

THE SCHOOL DISTRICT OF PHILADELPHIA

SECTION: 800 Operations

TITLE: Suspected Financial
Misconduct and DishonestyADOPTED: December 13,
2018

REVISED:

828 SUSPECTED FINANCIAL MISCONDUCT AND DISHONESTY

Authority

The School Board expects all Board members, district employees, volunteers, consultants, vendors, contractors and other parties that maintain a relationship with the School District to act with integrity, due diligence, and in accordance with the law in their duties involving the district's resources. The Board is entrusted with public funds, and no one connected with the district shall do anything to erode that trust.

Definitions

For the purposes of this policy fraud, financial improprieties, or irregularities include but are not limited to and shall be defined as:

1. Forgery, unauthorized alteration, or misstatement of any financial or educational document, record or account belonging to the district or a district school or a district home and school association.
2. Forgery or unauthorized alteration of a check, bank draft, electronic money transfer or any other financial document.
3. Misappropriation of funds, securities, supplies, property, or other assets.
4. Impropriety in handling money or reporting financial transactions.
5. Profiteering because of insider information of district information or activities.
6. Disclosure of confidential and/or proprietary information to outside parties.
7. Accepting or seeking anything of material value, other than items used in the normal course of advertising, from contractors, vendors, or persons providing services and/or materials to the district.

8. Destruction, removal, or inappropriate use of district records, furniture, fixtures, computers, other electronic devices, or equipment.
9. Failure to provide financial records to authorized, federal, state or local entities.
10. Failure to cooperate fully with any financial auditors, investigators or law enforcement.
11. Other dishonest, fraudulent, or unlawful acts involving district or student monies or resources.

Delegation of Responsibility

The Superintendent or designee shall be responsible to:

1. Develop and implement internal controls designed to prevent and detect fraud, financial impropriety, or fiscal irregularities within the district.
2. Maintain a sound system of internal controls that is designed to identify potential risks, evaluate the nature and extent of those risks, and manage them effectively.
3. Ensure the appropriate authorities are notified, pursuant to law, when cases of fraud, embezzlement or theft of a criminal nature have been identified.
4. Ensure that all district employees are made aware of the requirements of this policy and the Employee Code of Ethics as well as the significant consequences that may result from violations.
5. Develop administrative procedures necessary to implement this policy.

District employees are responsible to be alert to an indication of fraud, financial impropriety, or irregularity within their areas of responsibility.

Reporting

An employee who discovers or suspects fraud, impropriety, or irregularity shall immediately report his/her suspicions to the Office of the Inspector General.

Employees who bring forth a legitimate concern or suspicion about a potential impropriety shall remain anonymous and shall not be retaliated against. Those who do retaliate against such an employee shall be subject to disciplinary action.[\[1\]](#)[\[2\]](#)[\[3\]](#)

Confidentiality

All reports of fraudulent activity shall be investigated in a manner that protects the confidentiality of the individuals and facts.

All employees involved in the investigation are required to maintain confidentiality regarding all information about the matter during the investigation.

Subject to the requirements of Federal and State law, results of an investigation shall not be disclosed to or discussed with anyone other than those individuals with a legitimate need to know, until the results are made public.

Legal References:

1. 43 P.S. 1423
2. 18 U.S.C. 1513
3. Pol. 317 - Conduct/Disciplinary Procedures

Related Information:

43 P.S. 1421 et seq
15 U.S.C. 7201 et seq