
HUMAN RESOURCES
INTEROFFICE MEMORANDUM

TO: COMMISSIONER MAGGI • COMMISSIONER BURNS
CO CHAIRMEN

COMMISSIONER IREY

FROM: MICHELLE MILLER-KOTULA *mmk*
DIRECTOR OF HUMAN RESOURCES

SUBJECT: POLICY ON DISHONESTY AND FRAUD

DATE: MARCH 3, 2005

Please Post

Attached please find a copy of the Policy on Dishonesty and Fraud which was adopted by the Board of Commissioners on February 24, 2005 per minute number 762.

Please review and post it in a convenient location. Should you have any questions concerning this policy, please contact the Human Resources Department.

Thank you for your cooperation.

attachment

<p style="text-align: center;">COUNTY OF WASHINGTON</p> <p style="text-align: center;">Pennsylvania</p>	<p style="text-align: center;">POLICY ON DISHONESTY AND FRAUD</p>	<p>PAGE: 1 OF 3</p> <p>DATE: February 24, 2005</p>
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POLICY

The deterrence and detection of dishonesty and/or fraud is a matter of significant importance to the County of Washington. Acts of dishonesty and fraud undermine the ability of Washington County to perform its important public mission. Employees, elected officials, and the public must be assured that the County operates in accordance with the highest standards. Acts of dishonesty and fraud may lead to financial loss and litigation. In addition, these acts damage the reputation of the County, its elected and appointed officials, and employees. The development of policies and procedures to deter dishonesty and fraud, and a procedure for investigating and addressing allegations of such misconduct, is in the best interest of the County and the public. This policy serves to confirm County policy regarding deterrence and detection of dishonestly and/or fraud.

PROHIBITED CONDUCT

The following examples are provided to illustrate the kind of conduct prescribed by this policy; the list is not exhaustive. The County considers the following conduct to represent some of the type of acts which violate this policy:

- a. Theft or misappropriation of assets, including those of the County or others with whom the County has contact.
- b. Misstatement, misrepresentation or falsification of information or records, or other similar irregularities.
- c. Forgery or other alteration of documents.
- d. Fraud or other unlawful acts.
- e. Retaliation against an individual for reporting suspected acts of misconduct or fraud.

Washington County specifically prohibits these and other dishonest or fraudulent actions.

PENALTIES FOR MISCONDUCT

Any employee's commission of an act of dishonesty or fraud, or retaliation against an individual reporting suspected acts of dishonesty or fraud, will result in appropriate disciplinary sanction up to and including dismissal, against the offending employee. A written record of each action taken pursuant to this policy will be placed in the offending employee's personnel file. The record will reflect the conduct and the action taken by the County.

PROCEDURES FOR REPORTING, INVESTIGATING AND RESOLVING SUSPECTED DISHONESTY AND FRAUD AND/OR COMPLAINTS OF RETALIATION

a. Reporting. Elected Officials, Managers, Supervisors and employees are required to report suspected dishonesty and fraud to either an immediate supervisor or to the Director of Human Resources. Supervisors, when in receipt of a report of potential violations of this policy, must immediately notify the Director of Human Resources of the report. Retaliation against an individual reporting suspected dishonesty or fraud, or providing information during an investigation conducted under this policy is strictly forbidden.

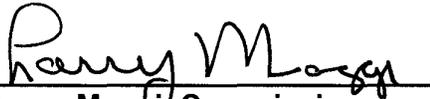
b. Investigation of Reports. The Department of Human Resources has primary responsibility for all investigations involving complaints under this policy. The Washington County Commissioners may designate another individual for purposes of conducting an investigation, if necessary to further the purpose of this policy. The individual investigating potential dishonesty and fraud shall have full authority to make any necessary investigation in accordance with applicable law and County policy and procedure.

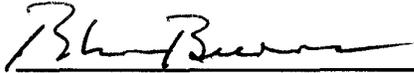
c. Cooperation. Employees are required to cooperate with any investigation of suspected dishonesty or fraud. Employees who engage in misconduct under this policy, or retaliation, or who fail to cooperate with investigations into suspected misconduct under the policy may be sanctioned up to and including dismissal. Employees, who refuse to implement remedial measures, obstruct remedial efforts and/or retaliate against individuals making a report under this policy, or witnesses, may be sanctioned up to and including dismissal.

d. Supervisory Responsibility. An effective policy requires the support and example of personnel in positions of authority. Managers and supervisors are expected to be aware of the policies and procedures in effect, in their areas of responsibility, to establish and maintain monitoring, review and control procedures that deter misconduct and are also expected to develop policies and procedures to detect and report acts of wrongdoing promptly should prevention efforts fail. The authority to carry out these responsibilities is not be delegated to subordinates and accountability for effectiveness remains with managers and supervisors. Assistance in effectively carrying out these responsibilities is available from the Department of Human Resources.

ADOPTED this 24 day of February, 2005, per minute 762.

COUNTY OF WASHINGTON


Larry Maggi, Commissioner


Bracken Burns, Commissioner

Co-Chairmen


Diana L. Irey, Commissioner

ATTEST:


Michelle R. Miller-Kotula
Director of Human Resources

Approved as to Form and
Legality:


Lynn DeHaven
County Solicitor


Mary Helicke
Chief Clerk