

## SCHOOL DISTRICT OF THE MENOMONIE AREA

665

### FRAUD

The Board is committed to protecting the financial assets of the District. Fraudulent behavior by school district employees, school board members, any contracted entity, or other individual will not be tolerated.

Fraudulent behavior includes, but is not limited to, theft, embezzlement, lying by providing false information to obtain a material benefit, including falsification of employee expense reports, employee time records or other manipulation of time records to obtain compensation for time not worked, purchasing property for personal use with District funds, and inappropriate personal use of District property.

The district administrator or designee, in cooperation with the auditors and district staff, 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 and supervisory team shall be alert for any indication of fraud, financial impropriety or irregularity within his/her areas of responsibility.

#### Procedure

##### 1. Fraud Prevention

- a. The district administrator or designee shall review fraud prevention and reporting with the administrative/supervisory team on an annual basis. He/she shall also communicate the District's position regarding fraud, expectations, and the fraud reporting process to all new employees at their in-service and to regular district staff on a periodic basis.
- b. The Director of Business Services shall review fiscal procedures and related internal controls for accuracy, relevancy, and effectiveness on an annual basis. He/she shall also conduct periodic internal audits of processes identified as high risk for fraud potential.

##### 2. Fraud Reporting

- a. Any District employee who suspects fraud, impropriety or irregularity in relation to District fiscal or other resources shall report his/her suspicions immediately to his/her supervisor and/or the district administrator, who shall be responsible for initiating necessary investigations. In the event the concern or complaint involves the district administrator, the concern shall be brought to the attention of the board president. Investigations shall be conducted in a manner that protects the confidentiality of the parties and the facts, and be conducted in coordination with legal counsel and other internal or external departments and agencies as appropriate. All employees involved in the investigation shall be advised to keep information about the investigation confidential.

- b. If an investigation substantiates the occurrence of a fraudulent activity, appropriate actions shall be taken in consultation with the District's legal counsel. These actions may include, but are not limited to, suspension, dismissal, and criminal prosecution.

LEGAL REF.:    Sections    19.41    Wisconsin Statutes  
   19.59  
   120.12(1)  
   946.10  
   946.12  
   946.13

APPROVED: October 13, 2008

*/s/Bud Karis*  
Clerk