

Catasauqua Area School District
Business Operating Procedures
Fraud, Waste and Abuse of Public Funds

The Catasauqua Area School District prohibits fraud and financial impropriety, as defined below, in the actions of its Board of Directors, employees, vendors, contractors, consultants, volunteers, and others seeking or maintaining a business relationship with the District.

Fraud and financial impropriety shall include but not be 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 other financial document
- Misappropriation of funds, securities, supplies, or other assets, including employee time
- Impropriety in the handling of money or reporting of the District's financial transactions
- Profiteering as a result of insider knowledge of the District's information or activities
- Unauthorized disclosure of confidential or proprietary information to outside parties
- Unauthorized disclosure of investment activities engaged in or contemplated by the District
- Accepting or seeking anything of material value from contractors, vendors, or other persons providing services or materials to the District, except as otherwise provided
- Inappropriately destroying, removing, or using records, furniture, fixtures, or equipment
- Failing to provide financial records required by state or local entities
- Failing to disclose conflicts of interest as require by law or District policy
- Any other dishonest act regarding the finances of the District

Financial Controls and Oversight

Each employee who supervises or prepares Catasauqua Area School District 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.

Fraud Prevention

The Business Manager shall be responsible for maintaining a system of internal controls to deter and monitor for fraud or financial impropriety in the District.

Reports

Any person who suspects fraud or financial impropriety within the Catasauqua Area School District shall report the suspicions immediately to the Superintendent, Business Manager, Principal, the Board President, or local law enforcement.

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.

Protection from Retaliation

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

Fraud Investigations

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.

Response

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 employee. If a contractor or vendor is found to have committed fraud and financial impropriety, the Superintendent shall take appropriate action, which may include cancellation of the District's relationship with the contractor or vendor.

When circumstances warrant, the Board, Superintendent, or designee may refer matters to appropriate law enforcement or regulatory authorities. In cases involving monetary loss to the Catasauqua Area School District, the District may seek to recover lost or misappropriated funds.

The final disposition of the matter and any decision to file a criminal complaint or to refer the matter to the appropriate law enforcement or regulatory agency for independent investigation shall be made in consultation with legal counsel.

Analysis of Fraud

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 prevent future misconduct.

[Fraud, Waste and Abuse Report Form](#)