

Creating an “Effective” Anti-Fraud Program

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EthicsLine[®]
THE OFFICIAL HOTLINE OF THE **ACFE**

AGENDA

- Responsibility for Fraud Protection
- The Economic Climate and Fraud
- Building an Effective Anti-Fraud Program
- Impact of an Effective Anti-Fraud Program
- ACFE Anti-Fraud Program Offerings

RESPONSIBILITY FOR FRAUD PROTECTION

Who Owns Fraud?

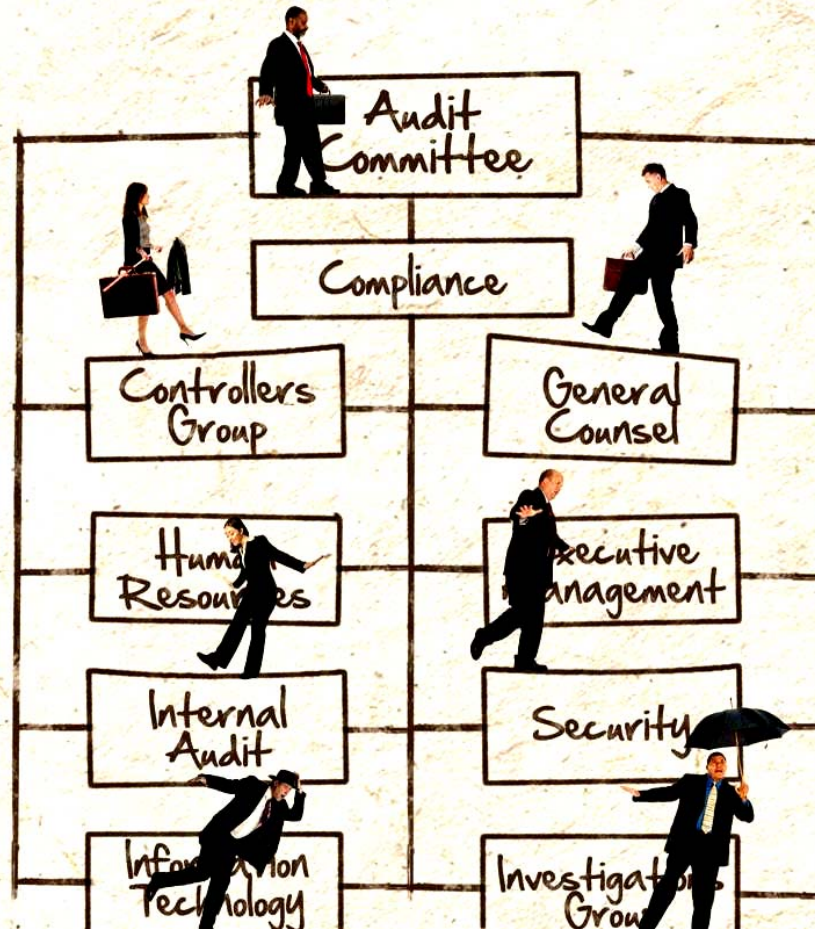


Photo courtesy of ACFE

AGENDA

- Responsibility for Fraud Protection
- The Economic Climate and Fraud
- Moving Out of Recession and Into Growth
- Building an Effective Anti-Fraud Program
- Impact of an Effective Anti-Fraud Program
- ACFE Anti-Fraud Program Offerings

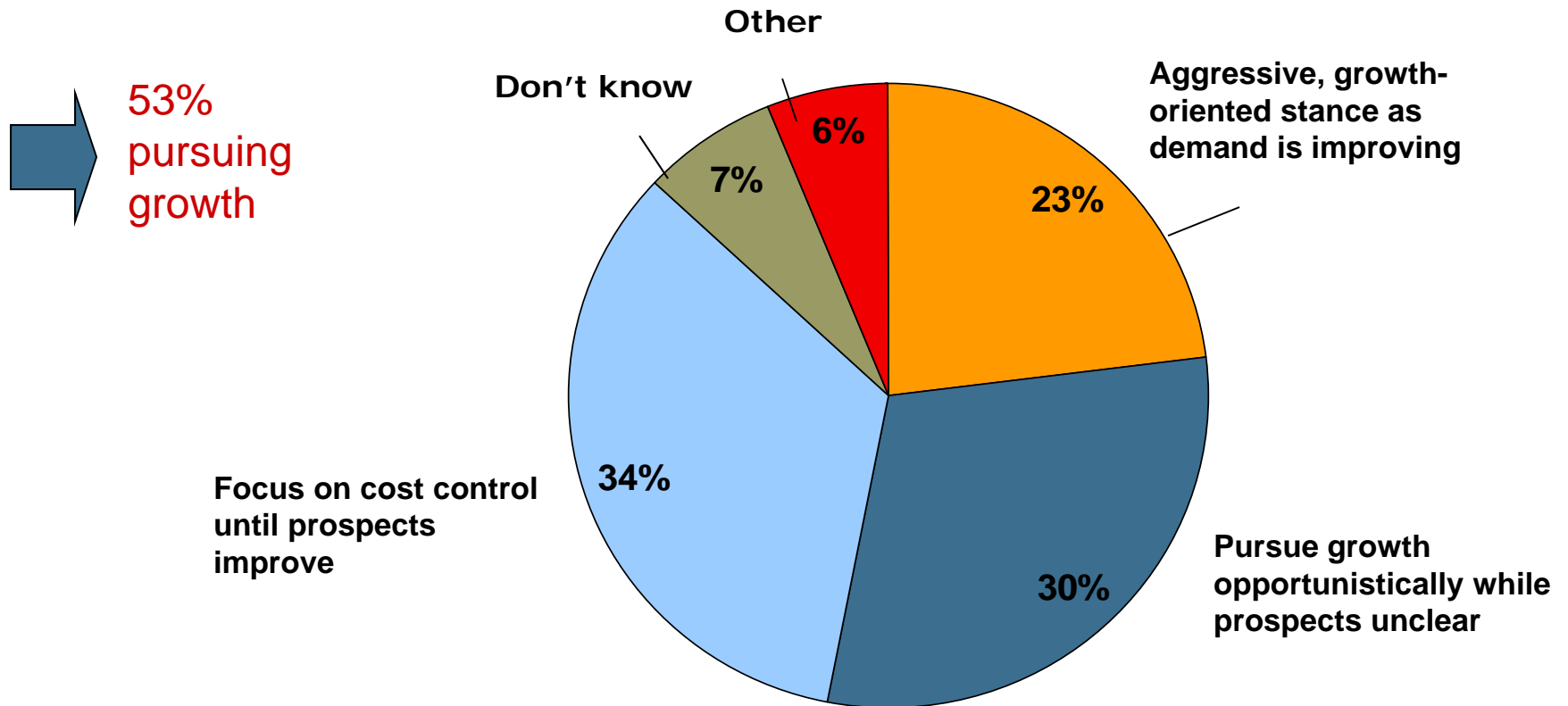
ECONOMIC CLIMATE IMPROVING

- Economic slowdown has stalled business growth for the past couple of years
 - Anti-fraud and anti-corruption efforts that had begun to gain traction for some corporations were eroded with the economic downturn, as resources were not adequate to support efforts
- Having managed through the financial crises of the last two years, many corporations are beginning to again focus on growth

Source: Ernst & Young 11th Global Fraud Survey

MANAGEMENT TARGETING GROWTH

Q: Which of the following best characterizes your corporation's strategy over the next year?



Source: Ernst & Young 11th Global Fraud Survey

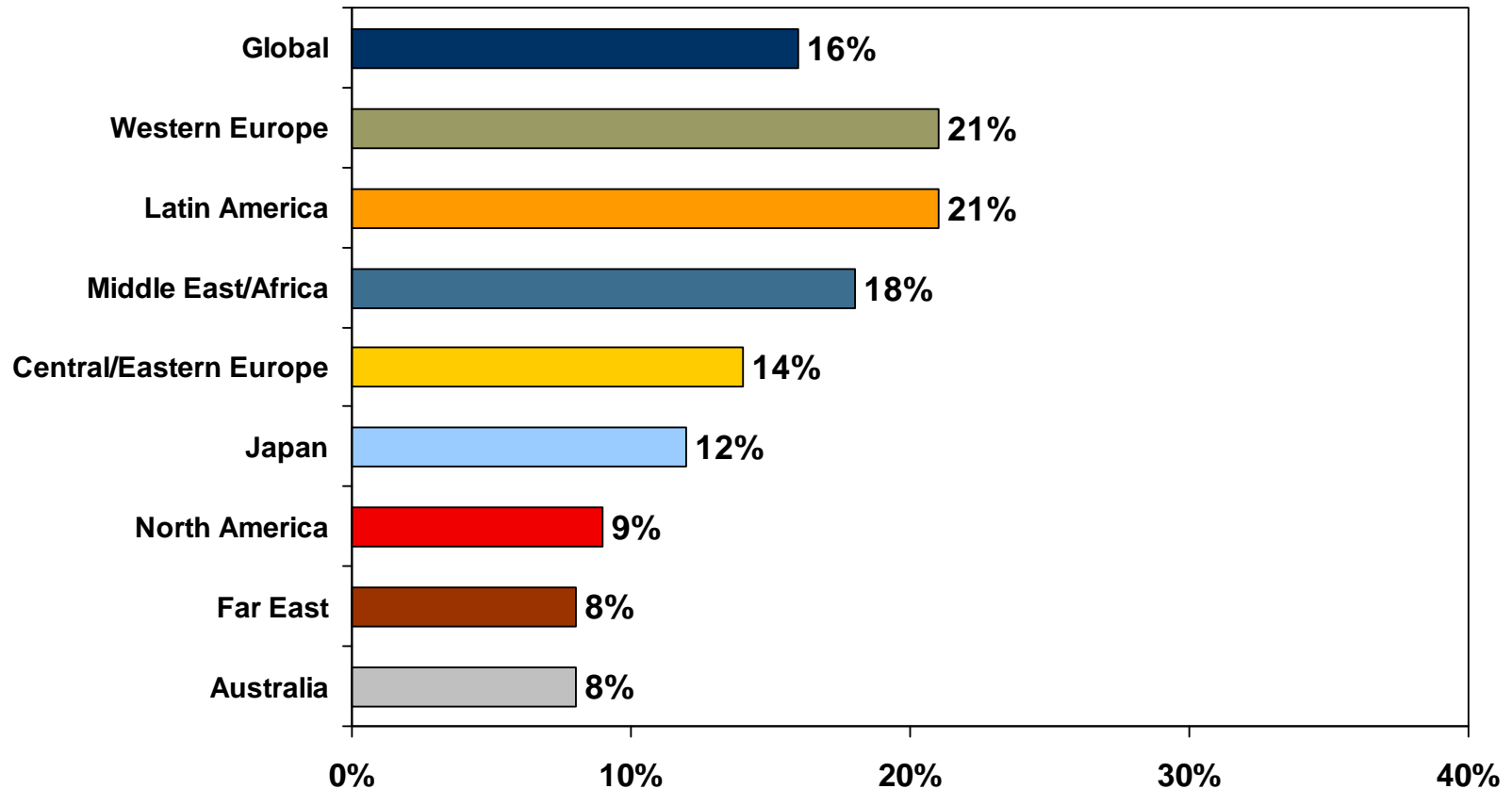
ECONOMIC CLIMATE IMPROVING

Moving into growth

- Growth often translates to increased risk—fraud, bribery, corruption
 - Expansion of geographies
 - Acquisition
- Challenge is to achieve ***ethical*** growth
- A robust anti-fraud program to manage risks requires investment in resources—time, people, and technology

FRAUD IS GLOBAL

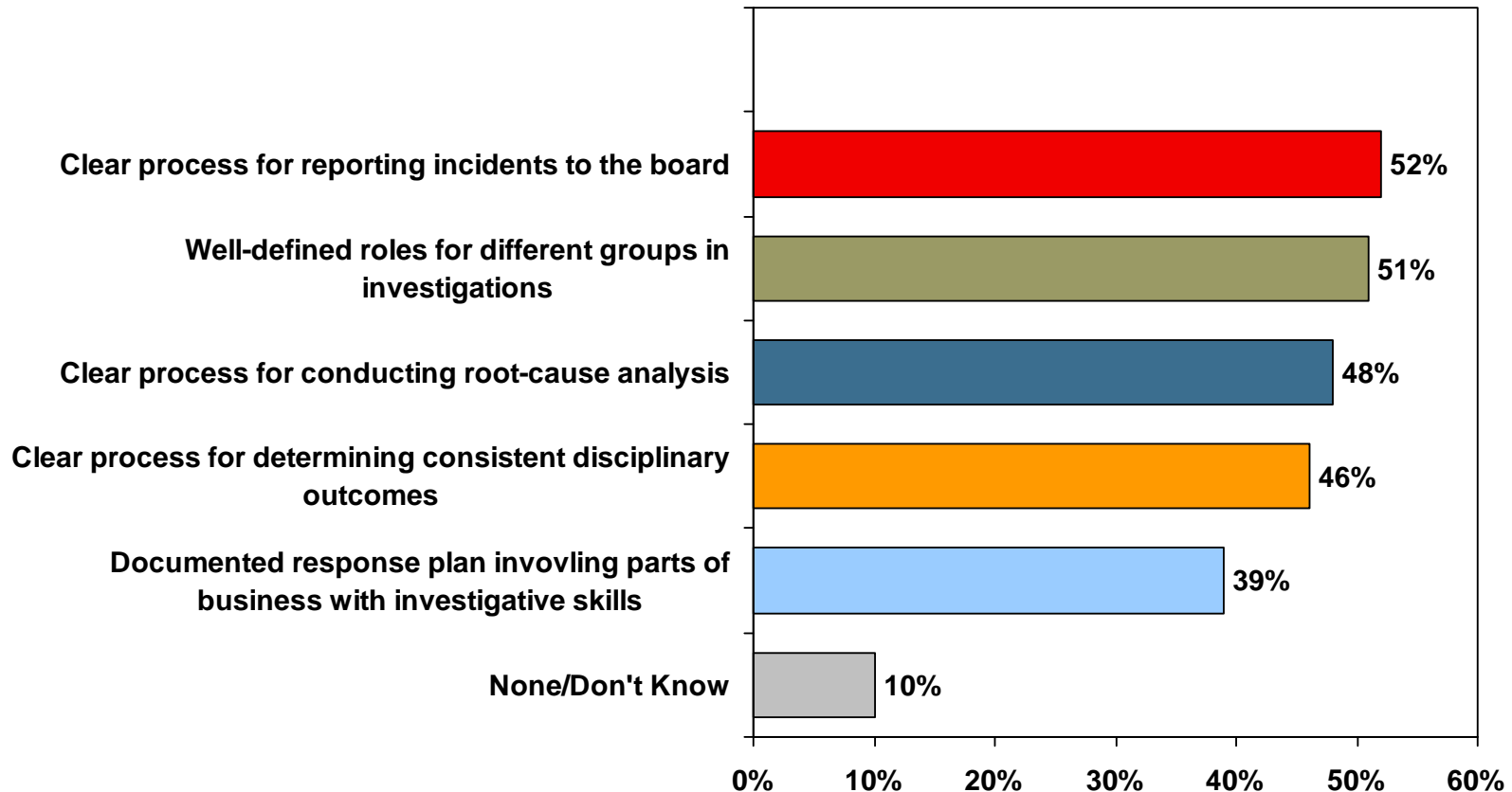
Q: Has your organization experienced a “significant” fraud in the last 2 years?



Source: Ernst & Young 11th Global Fraud Survey

PREPARED TO ADDRESS FRAUD?

Q: Which, if any, apply to your organization's response to the first reporting of a possible case of fraud, bribery, or corrupt practice?

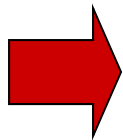
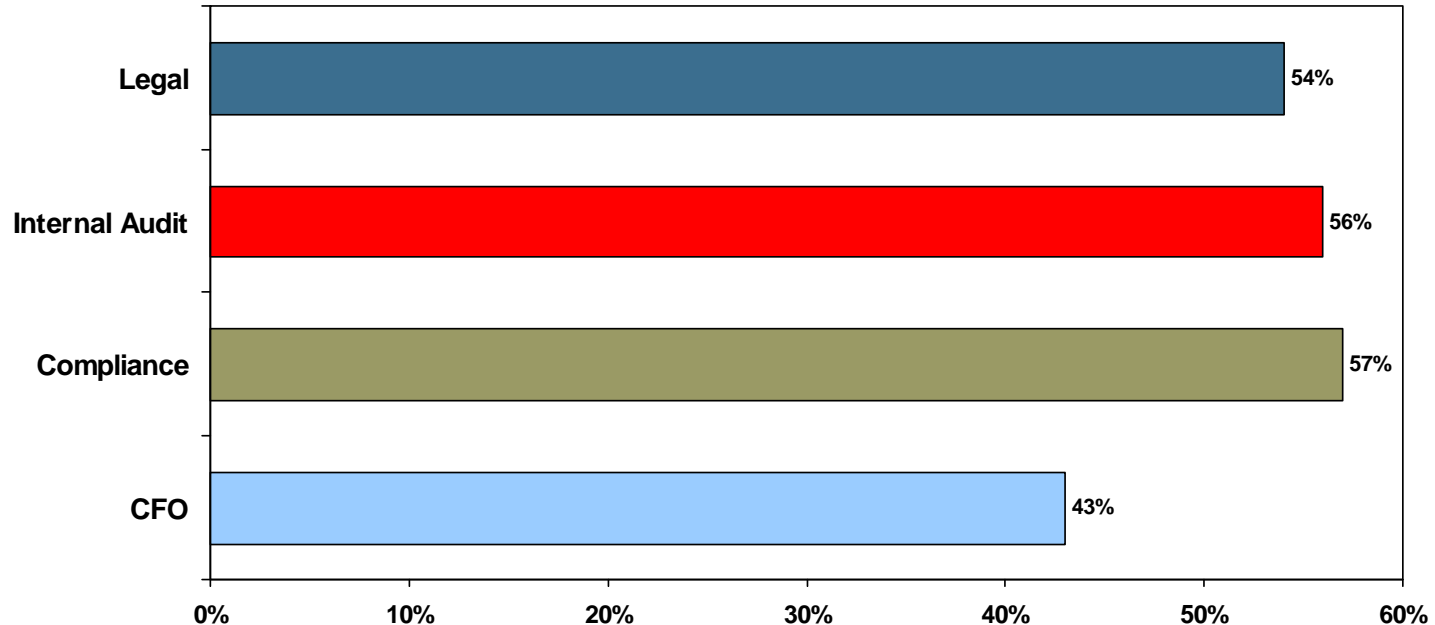


Note: North America surpassed averages

Source: Ernst & Young 11th Global Fraud Survey

ROLE DEFINITION

Q: Does your organization have well-defined roles for different groups in response to the first reporting of a possible case of fraud, bribery, or corrupt practice?



Not atypical to find lack of consistency, division of responsibility, and various departments working in silos with little integration of systems and processes

Source: Ernst & Young 11th Global Fraud Survey

WHY IS FRAUD PREPAREDNESS AND RESPONSE OFTEN INSUFFICIENT?

- Realization that putting an effective fraud program in place takes focus and time
- Little appetite for expense associated with appropriate procedures to mitigate fraud
- Proactive fraud prevention planning often met with initial support, but not sustainable top-level commitment to complete the task and create a lasting “effective” effort

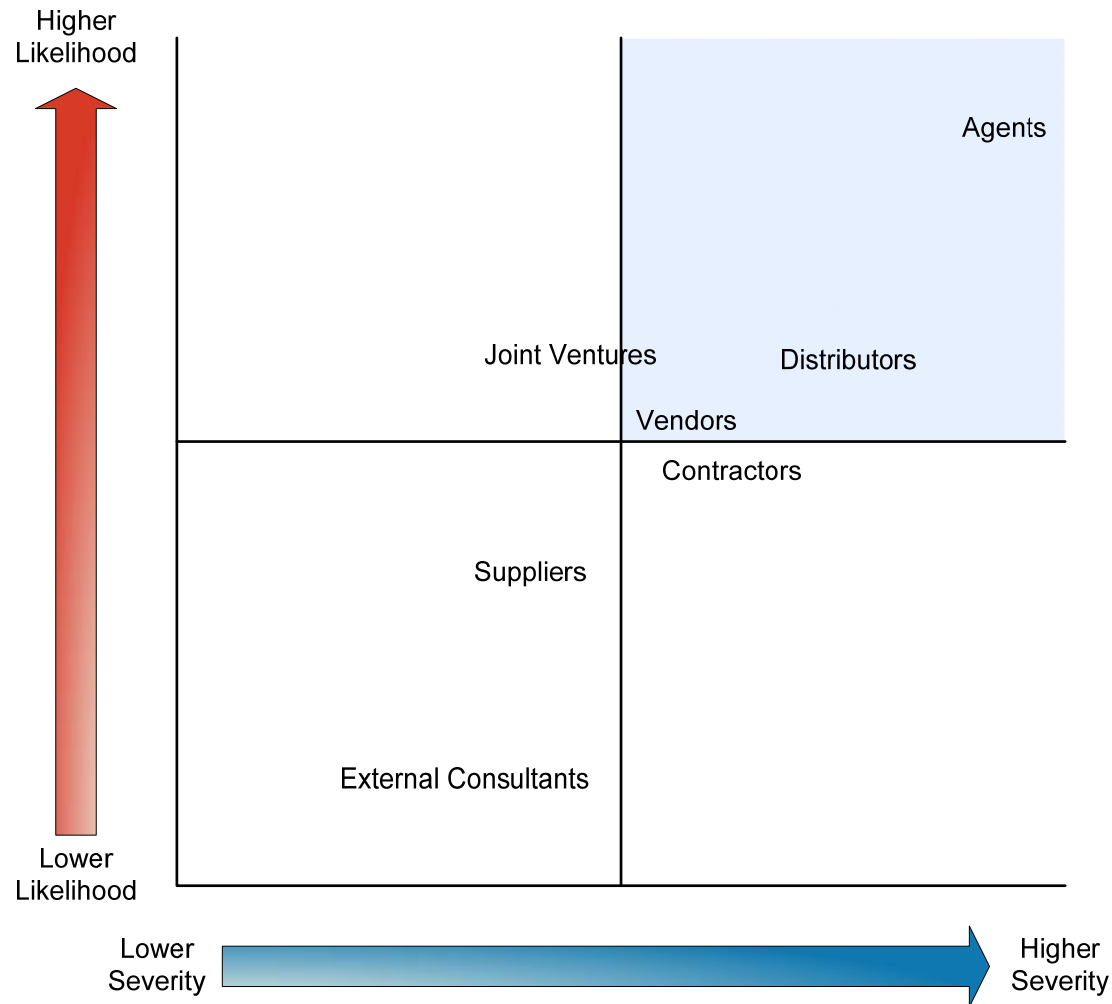
Source: Ernst & Young 11th Global Fraud Survey

FURTHER COMPLICATING FACTORS

Supply chains are now an important inclusion in an anti-fraud program —the more complex the organization, the larger the supply chain



GAUGING SUPPLIER RISK



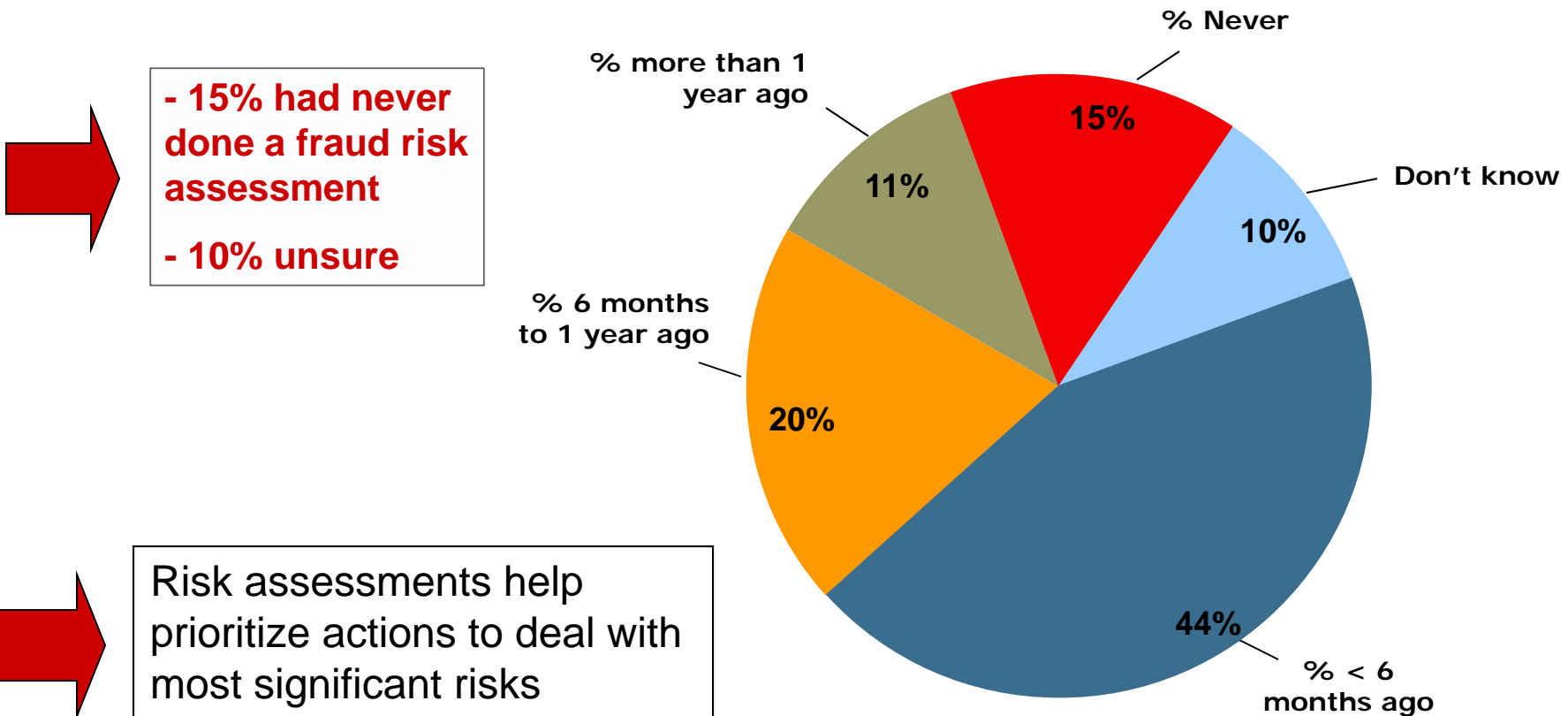
HOW DO YOU APPROACH FRAUD?

- **Proactive** fraud detection and prevention
 - Assess risk
 - Implement controls to detect and deter fraud
 - Implement processes/procedures to address alleged fraud
 - Continue to evaluate and alter controls as necessary to mitigate fraud

- **Reactive** fraud detection and prevention
 - “Cross that bridge when we come to it”

ASSESSING FRAUD RISK

Q: When did your organization last carry out a fraud risk assessment?



Source: Ernst & Young 11th Global Fraud Survey

GROWTH EVENTS NECESSITATE ADDED DILIGENCE

Q: How frequently has your company conducted fraud and/or corruption-related “pre- and post-acquisition” due diligence in the last two years?

	% Not Very Frequently / Never	
	Pre-acquisition	Post-acquisition
North America	18%	41%
Latin America	16%	27%
Western Europe	33%	43%
Central and Eastern Europe	38%	43%
Middle East/Africa	29%	42%
Far East	30%	41%
Australia	25%	54%
Japan	40%	53%

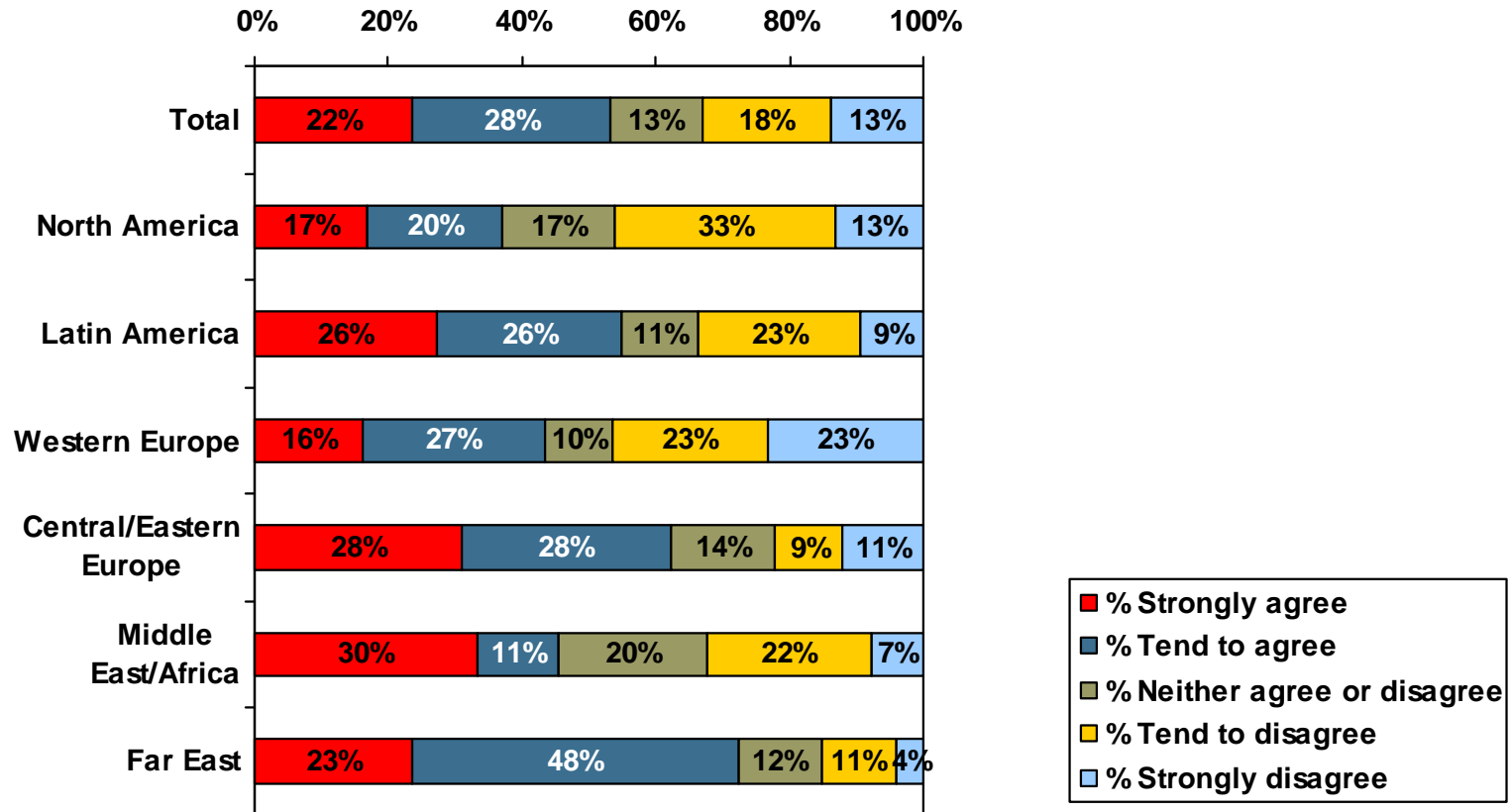
Source: Ernst & Young 11th Global Fraud Survey

FRAUD DUE DILIGENCE

- “Prepared” organizations regularly and continually assess fraud risk
- Organizations experiencing growth events must conduct added diligence
 - Of particular importance for organizations operating in highly regulated industries and/or operating in high-risk geographies

FRAUD DUE DILIGENCE—IS THE BOARD ENGAGED AND EDUCATED?

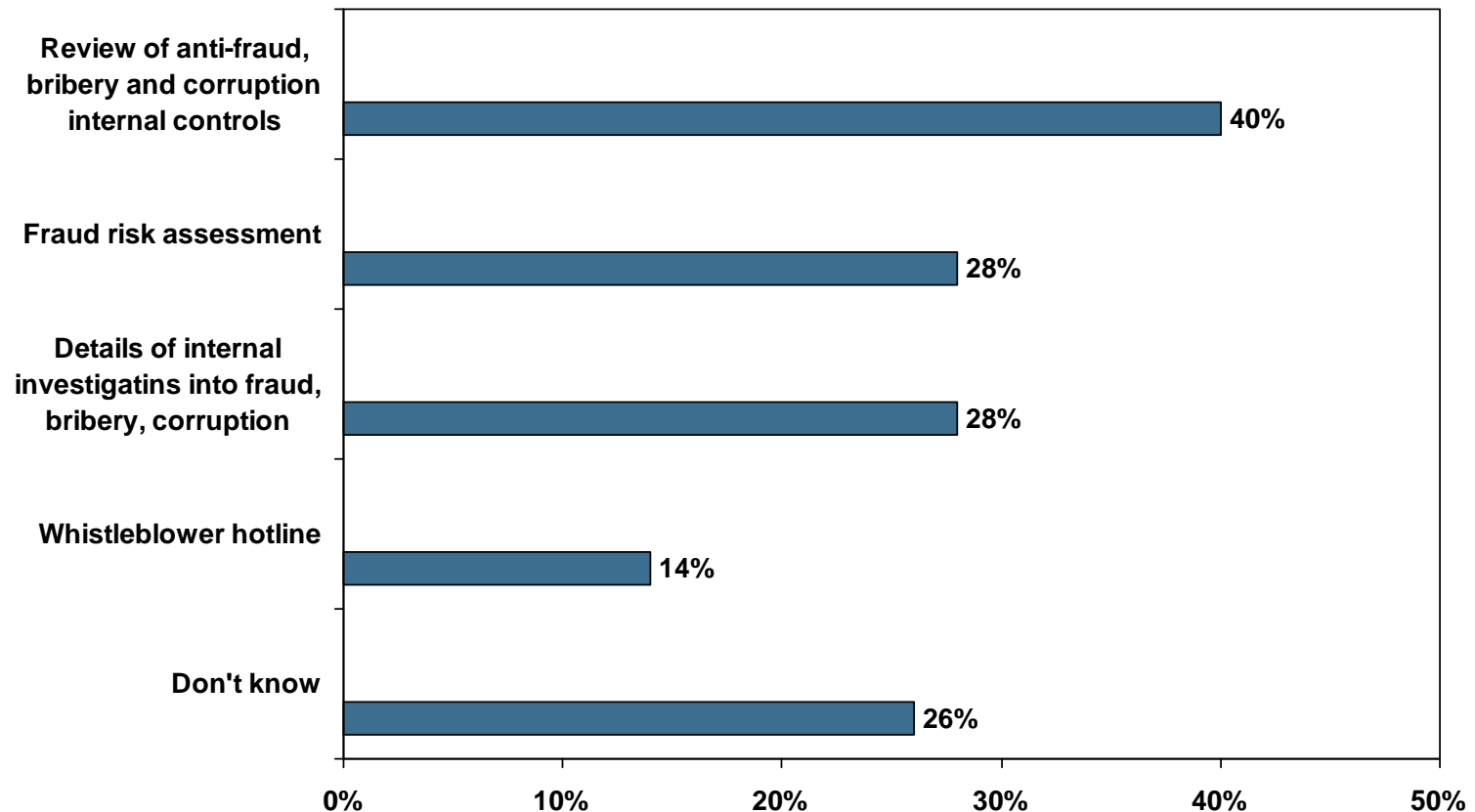
Q: Extent of agreement with this statement: “Our Board needs a more detailed understanding of the business if it is to be an effective safeguard against fraud, bribery, and corrupt practices.”



Source: Ernst & Young 11th Global Fraud Survey

FRAUD DUE DILIGENCE—IS THE BOARD ENGAGED AND EDUCATED?

Q: Which, if any, of the following has the Board asked for in the last 12 months?



Note: North America above average in performance

Source: Ernst & Young 11th Global Fraud Survey

DATA DOES NOT SUBSTANTIATE ADEQUATE BOARD CONCERN ABOUT FRAUD

- Boards don't always seem to be behaving in a manner that would increase their own protection
- Management over-ride of controls was prevalent in many high-profile fraud instances
- Board needs to understand how the corporation really operates and is “sufficiently skeptical” about numbers presented to them

Source: Ernst & Young 11th Global Fraud Survey

SUMMARY OF ERNST & YOUNG SURVEY FINDINGS

- A substantial number of corporations suffered a significant fraud in the 2009/2010 timeframe
- Despite the increased incidents of fraud, corporate entities' responses to fraud allegations are ad hoc and inconsistent
- Proactive measures to manage the risk of fraud are not universally contemplated
- Measures to mitigate corruption and bribery exposure are still not standard practice for corporations, including those looking to drive growth through acquisitions

Source: Ernst & Young 11th Global Fraud Survey

AGENDA

- Responsibility for Fraud Protection
- The Economic Climate and Fraud
- **Building an Effective Anti-Fraud Program**
- Impact of an Effective Anti-Fraud Program
- ACFE Anti-Fraud Program Offerings

9 ELEMENTS OF AN “EFFECTIVE” ANTI-FRAUD PROGRAM

1. Risk Assessment
2. Code of Ethics or Conduct and Ethics and Anti-Fraud Policies
3. Tone from the Top—Ongoing Communications
4. Training
5. Vehicles for Reporting Suspected Misconduct or Noncompliance
6. Centralized Data Repository
7. Standardized Case Investigation, Management, and Disposition
8. Data Analytics
9. Evaluation and Validation (Monitoring)

1. RISK ASSESSMENT

WHAT SHOULD ASSESSMENT INVOLVE?

Varies based on corporation size, industry, and geography of operation

- Key elements of assessment:
 - Review of Code of Conduct and other relevant policies and procedures
 - Scrutiny of policies and procedures surrounding cash disbursements and facilitation payments, gifts and hospitality, and sponsorships
 - Assessing the ability of systems to report or monitor expenditures
 - Interviews with key personnel regarding:
 - Corporate culture and attitude toward ethics and compliance
 - Vetting procedures for and use of third parties and agents
 - Interactions with government officials and departments

1. RISK ASSESSMENT

WHAT SHOULD ASSESSMENT INVOLVE?

- Key elements of assessment (cont'd):
 - Testing internal controls already in place to mitigate fraud, bribery, and corruption risks
 - Reviewing fraud and corruption incident logs along with the nature of the responses and ultimate outcomes
 - Identifying third-party agents involved in obtaining key assets, operating licenses, or sales contracts and understanding their role
 - Checking whether audit rights relating to suppliers, agents, and other third parties have ever been exercised with regard to bribery and corruption controls
 - Assessing to whom compliance training is offered and how often, as well as checking compliance training attendance/completion records

2. CODE OF CONDUCT AND ETHICS/ANTI-FRAUD POLICIES

- Outlines an organization's:
 - Corporate Values
 - Expected Behaviors

- Effective Codes of Conduct are:
 - Written in common language at the 6th grade reading comprehension level
 - Customized to industry, organization, workforce, and demographic (ethnic, age, gender, socio-economic)
 - Translated and culturally adapted if the organization is multinational
 - Reviewed, tested, and certified annually

FRAUD PREVENTION—CODE AND POLICY JUSTIFICATION

- When a strong Code of Conduct was in place:
 - The median fraud losses were **reduced by 46%***
and
 - The duration of the fraud scheme was **reduced on average by 37.5%***

- When an anti-fraud policy was in place:
 - The median loss related to fraud was **reduced by 40%***
and
 - The average duration of a fraud scheme **was reduced by 28%***

Source: 2010 ACFE Report to the Nations on Occupational Fraud and Abuse

3. TONE FROM THE TOP

- Executive management must:
 - Set the tone that reflects the desired culture
 - Personally respect and demonstrate the tone in everyday communications and functionality (“Talk the Talk / Walk the Walk”)
 - Drive tone down through all levels of the organization
 - Communicate with specific message of ethics and integrity at least 4 times per year
 - Consistently enforce the organization’s Code of Conduct

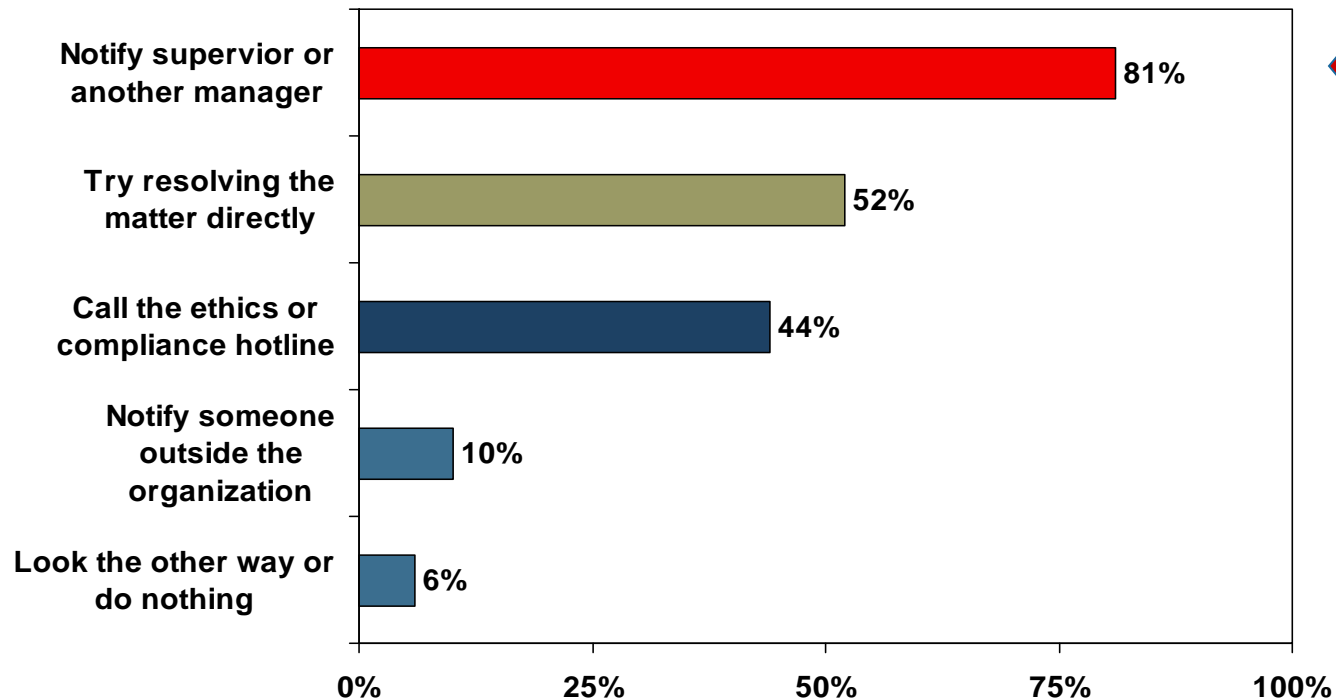
“It's pretty clear that the best compliance program in the world is meaningless—even if it is funded with a well-meaning compliance officer, if the leadership is not behind it and isn't supportive.”

- Honorable Michael E. Horowitz,
Commissioner, United States Sentencing Commission

MOOD IN THE MIDDLE

- Important to use line leadership to embed culture of ethics and integrity

Q: What would you be inclined to do if you observed a violation of your organization's standards of conduct?



Source: KPMG Integrity Survey 2008/2009

4. TRAINING AND EDUCATION

- Every employee at every level of the organization should be educated on:
 - Corporate values and expected behaviors (Code of Conduct)
 - Vehicles and procedures for reporting observed misconduct
 - Industry regulatory training as appropriate to job function
 - Legislative training as appropriate to job function (Anti-trust, Anti-bribery, money laundering, etc.)
 - Environment, health, and safety training as appropriate to job function

- Multi-element communications campaigns focus on key ethics and compliance messages and serve as everyday visual reminders

TRAINING DELIVERY OPTIONS

- **Online training** is an efficient and cost-effective way to train a large number of geographically dispersed employees
 - Customizable to your organization and industry
 - Accessed from anywhere in the world by any computer equipped with Internet access
 - Enables self-paced self study on the learner's schedule
 - Provides automatic completion certificate for learner and management summary reports for administrator

- **Instructor-led, onsite training** is an effective way to train employees that are centralized across few locations
 - Customizable to your organization and industry
 - Enables group and instructor interaction
 - Delivered at your work location of choice

FRAUD PREVENTION—TRAINING JUSTIFICATION

- When Anti-Fraud Training for employees was in place as an anti-fraud control:
 - Median loss related to fraud **decreased by 50%***
and
 - The average duration of a fraud scheme was **decreased by 28%***

Source: 2010 ACFE Report to the Nations on Occupational Fraud and Abuse

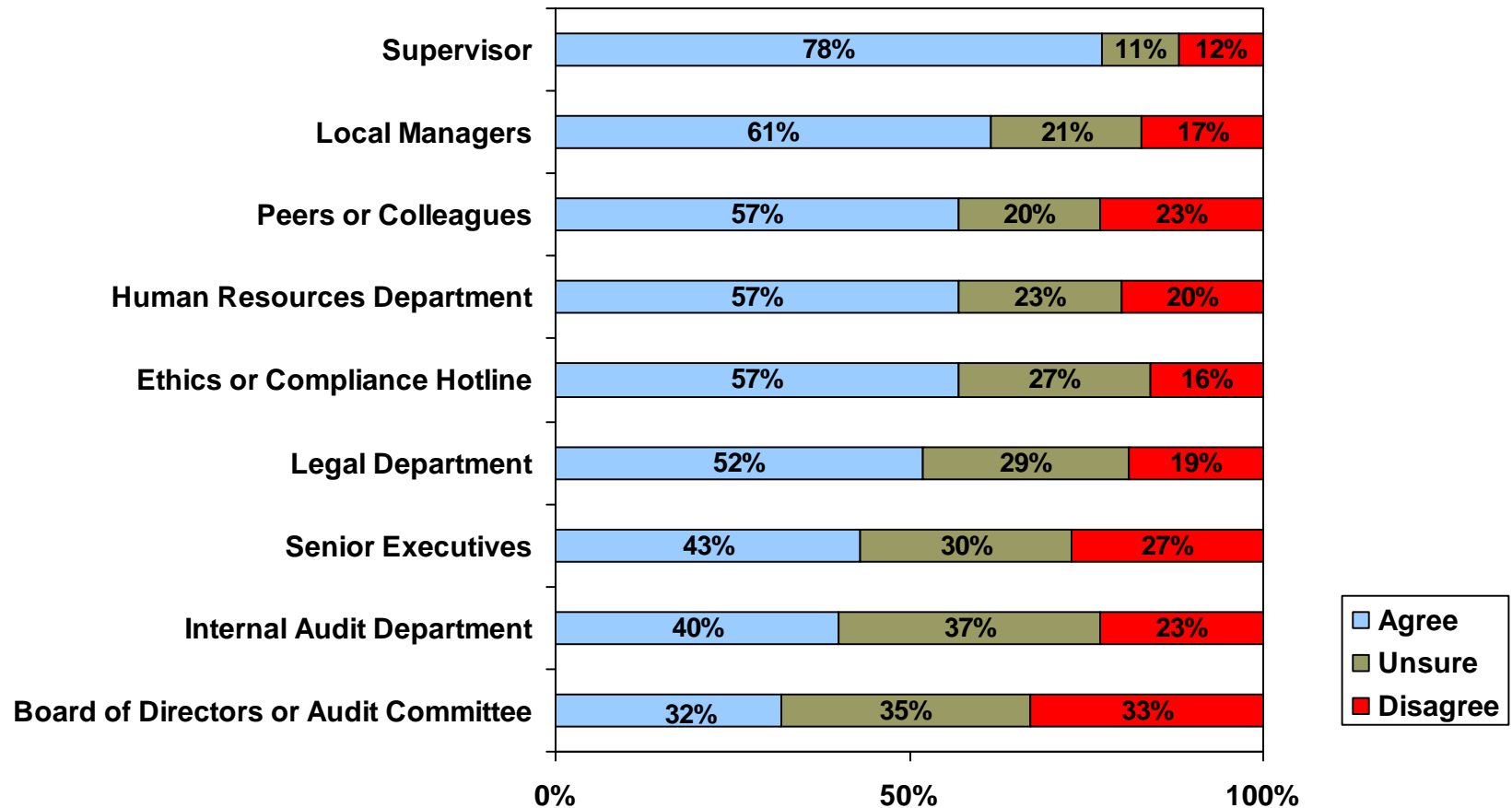
5. VEHICLES AND PROCEDURES FOR REPORTING SUSPECTED MISCONDUCT

- Traditional “Open Door” Channels
 - Supervisor
 - Human Resources
 - Ombudsman

- Confidential, anonymous reporting vehicle
 - Anti-fraud or ethics/compliance hotline

CHANNELS FOR REPORTING MISCONDUCT

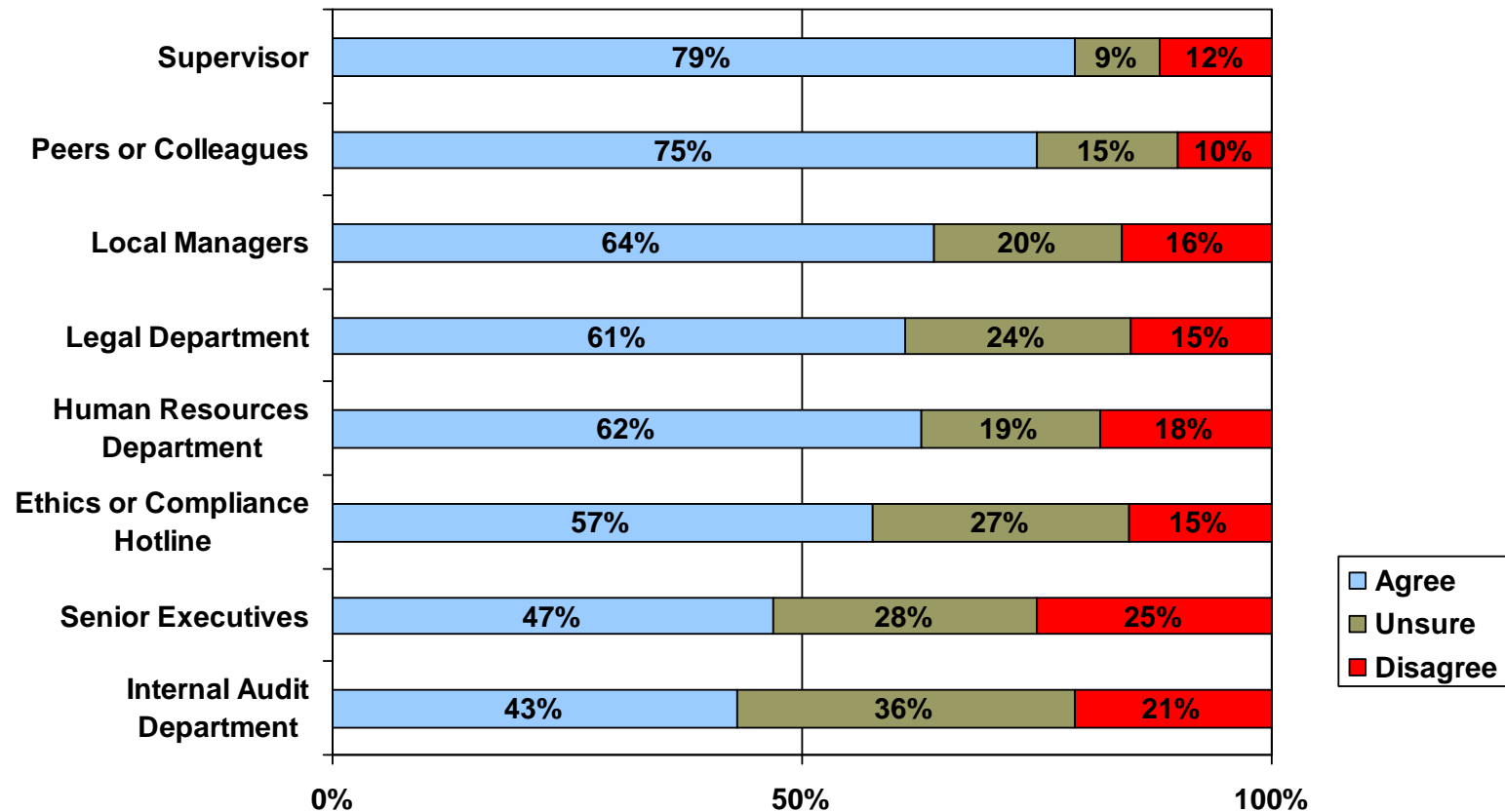
Q: To whom would you “feel comfortable” reporting misconduct if you became aware of it?



Source: KPMG Integrity Survey 2008/2009

DETECTING MISCONDUCT

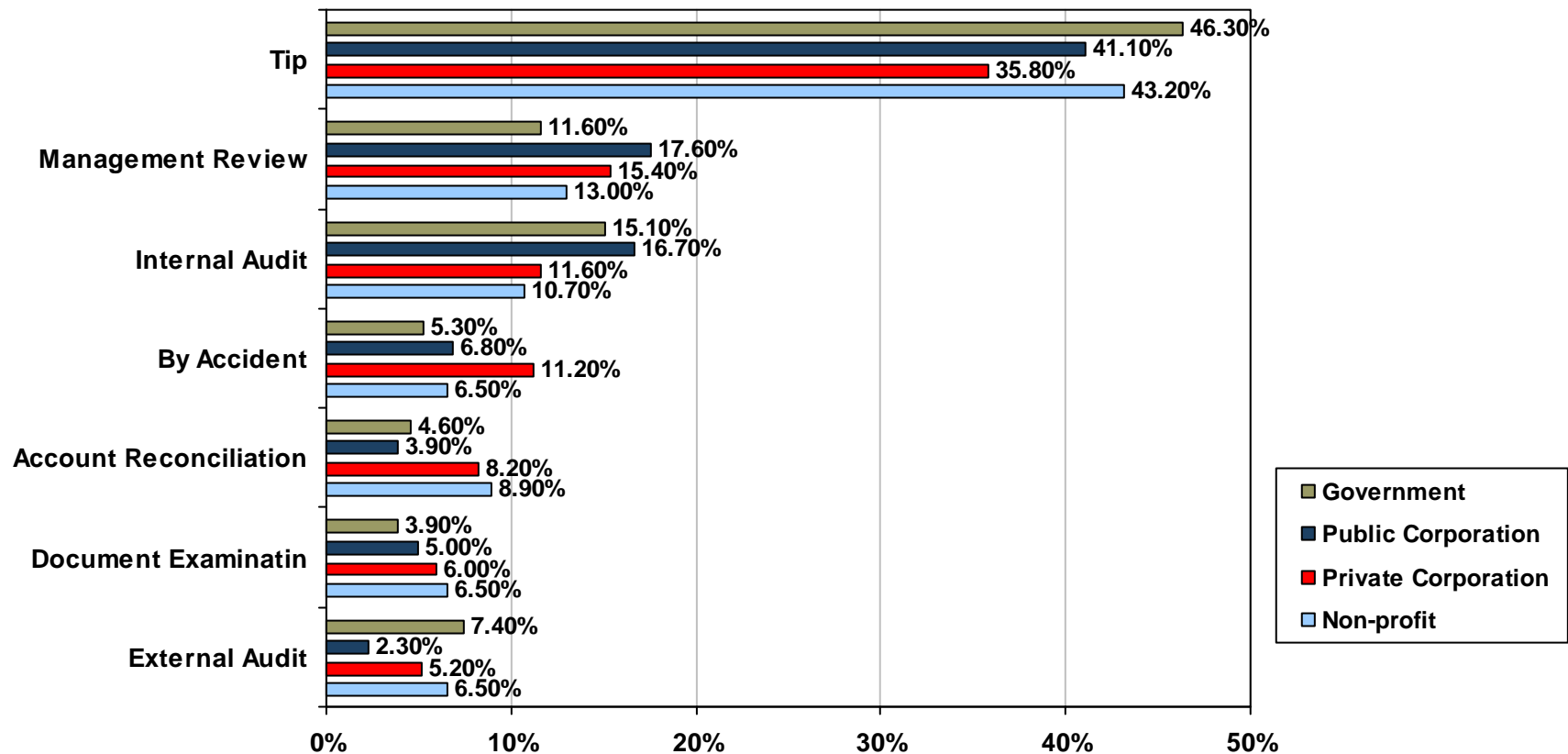
Q: From whom would you “feel comfortable” seeking advise and counsel if you had a question about doing the right thing?



Source: KPMG Integrity Survey 2008/2009

UNCOVERING FRAUD

- Tips remain the most common method of fraud detection
- Hotlines remain a leading vehicle for tip receipt



Source: 2010 ACFE Report to the Nations on Occupational Fraud and Abuse

ANTI-FRAUD HOTLINES

Hotline Planning, Implementation, Execution

- Administration—Internal or External
- Multiple Reporting Methods (telephone, web, mobile, etc.)
- Anonymity
- 24-hour availability
- Multilingual capability
- Toll-free access
- Ability for reporter to inquire about response or actions following report

HOTLINE BEST PRACTICES



Best Practices

- Hotline is one of the multiple reporting channels
- Drive awareness
- Support from the top
- Don't refuse calls
- Provide interactive tools tailored to your employee base
- Underscore anonymity of reporting (where you can)
- Underscore privacy of information
- Test and audit

FRAUD PREVENTION—HOTLINE JUSTIFICATION

- Where a hotline was in place:
 - The average duration of a fraud scheme was **reduced by 7 months*** and
 - The median loss was **reduced by 59%***
- *Note: Confidential and anonymous reporting is a requirement for publicly traded corporations under the Sarbanes-Oxley Act of 2002*

Source: 2010 ACFE Report to the Nations on Occupational Fraud and Abuse

6. CENTRALIZED DATA REPOSITORY

- Electronic “archive” of all received reports of fraud and other business misconduct
 - Permission based
 - 24/7/365 real-time availability
 - Online accessibility from anywhere, anytime—Internet access
 - Viewing of reports
 - Posting of report responses
 - Entry of incremental reports
 - Data searching
 - Integration of all report intake (hotline and direct internal entry)

7. STANDARDIZED INVESTIGATION, CASE MANAGEMENT, DISPOSITION

- Standardized and consistent investigations processes and procedures in line with legislation and data privacy requirements
- Highly trained investigators who uphold the highest standards of confidentiality
- Timely response and completion
- Automated and collaborative workflow
- Permission-based, access to all case details including disposition and disciplinary action
- Disciplinary action proportionate to offense

8. DATA ANALYTICS

- Tracking and trending of all reports of fraud and other business misconduct
- Interpretation and benchmarking of your data
 - What does data tell you?
 - Continually high number of reports out of one geography
 - Excessively high number of reports of a single type (i.e., harassment, violence?)
 - “Where there’s smoke, there’s usually fire”
- Use of data to enhance anti-fraud program components and deliverables—communications, training, etc.

9. EVALUATION AND VALIDATION— ASSESSING EFFECTIVENESS

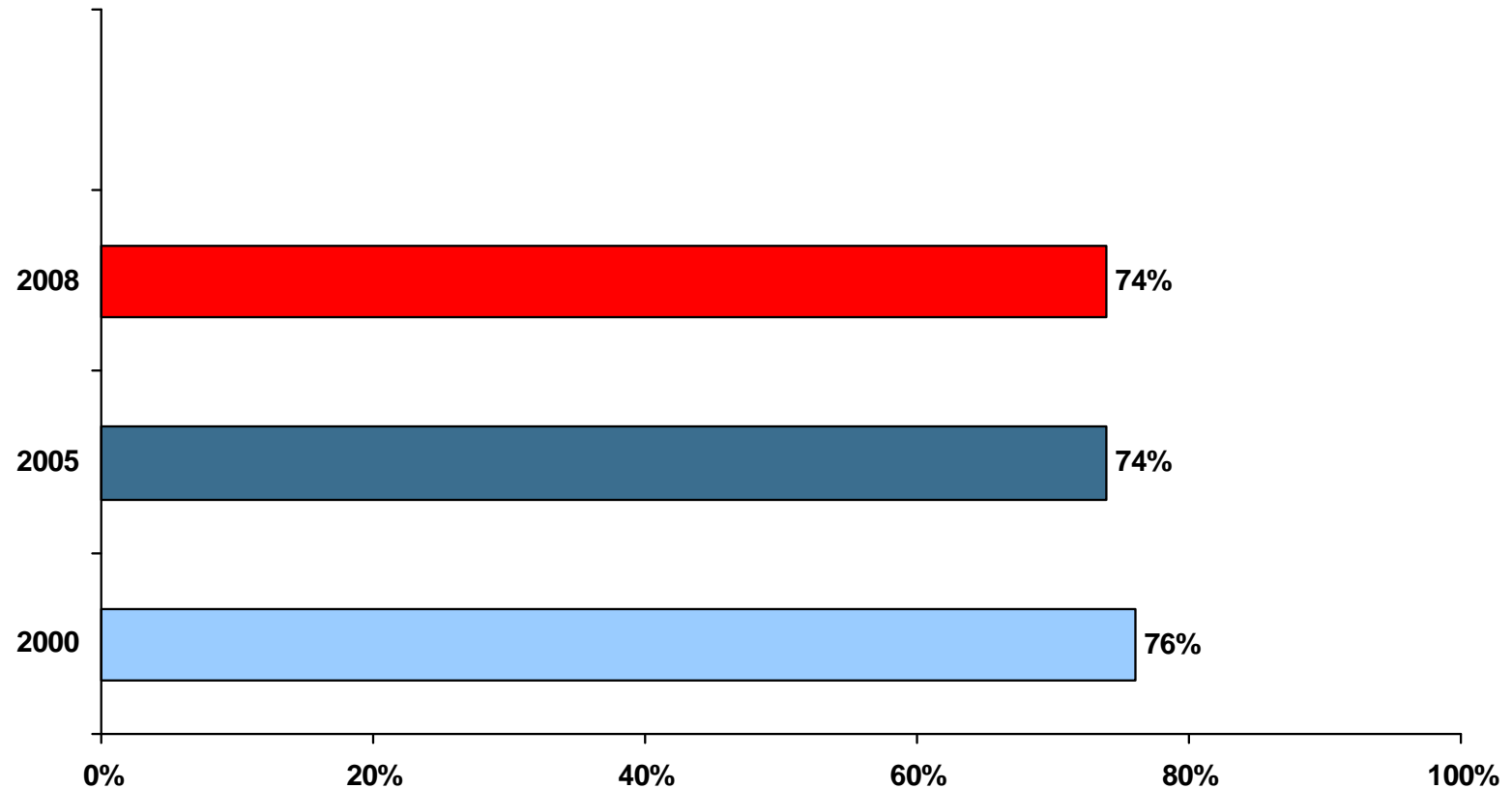
- Programs must be regularly evaluated and validated
 - Quantitative and Qualitative Measurement
- Measurement of:
 - Awareness and comprehension of program
 - Trust and confidence in program
 - Perception of organization's culture and integrity of executive management
- Comparison of program relative to industry statistics
- Program changes and updates must be incorporated as a result of evaluation

AGENDA

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PREVELANCE OF BUSINESS MISCONDCUT

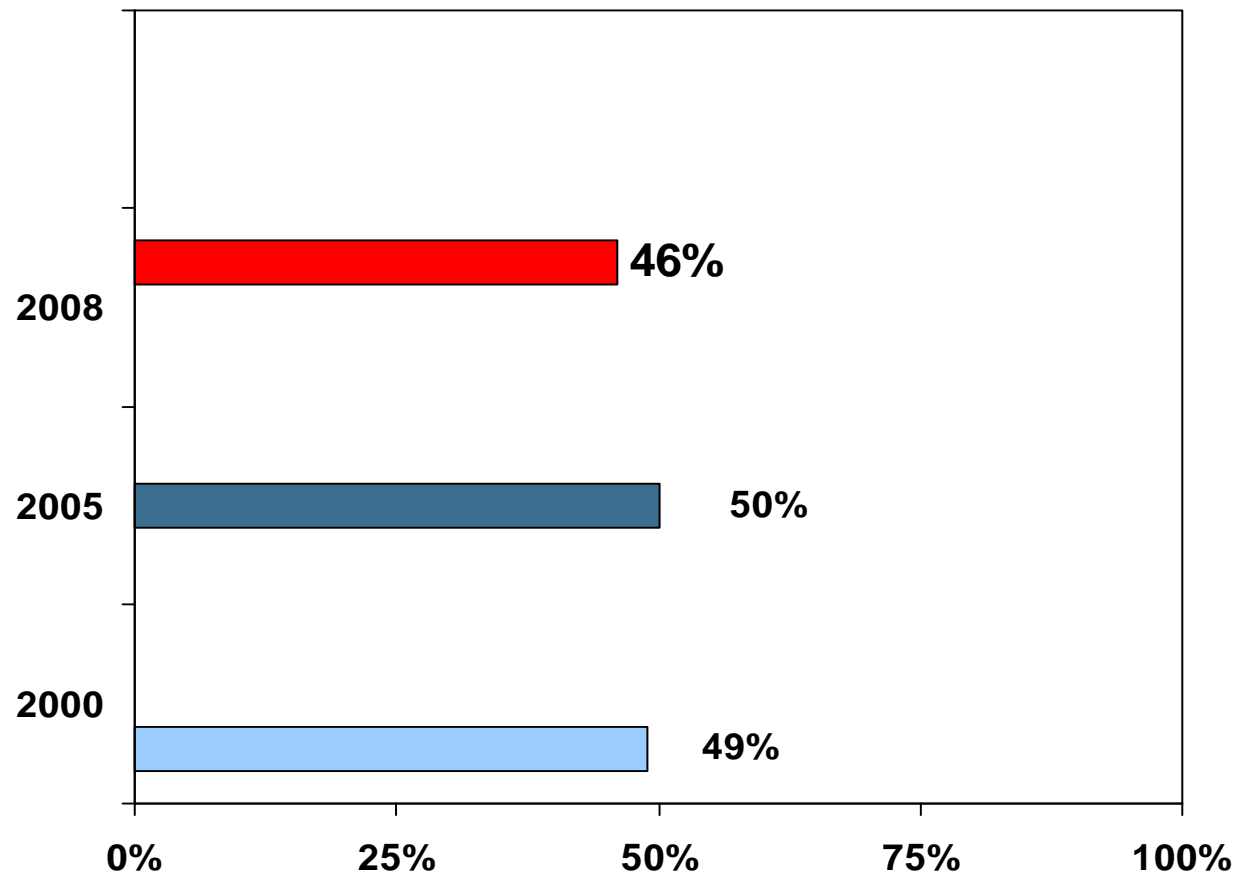
Q: Have you personally seen or do you have firsthand knowledge of misconduct within your organization in the last 12 months?



Source: KPMG Integrity Survey 2008/2009

SERIOUSNESS OF MISCONDUCT

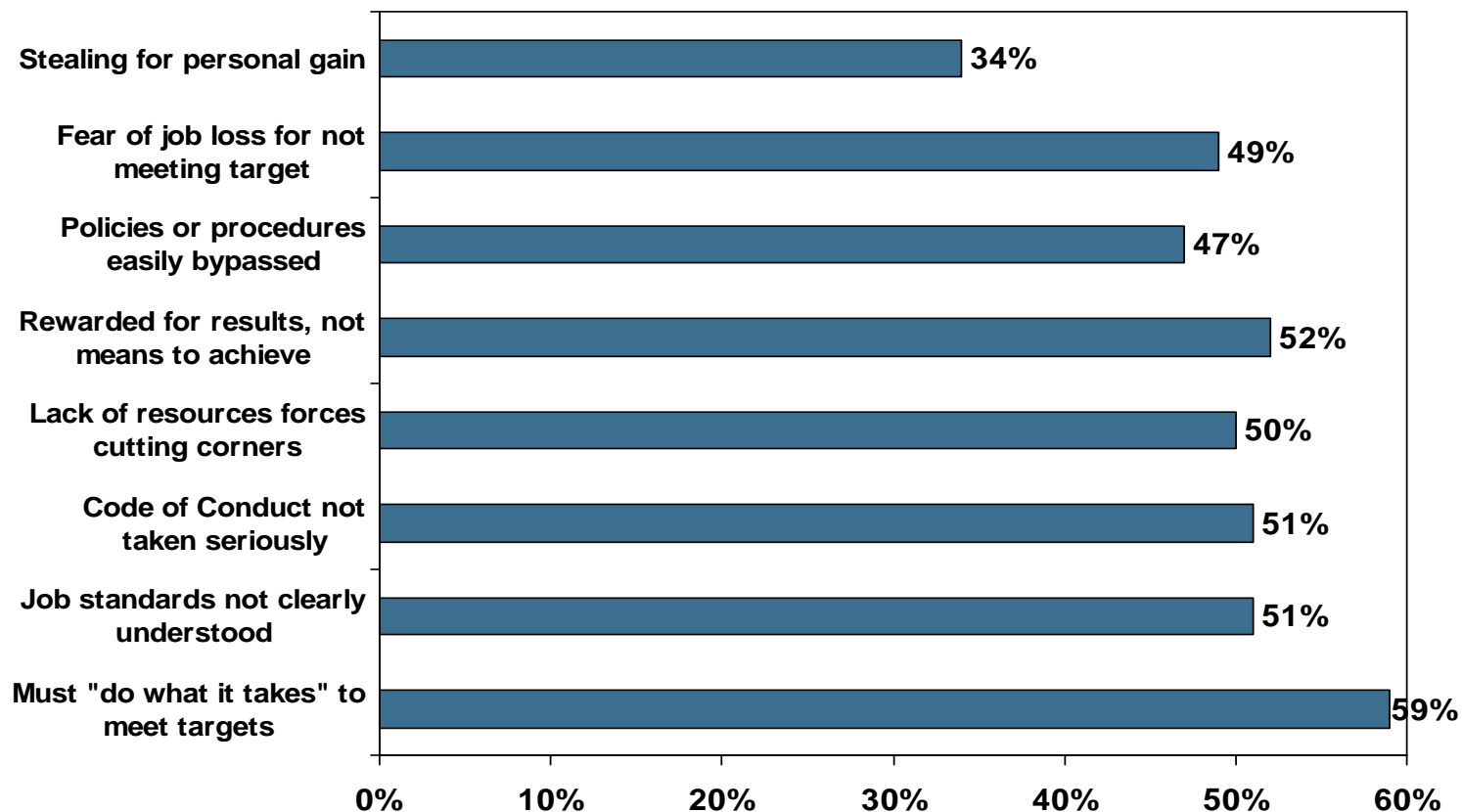
Q: Could the misconduct observed cause a “significant loss of public trust” if discovered?



Source: KPMG Integrity Survey 2008/2009

DRIVERS OF BUSINESS MISCONDUCT

Q: What factors might cause employees and management to engage in misconduct?



Source: KPMG Integrity Survey 2008/2009

PREVELANCE OF ANTI-FRAUD PROGRAMS

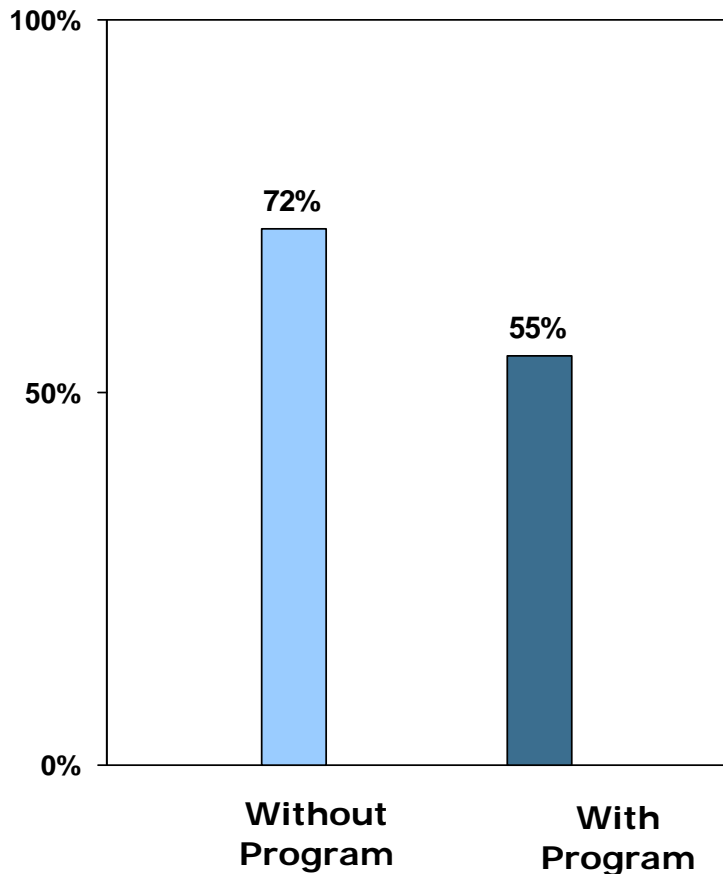
	Formally	Informally	Unsure	Not at All	
Has a code of conduct that articulates the values and standards of the organization	82%	7%	9%	1%	
Provides communication and training to employees on its code of conduct	77%	13%	7%	3%	←
Audits and monitors employee compliance with its code of conduct	49%	20%	23%	8%	←
Has policies to hold employees and managers accountable for code of conduct violations	72%	9%	15%	4%	←
Provides incentives for employees to uphold the code of conduct	26%	10%	27%	37%	
Has policies to investigate and take corrective action if misconduct is alleged	71%	9%	16%	3%	←
Performs background investigations on prospective employees	67%	7%	21%	4%	
Has a senior-level ethics or compliance officer	58%	6%	28%	8%	←
Has confidential/anonymous hotline employees can use to report misconduct or seek advice	60%	5%	21%	14%	←

Source: KPMG Integrity Survey 2008/2009

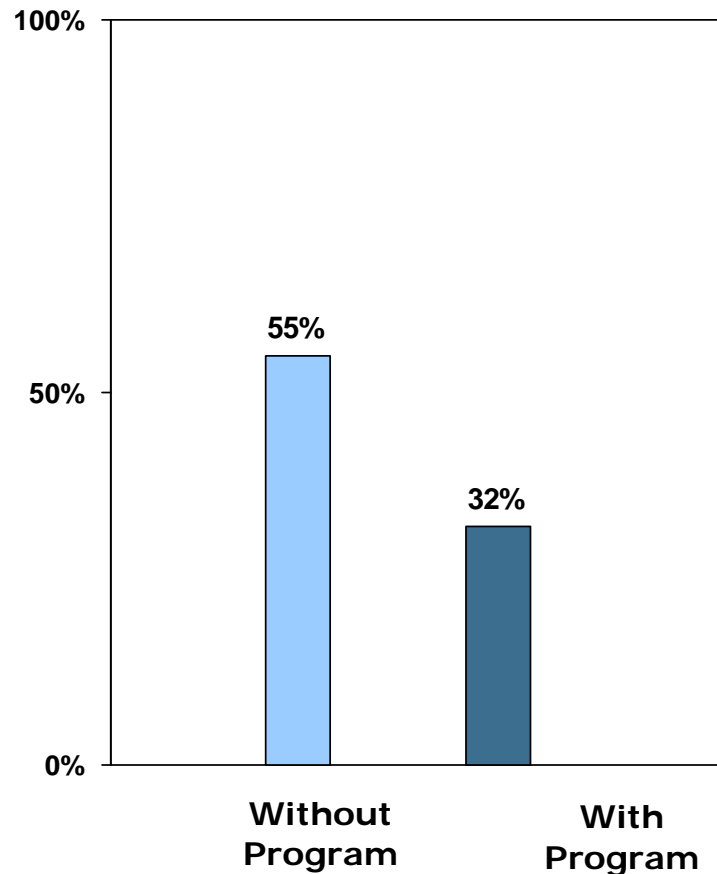
IMPACT OF ANTI-FRAUD PROGRAMS

Prevalence of Misconduct

Observed “misconduct” in the prior 12 months



Observed violations of “organizational values and principles” in the prior 12 months

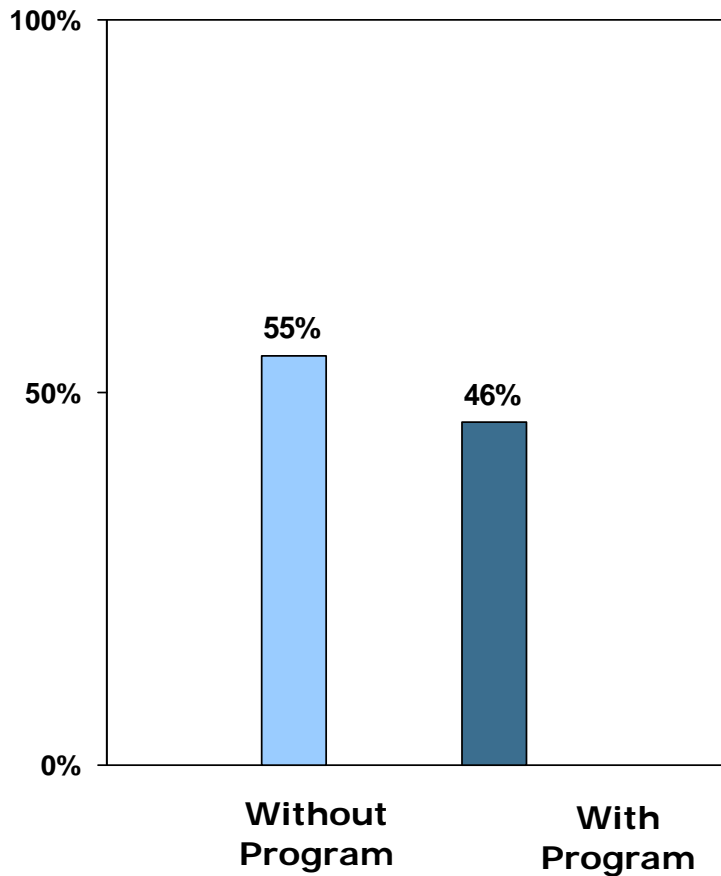


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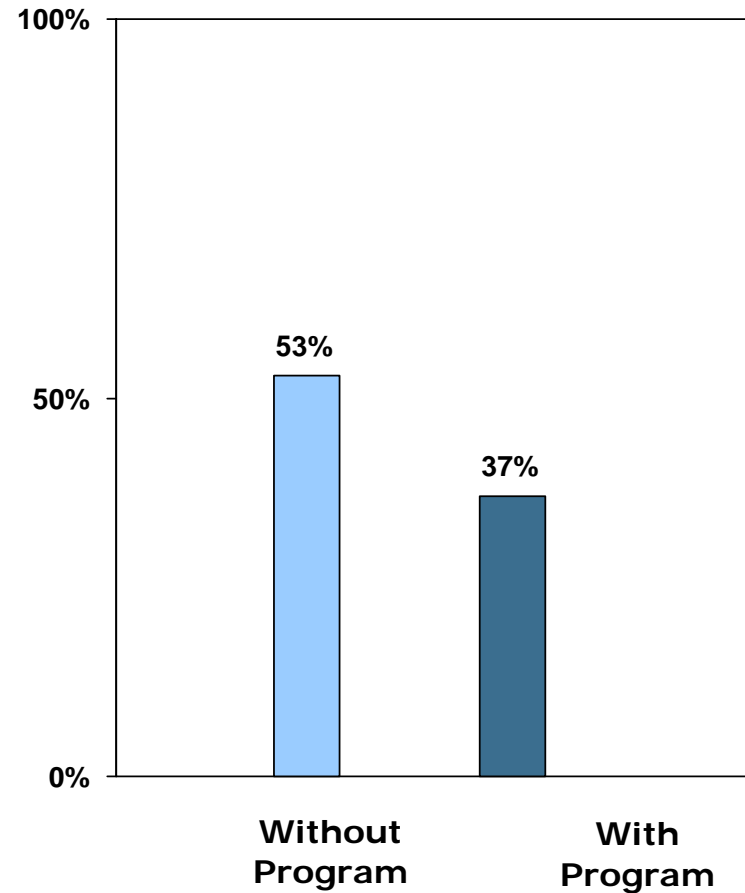
IMPACT OF ANTI-FRAUD PROGRAMS

Root Causes of Misconduct

Feel pressure to do whatever it takes to meet targets



Believe policies and procedures are easy to bypass and override

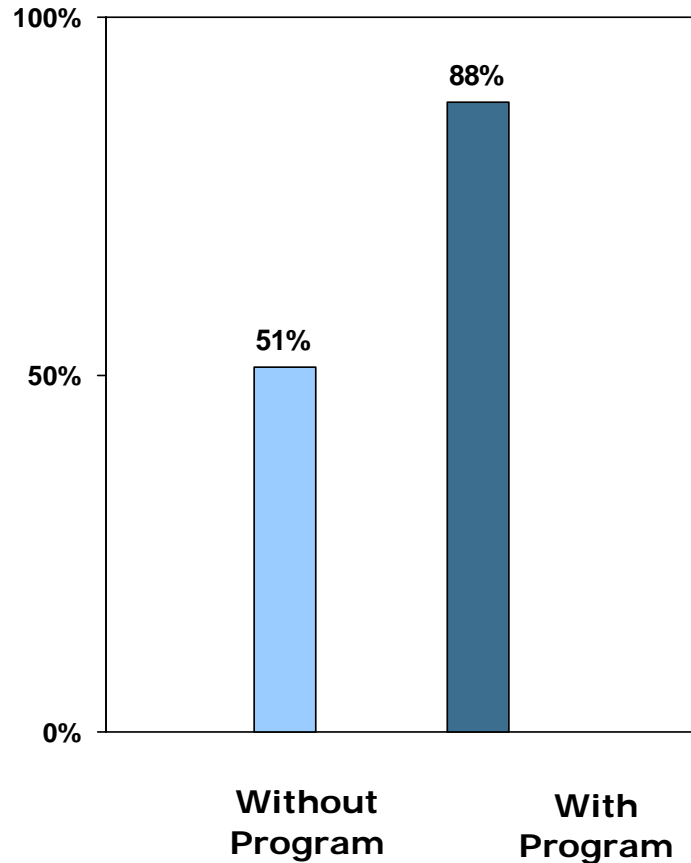


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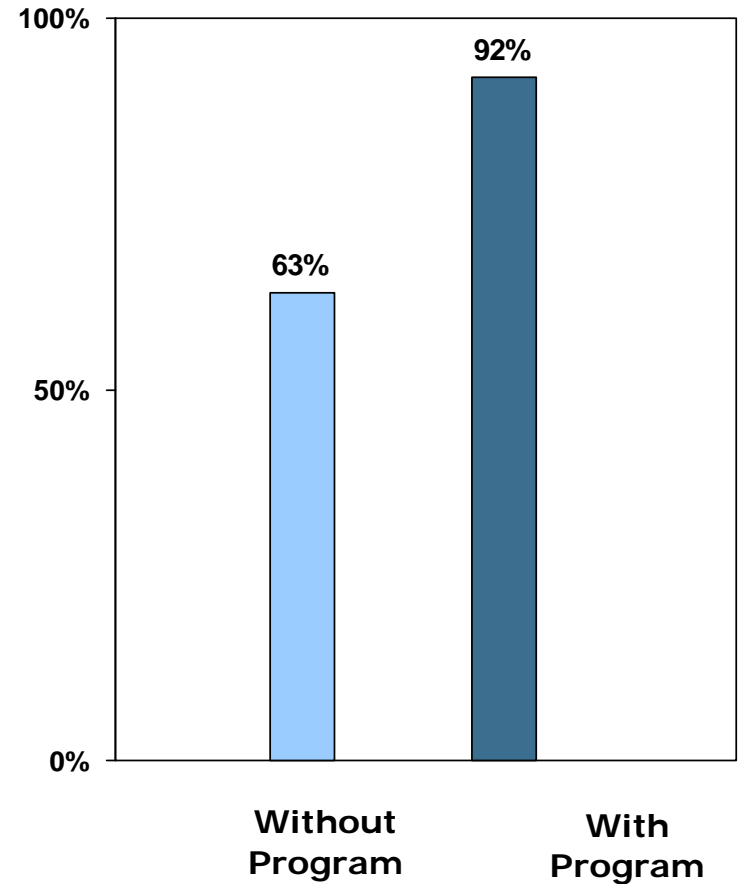
IMPACT OF ANTI-FRAUD PROGRAMS

Uncovering Misconduct

Would feel comfortable reporting misconduct to a supervisor



Believe they would be doing the right thing

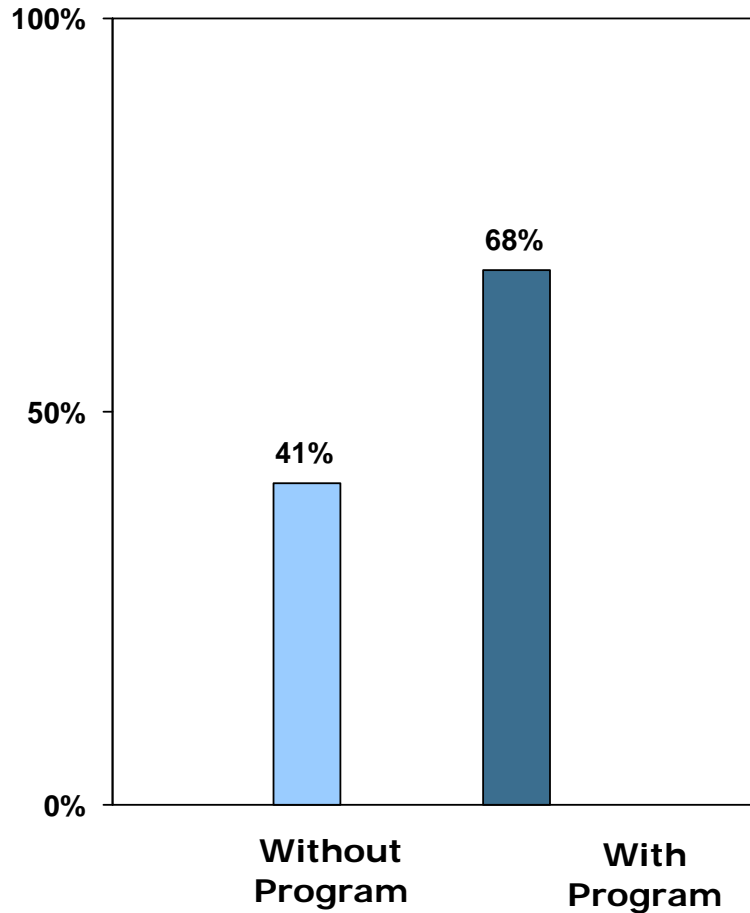


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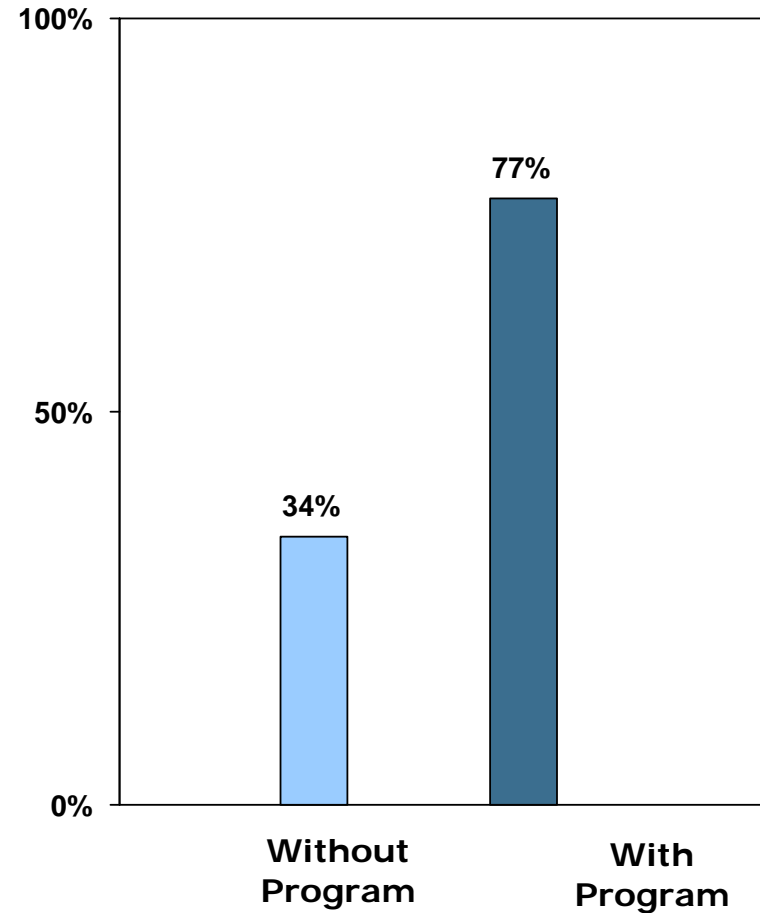
IMPACT OF ANTI-FRAUD PROGRAMS

Faith and Trust in Program

Believe appropriate action would be taken



Believe they would be protected from retaliation

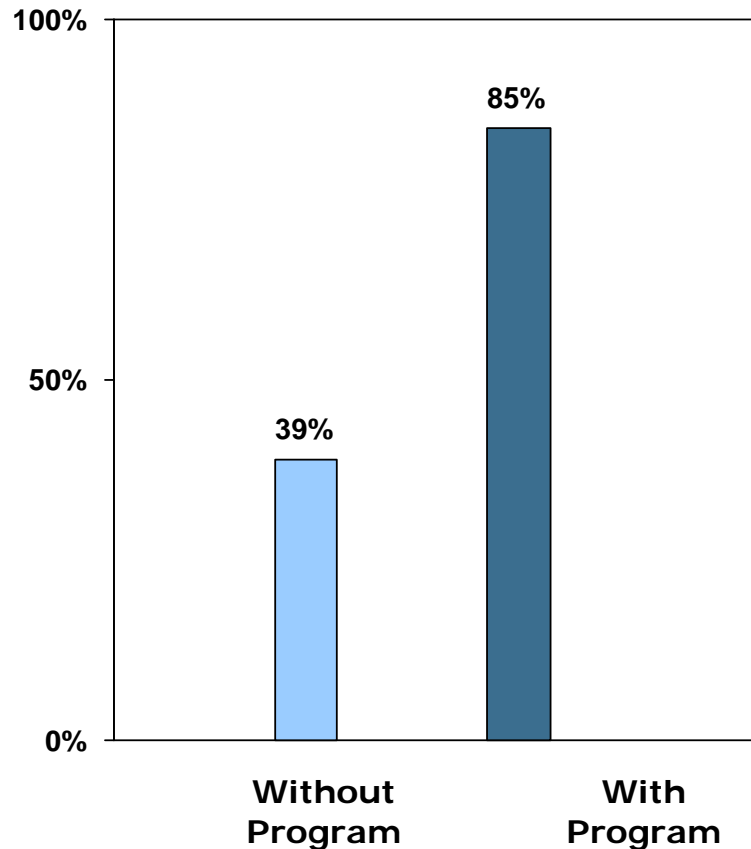


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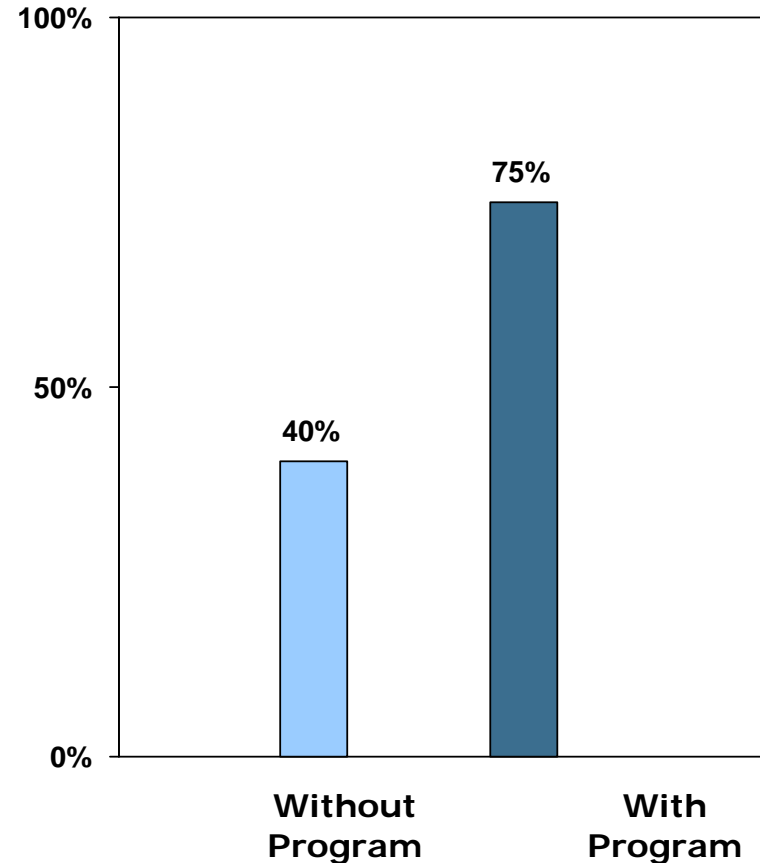
IMPACT OF ANTI-FRAUD PROGRAMS

Perceived Tone from the Top

Believe CEO and other senior executives set the right “tone” for ethics and integrity



Believe CEO and other executives are approachable with ethics concerns

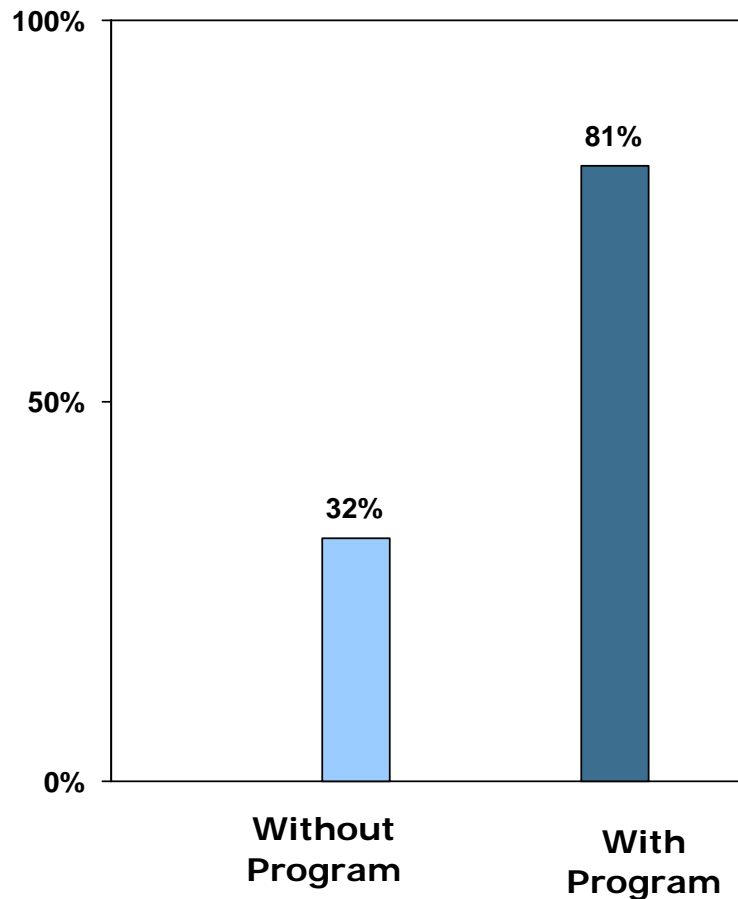


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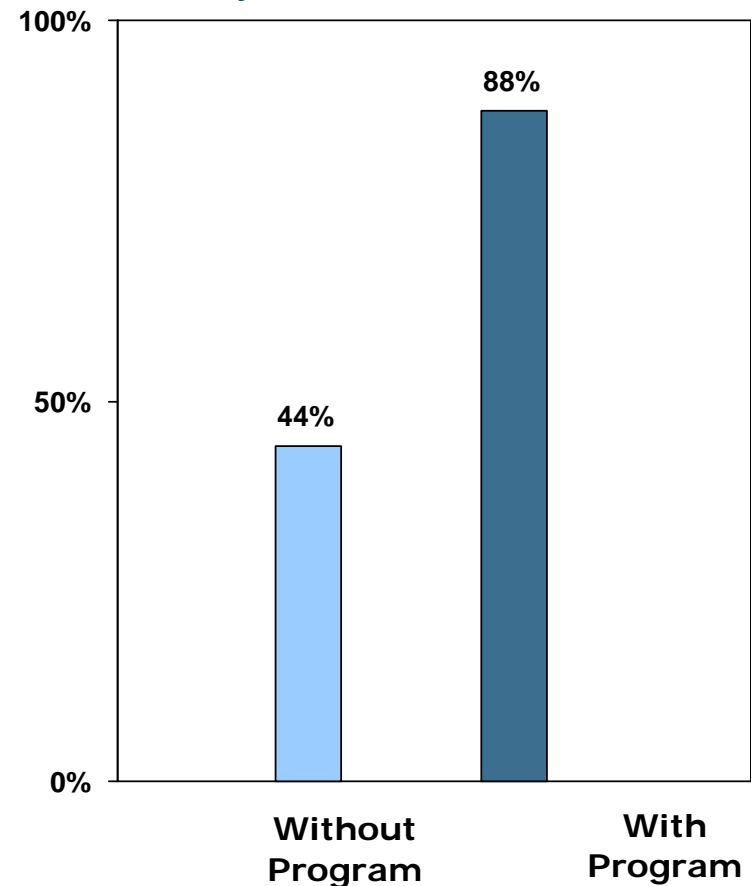
IMPACT OF ANTI-FRAUD PROGRAMS

Perceived Executive Values

Believe CEO and other senior executives value ethics and integrity over short-term business goals



Believe CEO and other senior executives would respond appropriately if they became aware of misconduct

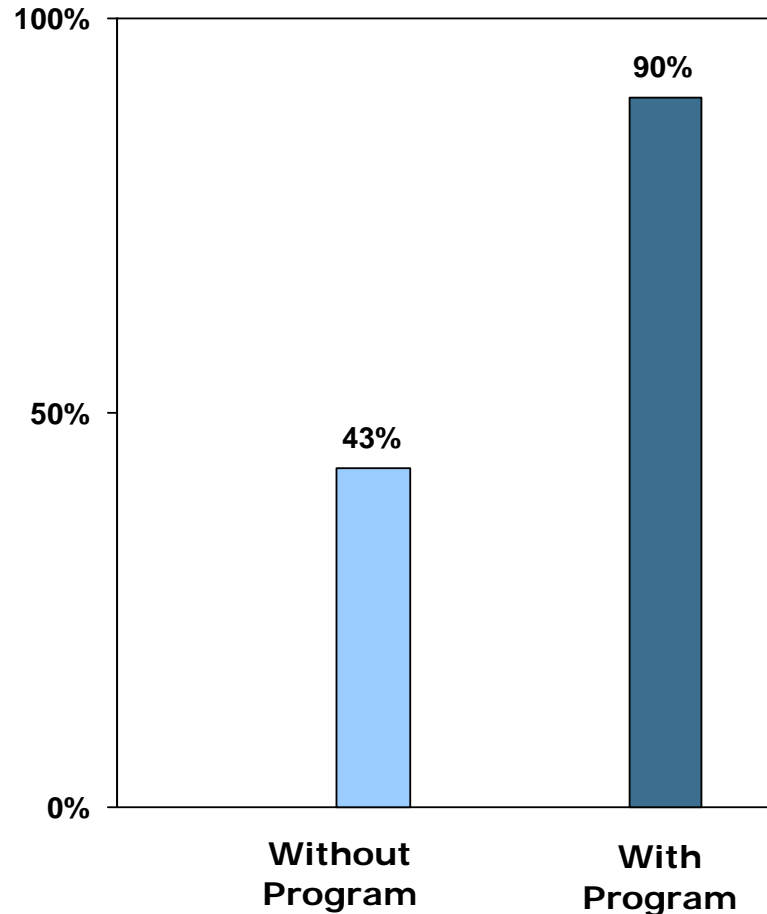


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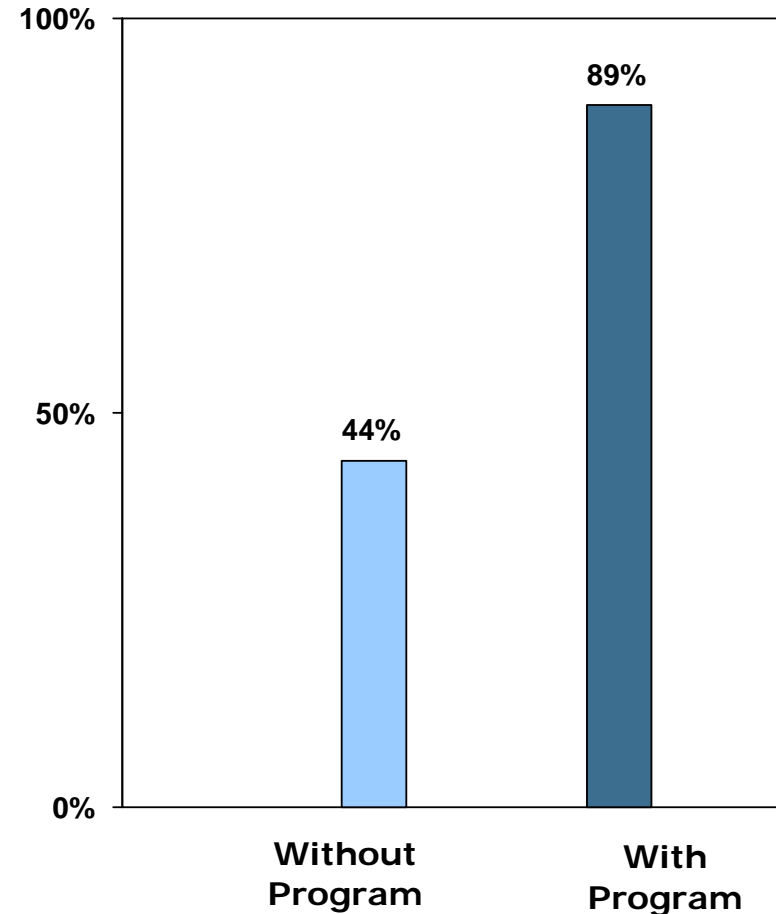
IMPACT OF ANTI-FRAUD PROGRAMS

Everyday Workplace Impact

People feel motivated and empowered to do the right thing



People apply the right values to their decisions and behaviors

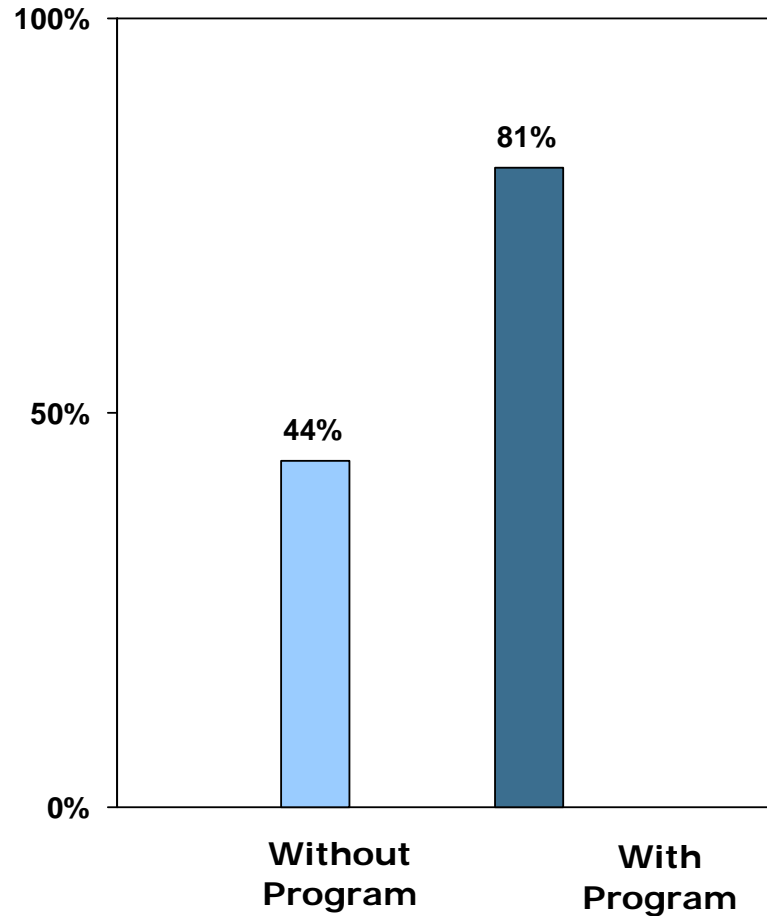


Source: KPMG Integrity Survey 2008/2009

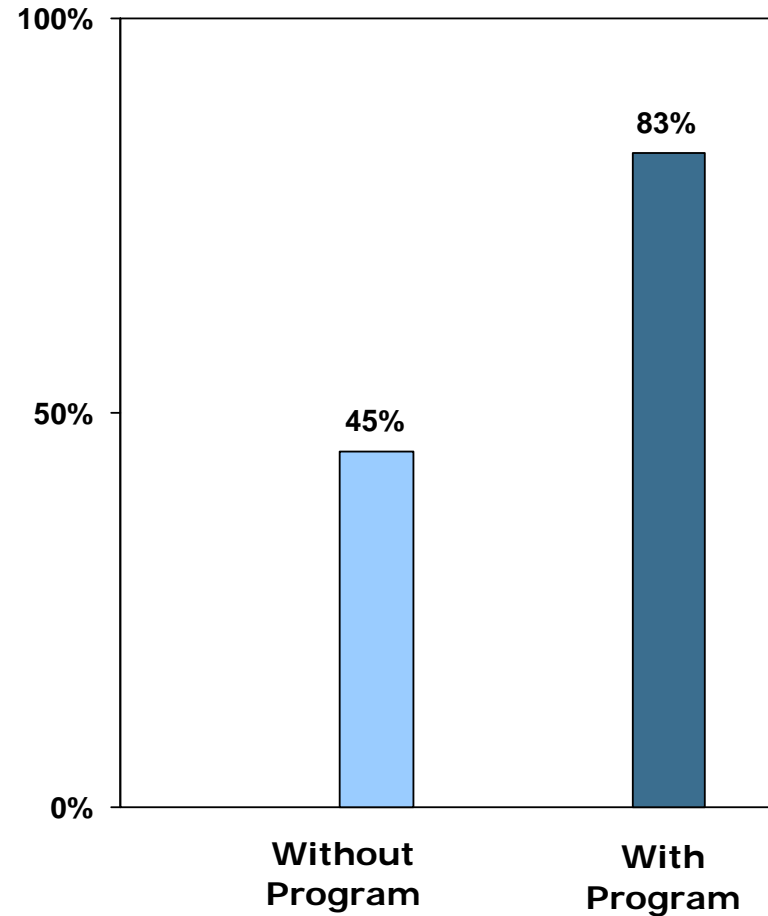
IMPACT OF ANTI-FRAUD PROGRAMS

Everyday Workplace Impact

The opportunity to engage in misconduct is minimal



The willingness to tolerate misconduct is minimal



Source: KPMG Integrity Survey 2008/2009

AGENDA

- Responsibility for Fraud Protection
- The Economic Climate and Fraud
- Building an Effective Anti-Fraud Program
- Impact of an Effective Anti-Fraud Program
- **ACFE Anti-Fraud Program Offerings**

- Core element in an effective ethics and compliance program

- EthicsLine®—the official hotline of the ACFE
 - EthicsLine is powered by Global Compliance, the leading global hotline provider
 - EthicsLine package includes:
 - **Hotline** (telephone, web, mobile)—anonymous, confidential, 24/7/365, global reach
 - **Case Management** (Web-based desktop, mobile)—for management of investigations from open through closed status
 - **Analytics**—for tracking and trending
 - **Communications Campaign Materials**—to increase awareness and comprehension of reporting obligations
 - EthicsLine is scalable to meet an organization's needs—regardless of industry, size, or geography of operation
-

ETHICSLINE® HOTLINE ATTRIBUTES

Reflects all attributes of an “effective” hotline

- Availability 24/7/365
- Multiple means of entry: phone, desktop web, mobile web
- Multilingual; culturally adapted
- Secure and confidential—with ability to provide anonymous tips
- Accessible to key stakeholders: employees, executives, agents, vendors, contractors, customers, patients, shareholders, board of directors
- Centralized repository of reports
- Case Management functionality
- Analytics functionality

ETHICSLINE® CASE MANAGEMENT

- **View** reports from all intake sources; enter new reports
- **Review** initial and follow-up report details; view file attachments; submit non-English reports for translation (authorized users)
- **Respond** to and request additional information from reporters
- **Assign** Case Manager and Case Investigator roles per case
- **Document** case investigation and resolution details; attach documents
- **Track** case progress; receive e-mail notification of case activity; view audit trail of case updates; archive closed cases
- **Search** for reports; download results for I formatting and analysis
- **Analyze** report counts and trends; view summary data; print management reports

The screenshot displays the IntegriLink case management interface. At the top, there is a navigation bar with options like 'My Homepage', 'Cases', 'Inbox', 'Analysis', 'Library', and 'Admin'. The main content area shows the details for Case Number: BTC-11-01-0024 [S3JN].

Case Vitals:

Case Status:	Open
Report Initiated:	2011-01-19 17:38 ET
Scheduled Follow-up Date:	2011-02-03 00:00 ET
Primary Allegation:	Harassment - Workplace, C
Subject Name:	Vernon Vermont
Disposition:	N/A

Issue Summary: My manager is constantly harassing me.

Background Investigation Resolution

Details:

Report Initiated:	2011-01-19 17:38 ET
Scheduled Follow-up Date:	2011-02-03 00:00 ET
Location:	HO Headquarters 145 S. Union Road Charlotte, North Carolina 28277 United States
Region:	North
Primary Allegation Class:	Diversity, Equal Opportunity and Respect in the Workplace
Primary Allegation:	Harassment - Workplace
Allegation Priority:	C
Language:	English
Source:	Web Submission

Parties Involved:

Party Type	Party Name	Job Title
Caller	Mrs. Jennifer Small	Service Desk
Subject	Vernon Vermont	Store Manager

Narrative: Summary | Details | Interview | Notes

My manager is constantly harassing me.

Actions: View Case History, Create PDF, Reply To Reporter, Edit Case Status, Add Note, Quick Assign

Case Status: Open

Assignments:

Type	Assignee	Complete
Investigator	Amit Patel	<input type="checkbox"/>
Investigator	Bob Jones	<input type="checkbox"/>
View Only	Alvin Simons	<input type="checkbox"/>

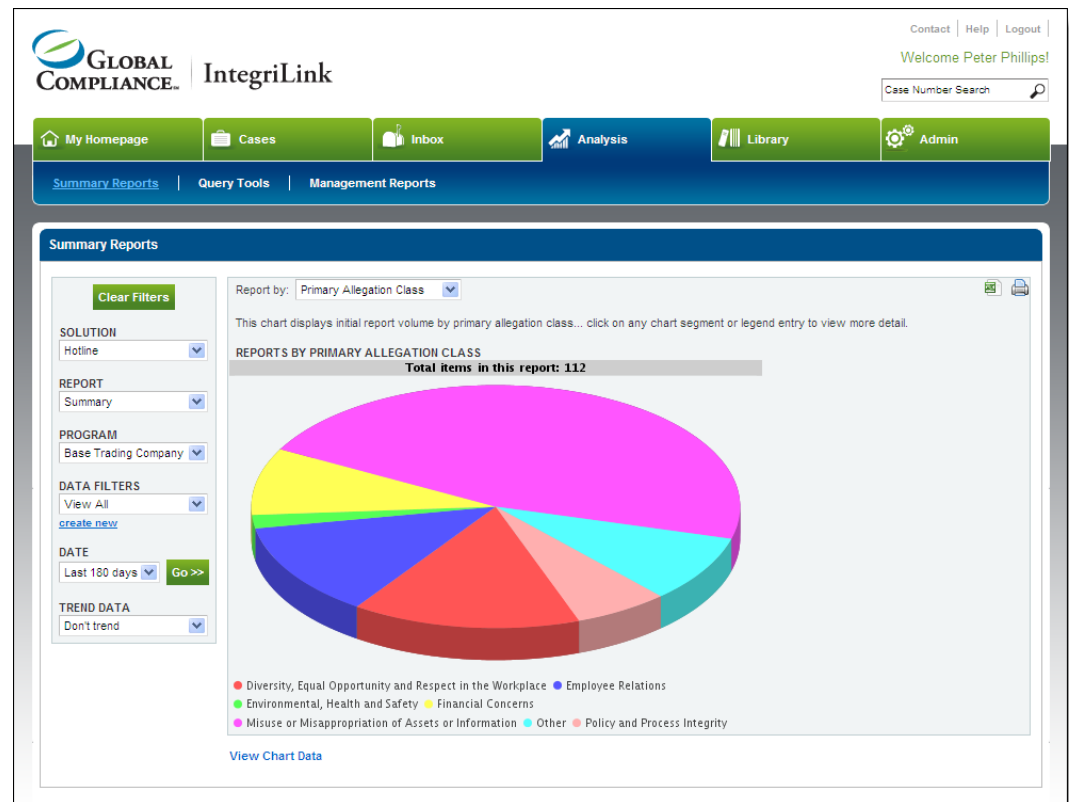
Attachments: 19 of 100 mb used

File Name	Uploaded By
There are no attachments to display.	

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- Unsurpassed reporting options and capabilities including:
 - Standard Monthly management reports
 - Standard Dashboard charts and graphs
 - Management report library
 - Data searching and filtering
 - Ad-hoc charting, graphing



ASSESSMENTS AND CONSULTING

- The Ethical Leadership Group™, Global Compliance's in-house team of expert advisors, have unmatched experience:
 - Served on the U.S. Sentencing Commission Advisory Panel that guided a rewrite of the U.S. Sentencing Guidelines; act as corporate monitors on behalf of the U.S. government; served as ethics and compliance officers; led the Ethics and Compliance Officer Association.
 - The United Nations selected our expert advisors to consult on revisions to its investigation procedures
- Define and develop ethics and compliance risk assessments
- Consult and develop Codes of Conduct and other key ethics and compliance policies
- Engagements in over 50 countries, including India, China, Japan, United Kingdom, Germany, and Russia

ABOUT GLOBAL COMPLIANCE®

The Power Behind EthicsLine

- Pioneered the original ethics/compliance reporting hotline in 1981
- Provides a comprehensive set of ethics/compliance offerings:
 - Hotlines/Case Management Solutions
 - Training and Education
 - Consulting and Assessment
 - Inspections and Validations
- Serves 4,000+ clients and their 25+ million employees in more than 200 countries and territories
- Serves 50% of Fortune 100, 45% of Fortune 500, 35% of Fortune 1000, and 25% of Global 500

SUMMARY

Who Owns Fraud?

- “Effective” fraud prevention is the responsibility of many departments with each one sharing the same goal and working together in an integrated fashion

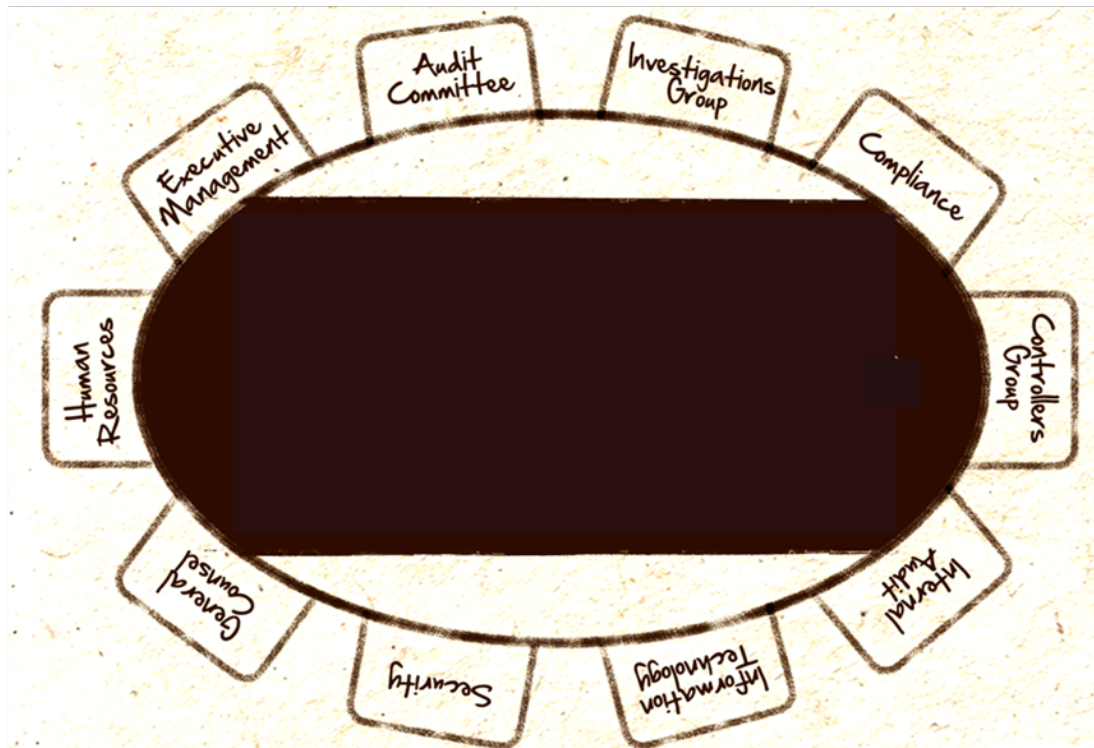


Photo courtesy of ACFE

THANK YOU

Nick Ciancio

Chief Compliance Officer

704-564-6633

nick.ciancio@globalcompliance.com

APPENDIX

SURVEY METHODOLOGY

Ernst & Young Study – 11th Global Fraud Survey

- Survey to get executive views on how corporations are managing the risks associated with fraud, bribery and corruption
 - 1409 interviews between November 2009 and February 2010
 - Senior decision makers from large corporations across 36 countries who have responsibility for tackling fraud
 - CFOs
 - Heads of Internal Audit
 - Heads of Legal
 - Heads of Compliance

SURVEY METHODOLOGY

KPMG Study – 2008/2009 Integrity Survey

- Survey to understand prevalence and nature of corporate fraud and effectiveness of efforts to prevent, detect and respond to wrongdoing
 - 5,065 interviews
 - All job levels across 13 industry sectors
 - 61% individual contributors
 - 13% supervisors
 - 12% mid-level managers
 - 5% senior management, executives, etc.
 - 4 thresholds of organization size
 - 28% = 200 to 999 employees
 - 24% = 1,000 to 4,999 employees
 - 11% = 5,000 to 9,999 employees
 - 38% = more than 10,000 employees
 - U.S.-based and multinational organizations
 - 34% U.S. operations only
 - 66% multinational operations

SURVEY METHODOLOGY

ACFE 2010 Report to the Nations on Occupational Fraud and Abuse

- Study to gain details on largest cases of fraud
 - 1,843 survey respondents
 - Cases involved internal fraud or fraud committed by person against the organization for which he/she worked
 - Investigation was completed and occurred between January 2008 and October 2009
 - Perpetrator was identified in most cases