



**POLICIES SET BY BOARD OF SELECTMEN  
AT BOARD OF SELECTMEN MEETING**

Date: November 4, 2015

**REIMBURSEMENT POLICY:**

Only expenditures that are necessary will be reimbursed. Department Heads and Employees shall utilize established accounts with vendors (i.e. Staples, Baker Office Supply, A.L. Avery, Big Y) for most routine purchases. In the event that an item cannot be procured utilizing established accounts, the following procedures must be followed to ensure prompt reimbursement.

As the Town of Rowe is tax exempt, **no sales tax can be reimbursed**. A copy of the tax exempt certificate can be obtained from the accountant or treasurer.

For reimbursements incurred by a Board Commission or Committee approval must occur at a duly convened open meeting of the Board requesting reimbursement. At least two committee/board members should sign the bill schedule, *or* minutes that reflect the approved expense amount should be provided with the bill. For reimbursements for a Town Employee approval should be made by the Head of the Department.

For all reimbursements:

1. An original invoice or one approved under the Town of Rowe's Electronic Invoice Policy is required, and;
2. Provide a detailed, original paid invoice from the store or supplier. The person requesting reimbursement shall write a statement, on the receipt, or tape the receipt to a full sheet and write on the sheet, stating: "Please reimburse me for these items I purchased, and delivered, using (cash, credit/debit card, or check), for the purpose of (supplies needed, meeting snacks, services rendered, etc.)." **Please sign and date this statement.**
3. Complete a Bill Schedule. All requests for reimbursement shall be submitted on a completed Bill Schedule. The vendor name will be the individual requesting reimbursement. Please provide requestor's mailing address if reimbursement is to be mailed.

**INSUFFICIENT APPROPRIATIONS POLICY:**

Once a budget is approved, department heads have responsibility for ensuring that they spend within the allocated amount. It is illegal to spend over budget allocations except in very limited circumstances. If sudden or unforeseen expenditures arise, and/or the department head determines that there is not enough funding to continue to June 30, he or she should contact the Select Board as soon as possible. This will allow maximum time to make other provisions.

**ELECTRONIC INVOICE POLICY:**

Increasingly vendors are switching to electronic invoices in order to “go green.” The following are guidelines that will be followed for payment of electronic invoices.

1. If the invoice is in the form of an email, please print the entire correspondence, including any attachments and submit as a whole. The auditors look at the URL on the bottom or top of the invoice to verify authenticity.
2. If it is a PDF document, please submit that along with the announcement email (like “your invoice is ready and can be accessed from this link.”)
3. Complete a bill schedule as usual. Invoices still must be in the proper format (no tax charged, listing name, phone and address of vendor, date of service/purchase, and amount for each service/purchase as well as any other detailed description of goods and services.

**INTERNAL AUDIT POLICY:**

In order to properly track all receipts into the Town of Rowe, department heads should keep proper records of any income they receive. This can be in the form of an electronic or handwritten spreadsheet listing the name of the customer, the date, the amount and whether cash or check, and the reason the receipt was paid (for example, dump sticker). A receipt should be available should the customer request one. Whenever possible, receipts should be pre numbered. A record should also be made indicating the date these funds were turned over to the Town Treasurer.

Occasionally the Town Accountant will request a copy of your records to compare with those of the treasurer. This will satisfy the internal audit recommendation in any future audits.

## **FRAUD POLICY:**

The Town of Rowe is committed to protecting its revenue, property, information, and other assets from any attempt, either by members of the public, contractors, vendors, agents or its own employees, to gain by deceit, financial or other benefits at the expense of the taxpayers.

Town Officials and employees must, at all times, comply with all applicable laws and regulations. The Town will not condone the activities of officials or employees who achieve results through violation of the law or unethical business dealings. The Town does not permit any activity that fails to stand the closest possible public scrutiny.

This policy sets out specific guidelines and responsibilities regarding appropriate actions that must be followed for the investigation of fraud and other similar irregularities.

### **Definitions**

**Fraud** is defined as the intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it. Occupational **fraud** is defined as the intentional use of one's occupation for personal enrichment through the deliberate misuse or misappropriation of the Town's resources and/or assets. There are three major categories of occupational fraud:

- **Asset Misappropriations** – Theft or misuse of the Town's assets.
  - Cash
    - Fraudulent Disbursements – The perpetrator causes the Town to disburse funds through some trick or device (e.g. submitting false invoices/time card/sheets, expense reimbursement schemes, check tampering, etc.)
    - Skimming – Cash is stolen from the Town before it is recorded on the Town's books and records.
    - Cash Larceny – Cash is stolen from the Town after it has been recorded on the Town's books and records.
  - Inventory and all other assets
    - Misuse – Misuse of the Town's inventory or assets for personal use (e.g. Town vehicles, computers, supplies, etc.)
- **Larceny** – Inventory or other assets are stolen from the Town.
- **Corruption** – Wrongfully use influence in a business transaction in order to procure some benefit for themselves or another person, contrary to duty to employer or the rights of another.
  - Conflicts of Interest – An economic or personal interest in a transaction.
  - Bribery – The offering, giving, receiving, or soliciting of anything of value to influence an official act or business decision.
  - Illegal Gratuities – A party who benefits from an official act or a business decision gives a gift to a person who made the decision. An illegal gratuity does not require proof of intent to influence.
  - Economic Extortion – An employee demands that a vendor/contractor/etc. pay to influence an official act or a business decision.

- **Fraudulent Statements** – Falsification of an organization’s financial statements.

**Other similar irregularities** is defined as any activity involving questionable behavior or business dealings by members of the public, contractors, vendors, agents or government employees, that put government revenue, property, information and other assets at risk of waste or abuse.

### **Applicability**

This policy applies to all elected officials, appointed officials, committee members, board members, volunteers, interns, and all employees (full-time, part-time, seasonal, and/or casual) of the Town. This policy also applies to any business or individual doing business with the Town.

### **General Policy and Responsibility**

1. It is the Town’s intent to fully investigate any suspected acts of fraud or other similar irregularity. An objective and impartial investigation will be conducted regardless of the position, title, and length of service or relationship with the government of any party who might be or becomes involved in or becomes/is the subject of such investigation.
2. Elected Officials, appointed officials, committee members, board members, department heads, and managers are responsible for instituting and maintaining a system of internal control to provide reasonable assurance for the prevention and detection of fraud, misappropriations and other irregularities within their respective committee, board, or department. Management should be familiar with the types of improprieties that might occur within their area of responsibility and be alert for any indications of such conduct.
3. The Rowe Select Board has the primary responsibility for the investigation of all reported cases of asset misappropriation, corruption, commission of a fraudulent statement, irregular conduct, or suspected fraud activity defined in this policy. Initial reporting should be through the Board of Selectmen’s Administrative Clerk or the Select Board.
4. The Board of Selectmen’s Administrative Clerk will notify the Rowe Select Board of a reported allegation of fraudulent or irregular conduct upon receipt of the allegation.
5. In circumstances where an investigation finds that there are reasonable grounds to indicate that a fraud may have occurred, decisions to prosecute or refer the investigation to the appropriate law enforcement and/or regulatory agencies for an independent investigation will be made by the Rowe Select Board, subject to the advice of Town Counsel.
6. The Town will take appropriate and timely action against those proven to have committed asset misappropriation, corruption, commission of a fraudulent statement, irregular conduct, or fraud, including, but not limited to, the following: immediate termination of employment with the Town; seeking restitution for all losses, including investigation expenses and legal expenses, to the fullest extent of the law; and initiating civil action to recover losses. The Town reserves the right to take disciplinary action without awaiting the resolution of civil or criminal proceedings arising from the asset misappropriation, corruption, and commission of a fraudulent statement, irregular conduct, or fraud.
7. All elected officials, appointed officials, committee members, board members, volunteers, interns, and all employees shall read and understand this policy.

## Procedures

### 1. All Employees

Any employee who has knowledge of an occurrence of asset misappropriation, corruption, commission of a fraudulent statement(s), or irregular conduct, or has reason to suspect that a fraud has occurred, shall immediately notify the Rowe Select Board.

An employee who reports such an occurrence has a duty to cooperate during an investigation. All investigations shall be conducted in confidence in so far as reasonably possible. The name or names of those individuals communicating information about a fraudulent act or the name or names of those suspected of a fraudulent act will only be revealed when required by law.

Employees who knowingly make false allegations of asset misappropriation, corruption, commission of a fraudulent statement(s) or irregular conduct as those terms are defined herein, or fail to report such an occurrence when they know of the same, will be subject to discipline up to and including termination of employment.

### 2. Town/Town Management/Elected Officials

Upon notification from an employee of asset misappropriation, corruption, commission of a fraudulent statement, irregular conduct, or suspected fraud, or if management has reason to suspect that any of the above have occurred, they shall immediately notify the Rowe Select Board.

### 3. Contacts/Protocols

After an initial review and a determination that the suspected incident of asset misappropriation, corruption, commission of a fraudulent statement, irregular conduct, or suspected fraud warrants investigation, the Rowe Select Board will coordinate the investigation.

### 4. Security of Evidence

Once a suspected incident of asset misappropriation, corruption, commission of a fraudulent statement, irregular conduct, or suspected fraud is reported, the Rowe Select Board shall take immediate action to prevent the theft, alteration, or destruction of relevant records. Such actions include, but are not necessarily limited to, removing the records and placing them in a secure location, limiting access to the location where the records currently exist, and preventing the individual suspected of committing the fraud from having access to the records, including placing the individual suspected of fraud on administrative leave status. The records must be adequately secured until the Rowe Select Board obtains the records to begin the investigation.

### 5. Personnel Actions

If a suspicion of asset misappropriation, corruption, commission of a fraudulent statement, irregular conduct, or suspected fraud is substantiated by the investigation, disciplinary action shall be taken by the Rowe Select Board.

### 6. Whistle-Blower Protection

Under Massachusetts General Law Chapter 149, paragraphs 148A, 185 and 187, no employer or person acting on behalf of an employer shall:

Dismiss or threaten to dismiss an employee

Discipline or suspend, or threaten to discipline or suspend, an employee

Impose any penalty upon an employee; or

Intimidate or coerce an employee because the employee has acted in accordance with the requirements of this policy.

The violation of this section will result in discipline up to and including dismissal in accordance with the applicable federal, state, and local administrative laws.

#### 7. Media Issues

Any Town employee or elected official contacted by the media with respect to an investigation shall refer the media to the Chair of the Rowe Select Board. The alleged fraud or audit investigation shall not be discussed with the media by any person other than the Rowe Select Board.

If the Board of Selectmen's Administrative Clerk is contacted by the media regarding an alleged fraud or audit investigation, the Rowe Select Board will be consulted before responding to any inquiries.

Neither the Board of Selectmen's Administrative Clerk nor the Rowe Select Board will discuss the details of any ongoing fraud investigation with the media that may compromise the integrity of the investigation.

#### 8. Documentation

At the conclusion of the investigation by the Rowe Select Board, the results of the investigation will be reported to others as determined necessary. If the report concludes that the allegations of asset misappropriation, corruption, commission of a fraudulent statement, irregular conduct, or suspected are substantiated, the report may be forwarded to the appropriate law enforcement agency or regulatory agency as set out above.

#### 9. Completion of the Investigation

Upon completion of the investigation, including all legal and personnel action, any records, documents and other evidentiary material related to the investigation will be retained by the Rowe Select Board in a separate file with copies of the retained documents provided to the appropriate department from which the document(s) originated.

#### 10. Dissemination and Sign Off of Fraud Policy for All Employees

All employees shall be provided a copy of this policy. A sign-off of the policy acknowledging that the policy has been read and the provisions have been understood is required of all employees.



**ACKNOWLEDGEMENT OF RECEIPT & AWARENESS**

**FRAUD, ELECTRONIC INVOICE, INSUFFICIENT APPROPRIATIONS, INTERNAL AUDIT,  
AND REIMBURSEMENT POLICIES**

**TOWN OF ROWE**

I hereby acknowledge receipt of the Town of Rowe Accounting Policies. My signature signifies that I have read and understand its provisions and understand my responsibilities related to the prevention, detection, and reporting of asset misappropriation, corruption, commission of a fraudulent statement, irregular conduct, and/or suspected fraud.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name of Individual Receiving Policies

\_\_\_\_\_  
Department Head

Date: \_\_\_\_\_

Please return this signed receipt to the Select Board Office