

## Preventing Fraud, Waste, and Abuse

THEC/TSAC staff members are responsible for establishing and implementing procedures to prevent and detect fraud, waste, and abuse.

The basic elements of a proper system of controls include:

- Creating a culture of honesty and high ethics
- Evaluating risks and implementing processes, procedures and controls to prevent, deter and detect fraud, waste, and abuse
- Develop an oversight process that is appropriate

Additional information can be found at [www.tn.gov/thec](http://www.tn.gov/thec) or [www.tn.gov/tsac](http://www.tn.gov/tsac)

Select “About THEC”, then “Agency Information”, then select “ Reporting Fraud, Waste, and Abuse.”

If you have any questions or suggestions regarding internal controls, please contact the Fiscal Office or the Internal Auditor.

## THEC and TSAC Mission Statement

The Tennessee Higher Education Commission and the Tennessee Student Assistance Corporation are relentlessly focused on increasing the number of Tennesseans with a post secondary credential. THEC pursues this goal by innovating for student access and success, creating a policy environment conducive to increased degree attainment, and protecting students and consumers. TSAC administers over 20 different state student financial aid programs. To increase awareness and participation in the programs, the agency conducts financial aid outreach and training to students and staff at every high school and postsecondary institution in the state.

Tennessee Higher Education Commission  
Tennessee Student Assistance Corporation  
312 Rosa L. Parks Ave., 9th Floor  
Nashville, Tennessee 37243-0830  
(615) 741-3605  
[www.tn.gov/thec](http://www.tn.gov/thec)  
[www.tn.gov/tsac](http://www.tn.gov/tsac)

## Tennessee Higher Education Commission

## Tennessee Student Assistance Corporation



## Reporting and Preventing Fraud, Waste, and Abuse

## Reporting Fraud, Waste, and Abuse

TCA 8-50-116 requires that THEC/TSAC provide a means by which employees or others may report dishonest acts, either known, or suspected.

### Actions to Report

Dishonest acts, either known or suspected, should be reported. Dishonest acts include but are not limited to:

- Theft or misappropriation of funds, supplies, property, or other state resources
- Forgery or inappropriate alteration of documents
- Unauthorized alteration or manipulation of computer files
- Improper and wasteful activities
- Falsification of reports to management or external agencies
- Pursuit of a benefit or advantage in violation of THEC's conflict of interest policy or THEC or TSAC's Code of Conduct
- Authorizing or receiving compensation for hours not worked
- Violation of the THEC Outside Employment Policy
- Being absent from work and not requesting leave status

## Reporting Options

Several options are available to all THEC/TSAC employees and others.

You may report your concerns to:

- Dr. Steven Gentile, Executive Director (615) 741-0350
- The Audit Committee:  
Ms. Pam Koban, Chair  
Dr. Claude Pressnell, (615) 242-6400, ext. 201  
Mr. Greg Turner  
Mr. Vernon Stafford  
Mr. Jay Moser
- Doug Cullum, Internal Auditor (615) 238-1055
- Jason Cavender, Chief Financial Officer (615) 714-3612
- The State Audit Hotline for Fraud, Waste, and Abuse  
1-800-232-5454 or at <http://www.comptroller.tn.gov/hotline>

## Investigations

The Executive Director, the Internal Auditor and the Audit Committee's objectives include verifying the facts, maintaining objectivity and confidentiality, determining responsibility, and recommending corrective actions to ensure that similar actions do not occur in the future.

### Think Before You Speak

Before making allegations of dishonesty, employees must be reasonably certain of any claims. Such allegations can seriously and negatively impact the accused individual's life and adversely affect the working environment.

### Protection Under State Law

As the Executive Director, the Internal Auditor, or the Audit Committee investigates allegations of dishonesty, the reporting individual's confidentiality is protected under state law unless a court action requires disclosure. Also, discrimination or retaliation is prohibited against a THEC/TSAC employee who reports allegations of dishonest acts.