

**Disclaimer:**

**District Financial Fraud or Theft is a criminal matter and covered by state laws. This policy is merely a guideline so that all district employees understand the possible repercussions of such actions. If you have questions regarding fraud and/or theft, please contact your district legal counsel and/or your local law enforcement agency.**

District Financial Fraud and Theft Prevention

All District employees, Board members, consultants, vendors, contractors and other parties maintaining a business relationship with the District shall act with integrity and due diligence in matters involving District fiscal resources.

The Superintendent and Business Manager shall be responsible for developing internal controls designed to prevent and detect fraud, financial impropriety or fiscal irregularities within the District. Every member of the District's administrative team shall be alert for any indication of fraud, financial impropriety or irregularity within his/her areas of responsibility.

The Superintendent and Business Manager shall investigate reports of fraudulent activity in a manner that protects the confidentiality of the parties and the facts. All employees involved in the investigation shall be advised to keep information about the investigation confidential.

Staff Responsibilities

Any employee who suspects that financial fraud, impropriety or irregularity has occurred shall immediately report those suspicions to their immediate supervisor and/or the Superintendent/designee who shall have the primary responsibility for initiating necessary investigations. Additionally, the Superintendent and Business Manager shall coordinate investigative efforts with the District's legal counsel, auditing firm and other internal or external departments and agencies, including the county prosecutor's office and law enforcement officials, as the Superintendent may deem appropriate.

In the event the concern or complaint involves the Superintendent, the concern shall be brought to the attention of the Chairman of the Board of Trustees who is hereby empowered to contact the District's legal counsel, auditing firm and any other agency to investigate the concern or complaint.

## Definitions

As used in this policy, “fraud” refers to intentionally misrepresenting, concealing or misusing information in an attempt to commit fiscal wrongdoing. Fraudulent actions include, but are not limited to:

- Behaving in a dishonest or false manner in relation to District assets, including theft of funds, securities, supplies or other District properties.
- Forging or altering financial documents or accounts illegally or without proper authorization.
- Improper handling or reporting of financial transactions
- Personally profiting as a result of insider knowledge
- Disregarding confidentiality safeguards concerning financial information
- Violating Board conflict of interest policies
- Mishandling financial records of District assets (destroying, removing or misusing)

As used in this policy, “impropriety” refers to any actions taken without complying with the internal controls established by this policy or by the Superintendent pursuant to this policy. Impropriety includes, but is not limited to: failing to comply with mandatory requirements of this policy (*e.g.*, actions that “shall” occur); inappropriately applying or avoiding discretionary requirements of this policy (*e.g.*, actions that “should” occur); inaccurately recording financial transactions; accepting any unlawful gratuity, gift, or favor that might impair or appear to impair professional judgment; and violating local, state, or federal law with respect to the District’s finances.

## Internal Controls

The following internal controls shall be a regular practice of the district in an effort to prevent the possibility of fraud:

- Budgetary Transfers. The transfer of appropriations is important for the superintendent, business manager and treasurer to be aware of, and all should have written confirmation of the information. The purchasing agent shall be apprised if the transfer has been approved, the treasurer shall document it and the business official shall record it.
- Treasurer’s Receipts. The treasurer should have receipts and numbered duplicates for everything paid out in his/her custody.
- Checks. The treasurer shall keep personal custody of any signature stamps and maintain a log for every check written.
- Audit. An individual not connected to the business office should audit the check register regularly.
- Conduct background checks on potential business office employees. Check all possible references, not just those offered, and perform criminal background checks on key business officials and other warranted.

- Segregate functions within the business office so as to avoid the opportunity for fraud without collusion.
- With regard to electronic transfers of funds, the internal controls provided in Policy 7226 shall also be complied with.

Policy History:

Adopted on: August 10, 2009

Revised on: June 21, 2010

Revised on: November 11, 2019