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The Board of Directors' expects all Board members, officers, employees, volunteers, consultants, vendors, contractors, students and other parties maintaining any relationship with the District to act with integrity, due diligence and in accordance with all laws in their duties involving the 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 control is the responsibility of all officers and employees of the District. The Superintendent, Chief Financial Officer and board secretary shall 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 by the board. Administrators shall be alert for any indication of fraud, financial impropriety or irregularity within the administrator's area of responsibility.

Any employee who suspects fraud, impropriety or irregularity shall report their suspicions immediately to his/her immediate supervisor and the Superintendent. The Superintendent shall have primary responsibility for any necessary investigations and shall coordinate investigative efforts with the board's legal counsel, auditing firm and other internal or external departments and agencies, including the District's insurance agent and law enforcement officials, as the Superintendent may deem appropriate. In the event the concern or complaint involves the Superintendent, the concern shall be brought to the attention of the Board president, who shall be empowered to contact such agencies to investigate the concern or complaint.

Employees bringing forth a 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, termination of employment.

Upon approval of the Board, the Superintendent shall contact the State Auditor or elect to employ the District's auditing firm to conduct a complete or partial forensic/internal control/SAS99 audit annually or otherwise as often as deemed necessary. The Superintendent shall be authorized to order a complete forensic audit if, in the Superintendent's judgment, such an audit would be useful and beneficial to the District. The Superintendent shall ensure the State Auditor is notified of any suspected embezzlement or theft or other significant financial irregularities pursuant to Iowa law. In the event there is an investigation, records will be maintained for use in the

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investigation. Individuals found to have altered or destroyed records will be subject to disciplinary action up to and including termination of employment.

Cross References:

Legal References:

Iowa Code Chapters 11, 279.8 American Competitiveness and Accountability Act of 2002, Pub. L. No. 107-204

Approved April 10, 2007

Reviewed _____

Revised <u>March 27, 2012</u> <u>April 25, 2017</u> <u>March 28, 2023</u>