



Department of
Higher Education

John R. Kasich, Governor
John Carey, Chancellor

OFFICE OF THE
INSPECTOR GENERAL
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October 3, 2017

Via electronic and hand delivery

Randall J. Meyer, Inspector General
Office of the Inspector General
30 East Broad Street, Suite 2940
Columbus, OH 43215

RE: IG File Number 2015-CA00046
Response to Report of Investigation dated August 17, 2017

Dear Inspector General Meyer:

The Ohio Department of Higher Education (ODHE) has completed its review of your office's recommendations contained in the above-referenced report. I respectfully submit the following response to you regarding the recommendations outlined in the report.

Recommendation #1: Consider implementing a secondary employment policy, which requires all employees to report all outside employment.

Response: ODHE Chief Legal Counsel issues an annual all-staff email detailing the requirement that staff disclose secondary employment. During each such disclosure, ODHE Chief Legal Counsel provides guidance and advises whether or not the individual should seek the advice and opinion of the Ethics Commission if there is a potential for a conflict of interest. Staff will continue to receive annual ethics training which details the potential illegality of conflicts of interest and concerns of secondary employment. An in-person meeting with ODHE Chief Legal Counsel has also been added to our onboarding process to issue formal guidance to all new employees.

Recommendation #2: Require all ODHE employees to complete a timesheet, either paper or electronic, that identifies starting time, ending time and lunch in and out times.

Response: Beginning in January of this year, ODHE Chief Legal Counsel held small and large group discussions and training sessions regarding the expectations of time reporting, when to start and end the day, the requirement of a minimum 30 minute lunch, and the expectations of

when to record exact lunch times. Staff are advised to formally record exact lunch times when they are engaging in non-ODHE activities and not just eating during their break. ODHE will formally remind all staff of time and attendance expectations through an annual, all-staff email message sent at the beginning of each year.

Recommendation #3: Require ODHE supervisors to review and sign off on all their employees time reporting.

Response: ODHE Chief Legal Counsel and Human Resources reviewed past time sheets to ascertain variant reporting practices and develop best practices for time reporting. As a result, in January of this year supervisors were requested to establish the following expectations with each employee: general daily working hours, when and how to notify if those daily working hours were not to be followed, and compensatory time guidelines. Furthermore, timesheets were changed to connect direct supervisors with review and signature responsibility of paper timesheets. Annual reminders will be issued to supervisors to maintain best practices and help assure policy compliance.

Recommendation #4: Provide employees with a review of the policies on ethics, use of internet, email and other IT resources, time and attendance, compensatory time, and use of telephone.

Response: New and revised agency policies were adopted in July of this year and required all staff to review and provide signed acknowledgement of all existing policies in addition to the new and revised. Human Resources will continue to require policy acknowledgement for new employees and the opportunity to review expectations with ODHE Chief Legal Counsel, as part of the newly added onboarding meeting, will reinforce new employee understanding.

Thank you for providing the opportunity to outline ODHE policies that have been put in place and explain how they align with your recommendations. If you have any questions regarding this response or are in need of further information, please contact me at 614-995-7754.

Sincerely,


John Carey, Chancellor
Ohio Department of Higher Education