

Policy on Fraudulent Financial Activities

Fraud generally involves a willful or deliberate act with the intention of obtaining an unauthorized benefit, such as money or property, by deception or other unethical means. All fraudulent acts are included under this policy and include such things as:

- Embezzlement, misappropriation or other financial irregularities
- Forgery or alteration of documents (checks, time sheets, contractor agreements, purchase orders, other financial documents, electronic files)
- Improprieties in handling or reporting of money or financial transactions
- Misappropriation of funds, securities, supplies, inventory, or any other asset (including furniture, fixtures of equipment)
- Authorizing or receiving payment for goods not received or services not performed
- Authorizing or receiving payments for hours not worked

Any one who believes fraud has occurred should report such incident. Employees are protected under Massachusetts General Law, Chapter 149, section 185, from retaliatory actions by the employer. You may report your concerns to your immediate supervisor, the executive director or a Millis Housing Authority Board Member.

Responsibilities of management and non-managerial staff for handling fraudulent activities include the following:

- Insure that notification promptly reaches the Executive Director, or
- Insure that notification promptly reaches the Board of Commissioners
- Do not contact the suspected individuals to determine facts or demand restitution
- Do not discuss the case, facts, suspicions, or allegations with anyone, unless specifically directed to do so by the Executive Director or Board of Commissioners
- Direct all inquiries from any suspected individual, his or her representative, or his or her attorney to the Executive Director or Board of Commissioners.

Great care must be taken in the dealing with suspected fraudulent activities to avoid any incorrect accusations, alerting suspected individuals that an investigation is under way, violating any person's right to due process, or making statements that could lead to claims of false accusation or other civil rights violations.

Non-Fraud Irregularities: Identification or allegations of acts outside the scope of this policy, such as personal improprieties or irregularities, whether moral, ethical, or behavioral, safety or work environment related, or complaints of discrimination or sexual harassment, should be resolved by the respective area management.

Adopted by the Board of Commissioners:

MEDFIELD HOUSING AUTHORITY

CREDIT CARD POLICY

Medfield Housing Authority credit cards will be used only for business. Personal purchases of any type are not allowed.

The following purchases are not allowed:

- * Capital equipment and upgrades over \$5,000
- * Construction, renovation/Installation
- * Items or services on term contracts
- * Maintenance agreements
- * Personal items or loans
- * Purchases involving trade-in of MMA property
- * Any items deemed inconsistent with the values of the agency
- * Cash advances on credit cards are not allowed

Cardholders will be required to sign an agreement indicating their acceptance of these terms.

Individuals who do not adhere to these policies and procedures will risk revocation of their credit card privileges and/or disciplinary action.

Detailed receipts must be retained and attached to the credit card statements. In the case of meals and entertainment, each receipt must include the date, time, names of all persons involved in the purchase, and a brief description of the business purpose of the purchase, in accordance with Internal Revenue Service regulations

All monthly statements submitted for payment must have the appropriate account number(s) and the associated amounts clearly written on the statement.

APPROVED BY BOARD OF COMMISSIONERS: