Ethics and Fraud, Waste, Abuse, Corruption

Meriwether County Schools follow all laws pertaining to Fraud, Waste, Abuse and Corruption as regulated by the Federal Government.

§200.113 - The non-Federal entity or applicant for a Federal award must disclose, in a timely manner, in writing to the Federal awarding agency or pass-through entity all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Failure to make required disclosures can result in any of the remedies described in §200.338 Remedies for noncompliance, including suspension or debarment.

The Federal Programs Director reviews the ethics, waste, fraud and corruption policies with all administrators during the summer seminar. An agenda and sign in sheets will be kept by the FP Director to document this has been completed. Principals and Central Office Directors discuss the same information with their personnel. Each principal or Director submits agendas and sign-in sheets to the FP Director to verify the policies have been reviewed with all staff. A signature, by the person reviewing the policies, verifies the completion of this procedure. Principals are expected to inform their faculties about policies and updates as they are approved throughout the year. The Meriwether County School System fraud regulation describes the definition, staff responsibilities, and internal controls/investigations.

Fraud, Waste, Abuse and Corruption Administrative Regulations:

- **Reporting Suspicion of Activities**
  - **Purpose:** To ensure the reporting of suspicious fraudulent activity and provide employees, clients, and providers with confidential channels to report suspicious activities of fraud, bribery, or gratuity violations to the Meriwether County Board of Education.

- **Definitions:** Fraud: A false representation of a matter of fact, whether by words or by conduct, or concealment of that which should have been disclosed, that is used for the purpose of misappropriating property and/or monetary funds from federal grants.

- **Statement of Administrative Regulations:** The Meriwether County Board of Education thoroughly and expeditiously investigates any reported cases of suspected fraud, waste, abuse or corruption to determine if disciplinary, financial recovery and/or criminal action should be taken.

- **Confidentiality:** All reports of suspected fraud, waste, abuse or corruption must be handled under the strictest confidentiality. Only those directly involved in the investigation should be given information. Information may remain anonymous but persons reporting information are encouraged to cooperate with the investigators and should provide as much detail and evidence of alleged fraudulent act as possible.

**Procedures and Responsibilities:**

1. Anyone suspecting fraud, waste, abuse or corruption concerning federal programs should report their concerns to the Superintendent of Meriwether County Schools at 2100 Gaston Street, P. O. Box 70, Greenville, Georgia 30222, or call 706-672-4297, ext. 6100.

2. Any employee with the Meriwether County Board of Education (temporary staff, full-time staff, and contractors) who receives a report of suspected fraudulent activity must report this information within the next business day. You are to contact the Superintendent of Meriwether County Schools. Employees have the responsibility to report suspected fraud. All reports can be made in confidence.
3. The Meriwether County Board of Education shall conduct investigations of employees, providers, contractors, or vendors.

4. If necessary you will be contacted for additional information.

5. Periodic communication through meetings should emphasize the responsibilities and channels to report suspected fraud.

6. Each employee shall receive a hard copy of this document and will sign attesting that he or she has indeed received this information and understands its contents.

**Conflict of Interest:**
Meriwether County Board of Education is a non-profit, tax-exempt organization. Maintenance of its tax-exempt status is important both for its continued financial stability and for public support. Therefore, the IRS as well as state and regulatory and tax officials view the operations of Meriwether County Board of Education as a public trust, which is subject to scrutiny by and accountable to such governmental authorities as well as to member of the public.

Consequently, there exists between Meriwether County Board of Education, the Superintendent of Schools and management employees and the public fiduciary duty, which carries with it a broad unbending duty of loyalty and fidelity. The board, superintendent and management employees have the responsibility of administering the affairs of Meriwether County Board of Education. Those persons shall exercise the utmost good faith in all transaction involved in their duties, and they shall not use their positions with Meriwether County Board of Education or knowledge gained therefrom for their personal benefit. The interests of the organization must be the first priority in all decision and actions.

**Standards of Conduct:**
- All Employees of the Meriwether County Board of Education are expected to abide by Federal, State and Local laws and statutes. This specifically relates to MCBOE Conflict of Interest Policy.
- All employees of the Meriwether County Board of Education are expected to submit all required reports in compliance with the MCBOE Conflict of Interest Policy.

**Statement:**
- No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest.

The superintendent of schools is charged with the development of procedures and guidelines to support and enforce this policy.