



March 14, 2014

Mr. Randall J. Meyer
Ohio Inspector General
Office of the Inspector General
James A. Rhodes State Office Tower
30 East Broad Street, Suite 2940
Columbus, OH 43215

2014 MAR 14 PM 2:37
OFFICE OF
INSPECTOR GENERAL

Dear Inspector General Meyer:

This letter is in response to the recommendations made by your office to The Ohio State University Wexner Medical Center (OSUWMC) in File ID Number: 2012-CA00085. The following action items detail how the recommendations have been implemented.

Recommendation #1

Review the conduct of the OSUWMC employees named in this investigation and determine whether administrative action or discipline is warranted.

Action:

We have reviewed the conduct of the OSUWMC employees identified in your investigation in order to determine whether the employees met the high expectations that we have at The Ohio State University for honesty, integrity and compliance with our policies and Ohio law. Consequently, three of the employees named in your report are no longer employed at the university.

By way of background, in 2013, the OSUWMC Department of Human Resources began an internal investigation based on questions that arose during your office's ongoing investigation regarding Accu-Tech's interactions with OSUWMC employees. At that time, the university fully cooperated with your office's investigation; provided all of the information requested by your investigator; and offered to provide additional information in order to assist your office's investigation. The OSUWMC Department of Human Resources

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interviewed individuals who may have had knowledge about or engaged in misconduct. As a result of the internal investigation, preliminary action was taken and three employees were disciplined in August 2013. Samuel Stephens, senior systems consultant, was suspended without pay for one week for accepting one dinner from Accu-Tech in violation of the university's Vendor Interaction Policy and for not being forthright with the Department of Human Resources. Shawn Brown, senior systems consultant, received a written reprimand for accepting one dinner from Accu-Tech. Matt Daugherty, senior systems analyst, was issued a written notice for unethical behavior exhibited when he worked at Accu-Tech prior to his employment at the OSUWMC. Each employee was also warned that they may be subject to additional discipline, up to and including termination, pending the outcome of your office's investigation.

Upon receiving your office's investigation report in January 2014, which contained some information that was not previously made available to the university, the OSUWMC Department of Human Resources initiated a supplemental investigation of this matter, which included interviews with employees involved and a careful review of the information contained in your report. Prior to the completion of this supplemental investigation, Shawn Brown resigned his position. Subsequent to the supplemental investigation, Matt Daugherty and Samuel Stephens were terminated based on new information in your report and dishonesty exhibited in the university's review of the issues.

Recommendation #2

Provide additional training on the Vendor Interaction Policy to OSUWMC employees.

Action:

To date, OSUWMC's Office of Compliance and Office of Legal Services conducted 14 educational sessions regarding the OSUWMC Vendor Interaction Policy and Ohio Ethics Law. The educational sessions began in summer 2013 and are ongoing. OSUWMC departments were prioritized to receive the educational training based on the extent to which their employees interact with vendors, and have included the Departments of Information Technology and Material Systems. Managers and employees of these departments participated in the training. The educational sessions included an in-depth review of the OSUWMC Vendor Interaction Policy. Additionally, the OSUWMC increased and enhanced its online employee training regarding the Vendor Interaction Policy to complement the

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in-person educational sessions.

Recommendation #3

Provide a copy of the Vendor Interaction Policy to all OSUWMC vendors to remind them of the policy.

Action:

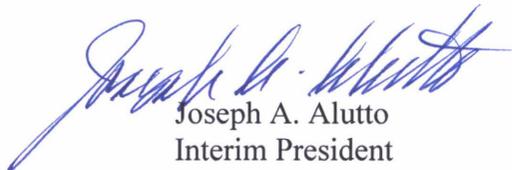
As we previously shared with you in a separate letter, we sent a letter to approximately 4,000 active vendors. The letter detailed the following information:

- The expectation, under both OSUWMC's Vendor Interaction Policy and Ohio law, that nothing of value be given to OSUWMC staff;
- The OSUWMC Vendor Interaction Policy itself, through a link to a PDF version; and
- Contact information at the OSUWMC for questions or concerns.

In addition, the letter asked the recipient to circulate the communication to all vendor employees who interact with OSUWMC staff.

I appreciate the opportunity to detail the actions that the OSUWMC has undertaken in response to your recommendations. Please know that The Ohio State University is committed to conducting business with integrity and in compliance with federal and state laws as well as our own policies.

Sincerely,



Joseph A. Alutto
Interim President