

Fraud Action Plan			
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Purpose: It is the responsibility of the Board of Trustees and Administration of Tusculum College to provide a foundation for protecting the financial resources of the College and to identify the essential elements needed for the prevention and detection of fraud.

Applies to: All Employees

Policy: Tusculum College administration shall be committed to the creation and continually maintain a culture of honesty and high ethics. This shall be accomplished by the following:

- The College administration shall be committed to setting an example for ethical behavior.
- The College administration and the Board of Trustees shall work to create and maintain a positive workplace environment.
- All employees shall follow the Human Resources Policies which enhance a culture of honesty and high ethics. These include, but are not limited to, Code of Ethics and Standards of Conduct (policy 5.07), Conflict of Interest (policy 5.10) and the Whistleblower (policy 5.22).
- Proactive procedures as specified in the Human Resources Policies ensure the hiring and promotion of appropriate employees.
- The College will make a conscious effort to make training available in the area of ethics.
- Appropriate and consistent discipline, as outlined in the Human Resources Policies, shall be taken after a thorough investigation of an incident of ethical violation.

Tusculum College shall periodically evaluate and improve antifraud processes and controls. This shall be accomplished by the following:

- Implement consistent purchasing policies and procedures.
- Periodic assessment of which employees are required to be insured for liability.
- Periodic evaluation of procedures used to handle the financial transactions.
- Periodic review of the Human Resources policies and procedures which guides the employees' ethical behavior.

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Policy continued:

Tusculum College shall continually develop and utilize appropriate oversight processes including, but not limited to the following:

- Notification to all employees to report to either the Chief Financial Officer or the Chairman of the Board of Trustees instances of fraudulent activity that have been detected or suspected.
- Commitment to implement reasonable suggestions made by the College Audit and Financial Committees of the Board of Trustees.
- Commitment to implement reasonable recommendations made by the the College's auditors.