for Non-Compliance Policy,” will be reviewed in the next semiannual audit.

We conclude that as currently written, the faculty consulting policy promotes automatic approval of consulting requests that do not exceed an average of one day a week rather than ensuring that faculty consulting activities do not conflict with a faculty member’s university responsibilities. We arrived at this conclusion based on the number of faculty consulting requests at or nearing the one day a week maximum and our observation of departmental review and approval practices. In addition, due to contradictions and inconsistencies in the policy language, we found there to be confusion regarding several terms/concepts particularly in the definition and treatment of “time due the university” and periods “deemed off duty” and “total amount of consulting.”

The Consulting Request Form provides a written template for minimum disclosure requirements. It is the faculty members’ responsibility to provide all of the facts relating to the proposed consulting activity, in sufficient detail, whereby, the Department Head, Dean and Provost’s designee can determine whether the activity may conflict with their primary commitment to the University. We observed a number of consulting request forms that failed to provide the level of detail necessary to assess the impact of the activity on the requestor’s ability to perform his/her duties or to determine if the consulting activity may be perceived as being work the University would choose to perform.

Departmental implementation of the provisions of the University’s faculty consulting policies and procedures was a focal point of our current review. Based on our discussions with management and the responses provided to our departmental questionnaire, we concluded that while departments appear to have a loose mechanism to monitor faculty consulting, individual faculty member schedules and activities are not reviewed prior to approval of a consulting request. Also, the length of time required to prepare the responses and documentation by three of the four departments selected for testing are an indication that no formal departmental level procedures or tracking existed for these departments prior to our request for information.

The Conflict of Interest Committee (COIC) on the Storrs campus and The Individual Conflict of Interest in Research Committee (ICIRC) at UCHC provide oversight and management with respect to matters involving individual conflicts of interest in research. Each Committee requires faculty members to report any financial relationship of \$10,000 or more and to provide updates to the Committees during the year if their financial situation significantly changes. Each Committee is empowered to develop a conflict management plan when it is determined that the perception of a financial conflict of interest exists. We observed various consulting requests possessing characteristics associated with potential conflicts of interest. These characteristics include consulting for an entity in which the faculty member holds a significant ownership interest and remuneration that exceeds \$10,000. The UCHC FCO stated that consulting requests in which consulting income exceeds \$10,000 per year from a contracting entity that has grants/contracts with UCHC are reported to the ICIRC for review. However, the current faculty

consulting policy has no procedure for notifying the COIC when a potential conflict of interest in research is identified. These same consulting requests may also raise questions about the potential for competition relating to sponsored program activities.

Finally, after reviewing the first year-end faculty consulting reconciliation performed under the current faculty consulting policy, we conclude that the faculty consulting reconciliation forms produced and distributed by the FCOs did not require the faculty to provide accurate “after the fact” details regarding total compensation received and actual number of days spent on each consulting activity as required in Section 5.i of the BOT approved faculty consulting policy.

The management and staff in the Storrs and UCHC FCOs were accessible and helpful during our audit. The FCOs have invested a tremendous amount of effort in fine tuning the implementation of the University’s faculty consulting policy, demonstrating a commitment to fulfilling their oversight responsibilities and to achieving compliance with the requirements of PA 07-166. We thank them for their effort, professionalism and consideration.

Management Response

Within the Conclusion Section and in the specific numbered observations and recommendations that follow, the auditors raise concerns regarding the adequacy of the review processes being conducted by department heads prior to approving consulting request forms. These especially focus on the determination of whether consulting activities will interfere with a faculty member’s ability to adequately perform his/her assigned duties.

It is important to recognize that faculty consulting is encouraged and expected by the University as a vehicle of putting knowledge into practice and to assist the University in meeting its public mission.

Indeed, Public Act 07-166 exempts consulting by faculty and members of faculty collective bargaining units from the State Code of Ethics as long as a rigorous set of conditions are met. The consulting approval system for UConn is therefore different than that of all other State employees in that it requires prior approval rather than using a trust-based system that allows the employee to consult and then, only if a question is raised, having such consulting reviewed and deemed appropriate or inappropriate after the fact. The Consulting Oversight Committee also created by Public Act 07-166 (and who receive and review the reports generated by the OACE) has already acknowledged that this system used by UConn is more rigorous than for other State employees.

Nonetheless, Management agrees that appropriate oversight does require that faculty provide sufficient information on the consulting approval request form to ensure that consulting activities do not interfere with their State jobs. To that end, Management gives serious consideration of any consulting activity from its initiation; during the activity; and, retrospectively, at its conclusion in order to ensure transparency of this important component of the University’s mission. Specifically, the FCO offices work with departments at the front end of the process to verify information that may seem extreme or inaccurate; the University has the ability to curtail a consulting activity at any time should it interfere with a faculty member’s state duties; and, finally, faculty members are subject to rigorous annual performance reviews that would clearly

identify any inadequacy in performing their duties. In addition, the FCOs track heavy users of the consulting system throughout the year and new requests from such faculty members undergo additional scrutiny.

OBSERVATIONS & RECOMMENDATIONS

1. Time Due the University Policy

As employees of the University, faculty members are expected to devote their primary efforts to the advancement of its educational, research and service objectives. As noted in the introduction to the BOT approved “Policy on Consulting for Faculty and Members of the Faculty Bargaining Unit” (the faculty consulting policy), faculty are prohibited from consulting on “time due to the University.” Additionally, Sections 5.b.ii and iii of the faculty consulting policy contain the provisions that “permission to consult may only be granted when... The faculty member is currently, fully performing his/her State duties and the consulting activity will not interfere with a faculty member’s future ability to perform his/her duties and the total amount of consulting in any fiscal year will not exceed an average of one day per week.”

Based on the broad nature of faculty duties, “time due the University” cannot be assigned to the traditional concept of a “normal workweek”, i.e., 8-hours a day, 5-days a week. As such, it follows that when a faculty member is fully performing his/her duties, time spent on any private consulting activity, regardless of when it occurs, is off-duty or uncommitted time, i.e., time in which the faculty member is not performing his/her University duties.

However, section 5.b.iii also contains the provision that “Time spent on consulting activities performed during any period during which the faculty member is deemed off duty (e.g. faculty members who have 10 or 11 month contracts) will not be considered in determining the maximum of such time allowed.” This provision appears to be in direct conflict with the provisions above.

Additionally, the treatment and definition of “total” amount of consulting is not clearly stated in the policy and needs further clarification.

During our audit fieldwork, we identified various Storrs and UCHC faculty members who have requested consulting days in excess of the one-day-a-week threshold. However, further testing identified several of these individuals as either part-time faculty members or as faculty members on sabbatical leave for the duration of the consulting request. The permission to consult section of the policy, as written, does not clearly describe the policy as it relates to individuals who are on leave or employed less than full time.

We also observed several nine-month faculty members at Storrs with a single approved consulting request totaling at or near the one-day-a-week ceiling. The permission to consult section of the policy, as written, appears to promote automatic approval of requests falling within the one-day-a week allowance.

Recommendation

The faculty consulting policy should be revised to provide additional clarification, particularly in the definition and treatment of faculty who are on leave or employed less than full time, “periods deemed off duty,” uncommitted time, “total” amount of consulting and use of the “one-day-a-week rule.”

Management Response

Management agrees that the additional clarification on the definitions of “time due to the University,” “time during normal work hours/week,” and similar references related to the “one-day-a-week rule” would be beneficial and should be made. Estimated completion date: January 1, 2010.

As far as Management can determine, no faculty member exceeded the “one-day-a-week” rule.

2. Inadequate Description of Consulting Activity

Section 5.a of the faculty consulting policy states: “All faculty members must receive written permission in advance...in order to engage in consulting activities. Requests for such permission will describe the activity, its contracting entity, dates and times to take place, and an estimate of the total time it will take to complete.”

We observed that 31% of the Storrs and 30% of the UCHC Consulting Requests Forms identified a consulting period greater than six months and up to one year in length. The number of days allocated to the consulting activities on these requests ranged as high as 52 days and 30 days respectively, with no explicit details on the dates and times that the activity would take place. While the policy indicates that on-going consulting requests are allowed, forms completed without information on dates and times do not comply with the requirements of section 5.a of policy. Without this information it is difficult to determine if the consulting request conflicts with the faculty member’s responsibilities.

Additionally, numerous Storrs consulting requests provide one word descriptions of the activity to be performed such as, “consulting,” “evaluating” and “advising.”

Recommendations

The faculty consulting policy and procedures should be revised to clarify the use of estimated times and/or the actual dates and times as it relates to an “on-going” consulting activity.

Faculty members should include specific details in the description of the consulting activity to be performed rather than use generic verbs and when possible, estimate the frequency, dates and times of the activity over the time period specified in the request.

When specific dates and times are not known at the time of the request, Department Heads should establish procedures to require the faculty members to provide the actual dates and times allocated to the consulting activity as soon as the date(s) become available. This recommendation is not addressed.

Management Responses

Many faculty members submit consulting requests for extended periods of time (up to one fiscal year per request form) because it is unclear at the onset of the fiscal year what the total effort will be for the year. This works much as a legal retainer system in which a maximum is set and approved activities must fall below such a cap.

Management agrees that the consulting procedures should be revised to clarify the use of estimated times and dates of ongoing activities and to articulate when and how actual dates are communicated with Department Heads. Estimated completion date: January 1, 2010.

Management agrees that it needs to collect sufficient information regarding the nature of consulting and/or the effort required in order to determine whether approval should be granted. Management believes that it is already obtaining such information in almost all cases but notes that in many cases, the description of the activity, even if as terse as “lecture” or “scientific advice” might be sufficient and more detail not needed in determining whether to approve a consulting activity. The FCOs will return consulting requests forms back to the faculty members if the description of the activity is insufficient.

3. Consulting Activities Performed while Drawing Summer Salary

During our review of the Storrs consulting records, we identified 207 consulting activities that occurred during the period, July 1, 2008 through August 22, 2008, prior to the academic payroll year which began on August 22, 2008. We traced the faculty members submitting the requests to the payroll system (Genesys) to determine if any were authorized to receive University paid compensation during the same period. We observed 57 consulting requests for 43 faculty members with some degree of overlap between the dates committed to externally funded research activities paid through the University and the activity dates specified in the request. Fifteen of these 57 consulting requests specified dates in direct conflict with time already allocated to and compensated through externally funded research projects.

Faculty members earning extra compensation from the University have committed a corresponding percentage of “on duty time” to research activities funded by external sponsors. In these instances, significant paid “release” time to perform consulting activities for other contracting entities during the same time period may compromise a faculty member’s ability to perform his/her duties which may conflict with the sponsors’ expectations and jeopardize the University’s relationship with these sponsors.

Recommendations

As described in Recommendation #2, Department Heads should require more specificity regarding the actual dates of a consulting activity when the faculty member earning University compensation during the summer for research activities funded by external sponsors. Serious consideration needs to be given to the amount of time and effort that can be appropriately devoted to private consulting activities when the faculty member’s summer salary is being reimbursed by governmental agencies or private funding sources.

As described in Recommendation #2, when specific dates and times are not known at the time of the request, Department Heads should establish procedures to require the faculty members to provide the actual dates and times allocated to the consulting activity as soon as the date(s) become available.

In lieu of seeking approval to consult from the external sponsor, Department Heads should cross check special payroll authorizations for summer research activities coinciding or overlapping in time. When a faculty member submits a consulting request diverting time from compensated summer research activities, the Department Head should not approve the request to consult.

Management Responses

Management would like to point out that faculty members who are paid a nine-month salary by the State of Connecticut and additional summer salary by the State (which may originate from the Federal Government or other sources) are entitled, assuming all other conditions are met, to consult so long as such consulting does not exceed an average of one day a week throughout the year. The faculty member is subject to the same consulting regulations for all 12 months.

Management would also like to point out that on the Storrs campus, (the summer salary issue is unique to the Storrs campus), faculty members certify in effort reports to OSP the amount of time they have worked for pay during the summer. In addition, this year, compliance training for all faculty and staff paid on grants focused on effort certification. Thus, faculty are well informed on these issues and Management agrees that all parties involved need to be mindful that rules governing these activities must be followed.

Management agrees that department heads should be aware of a faculty member's commitments to summer research activities and that consulting requests diverting time from these summer research activities should not be approved. As described in Management's response to Recommendation #2, Management agrees that the consulting procedures should be revised to clarify the use of estimated times and dates of ongoing activities and to articulate when and how actual dates be communicated with Department Heads. Estimated completion date: January 1, 2010.

4. Departmental Tracking and Management Review

By approving a faculty consulting request, the Department Head and/or Dean is attesting that he/she knows what the faculty member is doing and is cognizant of the combined impact of all consulting activities on the member's ability to fulfill his/her University obligations.

We selected three departments in each of the UCHC Schools of Medicine and Dental Medicine; the Storrs Schools of Engineering and Education for review of the faculty consulting approval process. A faculty consulting approval procedure questionnaire and request for details on faculty members' assigned duties were sent to the selected Storrs and UCHC Department Heads on March 6, 2009 and March 10, 2009 respectively.

Departmental testing at Storrs included a sample population of 22 faculty members in the School of Engineering with 314 days of approved consulting on 34 requests and 41 faculty members in the School of Education with 410 days of approved consulting on 91 requests. The five top faculty members in number of days consulting in the School of Engineering and the School of Education respectively requested an average of 36.6 and 35.5 days of consulting each. The remaining 17 and 36 faculty members in each School respectively, requested an average of 7.7 and 6.5 days of consulting each.

Departmental testing at UCHC included a sample population of 10 faculty members in the School of Dental Medicine with 115 days of approved consulting on 31 requests and 25 faculty members in the School of Medicine with 252 days of approved consulting on 101 requests. The top faculty member in total number of days consulting in the School of Dental Medicine requested 56 days of consulting (35 days during normal working hours). The remaining faculty members in both UCHC schools did not have a noticeably large number of requested days of consulting activity.

Several departments were not able to provide answers to the questionnaire or faculty members' assigned duties in a timely fashion, taking as long as five weeks to complete the request. We also observed several Department Heads making requests to faculty members for the details of their assigned duties after our request for information was made. These factors lead to the conclusion that approval is automatically given to consulting requests that do not exceed "an average of one day per week" without a more rigorous assessment of the nature of the activity and its impact on a faculty member's University duties, particularly for faculty members requesting a large number of consulting days.

Recommendations

Department Heads should monitor the total number of consulting requests for each faculty member and review current teaching schedules, student advising responsibilities, administrative assignments and sponsored research commitments to assess the impact of multiple consulting activities on a faculty member's ability to perform his/her University obligations.

The individual circumstances of each consulting request should be given thorough consideration. Department Heads should request additional information, including the actual days on which the consulting activity will be performed, a detailed description of the nature of the activity and the level of remuneration. It is the responsibility of the Department Head to determine whether a conflict of commitment exists and the impact of the activity on teaching schedules, office hours, research projects and other University service and administrative assignments.

Management Responses

Both the Storrs and UCHC FCOs maintain on-going database on cumulative time each faculty member has approval to consult. Since January 2009, UCHC has implemented a policy of reviewing this database quarterly and providing department heads with a list of their faculty who have a large number of days approved. The Department heads are asked to confirm the faculty member is fully performing his/her duties and the department head is

encouraged to consider the level of consulting if and when future requests are made. Both the UCHC and Storrs+ FCOs maintain an updated list of “heavy users” and when new requests are received ask the Department Head to confirm the faculty member is fully performing his/her duties. This system eliminates the need for each Department to keep its own running totals.

Management agrees to remind the department heads that they should be aware of the faculty member’s work commitments in order to assess the impact that a consulting activity may have on the faculty member’s ability to perform his/her duties.

5. Conflict of Interest in Research

The University has implemented the “Policy on Conflicts of Interest in Research” that encourages investigators to engage in appropriate outside relationships, while at the same time avoiding conflicts of interest that have the potential to directly and significantly affect the University's interests, compromise objectivity in carrying out University responsibilities, or otherwise compromise performance of University responsibilities, unless such conflicts are disclosed, reviewed, and managed in accordance with the policy.

During review of the Storrs and UCHC test populations, we observed eight Storrs and four UCHC Consulting Request Forms in which a faculty member requested approval to consult for a company in which he/she holds a significant ownership interest with remuneration in excess of \$10,000. These characteristics are indications of a significant financial interest, as defined by the COI policy. Currently, the faculty consulting policy does not include a mechanism or procedure to address communication with the Storrs COIC and the UCHC ICIRC regarding the potential conflict represented by the consulting activity.

Recommendation

The University should consider revising the faculty consulting policy to include procedures to ensure that potential conflicts of interest arising from a consulting activity are communicated to the COIC and ICIRC.

Management Response

Management agrees with the recommendation. The estimated completion date for policy/procedures revisions is January 1, 2010.

Management would like to reiterate that all faculty members who have a “significant financial interest” in an entity are already required by University policy and Federal regulations to disclose such interest to the appropriate COI Committee. The UCHC FCO already has policies in place to notify the appropriate COI Committee when it becomes aware that compensation earned while consulting creates a COI at the mandated level (\$10,000 per year.) The Storrs campus does a regular review and will contact the investigator to determine if a COI submission should be made.

6. Consulting Activities in Competition with the University

As noted earlier in this report, faculty members at both Storrs and UCHC are consulting for companies in which they have a significant ownership interest. Article XIV, Section M of the By-Laws states, “No employee in the service of the University shall devote to private purposes any portion of the time due the University without consent as provided in established University policy. Faculty members may take on outside consulting and research activities after the specific project has been approved by the appropriate University official.”

We performed additional testing for three Storrs faculty members whose consulting requests shared the following attributes.

- Only a single consulting request form was submitted for FY09
- The contracting entity was a private company in which the faculty member held an ownership interest and/or management position
- The consulting request spanned the entire academic year
- The days allocated to the consulting activity averaged one day per week
- The level of remuneration exceeded \$10,000

The purpose of this testing was to determine whether these activities contained an element of competition with the University. Using the federal website <http://www.usaspending.gov/fpds> we were able to identify the dollar value of federal contracts issued to the private companies in federal fiscal years 2000 to date. We extracted all University grant proposals submitted by these faculty members as Principal Investigator from the grants database maintained by the Storrs Office for Sponsored Programs. Finally, we used the University’s Financial Record System to identify the total funded grant expenditures from all sources for these faculty members for the fiscal years FY00 through May 2009.

Our analysis showed that federal research and development funding for the private company specified in each consulting request exceeded total grant funding to the University for these faculty members by as much as 131% to 260% during the ten year period reviewed. This pattern gives the appearance that a conflict of commitment exists for these faculty members and that the work performed as a consultant to the company in which he/she holds an ownership interest may be in direct competition with the University.

Recommendation

The faculty member should be required to provide a full written disclosure of the activities performed in the course of the consulting. Based on this written disclosure, the Office of the Provost should make a determination on the existence of a conflict of commitment and/or a conflict of interest. If warranted, an appropriate conflict management plan should be established and/or appropriate corrective actions undertaken.

Management Response

Management agrees that special attention needs to be given when the faculty member has an ownership interest in a contracting entity. In such cases a full written disclosure of the activities and careful review of potential conflicts of interest should be made. Estimated completion date: January 1, 2010.

7. Year End Consulting Reconciliation Reports

Section 5.c.i of the University's "Policy on Consulting for Faculty and Members of the Faculty Bargaining Unit," dated September 25, 2007 states, "All faculty members who were engaged in a consulting activity in a given fiscal year must complete a year end reconciliation report describing all consulting activities they have engaged in including the actual amount of time spent on each activity and the total compensation received for such consulting (including travel expenses.)"

Currently, the FCOs utilize the consulting request data records to generate a consulting reconciliation form for each faculty member with approved consulting requests in a fiscal year. This report includes each approved request submitted during the fiscal year, the activity start and end date, contracting entity, estimated range of remuneration, estimated number of days and an "Any Necessary Reimbursement" check box. Consulting requests that were not approved or were submitted in error are not included on the form.

Testing of the FY08 consulting reconciliation process included tracing the consulting request data records for the period from inception, September 2007, through June 30, 2008 to the completed reconciliation reports.

We observed that estimated rather than total remuneration received for each consulting activity was reported for more than 50% of both the Storrs and UCHC consulting requests. Based on our discussions with the FCOs, this was the result of the FCOs' interpretation of the policy. Also, the estimated rather than actual number of days spent on each consulting activity was reported for 87% Storrs consulting requests. This was not observed in the UCHC reports.

Additionally, faculty members appear to have misinterpreted the nature of the "any necessary reimbursement" section, confusing personal reimbursement with reimbursement due to the University for the use of University resources.

We also noted that follow-up of unapproved consulting requests was not included in the annual report.

Recommendations

As required in Section 5.i. of the faculty consulting policy, the annual consulting reconciliation form should be revised to include "fill-in" boxes for total compensation received and actual time allocated to each consulting activity. The reporting instructions and form should clearly indicate that this information is required. The reconciliation report forms should be returned, for completion, to faculty members who fail to provide this information.

Unapproved consulting requests should be included the annual report.

Management Responses

Management agrees to the changes recommended for the reconciliation form. Estimated Completion date: January 1, 2010.

Management also agrees to include unapproved consulting requests in its annual reports.
Estimated completion date: January 1, 2010.

8. Data Accuracy Issues

During our test procedures in the Storrs FCO, Audit traced a judgmentally selected sample of consulting request data records to the corresponding Consulting Request Form to test for existence, completeness and accuracy. We observed 11 consulting request data records (1%) that did not agree with the information on the corresponding Consulting Request Form, including: one error in the faculty member name and department; one error in the request-id and 12 errors in various date fields. These data entry errors had no material impact on the consulting request approval process. However, these errors, if not corrected, would flow through to the annual faculty consulting reconciliation forms generated from the data records.

No data entry errors were observed in the UCHC test sample during the period under review.

Recommendation

The accuracy of the consulting database records should be reviewed by Storrs FCO staff members on a monthly basis. Data entry errors should be corrected upon identification.

Management Response

Management agrees to establish procedures to regularly audit a random sample of records from the databases in order to determine the validity of the databases and will take appropriate actions if a pattern of unreliable data is observed. Estimated completion date: January 1, 2010.

9. Requests Approved with Inconsistent Details

Based on a review of both a randomly and judgmentally selected sample of 65 UCHC Consulting Request Forms we noted a form received by the FCO prior to being signed by the requestor and a form in which the compensation amount was based on an estimate of three to four meetings but the time requested on the form was for one meeting on a single day.

We also noted that two UCHC forms did not adequately describe the consulting activity when compared to the attached documentation provided by the faculty member. Specifically, the description of the activity on the consulting form specified “board member meetings” while the attached documentation stated that the faculty member holds a significant ownership interest in the company and will continue to consult for the company once the form has been approved.

During the review of a judgmentally selected sample of 212 Storrs Consulting Request Forms, Audit observed one form in the FCO files that was not assigned a request number or included in the consulting request database, one form approved with an undated faculty signature, one form approved with an incomplete number of days and two forms given “fast track” approval when the remuneration level exceeded the \$500 limit.

Recommendation

Incomplete, inconsistent or unsigned Consulting Request Forms should be returned to the requester. These forms should not be accepted or approved by the FCO until all required information and signatures are entered on the form.

Management Response

Agreed. As the number of request forms increases, mistakes are bound to occur. The audit process described under Observation/Recommendation #8 will also help with the errors described above. Staff will be reminded to double check and be sure that the conditions for fast track approval have been satisfied. Estimated completion date: January 1, 2010.