



Fraud Assessment and Response Policy

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1. **PURPOSE:** To identify responsibilities, establish procedures and controls to aid in the prevention, detection, reporting and investigation of possible cases of fraud involving Iowa County governmental operations, resources, and/or finances.
2. **ORGANIZATIONS AFFECTED:** This policy applies to any actual or suspected fraud involving a County employee (including management), a consultant, a vendor, contractor, outside agency, elected Official or Supervisor, or any person conducting business with the County.
3. **POLICY:**
 - A. **Definitions:** For the purposes of this policy “fraud” means:
 1. Forgery or alteration of any document or account
 2. Forgery or alteration of a check, bank draft or any other financial document
 3. Misappropriation of funds, securities, supplies or other assets.
 4. Impropriety in the handling or reporting of money or financial transactions.
 5. Profiteering as a result of insider knowledge of County activities.
 6. Accepting or seeking anything of material value from consultants, contractors, vendors or persons providing services or materials to the County for personal benefit.
 7. Disclosing confidential and/or proprietary information to outside parties.
 8. Destruction, removal or inappropriate use of records, furniture, fixtures and equipment.
 9. Any claim or reimbursement of expenses that are not made for the exclusive benefit of the County.
 10. Any computer related activity involving the alteration, destruction, forgery or manipulation of data for fraudulent purposes, or
 11. Any similar or related irregularity.
 - B. **Fraud Prevention Steps:** All employees have the responsibility for reporting fraud or dishonest behavior. County supervisor or management staff are held to a higher standard and expected to educate themselves on the potential opportunities that exist in their areas of supervision.
 1. It shall be the manager’s responsibility to ensure that processes have effective monitoring of control procedures as a preventative measure.
 2. Managers must utilize duty segregation to limit opportunities for fraudulent activities to occur.
 3. Managers must educate themselves on weaknesses and opportunities for fraud to occur and implement specific processes to limit the opportunity.
 - C. **Fraud Reporting:** It is the responsibility of every employee to immediately report suspected fraud or other dishonest conduct. Reporting protocol for suspected fraud is as follows:

Within a department	Report to Department Head and County Administrator
Involving any Elected Official	Report to County Administrator and County Board Chair
Involving a department head	Report to County Administrator and County Board Chair
Involving the County Administrator	Report to the County Board Chair
Vendor/Contractor	Report to County Administrator

Management is to remind their staff quarterly about the availability of the 424 Anonymous Hotline Policy, and the hotline that is available for someone to remain anonymous.

424 Anonymous Hotline Policy: Iowa County will maintain a fraud hotline whereby any caller may call in and leave a message alerting management to the potential of fraud. The messages shall be documented word for word and distributed to the designated parties identified above. All callers will be given the option to leave a name and contact phone number if they wish, but it will be completely optional. It shall be the responsibility of individuals noted above to determine if the fraud or potential of fraud identified warrants an investigation and to what extent.

Any reprisal against an employee or other reporting individual because that individual, in good faith, reported a violation is strictly forbidden.

- D. Investigative Procedures: The County Administrator has the primary responsibility for coordinating the investigation of reported fraudulent and dishonest activity and the associated interaction with law enforcement and other parties to the investigation. In cases involving the County Administrator, the County Board Chair shall have this responsibility.
1. Once a report of fraud is deemed to warrant an investigation, an investigation will be conducted by the County Administrator and those other staff that he/she entrusts to complete the investigation. The County Administrator may involve agencies or consultants from outside the Iowa County government structure and are hereby authorized to utilize funds necessary to complete the investigation.
 2. Upon completion of the investigation, an incident report must be shared with the County Board of Supervisors. The incident report shall include a description of the subject or fraud reported, the investigation process, and an outline of the outcomes of the investigation. The report shall also identify any County resources (dollars or time) utilized to complete the investigation.
 3. All investigative documents, involvement, and investigative process shall be kept strictly confidential to the fullest extent provided by law.
- E. Iowa County has no tolerance for dishonesty or fraudulent activities. Participating in fraudulent activity is a reflection of those involved as individuals and as employees of Iowa County. Iowa County holds our employees to a higher standard and will consider instances of fraudulent activity as an egregious act subject to elevated disciplinary action.