NONINSTRUCTIONAL OPERATIONS AND BUSINESS SERVICES

Series 700

POLICY TITLE INTERNAL CONTROLS No. 707.5

The Board expects all board members, employees, volunteers, consultants, vendors, contractors, students and other parties maintaining any relationship with the school district to act with integrity, due diligence, and in accordance with all laws in their duties involving the school district's resources. The Board is entrusted with public dollars and no one connected with the school district should do anything to erode that trust.

Internal controls are used to help ensure the integrity of district financial and accounting information. Adherence to district-established internal control procedures is the responsibility of all employees of the school district. The Superintendent and Chief Financial Officer will be responsible for developing internal controls designed to prevent and detect fraud, financial impropriety, or fiscal irregularities within the school district subject to review and approval of the Board. Administrators will be alerted of any indication of fraud, financial impropriety, or irregularity with the administrator's area of responsibility.

Any employee who suspects fraud, impropriety, or irregularity will report his/her suspicions immediately to his/her immediate supervisor and the Superintendent. The Superintendent will have primary responsibility for any necessary investigations and will coordinate investigative efforts with the Board's legal counsel, auditing firm, the Auditor of State's office and other internal or external departments and agencies, including law enforcement officials, as the Superintendent may deem appropriate.

Employees bringing forth a legitimate concern about a potential impropriety will not be retaliated against and those who do retaliate against such an employee will be subject to disciplinary action up to, and including, discharge.

In the event the concern or complaint involves the Superintendent, the concern will be brought to the attention of the Board President or Board Vice-President who will be empowered to contact the Board's legal counsel, the Auditor of State's office, insurance agent auditing firm, and any other agency to investigate the concern or complaint.

The Superintendent or Board President shall ensure the Auditor of State's office is notified as required by law of any suspected embezzlement, theft or other financial irregularity pursuant to Iowa law. The Superintendent and/or Board President in coordination with the Auditor of State's office, will determine whether to conduct a complete or partial audit. The Superintendent is authorized to order a complete forensic audit if, in the Superintendent's judgment, such an audit would be useful and beneficial to the school district. The Superintendent will ensure the State

Auditor is notified of any suspected embezzlement or theft pursuant to Iowa law. In the event there is an investigation, records will be maintained for use in the investigation. Individuals found to have altered or destroyed records will be subject to disciplinary action up to, and including termination.

Legal References: American Competitiveness and Corporate Accountability Act of 2002, Pub. L. No. 107-204.
Iowa Code ch. 11, 279.8

Cross References: 401.12 Employee Use of Cell Phones
707.6 Audit Committee

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