

T. G. ...

Adopted 11/3/2011
Lmw-d

E12

FRAUD PREVENTION POLICY

Stratton School District

It is the policy of the Stratton School Board to provide a mechanism for employees and officers to bring to the attention of the auditors [the public accountant contracted by the Stratton School District] any complaints regarding the integrity of the Stratton School District's internal financial controls or the accuracy or completeness of financial or other information used in or related to the Stratton School District's financial statements and reports. The Stratton School District's employees and officers shall not be discharged, demoted, suspended, threatened, harassed, or discriminated against in any manner for raising reasonable questions concerning the fair presentation of the Stratton School District's financial statements in accordance with this policy.

Procedures

E12-R

REPORTS OF IRREGULARITY

Any employee who has a complaint regarding the integrity of the Stratton School District's internal financial controls or the accuracy or completeness of financial or other information used in or related to the Stratton School District's financial statements and reports, or who observes any questionable accounting practices, should report such complaint to the auditors [the public accountant contracted by the Stratton School District Board].

The report should include a description of the matter or irregularity, the period of time during which the employee observed the matter or irregularity, and any steps that the employee has taken to investigate the matter or irregularity, including reporting it to a supervisor and the supervisor's reaction. The report may include, at the employee's option, the employee's contact information if additional information is needed. However a report shall not be deemed deficient because the employee did not include contact information.

Examples of reportable actions include any indication of fraud, misappropriation of the Stratton School District's resources, substantial variation in the Stratton School District's financial reporting methodology from prior practice or from generally accepted accounting principles, and the falsification, concealment, or inappropriate destruction of the Stratton School District's financial records.

INVESTIGATION

Upon receiving such a report, the Stratton School District auditors [the public accountant contracted by the Stratton School District Board] shall investigate the issues identified in the report. The Stratton School District auditors [the public accountant contracted by the Stratton School District Board] may consult with the Board, Superintendent, treasurer, any other the Stratton School District or WCSU employee, and legal counsel as a part of their investigation. At the conclusion of the investigation, the the Stratton School District auditors [the public accountant contracted by the Stratton School District Board] shall prepare a written response to the report.

Warned: 10-6-11

Adopted: 11-3-11 Serrane M. Alce & Newell

Sister Eddy King
Thomas J. Montemagno