CoSA Council of State Archivists	**Antifraud Policy and Procedures** Approved by the Board of Directors August 11, 2014

The Board of Directors and Executive Director are responsible for preventing and detecting fraud and abuse within the organization. The Board is charged with establishing policies and procedures that address the fundamental responsibilities noted below, while the Executive Director shall implement and monitor such policies.

GENERAL STATEMENT

The Council of State Archivists (CoSA) and its board, management, employees, contractors and volunteers must, at all times, comply with all ethical principles and policies of the organization and all laws and regulations governing its activities. The Board accepts its responsibility to undertake all appropriate actions to prevent and detect fraud against CoSA or perpetrated by anyone associated with CoSA.

FUNDAMENTAL CONCEPTS

The Board, with the assistance of the Executive Director when appropriate, is charged with responsibility for the following:

- <u>Creating, demonstrating and maintaining a culture of honesty and ethical behavior.</u> This includes ensuring "zero tolerance" for unethical behavior and communicating it to all employees and volunteers. Management should also train employees regularly regarding CoSA's values and expected conduct and document their understanding and compliance annually.

- <u>Regularly assessing fraud and related risks to CoSA.</u> This includes establishing and monitoring appropriate policies, procedures and controls designed to mitigate or eliminate the risk of fraud and abuse.

- <u>Creating, implementing and monitoring a strong system of internal controls.</u> This includes continually seeking ways to increase security in CoSA's computer, recordkeeping and payment systems.

- <u>Training employees and volunteers to be alert to warning signs of fraud and unethical behavior and providing a system for reporting such matters.</u> This includes creating a system for employees and volunteers to anonymously report (to the CoSA Personnel Committee) instances of illegal or unethical actions that they have witnessed or suspect.

- <u>Conducting annual audits of CoSA's financial records.</u> This should include an evaluation of CoSA's antifraud policies and procedures, internal control systems and other relevant matters. The results of such audits should be communicated to the Board and summarized to the membership annually.

ACTIONS CONSTITUTING FRAUD

The terms defalcation, misappropriation, and other fiscal wrongdoings refer to, but are not limited to:

- Any dishonest or fraudulent act
- Forgery or alteration of any document or account belonging to CoSA
- Forgery or alteration of a check, bank draft, or any other financial document
- Misappropriation of funds, securities, supplies, or other assets
- Impropriety in the handling or reporting of money or financial transactions
- Disclosing confidential and proprietary information to outside parties
- Accepting or seeking anything of material value from contractors, vendors or persons providing services/materials to CoSA. Exception: gifts or favors that are not insubstantial as defined by each individual's state or territory.
- Destruction, removal or inappropriate use of records, furniture, fixtures and equipment
- Any similar or related inappropriate conduct

CONFIDENTIALITY AND PROCESS

All information received regarding unethical or fraudulent behavior will be treated confidentially. The reporting employee or complainant may remain anonymous.

Any person who suspects dishonest or fraudulent activity will follow the procedures defined in the Council's Whistleblower Protection Policy.