



What are the OIGs And Why You Should Care

Society of Corporate Compliance & Ethics
17th Annual Compliance & Ethics Institute – October 2018

Daniel Coney, CCEP, CFE, CFCS
(303) 985-6782
Daniel_coney@doigig.gov





This Session Uses Polling

To participate in polling

Download "SCCE Mobile" in your app store. Then under the agenda find this session, scroll to the bottom and click "Poll Questions". Or go to PollEV.com/scce to answer the active poll.



I have never heard of the Office of Inspector General before today?

Yes

No



*The Last Thing You
Want to See*



What are the OIGs?





*Best Practices
Compliance Model*

***Independent
Qualified
Empowered
Reporting Structure***

Visit the new website:
<https://www.oversight.gov>
Follow Oversight.gov on Twitter:
@Oversightgov





The Human Costs of Compliance Failures



Courtesy: Guard Photo: <https://www.usmc.mil/News/News-Details.aspx?nid=641704>

NPS Director Jonathan Jarvis and the good ol' boys

March 1, 2017

Park Service chief reprimanded after admittedly ignoring ethics rules



THE HILL

Park Service chief under fire for unapproved book

February 20, 2017



Former Commerce Employee Sentenced for Bribery Scheme

ALEXANDRIA, Va. – A former information technology official with the Department of Commerce was sentenced today to 4 years in prison and ordered to forfeit approximately \$224,500 for conspiracy to pay and receive bribes, and acceptance of bribes by a public official.

According to court records and evidence presented at trial, Raushi J. Conrad, 43, of Bristow, served as the Director of Systems Operation and Security within the Bureau of Industry and Security (BIS), a branch of the Department of Commerce. In that position, Conrad was designated to oversee and manage a project whereby computer files were transferred from an old BIS computer network that had been infected by a virus to a new, uninfected network. Conrad was also to ensure that the transferred files were free of viruses and, in some instances, retained the full functionality of the files that had resided on the old network.

According to court records and evidence presented at trial, while serving as the project manager for the data migration project, Conrad solicited and received bribes from James Bedford, a local businessman, in return for steering a lucrative subcontract and contract to perform the data migration work to companies owned in whole or in part by Bedford. One of Bedford's companies made \$208,000 in payments to a restaurant business owned by Conrad, and many of these payments were cancelled through false and fictitious invoices created by Conrad. The fake invoices made it appear that Conrad's restaurant business had performed various services for Bedford's company, when in fact no such services had ever been provided. Bedford's company also arranged for various employees and subcontractors to perform over \$16,000 worth of free renovation work at Conrad's residence. Bedford pleaded guilty and was sentenced on June 30 (Case number 1:16-cr-264).

<https://www.justice.gov/iso-ed/rjcf/former-commerce-employee-sentenced-bribery-scheme>



FOR IMMEDIATE RELEASE

Friday, February 17, 2017

Florida Man Pleads Guilty in Wire Fraud Case Related to Falsified Water Testing in Dale County, Alabama

Montgomery, Ala. – On Thursday, February 16, 2017, Darin Lewis, 46, of Crestview, Florida, pleaded guilty to one count of conspiring to commit wire fraud, announced United States Attorney George L. Beck, Jr. Lewis's conviction stemmed from his involvement in a scheme to falsify water samples during the testing of new water lines installed in Dale County, Alabama.

According to court documents, in 2014, the Dale County Water Authority hired a Florida company, Roberson Excavation, Inc. (Roberson Excavation), to replace water lines in the Marley Mill area of Dale County. Lewis's co-defendant, Billy Ray Roberson, was the owner and president of Roberson Excavation. Lewis began working on the project around February of 2015. By that time, Roberson Excavation was three months behind schedule on the job and paying penalties of \$900 for each day that the project went incomplete. At that time, Roberson instructed his site supervisor, Lewis, to falsify the testing required before the lines went into operation. Among the tests falsified were the tests used to determine whether harmful bacteria were present in the water.


A sentencing hearing will be scheduled in the upcoming months where Lewis will face a maximum sentence of 5 years' imprisonment. The other defendants charged in the case, Billy Ray Roberson and Roberson Excavation, will proceed to trial on June 5, 2017 in Dothan, Alabama.

This case was investigated by the Environmental Protection Agency's Criminal Investigations Division and Office of Inspector General. Assistant United States Attorney Jonathan S. Ross is prosecuting the case.


<https://www.justice.gov/iso-ed/rjcf/florida-man-pleads-guilty-wire-fraud-case-related-falsified-water-testing-dale-county>







Where are you most likely to come into contact with the OIG?



OIG employees receive performance ratings based on the number of convictions and recoveries they obtain.

True

False

Start the presentation to get live content. Still no live content? Install the app or get help at Phella.com/app



*Most Cases are
Not Criminal*

NOT GUILTY



But sometimes...





**A MISTAKE REPEATED
MORE THAN ONCE IS A
DECISION**



Example of How Inattention Turns a Mistake into a Fraud



By McComber, Inc., CC BY-SA 3.0, https://commons.wikimedia.org/wiki/File:V08-10N-RF-C1000_composite_Low_Res.jpg



Compliance Failure or Crime?



By U.S. — NOAA, <http://response.restoration.noaa.gov/index.php>, Public Domain, <https://commons.wikimedia.org/wiki/File:1000025>

FOR IMMEDIATE RELEASE

Thursday, January 19, 2007

Manhattan U.S. Attorney Announces \$50 Million Settlement With Walgreens For Paying Kickbacks To Induce Beneficiaries Of Government Healthcare Programs To Fill Their Prescriptions At Walgreens' Pharmacies

FOR IMMEDIATE RELEASE

Wednesday, May 31, 2007

Electronic Health Records Vendor to Pay \$155 Million to Settle False Claims Act Allegations

FOR IMMEDIATE RELEASE

Wednesday, June 28, 2007

Los Angeles Hospital Agrees to Pay \$42 Million to Settle Alleged False Claims Act Violations Arising from Improper Payments to Physicians

FOR IMMEDIATE RELEASE

Tuesday, February 13, 2008

Detroit Doctor Sentenced to Six Years in Prison for Role in \$10.4 Million Health Care Fraud Scheme

Whistleblowing cardiologist collects \$6 million from FCA settlement

License: CC0, https://commons.wikimedia.org/wiki/File:US_dollars_envelope_money_composition-2439136

I know what debarment is?

True

False

Start the presentation to see live content. Still no live content? Install the app or get help at PollIt.com/app

[illegible][illegible]



*Who can be suspended or
debarred?*





*Is there an evidentiary standard
which must be met?*





When it all goes wrong





How?

Proactive
Contrite
Truthful



By Nick Youngren, CC BY-SA 3.0 - via iStockphoto.com



*Tangible Actions that
Make a Difference*

1. Cooperate in the investigation.
2. Provide records.
3. Produce your compliance plan and policies implicated that will help show the efforts you took prior to the incident to identify and minimize risk.
4. Be accountable.
5. Be proactive in taking corrective actions BEFORE you're mandated to do so.
6. Reach out to oversight officials –Compliance is an evolving function – it is not one and done.
7. Don't hesitate to identify culprits and take appropriate disciplinary or corrective action yourself.



*Put your best foot forward
with debarring officials*





Methods of Contacting the DOI-OIG

Mail: U.S. Department of the Interior
Office of Inspector General
1849 C Street, NW (Mail Stop 5341)
Washington, DC 20240

Internet: www.doiig.gov/hotline

Phone: 1-800-424-5081

Fax: (703) 487-5402
(Attention: Hotline Operations)



Daniel Coney, 303-985-6782 or daniel_coney@doiig.gov
