Georgia Cyber Academy Inc.

FISCAL POLICIES & PROCEDURES
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Policy Overview
The purpose of this document is to provide an overview of internal control policies followed by Georgia Cyber Academy. The policies cover accounting, financial reporting, information technology and human resource services.

Internal controls are the methods and procedures used to provide reasonable assurance to items including:

- Safeguard assets
- Ensure validity of financial reports and records
- Promote adherence to policies, procedures, regulations and laws
- Promote effectiveness and efficiency of operations
- Ensure financial systems are secure and backed up as needed
- Separation of duties

Audience
This policy is intended for the School Board, School Management and GCA employees.

Policy Exceptions
Regulatory requirements and service agreements may modify the policy for an individual school; however, these changes must be documented in an addendum and approved by the School Board.

Delegation of Authority
The policies and procedures within this document are supplemented by the Delegation of Authority Matrix where specific roles are identified along the way of each process i.e. Bank account authorization, check signatories, invoice approvals.

Budget Approval
The School will adopt an annual Program Budget for each Fiscal Year during the planning period in the previous Fiscal Year. The School will present to the governing Board a proposed Program Budget for each such Fiscal Year prior to June 1 of the prior Fiscal Year. The proposed Program budget will include assumptions provided by the school, including but not limited to, the number of Student Support Staff to be employed, the number of teachers to be employed and projected enrollment, funding and expenses. The Board and the School will work to adopt a final Program Budget on or before June 30. The budget must be discussed in two public meetings prior to its approval by the Board.
Treasury

Authorization and Approval

- School Board must authorize the opening of a bank account.
- Head of School (HOS), Executive Director, and the Chief Financial Officer (CFO), (or Board Member/Designee), where applicable) are the signatory / agents for all Georgia Cyber Academy bank accounts. Two signatures are required for physical checks greater than $25,000. All Checks from Bill.com require two steps of approval subject to the PO and payment approval process.
- Cash balances shall not be reduced below zero.
- Public fund balances over $250K must be insured (collateralized).
- Checks outstanding and unpaid for a period of one (1) year shall be declared void, included as receipts and removed from the outstanding check listing unless state escheatment treatment is required.
- Any adjustments to cash, such as the write-off of old outstanding checks, must be approved by the HOS or CFO.
- Upon termination or change in job responsibility of a check signer the bank authorized signatures must be updated immediately.
- The HOS and the CFO will review the bank authorized signatories semi-annually and confirm review to Board. Finance will also review access to PayPal accounts.
- Debit cards issued on school bank accounts are not authorized.
- Purchasing Card (P-Card)/Credit Card expenses must be approved and reconciled monthly. Access to Credit Cards will be limited, requested by the Board and managed by the HOS. Current access can be found under the Delegation of Duty Matrix.
- School credit card and P Card limits require an approval to be increased by Board.
- Pay Pal Accounts may be established through the CFO to manage incidental student activities (field trips, events etc.) where absolutely necessary. The accounts must be tracked through the General Ledger and follow the standard monthly account reconciliation and review process.

Custodial and Security Arrangements:

- The CFO maintains custody of the school check stock if available but is now maintained transition to an electronically through Bill.com. A board member maintains custody of the starter check stock. Access to check stock is separated from those with the ability to sign checks.
- Check stock is stored in a secure/locked area.
- A record of the check sequence supplied to the Board member holding the starter check stock is kept by the Board Treasurer.
- Checks voided for any reason are maintained by Bill.com. The signature section is marked out or removed and the reason the check was voided is noted on the check
● Petty cash funds are not allowed.

**Accounts Receivable**

● Deposits of state student funding and federal grants should be routed to automatically deposit into the school bank account. A copy of all backup documentation for direct deposits must be sent Finance department.

● Cash should not be sent directly to the school. In the limited cases where checks are received by the school the following process must be followed:
  – Administrative Assistant opens mail and maintains a ledger of all checks received. The ledger is forwarded monthly to the Finance department.
  – Checks are deposited into the school bank account by the Finance department or HOS within one to two days of receipt.

**Monthly Bank Reconciliations**

● Bank reconciliations are performed and reviewed monthly for all bank and PayPal accounts.
  – Bank reconciliations are performed by the Finance department and include a beginning cash balance, listing of cleared checks/payments, deposits/credits, un-cleared checks/payments, deposits/credits and the ending cash balance. All variances are researched and explained.
  – The bank reconciliation, with a copy of the bank statement, is included in the monthly financial pack and reviewed/approved by the HOS or CFO.

All PayPal deposit and payment activity must be provided to the Finance department for accounting purposes. Accounts must be reconciled on a monthly basis by Finance and be reviewed / approved by the CFO. Reconciliation must include a tie out of funds deposited and expenditures paid to remaining PayPal balance.

**New Vendors**

All new approved vendors will require an approved vendor set-up form and a W-9 to accompany new vendor invoice in order to be entered for processing in the accounting within Bill.com. Vendors may be subject to the SAMs vendor setup per the Federal Guidelines. Exception - ISP check runs do not require W-9’s.

**Expenditures - General Funds**

**Authorization and Approval**

● The HOS and Finance Department are approved by the Board to approve and make expenditures on behalf of the school for operational purchases within the approved budget. Purchases greater than $50,000 and outside of the approved budget require approval from the Board.

● Purchase requisitions must be approved by the HOS or CFO. Purchase requisitions greater than $25,000 require approval by both the HOS and CFO. The School must get two or more quotes for purchases over $1,000,000. A recommended three bids if possible, must be obtained for
purchases over $2,00,000. These quotes are in consideration of the already approved Board Budget.

- All federal purchases must follow the guidelines of the Federal Programs Handbook – See federal purchases below and the appendix for System for Award Management (SAM) exert.
  - IT Support team must be consulted on technology purchase and implementation decisions. The IT team will assist in the securing of competitive pricing for computers, monitors, printers, software and school technology infrastructure components.

- All service contracts when applicable must be supported by a current written contract.

- The IT team must be consulted on technology purchase and implementation decisions. The IT team will assist in the securing of competitive pricing for computers, monitors, printers, software and school technology infrastructure components. This will also ensure the equipment is supportable by our technology personnel and that it meets the necessary requirements to ensure the security of sensitive school data.

- Loans to employees and Board members are prohibited under all circumstances.

- Compensation and any other payments for goods and services may not be paid in advance with the exception of: insurance, rent, facility/room rentals and software licenses and a contract for each service must be tied to the service. Some exceptions do apply that fall under Finance/Department Head discretion for goods and services.

- All invoices (including expense reimbursements) must be paid in a timely manner within 30 days. The turnaround time for payment processing with MSA is 5-10 business days.

- For payments to be processed the following must occur:
  - An itemized invoice must be approved according to the School Delegation of Authority and matched to a purchase requisition (if required).
  - Once approved, the invoice is scanned, with any supporting documents, to Bill.com for payment.

- For purchases of Gift Cards the following must be documented:
  - Preapproval by the HOS is required prior to purchase. Documentation must include the purpose of the gift cards, intended recipients and timing of distribution.
  - Gift card must be locked in a secure location with restricted access.
  - Monthly reconciliation of remaining gift cards and card distribution must be provided to Accountant and included in the monthly financial pack review by the HOS. All gift cards distributed to teachers must be reported to payroll and is considered imputed income.

- Checks must never be written for cash.

- **Disbursement Authorization:** The Board entrusts the power of disbursement of GCA funds, including check-signing authority, to its Chair and Finance Committee Chair, and to the HOS and CFO. The Board further entrusts the HOS with the power to designate an additional individual to disburse GCA funds for discrete transactions, on an as-needed basis.

- **Head of School Reporting Duties:**
  - Semi annually, the Head of School will in writing confirm his or her review of all
disbursements authorized by any individual to whom he or she has granted disbursement authority and of the reasonableness, questionability, or lack of reasonableness of each disbursement.

- Each quarter, The Head of School will in writing inform the Board of the total amount in (i) K12 invoices and (ii) other invoices received and paid in the preceding quarter.

- **Self Serving Disbursement Prohibited:** No person entrusted with disbursement power will sign any check made payable to him or herself or authorize any disbursement to him or herself.

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**Expense Reimbursement**

- The CFO / District Ops Director / Department Head reviews and approves all expense reports. These reports are exported to payroll by CFO or CFO designee.
  - Ensure compliance with the School Board approved Travel and General Expenses policy, in accordance with federal or state requirements, if applicable.
  - Confirm completion of supporting documentation.
  - Send scanned and approved expense reports (summary page only) to the expense portal for ACH processing.

- Checks along with expense reports and supporting documentation are sent back to the school. The HOS reviews and signs the checks if ACH is not utilized. ACH transactions do not require reconciliation. The Finance department photocopies the signed checks and files them with their respective invoices.

- The Board approves the Head of School expense reports. All expense reports must be submitted to expense portal and follow the expense reimbursement policy for District Staff and below.

- All expense reimbursements must be paid in a timely manner within 30 days.

- Refer to individual school expense policy for specific allowable expenses.

- All employee expense reports must be filed in the expense portal prior to termination of the employee’s services to GCA in order to be reimbursed.

**Expenditures - Restricted Funds**

*Authorization and Approval*

Expenditures for Restricted Funds follow the same policies for General Funds with the following exceptions:

- The HOS and Department Head along with Finance must pre-approve all Restricted Fund employee expenses during the budget creation process.
• Purchase requisitions must be completed for all restricted fund purchases and other one-time purchases. All purchase requisitions must show the amount of the purchase, if known, or if not known an estimate must be made. Prior to approving grant expenditures, the HOS and / Department Head must be certain that the expenditures are in accordance with federal or state requirements. Approvals must be secured.

• Prior to purchase. Quotes and/or other backup information must be attached to the purchase requisition. Items requiring purchase requisitions include but are not limited to the following: technology purchases such as computers, printers and software, fixed assets, furniture and equipment such as file cabinets, memberships and training or professional development costs.

• For payments to be processed, there must be a fully itemized invoice, invoice must be approved and coded to the proper restricted fund by the appropriate person and matched to a purchase requisition (if required). Once approved, scanned copies of the documents must be sent to Bill.com for payment (only for those schools that utilized the MSA Dept. for accounting / reporting purposes). All technology purchases must be vetted by our IT department

• All special education provider payments must be approved by the designated SPED Manager.

• All items (assets and inventory) purchased with restricted funds need to be tagged with an asset tag, tracked for physical location and inventoried annually. The tag must read “Purchased with XYZ funds for XXVA”. Any item (asset or inventory) assigned to a student or teacher also needs to be tagged, tracked for physical location and inventoried annually.

• Gift cards may not be purchased with restricted funds.

Payment Processing

• Bill.com generates all checks and records the payments within the Accounting Software.

• A manually signed invoice or invoice batch with electronic approval (with amount) is required before checks are cut for payment. If an invoice is presented for payment without proper approval or general ledger coding, it must be returned to the School.

• All scanned copies of checks with document support are saved in the individual school folders located on Bill.com.

• In the event of overpayment to a vendor, a refund or credit must be obtained and recorded as such.

Fixed Assets - General

The School is required to establish a fixed asset accounting system that will contain sufficient data to permit:

• The preparation of fiscal year-end financial statements in accordance with Generally Accepted Accounting Principles (GAAP)

• Adequate insurance coverage – assets are disclosed during insurance procurement

• Control, accountability and security

Criteria for Fixed Asset Capitalization

• The asset has a useful life of one (1) year or more
The cost of the asset is greater than $250,000

Valuation
Fixed assets are to be valued at purchase cost.
Donated fixed assets shall be valued at the donor’s estimated fair market value at the time of gifting.

Depreciation
Assets will be depreciated using straight-line depreciation. Estimated life for fixed assets shall follow IRS guidelines.

Classification
Fixed assets shall be classified as follows:
- Furniture - 7 years
- Equipment - 7 years
- Software – Amortized 3-5 years
- Structures and improvements – 15 years
- Land – Unlimited useful life
- Improvements other than buildings – 15 years

Information
The following information shall be maintained for all fixed assets:
- Description
- Asset classification
- Location
- Purchase price
- Vendor
- Date purchased or leased
- Accumulated depreciation
- Method and reason of disposal, if applicable

Fixed Asset Disposal
Any asset with a fair market value greater than or equal to $5,000 must be approved by the Board prior to retirement. Approval is required by the CFO for assets purchased with a fair market value of less than
$5,000, prior to retirement. The Fixed Asset Inventory will then be updated to include reason for retirement and date of write-off.

Examples of reasons for retirement:

- Asset is damaged beyond repair.
- Asset is damaged and the cost to repair it exceeds the current fair market value.
- Asset is not able to support current technology needs.

Any impairment to Fixed Assets needs to be communicated to IT Department and/or HOS immediately in order to assess the impairment.

- Fixed assets that are deemed obsolete or beyond repair should be communicated to the Accountant prior to disposal.

**Physical Controls:**

- An annual inventory must be performed by Department Heads Program Managers) and validated by Finance.
- Physical (when applicable) and virtual inventory must be performed for all capitalized items, as well as, all computers that do not meet the capitalization threshold.
  - The inventory is performed to determine that all assets are present, in usable condition, located in the assigned area, and accurately recorded on the fixed asset or inventory records.
  - Upon completion, the District Ops Director or CFO / Department Head must review and approve the results. Review includes a comparison of physical inventory to accounting records and fixed asset schedule.
  - Any discrepancies must be communicated to the HOS.
- Computer and software asset list must be submitted to the IT Team for maintenance of IT equipment inventory to ensure continued supportability, license compliance and information security.
- All fixed assets are tagged with a School fixed asset tag.

**Tracking and Reconciliation**

- A fixed assets schedule is to be maintained by the CFO and Finance department according to the Fixed Asset Section above.
- The fixed asset schedule must be updated monthly to include new purchases, retirements or transfers of assets.
- The CFO and Finance department District must also reconcile the fixed asset schedule to the accounting records.
**Physical Assets Purchased with Restricted Funds**

- All items purchased with restricted funds need to be tracked and inventoried by the school. The information must be maintained in a secure environment (i.e. system or network) with restricted access.

- All items (assets and inventory) purchased with restricted funds need to be tagged with an asset tag, tracked for physical location and inventoried annually.
  - The tag must read “Purchased with XYZ funds for XXVA”.
  - Any item (asset or inventory) assigned to a student or teacher also needs to be tagged, tracked for physical location and inventoried annually.
  - An annual inventory must be performed. The physical inventory must be performed for all restricted fund purchase to catalog for restricted fund audit purposes.

Physical assets purchased with restricted funds meeting the following criteria must also follow the fixed asset policy in the previous section in addition to the criteria laid out above.

- All items the asset has a useful life of one (1) year or more.
- The cost of the asset is greater than $2,000.00

**Tracking and Reconciliation**

- A restricted fund fixed asset schedule must be maintained by the SPED/District Program Fund Managers.
- The restricted fund schedule must be updated monthly to include new purchases, retirements and/or transfers of assets.
- The SPED/District Ops Director / Department Head must also reconcile the restricted fund schedule to the accounting records as part of the month-end financial reporting process.

**Accounting, Budgetary Control & Financial Closing**

- The Schools uses the modified accrual basis of accounting.
- Fund accounting is used to account for the financial activities of the School.
- Budgets are prepared annually by the CFO, Executive Director, and the HOS based on estimates of revenues and expenses. The annual budget is reviewed and approved by the Board in accordance with the state law.
- If applicable, an independent auditor is selected by the Board to perform the annual financial audit for the School. The selected auditor(s) will be required to work with a 3rd party accounting firm.

**Month End Close Accounting Process**

- Inputs
– School Payables
– Forecast Accruals
– Billing Accruals

● Month end journal entries and accruals
– Payroll Related
– Forecast Related
  • General Fund Revenue accruals
  • Revenue based Expenses – fees
    o Oversight Fees – Sponsor
  • Expenses
    o Teacher Bonus
    o ISP
    o Rent/Insurance/Others
– Amortization & Depreciation
  • Fixed Assets
  • Deferred Rent
  • Prepaid Expenses (Insurance and Legal)
– Restricted Funding Revenue Recognition

● Balance Sheet Reconciliations
– Bank Account Reconciliations
  • Manual Checks
  • Credit Cards
– Prepaid Expenses
– Other Receivables
– Fixed Assets
– Accounts Receivable
– Deferred Revenue
– Restricted Funds Analysis
– Deferred Rent
– Other Accrued Liabilities
– Accounts Payable

Monthly Financial Package
● Comprised of:
  – Actuals in Budget Format
  – Bank Reconciliation
  – Transaction Detail by Account
  – Journal Entry Posting

● The monthly financial close is performed by Finance.

● Financial reports are provided to the Board via email monthly. Board questions are addressed at applicable Board, Board Finance Committee meetings (if applicable) or other requested meetings.

● Financial pack approvals are performed by the HOS and the approval is after each closing cycle.

**Tax**

● School Finance reviews school contract to determine tax oversight/filing requirements for the organization. Consult state auditorf uncertain of terms and/or requirements.

● School Finance confirms and documents annually that school’s Federal and/or state not for profit status is valid.
  – A copy of the original IRS approval of the non-for-profit status is maintained in the organization’s permanent tax files.
  – Some states have their own non-profit status and/or education exemptions. Finance Manager ensures the School has applied for and received the appropriate exemptions and maintains a copy of the status/exemptions in the School’s permanent tax file. Consult Legal as needed for guidance.

● A calendar of tax form due dates is developed and the Finance ensures tax forms are timely and accurately filed for the non-profit organization:
  – Federal:
    o Form 990 – To be filed annually by the 15th day of the 5th month following the close of the tax year. (A return for the June 30 year end would be due by November 15). Note that a 90 day extension can be filed on Form 8868 for an additional 90 days (final extended date for a June 30 year end would be February 15).
    o The School engages a CPA firm to prepare Form 990 if required. Review and ensure accuracy of figures presented on the form agree with audited financial statements for the school.
  – State:
    o Business license: Typically annual or bi-annual business licenses are required and can be at the state and/or local level. Confirm required filings and frequency.
    o Sales/use tax: Taxation of educational materials and services vary widely depending on state rules, type of organization and the item. Consult Legal or state auditor to determine sales/use tax filing requirements for your school.
  – Local:
Property tax is due at the local level and non-profits typically are not exempt from property tax. CFO confirms the required property tax filings requirements in the local jurisdiction.

**APPENDIX**

**System for Award Management Excerpt**

Suspension and Debarment (2 CFR §200.213)

- Non-federal entities when using federal funds are subject to the non-procurement debarment and suspension regulations implementing Executive Orders 12549 and 12689, 2 CFR part 180.

- These regulations restrict awards, sub-awards, and contracts with certain parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in Federal assistance programs or activities.

- 2 CFR §180.220 Procurement contracts included as covered transactions:
  - Any vendor whose contract(s) (purchase orders) or subcontract(s) is expected to equal or exceed $25,000 during the GAN’s budget period must be checked against the System for Award Management (SAM) for suspension or debarment (includes contracted tutors)
  - Evidence of the verification can be in the form of a date/time stamped print screen, or other digital method that is readily available
    - Website for checking status: System for Award Management (SAM)
    - When micro and small procurements are made with vendors, the LEA shall check the vendor for suspension and debarment when cumulative vendor purchases equal or exceed $25,000

- Checking at the $25,000 threshold should suffice throughout the GAN’s budget period (LEAs may check prior to reaching the $25,000 threshold at their discretion) (2 CFR 180.320)
● If a vendor becomes suspended/debarred after checking SAM, the LEA may choose to continue to use the vendor if the LEA was using the vendor before the vendor was excluded (2 CFR 180.315)

• When sealed bids or competitive proposals are made with vendors (over $250,000), the LEA must check SAM twice (FAR 9.405(d)(1) and (4)). After opening of bids or receipt of proposals. Immediately prior to awarding the vendor Website for checking status: System for Award Management (SAM)

**Invoice Process Flow**

Purchase Approval (See also attached process map)

1. After Finance budget approval, staff member enters purchase requisition into PO system.

2. Purchase requisition are approved by the first approver. First level approvers are cabinet level administrators. Current first level approvers are: Directors and above.

3. Once approved by the first level approver, the purchase request is sent to Business Manager for 2nd approval. Once approved thirdly by the Head of School, currently Angela Lassetter, a PO number will be assigned, and the item can be purchased once final approval is met by CFO.

4. Funding approval is obtained for federal funds purchases such as Title I, Title IIA, Title III, and IDEA from the fund director. Current fund directors are Title I and Title IIA- Lucretia Nolan; Title III, Julie Ferrer and IDEA, Konteint Redmon

5. Once the Purchase Request has been approved, a PO number will be issued, and the PO is then forwarded to the Business Manager to purchase. Current Business Manager is Brenda Messer

Invoice Payment

6. The Business Manager matches the invoice with the PO and other documentation. The invoice is reviewed by Business Manager for accuracy.

7. If the invoice is accurate, it is submitted for payment but if there are inconsistencies between the invoice and the PO/documentation, the issue is resolved prior to requesting payment.

8. Invoices which are approved for payment are entered into a spreadsheet showing the date, vendor, coding, amount and other notes by the AP clerk, currently Reynalda Brant.

9. The spreadsheet and invoices/documentation are reviewed by the Business Manager for accuracy then sent to the Head of School and Federal Fund Director, if appropriate, for payment approval.
10. Once approved, the invoice/spreadsheet package is emailed to K12 or 3rd party accounting firm(Accounts Payable) to process the checks or ACH.

11. The Accountant logs the batch number, date received, due date and total amount into an Accounts Payable tracker.

12. The checks are cut by Bill.com and follow an electronic process through Bill.com.

Checks

13. All checks are processed by Bill.com then sent to GCA for signature and mailing.

14. Checks and invoices are scanned along with the invoice spreadsheet and saved within Bill.com before mailing.

15. The Accountant uses the check register to create a positive pay file that is uploaded to the bank. The total that is uploaded is tied to the total on the invoice spreadsheet.

16. The Accountant emails the check register and confirmation of positive pay upload to the Business Manager and AP clerk.

17. The invoices and check are reviewed by the AP Clerk to ensure the information is correct.

18. The check is attached to check copy/backup as well as the original check by the AP Clerk then given to the Business Manager to review.

19. Once reviewed by the Business Manager, the checks are given to the check signatories for a signature. Current check signatories are Chairman of the Board of Directors, Head of School, Executive Director, Chief Financial Officer and District Operations Manager.

20. Check signers review the check detail and sign the original check (Checks over $25,000 require two signatures)

21. Once the check has been signed, the AP Clerk mails the check to the vendor and files a copy of the check copy and invoice detail for reference. Bill.com also maintains a copy of each invoice and check copy.

22. The original check is mailed to the vendor and the check copy and backup is maintained by the school.