

## Internal Controls

The Board expects all board members, employees, volunteers, consultants, vendors, contractors, students and other parties maintaining any relationship with the agency to act with integrity, due diligence and in accordance with all laws in their duties involving the agency's resources. The board is entrusted with public dollars and no one connected with the agency should do anything to erode that trust.

Internal control is the responsibility of all employees of the agency. The Chief Administrator, Chief Financial Officer, and Accounting Director shall be responsible for developing internal controls designed to prevent and detect fraud, financial impropriety or fiscal irregularities within the Agency subject to review and approval by the board. Administrators shall be alert for any indication of fraud, financial impropriety or irregularity within the administrator's area of responsibility.

Any employee who suspects fraud, impropriety or irregularity shall report their suspicions immediately to his/her immediate supervisor or the Chief Administrator. The Chief Administrator or designee shall have primary responsibility for any necessary investigations and shall coordinate investigative efforts with the Board's legal counsel, auditing firm, the Auditor of State's Office and other internal or external departments and agencies, including law enforcement officials, as the Chief Administrator may deem appropriate.

Employees bringing forth a legitimate concern about a potential impropriety will not be retaliated against and those who do retaliate against such an employee will be subject to disciplinary action up to, and including, discharge.

In the event the concern or complaint involves the Chief Administrator, the concern shall be brought to the attention of the Board Vice President, who shall be empowered to contact the Board's legal counsel, insurance agent, auditing firm and any other agency to investigate the concern or complaint.

Upon approval of the board, the Chief Administrator or Designee may contact the State Auditor or elect to employ the agency's auditing firm to conduct a complete or partial forensic/internal control/SAS99 audit annually or otherwise as often as deemed necessary. The Chief Administrator or Designee is authorized to order a complete forensic audit if, in the Chief Administrator's judgment, such an audit would be useful and beneficial to the agency. The Chief Administrator shall ensure the State Auditor is notified of any suspected embezzlement or theft pursuant to Iowa law. In the event there is an investigation, records will be maintained for use in the investigation. Individuals found to have altered or destroyed records will be subject to disciplinary action up to, and including, termination.

### Legal References:

American Competitiveness & Corporate Accountability  
Act of 2002  
Public Law No. 107-204, Iowa Code Ch. 11,279.8

Adopted: 04-04-07

Amended: 07-12-17

Amended: 07-27-22