

ADMINISTRATIVE PROCEDURES OF THE MILWAUKEE PUBLIC SCHOOLS

ADMINISTRATIVE PROCEDURE 6.38 THEFT, FRAUD, WASTE, ABUSE, ILLEGAL OR UNETHICAL BEHAVIOR

(1) REPORTING THEFT, FRAUD, WASTE, ABUSE, AND ILLEGAL OR UNETHICAL BEHAVIOR

(a) The Office of Board Governance-Audit Services shall maintain a telephone hotline and electronic data link for on-line reporting, in order to provide any official, employee, vendor, volunteer, or member of the public the ability to anonymously and confidentially report any suspected theft, fraud, waste, abuse, and other illegal or unethical behavior.

(b) In addition to a telephone hotline and electronic data link, reports of theft, fraud, waste, abuse and illegal or unethical behavior will be accepted by email or U.S. mail.

(c) Reports may be filed anonymously and Audit Services shall treat such reports confidentially; however, disclosure to outside agencies or law enforcement may be required in certain cases.

(2) COMMUNICATION OF POLICY

(a) The Chief Human Resources Officer or designee shall ensure that this policy is provided to all active employees as of the effective date of this policy. The Chief Human Resources Officer or designee shall also ensure that all newly hired employees receive a copy of this policy.

(b) The Director of the Department of Communications and Outreach or designee shall ensure this policy is posted on the Milwaukee Public School's website. The Director of the Department of Communications and Outreach shall also ensure that a prominent link to the Milwaukee Public School's Audit Services reporting tools for theft, fraud, waste, abuse and other illegal or unethical behavior is displayed on the Milwaukee Public School's main web page.

(3) INVESTIGATIONS OF THEFT, FRAUD, WASTE, ABUSE, AND ILLEGAL OR UNETHICAL BEHAVIOR

a) Upon receipt of a report of theft, fraud, waste, abuse, or illegal or unethical behavior, the Office of Board Governance-Audit Services shall review the report and determine the extent to which an investigation is warranted. When an investigation is warranted, Audit Services shall conduct the investigation. When appropriate, Audit Services shall refer the issue to another department, office or entity for appropriate action and information.

b) The Office of Board Governance-Audit Services shall maintain a record of each complaint received that describes the nature of the investigation and its current status.

c) When a full investigation is required, Audit Services shall document the findings and any recommendations or conclusions in a confidential report.

(4) RECORDS

(a) Fraud Hotline reports as well as records pertaining to investigations into theft, fraud, waste, abuse, and illegal or unethical behavior shall generally be regarded as confidential. Public access shall not be granted, except as required by public records law. Access may be granted to law enforcement and regulatory agencies, as needed.

(b) On an annual basis, the Office of Board Governance-Audit Services shall submit to the Milwaukee Board of School Directors and the Superintendent an annual report describing the activities related to theft, fraud, waste, abuse, and illegal or unethical behavior in the Milwaukee Public Schools in the preceding year. Such reports shall also be available to other interested district employees and the general public on the Milwaukee Public School’s main web page.

(c) The Office of Board Governance may issue periodic memos to the Board, as needed, to describe the nature of completed investigations.

(d) Records pertaining to investigations of theft, fraud, waste, abuse, or illegal and unethical behavior shall be maintained in accordance with the district’s policies and procedures pertaining to records management.

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| History: | Adopted DATE TBD | | |
| Cross Ref.: | Admin. Policy | 6.04 | Employee Code of Ethics |
| | Admin. Policy | 6.05 | Code of Ethics |
| | Admin. Proc. | 6.05 | Code of Ethics |
| | Admin. Policy | 6.07 | Employee Rules of Conduct |
| | Admin. Policy | 6.35 | Whistleblower Protections |
| | Admin. Policy | XXX | Theft, Fraud, Waste, Abuse, Illegal or Unethical Behavior |
| | School Accounting Manual | Theft | |

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