

## Concord School District Policy #301

### Fraud Prevention

The School Board and Superintendent are committed to maintaining the public trust and financial integrity of the District. To this end, the Superintendent or designee shall maintain a system of internal controls to deter and monitor for fraud or financial impropriety in the District.

Fraud and financial impropriety shall include but not be limited to:

1. Forgery or unauthorized alteration of any document or account belonging to the District.
2. Forgery or unauthorized alteration of a check, bank draft, or any other financial document.
3. Misappropriation of funds, securities, supplies or any other assets of the District.
4. Impropriety in the handling of money or reporting of District financial transactions.
5. Unauthorized disclosure of confidential or proprietary information to outside parties.
6. Inappropriately destroying, removing, or using records, furniture, fixtures, or equipment.
7. Intentionally misrepresenting information for personal gain.
8. Acceptance or seeking of anything of material value, other than items used in the normal course of advertising, from contractors, vendors, or persons providing services to the District.
9. Any other dishonest or fraudulent acts regarding the finances of the District.
10. Failure to disclose knowledge of the occurrence of any of the above.

Each employee who supervises or prepares District financial reports or transactions shall set an example of honest and ethical behavior and shall actively monitor his or her area of responsibility for fraud and financial impropriety.

Any person who suspects fraud or financial impropriety in the District shall report the suspicions immediately to any supervisor, the Superintendent or designee.

Reports of suspected fraud or financial impropriety shall be treated as confidential to the extent permitted by law. Limited disclosure may be necessary to complete a full investigation or to comply with law. All employees involved in an investigation shall be advised to keep information about the investigation confidential.

Neither the Board nor any District employee shall unlawfully retaliate against a person who in good faith reports perceived fraud or financial impropriety.

In coordination with legal counsel and other internal or external departments or agencies, as appropriate, the Superintendent or a designee shall promptly investigate reports of potential fraud or financial impropriety. If an investigation substantiates a report of fraud or financial

impropriety, the Superintendent or designee shall promptly inform the Board of the report, the investigation, and any responsive action taken or recommended by the administration.

If an employee is found to have committed fraud or financial impropriety, the Superintendent or designee shall take or recommend appropriate disciplinary action, which may include termination of employment. If a contractor or vendor is found to have committed fraud or financial impropriety, the District shall take appropriate action, which may include but not be limited to cancellation of the District's relationship with the contractor or vendor.

When circumstances warrant, the Superintendent or designee may refer matters to appropriate law enforcement or regulatory authorities including, but not limited to local, state and federal agencies.

In cases involving monetary loss to the District, the District may seek to recover lost or misappropriated funds.

After any investigation substantiates a report of fraud or financial impropriety, the Superintendent or designee shall analyze conditions or factors that may have contributed to the fraudulent or improper activity. The Superintendent or designee shall ensure that appropriate administrative procedures are developed and implemented to mitigate the possibility of future misconduct.

If the Superintendent is reportedly suspected of fraud, impropriety or irregularity, the suspicions should be reported to the School Board President. The Board President is authorized to engage the District's legal counsel or alternate legal counsel to initiate an investigation of the complaint and coordinate the investigative efforts with individuals and agencies as appropriate.

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Corresponds to NHSBA Policy DIH