

MANUAL OF POLICY

POLICY NUMBER: I-13

POLICY TITLE: Report and Investigation of Fraud

LEGAL AUTHORITY: Florida Statutes 817.566, State Board of Education Rules 6A-

10.080 and 6A-10.081, Florida Administrative Code: The

Whistleblower Protection Act of 2012

DATE OF LAST REVIEW: 3/28/2022

I. PURPOSE

At R. A. Thomas Educational Center, we adhere to the highest ethical standards in all that we do. Relationships with students, employees, the community, and governing agencies are all built on a foundation of trust and honesty. This policy is intended to convey R. A. Thomas Educational Center's commitment to preventing, detecting, reporting, investigating, and enforcing disciplinary action for unethical, dishonest, and fraudulent acts because of the costs associated with violations and the damage they cause to the School's reputation. Employees who are dismissed for such violations are not eligible for rehire under any circumstances. When necessary, the School may also resort to legal remedies available under the law.

II. DEFINITION

Fraud means an act or omission with a willful or deliberate intent to deceive, misrepresent, or otherwise improperly obtain something of value from R. A. Thomas Educational Center through deception, misrepresentation, or other unethical or unlawful conduct. Examples include, but are not limited to:

- 1. Forgery of documents or computer records and unauthorized alteration.
- 2. Falsified or misrepresented reports internally to management or externally to regulatory agencies.
- 3. Submitting a false or misrepresented time sheet, travel reimbursement claim, or other expense reimbursement claim.

- 4. Allowing or receiving compensation for time not worked.
- 5. Theft of funds, supplies, materials, assets, or other property.
- 6. Engaging in illegal activity that creates a conflict of interest.
- 7. Unauthorized use or disclosure of confidential, private, or protected information to unauthorized individuals.
- 8. Removal of R. A. Thomas Educational Center property, documents, or other assets from the premises without management approval.
- 9. Unauthorized use or destruction of School property, records and assets.
- 10. Taking information, using it or providing information to others that would lead to identity theft.

III. RESPONSIBILITY FOR PREVENTION, DETECTION, AND REPORTING

Employees at all levels are responsible for:

Establishing and/or maintaining internal records that will that will ensure the safety and accountability of R. A. Thomas Educational Center's assets.

Employees must notify their immediate supervisor, the department administrator, the Vice President of Human Resources, the Vice President of Business Affairs, and any other appropriate administrators if they suspect any fraudulent or unethical or illegal activity has taken place.

Cooperating with the School's investigations into allegations of fraudulent or other unethical or illegal activity.

IV. INVESTIGATION, ACTION, AND RESULTS

In accordance with School policy and procedures, the Employee Relations Department of the Division of Human Resources will investigate allegations of fraud and other unethical or illegal activity after consulting with Business Affairs, Legal Affairs, and other departments as necessary.

Any improper conduct that an employee is found to have engaged in will result in disciplinary action, as per School policies and procedures. Disciplinary action will be taken against employees who knowingly make false allegations.

Federal and state laws protect employees against retaliation by management and other employees who report alleged fraud and/or assist with investigations of accusations. Individual's identity will remain confidential.

DocuSigned by:	
Randen A. Thomas	3/28/2022
95EF2B1010474AB	
PRESIDENT	DATE