



**BOARD OF REGENTS OF
THE UNIVERSITY SYSTEM OF GEORGIA**

OFFICE OF INTERNAL AUDIT AND COMPLIANCE
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May 14, 2013

Dr. Ricardo Azziz
President
Georgia Regents University
1120 Fifteenth Street
Augusta, GA 30912
sent via email

Dear Dr. Azziz:

The Board of Regents' audit staff has completed its special review of Georgia Regents University (GRU). This special review was undertaken at the direction of Chancellor Hank Huckaby and in response to your letter of April 24, 2013. We performed fieldwork at Georgia Regents University during the week of April 29 and follow-up testing the week of May 6. Following is the final report that includes your response to the draft report. This report references GRU senior administrators. This term includes Dr. Ricardo Azziz in his role as GRU's President. Specific titles are used as needed to further differentiate among the various GRU employees.

Several overall conclusions arose from our work. The limited nature of a special review increases the difficulty of making any overall conclusion; nevertheless, we believe that we performed sufficient work to support our findings. First, we did not detect intent on the part of GRU senior administrators to violate Board Policy or misuse state resources. GRU personnel were forthcoming during our interviews and their statements to the special review team were consistent with the documentation and other evidence we collected. However, GRU senior administrators indicated a lack of awareness of relevant Board Policy and applicable regulations. This lack of awareness, combined with an overall lack of coordination in the instances reviewed, resulted in the issues identified in this report. Second, GRU violated Board Policy with respect to the use of GRU resources, use of GRU personnel, and management of the President's home. Our overall recommendations are summarized below:

1. **Implement a comprehensive effort to train its senior administrators on the requirements associated with Board Policy and University System of Georgia (USG) procedures.**
 - a. *Management Response:* We acknowledge this issue and have implemented the following actions.
 - John Fuchko, Chief Audit Officer and Associate Vice Chancellor, University System of Georgia, will conduct a six-hour training session on the policies of the Board of Regents with the following group on May 15th, 2013:

Dr. Ricardo Azziz, President;
Dr. Gretchen Caughman, Executive Vice President for Academic Affairs and Provost;

David Hefner, Executive Vice President for Clinical Affairs;
Susan Barcus, Senior Vice President for Advancement;
David Brond, Senior Vice President for Communications and Marketing;
Charles Enicks, Chief Information Officer;
Mark Hamrick, Senior Vice President for Research;
Dr. Roman Cibirka, Vice Provost;
Phil Howard, Vice President for Facilities;
Susan Norton, Vice President for Human Resources;
Clay Sprouse, Chief Audit Officer;
Jim Rush, Chief Integrity Officer;
Andrew Newton, General Counsel (GRU);
Susan James, General Counsel (Georgia Regents Health System);
Michael Shaffer, Interim Chief of Staff and Vice President for Government Relations;
Clint Bryant, Director of Athletics;
William McBride, Chief of Police;
Jim Jones, Interim CFO and Associate Vice President for Finance;
Russ Williams, Associate Vice President for Budget Planning and Analysis;
Clay Trover, Director, Supply Chain

- This group received a copy of the Board of Regents Policy Manual on May 8th, 2013 to prepare for the upcoming training.
- The Chief Integrity Officer is preparing a training plan for the wider university community, and that training will be complete no later than November, our annual Compliance Training Month.
- The Chief Integrity Officer will implement a system to identify and publicize future changes to Board of Regents policies no later than May 31st.
- The Chief Integrity Officer will identify any other potential knowledge gaps, and develop a training plan to address them, no later than July 15th.

2. **Enhance coordination efforts among senior administrators.** Enhanced coordination should ensure 1) effective integration of compliance requirements in the decision-making process, 2) timely coordination with the Chancellor's Office, and 3) designated "owners" to follow up on decisions, communication, etc.

- a. *Management Response:* We acknowledge the importance of this issue as well, and have implemented the following actions.
- GRU has an Office of Compliance and Enterprise Risk Management that supports and leads our institutional effort to ensure that compliance and risk management are a part of our

decision making at all levels – from strategy to everyday decisions, in accord with the University System of Georgia’s policies in this area. Among other initiatives, this office will implement a vetting process to identify issues that pose potential risks to the university and develop plans to mitigate risks and concerns by including responsible senior administrators as well as compliance and legal teams. The plan should include a determination of compelling need to proceed with any issue in light of identified risks, designating roles, responsibilities and resources for plan implementation, communicating strategy internally, externally and with the University System of Georgia. The training initiatives described in response to your first recommendation are part of our actions in response to this issue as well.

- The Interim Chief of Staff has prepared a checklist that will be reviewed with the Executive Oversight Group to ensure that potential risks are brought to the forefront, that a responsible individual is identified for each follow up item, and that the Chancellor and his staff are appropriately informed. That group normally meets at least once a week, and this regular agenda item will be implemented immediately.

Detailed findings and recommendations include:

3. Ensure use of GRU resources is consistent with Board Policy and state regulations. The use of a GRU-owned bus for a private event at the President’s residence violated Board Policy.

GRU senior administrators authorized use of a GRU-owned bus to transport guests for a private event held at the GRU President’s residence. This use was personal in nature and violated Board Policy 9.10.6.4 which states “USG property owned by an institution shall be used only for institutional purposes. No USG employees shall permit such property to be removed from the campus of an institution for use on either a rental or loan basis for personal use.” GRU senior administrators, to include the President, discussed the proposed use of the bus and agreed that it would be more appropriate to rent a private vehicle. However, this decision was not communicated to the GRU Chief of Police who had already arranged for an institution vehicle. The GRU Chief of Police did receive authorization from his supervisor, GRU General Counsel, to use the bus.

We also note that two police vehicles were used during the private event. The GRU Chief of Police was only aware of one vehicle having been used, i.e., the marked patrol car. However, an unmarked car was driven to the event by one of the four GRU public safety officers who worked the event.

We already have established that it was inappropriate to use a GRU-owned bus in connection with the private event. *However, both email documentation and our interviews confirm that there clearly was intent to pay for the GRU-owned bus well in advance of the actual event.* An invoice for use of the bus and one patrol vehicle was produced on the first business day following the event and subsequently has been paid. The bus was billed at the rate normally billed to GRU-affiliated entities. We recommend additional billing to capture the cost of the second police vehicle and, as will be discussed further below, to capture the cost of the GRU public safety personnel that worked the private event.

We also reviewed Dr. Azziz's travel expenses for fiscal years 2012 and 2013 to date. Travel reimbursements appeared to be consistent with applicable travel regulations and for legitimate business purposes. We recommend GRU formalize procedures to review the President's expense reports as required by University System of Georgia Business Procedures Manual section 4.3.

- a. *Management Response:* We acknowledge this issue, and we have implemented the following actions.
- The Division of Public Safety will revise its policy no later than May 31st to specify that that our shuttles and other university property cannot be rented for unofficial use.
 - The groom will be invoiced for the unmarked university vehicle used at the wedding. As you noted, the Chief of Police was unaware of the use of the second vehicle when the first invoice was prepared.
 - The guidelines on Institutional Support to the President and Family have been updated, specifically including further details and guidance on the use of university resources and the rules for private events held at Twin Gables. The final version has been communicated to all concerned.
 - Our Interim Chief Financial Officer and Chief Audit Officer are revising our procedures to review the President's travel expenditures. The new process will be implemented no later than May 31st, and no Presidential travel expenditures will be reimbursed until this new procedure is in effect.

4. Ensure employment of GRU personnel is consistent with Board Policy and applicable requirements. The use of GRU personnel to work the event violated Board Policy.

Seven GRU personnel (four police officers, the shuttle driver, the housekeeper, and the groundskeeper) provided services to the private event. While the circumstances differ for the various personnel, the use of GRU personnel for a private event without proper remuneration to GRU and subsequent payment by GRU to those personnel violated Board Policy and GRU procedures.

GRU President's spouse Mrs. Azziz approached the GRU Chief of Police in February 2013 for advice on handling parking, security, and transportation arrangements associated with a family wedding to be held in April 2013 at the President's residence. The President's residence is owned by the Board of Regents and the President is required to live there pursuant to Board Policy and his employment contract. It was appropriate to consult with the GRU Chief of Police in regards to this event given that it is owned by the Board of Regents. During this conversation, the GRU Chief of Police suggested use of the GRU-owned bus and also offered to volunteer services for the private event. The GRU Chief of Police solicited volunteers from among his senior officers; two senior officers (a Major and a Lieutenant) volunteered to assist the Chief of Police with the wedding. Additionally, a police officer who often works as the President's driver volunteered on the Wednesday prior to work the wedding. Two police officers worked inside the residence

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and two officers worked outside the residence. All four officers were in uniform. The officers started on duty at approximately 4:30. Two of the officers left around 9:00 p.m. and the remaining two officers left around 11:30 that same evening. The GRU Chief of Police received a \$400 gratuity for their services which he subsequently split among the four officers who worked the event.

Several issues arose with respect to this arrangement. First, the original arrangement proposed by the GRU Chief of Police was that he and several other officers would volunteer to work the wedding event. However, one of the four officers was an hourly employee and could not volunteer under Federal labor regulations. This officer was subsequently paid through payroll. The funding for this payroll came from that officer's \$100 of the \$400 gratuity and the remaining \$75 in cost was paid from the Chief's share of the gratuity. Second, it is questionable whether the remaining officers would truly be considered volunteers in these circumstances. The three salaried officers were on institution property, in uniform, and performing services consistent with those for which they receive a salary. Each officer reported that the chain of command was in effect. Additionally, GRU's own police operations manual states that "Employees are considered on-duty when travelling in their police vehicle, on Department approved business, or when the need for police related activity is required." We acknowledge the Chief of Police's statement that he recounted two similar events held previous to the administration of President Azziz as a basis for why the Chief believed providing these services was appropriate.

The nature of the request to volunteer was such that it would be difficult to qualify the response as truly voluntary. The request came from the Chief of Police in a work environment that, appropriately, emphasizes the chain of command. As such, supervisors should not be asking subordinates to volunteer to perform additional duty. Whether intended or not, the power differential of the two parties calls into question the voluntariness of the subordinate's decision. We do note that those officers who worked the event each reported that they willingly volunteered. Insofar as the officers were on duty, it is a violation of Board Policy 8.2.13.1 and the GRU Police Operations Manual to receive a gratuity for performing services. However, we acknowledge that the officers working the event stated that they did not perceive they were on duty and so did not perceive that they were subject to the gratuity guidelines.

We recommend that GRU bill for the police officers' time who worked the event and for the two police vehicles used for the event consistent with GRU procedures. The \$20 already paid for one police vehicle should be applied to these charges. Additionally, the unused portion of the \$400 gratuity should be collected back and applied to these charges.

We previously addressed the use of the GRU-owned bus and, by extension, the bus driver. However, we also note that the housekeeper and the groundskeeper assigned to the President's residence performed services for the wedding event in exchange for payment via a gratuity. As hourly employees employed by the institution they should not be performing side services on institutional property. As such, we recommend that these employees be paid the appropriate hourly rate for their work hours and that GRU bill these costs to the private event.

We also reviewed work orders leading up to the wedding event and the use of vendors for the event. There was no indication that other University resources were used to prepare for the wedding. The vendors used

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for the wedding were not paid with University funds and there was no indication that the vendor provided a discount for their services.

We noted four instances when GRU public safety personnel picked up Dr. Azziz's children from school. Neither GRU personnel nor Dr. Azziz could recall the exact date but all agreed that these events occurred early in Dr. Azziz's tenure as president. The circumstances in which these events occurred appear to have been out of the ordinary and generally related to situations where both Dr. Azziz and Mrs. Azziz were engaged with institution business. Dr. Azziz later requested his General Counsel to develop clear guidelines on the appropriate level of institutional support to the President and the President's Family. These guidelines specify that the "university shall not provide transportation to the President or his family for personal business, including transportation to and from schools, vacations, etc." We did not note any instances of personal use after the institution adopted these guidelines.

We do note that it is common practice for GRU public safety personnel to provide transportation to Dr. Azziz, and other family members on occasion, in connection with official travel and other University events. There is nothing in Board Policy that prohibits this activity. Additionally, the use of a driver for these events permits Dr. Azziz to more effectively use travel time to complete institution business. However, statements by the driver and email documentation confirm that the driver occasionally picks up personal luggage from the President's residence in connection with official travel. Schedule demands may, in exigent circumstances, result in requesting an employee to pick up official documents along with luggage associated with an official trip. However, this use should be exceedingly rare and the institution should implement procedures to prevent any inappropriate levels of support.

- a. *Management Response:* We acknowledge these issues and have implemented the following actions.
 - As stated above, the guidelines on Institutional Support to the President and Family have been revised to address these issues. These guidelines specify that university personnel may not volunteer for the President, and that personal services cannot be provided.
 - All university staff, including the police officers, the housekeeper and the groundskeeper, will return any gratuities they were given, and that money will be deposited with the university. All those staff will be paid through the university in accordance with our normal policies.
 - The groom will be invoiced for any additional costs identified. These steps will be implemented as soon as possible, and no later than May 31st.

5. **Implement procedures to ensure full compliance with all provisions of Board Policy 9.10.5 Presidents' Homes. GRU did not obtain the required approvals for improvements made to the GRU President's home. Some job duties of a GRU staff member assigned to the President's home violated Board Policy.**

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Board Policy requires institutions to obtain prior review and approval from the Chancellor and the Board of Regents for both the scope and budget of any proposed improvement to a President's home. Senior GRU administrators were not aware of this policy and so did not obtain approval for multiple projects.

We identified \$97,907 in expenditures and obligations for various projects by outside contractors associated with Dr. Azziz's tenure as President to include renovation work on the 3rd floor of the President's residence, work on a proposed carport addition, and miscellaneous smaller improvements. GRU did not obtain the required approval for the actual and proposed improvements. GRU also provided an analysis listing costs for improvements to the President's residence extending back to Fiscal Year 2001. Their analysis reveals that \$363,365 was spent for improvements to the President's home since Fiscal Year 2001 and prior to Dr. Azziz's administration. This \$363,365 is in addition to the aforementioned \$97,907 spent for improvements made during or in preparation for Dr. Azziz's administration. All improvements to the GRU President's home required approval by the Board of Regents. We were unable to identify evidence that any of these projects received the required Board of Regents approval. We also identified expenditures for HVAC replacements and other major and minor repairs. These expenditures appear to be a part of routine and necessary maintenance and are recorded as such by GRU. Going forward, GRU must obtain prior review and approval for all proposed upgrades to the President's home.

Board Policy prohibits institutions from providing any "food, food service, or other services ... for the presidents and their families" while also providing that the institution shall "be responsible for the repair and upkeep of the buildings and grounds of the homes furnished for presidents." The housekeeper assigned to the President's residence currently provides some services that are prohibited by Board Policy such as washing dishes. The housekeeper's job description includes making light meals; however, both the housekeeper and Dr. Azziz indicated that she does not actually perform these duties. Additionally, the housekeeper reported that she is paid directly by a member of the Azziz family to clean the cottage and perform other services on Saturday. Cleaning the cottage is an assigned duty and should be accomplished as a normal part of her employment during the work week. Additionally, full-time institution personnel should not be performing private employment on the grounds of the University.

- a. *Management Response:* We acknowledge this issue, and have implemented the following actions.
- The job descriptions for the housekeeper and groundskeeper at Twin Gables have been updated to clarify that their duties are equivalent to those performed in other university facilities, and that no personal services should be provided.
 - The revised Guidelines on Institutional Support to the President and Family also clarify the scope of the staff's responsibilities at Twin Gables, and they provide that university personnel cannot be engaged for private employment at Twin Gables.
 - Our Chief Facilities Officer will institute a Standard Operating Procedure to ensure future compliance with this approval requirement. He will work with the USG Office of Facilities to further define what projects need approval, and incorporate that guidance into our procedures.


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Our special review objectives were to: 1) determine the facts and circumstances pertaining to the use of institutional resources and personnel connected with a family wedding held at the President's residence on April 20, 2013, 2) determine whether said use was consistent with applicable policies, procedures, and other standards governing University System of Georgia employees and the use of state resources, 3) address other issues that may arise during the course of the review and, 4) provide recommendations as appropriate to address any violations, control weaknesses, or other issues as may be noted during our engagement. As noted above, other issues arose during the course of our review planning and fieldwork and these issues are addressed in the body of the report. As noted in the management response, the institution either has implemented or is in the process of implementing corrective action to address all of the issues raised in our report.

The information contained in this report was obtained from institutional records and systems, through discussions with institution personnel and through tests of sampled records and data. The special review does not constitute a detailed review of all financial transactions. Therefore, it is possible that errors, irregularities and/or illegal acts may go undetected. However, we believe that our special review provides a reasonable basis for our opinion. The special review was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing*.

The status of all management action plans should be reported to Internal Audit no later than the end of each quarter via the TeamCentral online system. If you have any questions, please contact me at 404-962-3025. Thank you for your cooperation or via e-mail at John.Fuchko@usg.edu, if you have any questions. Thank you in advance for your cooperation and assistance.

Sincerely,



John M. Fuchko, III, CIA, CRMA, CCEP
Chief Audit Officer and Associate Vice Chancellor

JMF/

cc: Members, Board of Regents of the University System of Georgia
Henry M. Huckaby, Chancellor
Dr. Steve Wrigley, Executive Vice Chancellor for Administration, BOR
Dr. Houston Davis, Executive Vice Chancellor for Academic Affairs, BOR
Tom Daniel, Senior Vice Chancellor for External Affairs, BOR
John E. Brown, Vice Chancellor for Fiscal Affairs and Treasurer, BOR
J. Burns Newsome, Vice Chancellor for Legal Affairs and Secretary, BOR
Jim James, Vice Chancellor for Real Estate and Facilities, BOR
Marion Fedrick, Vice Chancellor for Human Resources, BOR
Clay Sprouse, Chief Audit Executive, Georgia Regents University
Deron Hicks, Inspector General, State of Georgia
Claire Arnold, Director, Education Audit Division, Georgia Department of Audits and Accounts

May 13, 2013

John M. Fuchko, III, CIA, CRMA, CCEP
Chief Audit Officer and Associate Vice Chancellor
Office of Internal Audit and Compliance
270 Washington Street, S.W.
Atlanta, Georgia 30334

Dear Mr. Fuchko:

Thank you for your thorough and thoughtful work on this review. We are glad that this process will clarify these important issues, and provide us a chance to improve our performance. I have copied your bolded recommendations below, followed by our response.

1. **Implement a comprehensive effort to train its senior administrators on the requirements associated with Board Policy and University System of Georgia (USG) procedures.**

- a. *Management Response:* We acknowledge this issue and have implemented the following actions.
 - John Fuchko, Chief Audit Officer and Associate Vice Chancellor, University System of Georgia, will conduct a six-hour training session on the policies of the Board of Regents with the following group on May 15th, 2013:

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David Brond, Senior Vice President for Communications and Marketing;

Charles Enicks, Chief Information Officer;

Mark Hamrick, Senior Vice President for Research;

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Dr. Roman Cibirka, Vice Provost;
Phil Howard, Vice President for Facilities;
Susan Norton, Vice President for Human Resources;
Clay Sprouse, Chief Audit Officer;
Jim Rush, Chief Integrity Officer;
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- This group received a copy of the Board of Regents Policy Manual on May 8th, 2013 to prepare for the upcoming training.
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 - The Interim Chief of Staff has prepared a checklist that will be reviewed with the Executive Oversight Group to ensure that potential risks are brought to the forefront, that a responsible individual is identified for each follow up item, and that the Chancellor and his staff are appropriately informed. That group normally meets at least once a week, and this regular agenda item will be implemented immediately.
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John M. Fuchko, III
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 - Our Chief Facilities Officer will institute a Standard Operating Procedure to ensure future compliance with this approval requirement. He will work with the USG Office of Facilities to further define what projects need approval, and incorporate that guidance into our procedures.

Please let me know if you have any questions about our response. Our Chief Audit Officer will track these action plans and keep your office updated per your normal procedures.

Sincerely,



Ricardo Azziz, MD, MPH, MBA
*Professor, Obstetrics & Gynecology,
Medicine, and Medical Humanities
President, Georgia Regents University
CEO, Georgia Regents Health System*