

**INTERNAL CONTROLS PROCEDURES**

Fraud, financial improprieties or irregularities include but are not limited to:

- Forgery or unauthorized alteration of any document or account belonging to the district.
- Forgery or unauthorized alteration of a check, bank draft or any other financial document.
- Misappropriation of funds, securities, supplies or other assets.
- Profiteering because of "insider" information from district information or activities.
- Disclosing confidential and/or proprietary information to outside parties.
- Accepting or seeking anything of material value, other than items used in the normal course of advertising, from contractors, vendors or persons providing services to the district.
- Destroying, removing or inappropriately using district records, furniture, fixtures or equipment.
- Failing to provide financial records to authorized state or local entities.
- Failure to cooperate fully with any financial auditors, investigators or law enforcement.
- Any other dishonest or fraudulent act involving district monies or resources.

The superintendent 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.

If an investigation substantiates the occurrence of a fraudulent activity, the superintendent or board vice-president, if the investigation centers on the superintendent, shall issue a report to the board and appropriate personnel. The final disposition of the matter and any decision to file or not file a criminal complaint or to refer the matter to the appropriate law enforcement and/or regulatory agency for independent investigation shall be made in consultation with district legal counsel. The results of the investigation shall not be disclosed to or discussed with anyone other than those individuals with a legitimate right to know until the results are made public.

LEGAL REFERENCE:

DATE OF ADOPTION: August 21, 2006

DATE OF REVISION:

MAQUOKETA VALLEY COMMUNITY SCHOOL DISTRICT  
DELHI, IOWA 52223