

## **FINANCIAL CONTROLS AND FRAUD PREVENTION**

### **I. MANAGEMENT OF DISTRICT ASSETS/ACCOUNTS**

The superintendent shall establish and maintain accurate, financial management systems to meet the district's fiscal obligations, produce useful information for financial reports, and safeguard district resources. The superintendent shall ensure the district's accounting system provides ongoing internal controls. The superintendent shall review the accounting system and internal controls with the board.

### **II. FRAUD PREVENTION AND INVESTIGATION**

All employees, board members, consultants, vendors, contractors and other parties maintaining a business relationship with the district shall act with due diligence in duties involving the district's fiscal resources. The superintendent shall develop internal controls that aid in the prevention and detection of fraud, financial impropriety or irregularity.

### **III. REPORTING FRAUD**

An employee who suspects fraud, impropriety or irregularity shall promptly report those suspicions to the immediate supervisor and/or the superintendent. The superintendent shall have primary responsibility for any investigations, in coordination with legal counsel and other internal or external departments and agencies as appropriate.

### **IV. CONFIDENTIALITY**

To the extent possible, confidentiality will be maintained throughout the investigation of a complaint of fraud. The desire for confidentiality must be balanced with the district's obligation to conduct a thorough investigation, to take appropriate corrective action or to provide due process to the accused.

### **V. WHISTLEBLOWERS**

The district encourages complaints, reports or inquiries about illegal practices or violations of district policies, including illegal or improper conduct by the district, its leadership or by others on its behalf. Reports could include, but not be limited to, financial improprieties, accounting or audit matters, ethical violations or other similar illegal or improper practices or policies. The district prohibits retaliation by or on behalf of the district against staff members who make good faith complaints, reports or inquiries under this policy or for participations in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. The district reserves the right to discipline persons who make bad

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**faith, knowingly false, or vexatious complaints, reports or inquiries or who otherwise abuse this policy.**

**Complaints, reports or inquiries may be made under this policy on a confidential or anonymous basis. They should describe in detail the specific facts demonstrating the bases for the complaints, reports or inquiries. They should be directed to the school district attorney or the superintendent. If the superintendent is implicated in the complaint, report or inquiry, it should be directed to the board of education. The district will conduct a prompt, review or investigation. The district may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.**

**VI. PUBLICATION**

**A summary of this policy shall be published in employee handbooks and district newsletters, and posted on the district website annually.**