FRAUD POLICY– WHISTLEBLOWER POLICY

Northwest Foundation, Inc. is committed to the highest standards of conduct and ethics. This policy reflects the practices and principles of behavior that support this commitment. The Foundation expects every employee, and volunteer board member to read and understand the Policy and its application to the performance of his or her responsibilities.

The Foundation and appropriate University personnel will investigate any possible fraudulent or dishonest use or misuse of Foundation resources or property by staff or volunteer board member. The Foundation and/or University will take appropriate action against anyone found to have engaged in fraudulent or dishonest conduct, including disciplinary action by the Foundation or the University, or civil or criminal prosecution when warranted.

All members of the Foundation community are encouraged to report possible fraudulent or dishonest conduct (i.e., to act as a “whistleblower”), pursuant to the procedures set forth in the next section.

Concerns about possible fraudulent or dishonest use or misuse of resources should be made in writing and forwarded in a sealed envelope to the Vice President for University Advancement or the President of the University. Sufficient information should be provided in order that an investigation can be conducted. The envelope should be marked as “Confidential – Fraud Policy.” These concerns may be submitted on a confidential, anonymous basis, if the person so desires. The names of the current persons in these positions and their contact information are attached to this Policy.

The Foundation encourages those submitting concerns to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Anonymous whistleblowers must provide sufficient corroborating evidence to justify the commencement of an investigation. An investigation of unspecified wrongdoing or broad allegations will not be undertaken without verifiable evidentiary support. Because investigators are unable to interview anonymous whistleblowers, it may be more difficult to evaluate the credibility of the allegations and therefore, less likely to cause an investigation to be initiated.

Whistle blowing complaints will be handled with sensitivity, discretion and confidentiality to the extent allowed by the circumstances and the law. Generally this means that whistleblower complaints will only be shared with those who have a need to know so that the Foundation and/or University can conduct an effective investigation, determine what action to take based on the results of any such investigation, and in appropriate cases, with law enforcement personnel. (Should disciplinary or legal action be taken against a person or persons as a result of a whistleblower complaint, such persons may also have the right to know the identity of the whistleblower.) Malicious allegations may result in disciplinary action.
Employees of the University and members of the Foundation board may not retaliate against a whistleblower for informing the administration about an activity which that person believes to be fraudulent or dishonest with the intent or effect of adversely affecting the terms or conditions of the whistleblower’s employment, including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or wages. Whistleblowers who believe that they have been retaliated against may file a written complaint with the Vice President for University Advancement or the University President. Any complaint of retaliation will be promptly investigated and appropriate corrective measures taken if allegations of retaliation are substantiated. This protection from retaliation is not intended to prohibit directors or supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

The results of investigations of fraud shall be communicated, either orally or in writing, to the Board of Directors of the Foundation.

Contact Information

Vice President for University Advancement
Michael C. Johnson
800 University Drive
Maryville, MO 64468
660-562-1460
mikej@nwmissouri.edu

President of Northwest Missouri State University
John Jasinski, PhD
800 University Drive
Maryville, MO 64468
660-562-1110
johnj@nwmissouri.edu

The Directors of the Northwest Foundation, Inc. adopt this Fraud – Whistleblower Policy.

7/1/2009
President, Northwest Foundation, Inc. Dated