
BUSINESS OFFICE PROCEDURES AND INTERNAL CONTROLS

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INTERNAL CONTROL SYSTEM

The Corporation's internal control system comprises the policies and procedures established to provide reasonable assurance that specific Corporation objectives will be achieved. Accounting responsibilities, procedures, and policies should be implemented and designed to prevent:

1. Misstatement of account balances because errors go undetected (both intentional and unintentional); and
2. Misappropriation of cash and other resources of the School Corporation.

These objectives are pursued through a sound internal control structure which is carefully established and followed by business office personnel as well as all other applicable personnel. Such an internal control structure can also tend to promote operational efficiency. From a financial statement perspective, the School Corporation's internal control structure is comprised of the control environment, the accounting system, control procedures and internal control systems. This internal control structure will ensure that the five requirements are met — Control Environment, Risk Assessment, Control Activities, Information and Communication and Monitoring Activities.

These elements of the internal control structure are as follows:

Control Environment

The control environment establishes the integrity and ethical values of the school corporation as established by the board and administration. These include the standards, process and structures and the expectations for accountability and leadership. There are five principles of internal control specific to the control environment:

1. The Board of Trustees and administration demonstrate a commitment to integrity and ethical values.
2. The Board of Trustees oversees the Corporation's internal control system.
3. The administration establishes an organizational structure, assigns responsibility, and delegates authority to achieve the Corporation's objectives.
4. The administration demonstrates a commitment to attract, develop and retain competent individuals.
5. The administration evaluates performance and holds individuals accountable for their internal control responsibilities.

The control environment reflects the overall attitude, awareness, and action of the Board of Trustees, Administration, and others concerning the importance of control and its emphasis in the Corporation.

Risk Assessment

Risk assessment is the process used to identify and assess internal and external risks to achievement of objectives and the risk tolerances associated with those risks. There are four principles that apply to risk assessment:

1. The administration defines objectives clearly to enable the identification of risks and to define risk tolerances.
2. The administration identifies, analyzes, and responds to risk related to achieving the defined objectives.
3. The administration considers the potential for fraud when identifying, analyzing, and responding to risks.
4. The administration identifies, analyzes, and responds to significant changes that could impact the internal control system.

Control Activities

Control activities are the methods used to detect, prevent or reduce identified risks. Detection activities identify unfavorable events in a timely manner where prevention activities are intended to deter the occurrence of an unfavorable event. Examples of these activities include reconciliation, authorization, approval process, performance review, and verification process. The key concept of control activities is segregation of duties – separating the ability to record, authority and approve transactions limits the risk of error or fraud. If total segregation of duties is not practical (with a school's extracurricular accounts for example), compensating activities, such as an additional level or review or period review of transactions, should be utilized.

There are three specific principles which apply to control activities:

1. The administration designs control activities to achieve objectives and respond to risks.
2. The administration designs the Corporation's information system and related control activities to achieve objectives and respond to risks.
3. The administration implements control activities through policies.

Information and Communication

Internal and external communication are necessary to support the other components of internal control. The three principles that pertain to information and communication include:

1. The administration uses quality information to achieve the Corporation's objectives.
2. The administration internally communicates the necessary quality information to achieve the Corporation's objectives.
3. The administration externally communicates the necessary quality information to achieve the Corporation's objectives.

Monitoring Activities

Evaluations are conducted to determine whether the five components of internal control are functioning. There are two principles of internal control related to this factor, which include:

1. The administration establishes and operates monitoring activities to monitor the internal control system and evaluate the results.
2. The administration remediates identified internal control deficiencies on a timely basis.

Retention of Records

Please refer to the following link for the most recent records retention schedule revised April 26, 2023.

- <http://www.in.gov/iara/files/schoolretentionschedule.pdf>

Credit Card

F150 – USE OF CREDIT CARDS POLICY

The School Board recognizes the value of an efficient method of payment and recordkeeping for certain expenses. The Board therefore authorizes the use of School Corporation credit cards.

The Superintendent shall develop administrative guidelines that specify those authorized to use credit cards, the types of expense which can be paid by credit card, and their proper supervision and use. The administrative guidelines should also require that a log be kept which includes the names of the individuals using the cards, their position, estimated amounts to be charged and the date the card is issued and returned.

Credit cards are not to be used to bypass the accounting system of the School Corporation. In addition, credit cards are not to be used for personal expenses not related to Corporation activities.

Procedures for payment of expenses charged to credit cards must be according to Board policy for the payment of claims.

School Accounting Activities

School Accounting Activities	School Accounting Activities Internal Control Procedures	Separation of Duties
DAILY PROCEDURES:		
Cash Receipts Activities:		
Open mail and write receipt	Administrative Assistant	Person who opens mail does not write official receipt
Receive money, issue official receipts	Accounts Manager	
Prepare bank deposits	Accounts Manager	
Review bank deposit in detail before taking to bank	Corporation Treasurer	Corporation Treasurer initials and dates all deposits
Take deposits to bank	Accounts Manager	
Post receipts	Accounts Manager	
Access to computer system to make receipt adjustments	Accounts Manager	
Approves adjustments	Corporation Treasurer	
Post credits to accounts receivable	Accounts Manager	
Prepare customer billings (retiree health ins. bills)	Accounts Manager	
Mail billings or statements	Accounts Manager	
Approve accounts receivable adjustments	Corporation Treasurer	
Cash Disbursement Activities:		
Authorize purchases	Dept. Supervisor	
Prepare purchase orders	Accounts Manager	Corporation Treasurer approves PO before it is issued
Certify receipt of goods or services	Dept. Supervisor	The person receiving goods does not write checks
Prepare claim for payment	Dept. Secretary	The person preparing the claim is not approving the claim
Approve claim	Dept. Supervisor	Claim is approved before processing
Audit claims	Accounts Manager	
Reviews invoices/receipts attached to each claim to support the disbursement	Accounts Manager	
Approve claims - Disbursing Officer	Corporation Treasurer	Accounts Manager does not approve claims
Write checks (generated by accounting system)	Accounts Manager	Accounts Manager does not sign checks
Write manual checks	Accounts Manager	
Have receipt of W-9 form before paying vendor	Accounts Manager	
Post checks	Accounts Manager	

Sign A/P checks--automated in accounting system	Corporation Treasurer	Corporation Treasurer signs checks but does not prepare checks
Manual checks have a "live" signature	Corporation Treasurer	
Mail or distribute checks	Accounts Manager	
A/P checks are accounted for in numerical order	Accounts Manager	Payroll Specialist also maintains current numerical order
A/P check numbers are reconciled to the A/P bank acct	Accounts Manager	
A/P checks are in a secured location	Accounts Manager	Access limited to Payroll Specialist, Corporation Treasurer and Accounts Manager
Custodian of petty cash--	ECA Treasurer	
Custodian of investments	Accounts Manager	Corporation Treasurer reviews all investments monthly
Access to check stock	Accounts Manager & Corporation Treasurer	Check stock is locked
Access to computer system to make adjustments	Accounts Manager & Corporation Treasurer	Corporation Treasurer approves adjustments
Payroll Activities:		
Post vacation and sick leave records	Payroll Specialist	
Check and extend time cards	Dept. Supervisor	
Approve corrections to recorded time	Dept. Supervisor	
Input corrections to recorded time	Payroll Specialist	
Prepare payroll claims	Payroll Specialist	
Check payroll claim with excel spreadsheet	Payroll Specialist & Accounts Manager	
Approve payroll claim to be run in accounting system	Corporation Treasurer	
Approve payroll claims for department	Dept. Supervisor	
Approve payroll claims for disbursing officer	Corporation Treasurer	
Calculate deductions and net pay	Payroll Specialist	
Generate payroll checks	Payroll Specialist	Payroll Specialist does not sign checks
Sign payroll checks--automated in accounting system	Corporation Treasurer	Corporation Treasurer signs checks but does not prepare checks
Manual checks have a "live" signature	Corporation Treasurer	
Distribute payroll checks	Payroll Specialist & system portal	
Payroll checks are accounted for in numerical order	Payroll Specialist	Accounts Manager also maintains current numerical order
Payroll check numbers are reconciled to payroll account	Accounts Manager	
Payroll checks are in a secured location	Payroll Specialist	Access limited to Payroll and Deputy
Prepare earnings and deductions reports	Payroll Specialist	

Access to computer system to make adjustments	Payroll Specialist	
Approves adjustments:		
Authorizes Payroll Changes (new hires, terminations...)	Superintendent and Board	Superintendent and School Board authorize payroll
Prepares Payroll Change form	Payroll Specialist	
Checks Payroll Change form	Corporation Treasurer	
Inputs Payroll Changes into accounting system	Payroll Specialist	Input is done by payroll only
Checks Payroll Changes in accounting system	Corporation Treasurer	
MONTHLY PROCEDURES:		
Cash Activities:		
Receive bank statement online or by mail, open and print	Accounts Manager	
Compares checks cleared to disbursements posted	Accounts Manager	
Compares deposits to receipts posted	Accounts Manager	
Prepares bank reconciliation	Accounts Manager	
Prepare bank reconciliation statement summary	Accounts Manager	
Check clearing account balances for the month	Accounts Manager	
Update investment report	Accounts Manager	
Prepare Food Service analysis of 3 month operating cash balance	Accounts Manager	
Balance revenue to receipts	Accounts Manager	
In depth review and approve bank reconciliation	Corporation Treasurer	In depth review is done monthly because of lack of separation of duties in cash receipt activities due to the lack of the number of employees
Close month in accounting system	Accounts Manager	
Cash Disbursement Activities:		
Prepare monthly docket for board meeting	Accounts Manager	
Run voucher register for docket	Accounts Manager	
Organize claims alphabetically and verify claim total	Accounts Manager	
Approve claim docket	School Board	Claims are approved by School Board prior to payment
Approve claims in accounting system (See daily procedures for more details)	Corporation Treasurer	
Other Activities		
Update Cash Flow spreadsheets	Corporation Treasurer	
Prepare Grant reimbursement forms	Accounts Manager/Corporation Treasurer	
Run grant expenditure reports	Accounts Manager/Corporation Treasurer	

Sign and approve Grant reimbursement forms	Superintendent/Corporation Treasurer/Accounts Manager
Balance Appropriations w/Budget Order and Cash by Fund	Corporation Treasurer

Payroll Activities:

Prepare and pay WH-1 form online on or before the 20th (State and County monthly payroll taxes)	Accounts Manager
Enter leaves and terminations in accounting system	Payroll Specialist
Submit PERF and TRF files to INPRS after each payroll	Accounts Manager
Process payment	Accounts Manager
Enter leaves and terminations in INPRS	Accounts Manager

QUARTERLY PROCEDURES:

Cash Activities:

Prepare and submit Federal interest report	Corporation Treasurer
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Cash Disbursement Activities:

Other Activities

Prepare and submit CE report to DOE	Corporation Treasurer
Print CE report and prepare file for transmission	Accounts Manager
Prepare and submit CP report to DOE via STN	Technology Director

Payroll Activities:

Prepare Form 941	Accounts Manager
Print 941 reports from financial system	Accounts Manager
Print vendor reports for payroll and EFTPS	Accounts Manager
Print excel spreadsheet of payroll tax calculations for the quarter	Accounts Manager
Review Form 941 and sign form	Payroll Specialist
Review and sign all back up documentation	Payroll Specialist
Upload file for SUTA report online and submit	Accounts Manager
Prepare and print SUTA reports and electronic file from accounting system	Accounts Manager
Review SUTA forms UC-1 and UC-5a	Payroll Specialist
Review and sign all back up documentation	Payroll Specialist

SEMI-ANNUAL PROCEDURES

Cash Activities:

Cash Disbursement Activities:

Other Activities

Prepare Form 9	Accounts Manager
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Print and verify all required reports	Accounts Manager
Prepare debt analysis for the 6 month period	Accounts Manager
Submit Form 9 info on DOE website	Accounts Manager
Print and save files after DOE approval	Accounts Manager
Review Form 9 in detail and sign signature page	Corporation Treasurer
Review Form 9 and sign signature page	Board President and Superintendent
Report ADM to DOE Sept and Feb	Technology Director
Prepare attendance report and send to Admin	School Principals

Payroll Activities:

Prepare Form 100R	Payroll Specialist
Prepare and print 100R report and electronic file from accounting system	Payroll Specialist
Submit Form 100R to County Treasurer via email	Payroll Specialist
Submit Form 100R to Gateway	Corporation Treasurer
Review Form 100R	Corporation Treasurer
Review and sign all back up documentation	Corporation Treasurer

FISCAL YEAR END AND OTHER ANNUAL PROCEDURES

Cash Activities:

Cash Disbursement Activities:

Void stale dated checks by end of February each year	Accounts Manager	Approved by Corporation Treasurer
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Other Activities

Prepare Annual Financial Report	Accounts Manager	Reviewed by Corporation Treasurer
Free and Reduced applications	Food Service Director	Reviewed by Food Service Director
Audit of Free and Reduced applications	High School Cafeteria Manager	
Textbook Rental Reimbursement Report	ECA Treasurer and Technology Director	Corporation Treasurer compiles and reviews report Treasurer and Superintendent sign
Monitoring Segregation of Duties	Corporation Treasurer	
Bidding Procedures	Corporation Treasurer	
Post bid in newspaper	Corporation Treasurer	
Bid Opening	Bid Committee	
Award Bid	School Board	
Oversee work	Dept. Supervisors	
Prepare claims for payment	Custodial	Approved by Superintendent or Corporation Treasurer

Contract Management	Corporation Treasurer	
Prepare and submit CE report to DOE	Corporation Treasurer	
Print CE report and prepare file for transmission	Corporation Treasurer	
Prepare and submit CP report to DOE	Technology Director	
Prepare and submit NE report to DOE	Corporation Treasurer	
Balance Appropriation with Budget Order and Funds	Corporation Treasurer	
Budget Process	Corporation Treasurer	Board Review and Approve
Review and Update Corporation Policies and Administrative Guidelines	Superintendent	Board Review and Approve
Review and Update the Classified Employee Handbook	Corporation Treasurer and Superintendent	Board Review and Approve
Payroll Activities:		
CALENDAR YEAR END PROCEDURES		
Cash Activities:		
Present the Annual Report	Corporation Treasurer	Board of Finance Review and Approve
Cash Disbursement Activities:		
Prepare forms 1099 and 1096	Accounts Manager	
Order 1099 and 1096 forms	Accounts Manager	
Update W-9 file	Accounts Manager	
Print calendar year vendor reports and review all activity	Accounts Manager	
Balance vendor report to 1099 report	Accounts Manager	
Print 1099 forms and mail to vendors	Accounts Manager	
Review: reports,1099's and 1096 (prior to mailing)	Accounts Manager	
Review 1099's and sign 1096	Corporation Treasurer	
Review outstanding PO's and void if necessary	Accounts Manager	
Make Year End appropriation adjustments within funds	Corporation Treasurer	School Board review and approve
Other Activities		
Prepare 1095-C forms (Affordable Health Care Act)	Payroll Specialist	
Order 1095-C forms	Payroll Specialist	
Upload Ins. Co. file into accounting system	Payroll Specialist	
Print health insurance reports	Payroll Specialist	
Reconcile 1095 C reports to Ins. Co. monthly billings	Payroll Specialist	
Print forms 1095C and distribute to employees	Payroll Specialist	
Transmit 1095-C and 1094-C to federal government	Payroll Specialist	

Review reports and spot check 1095-C forms
 Responsible for 1095-C and 1094-C contents
 Balance Appropriations to Budget Order to Cash by Fund
 Close Year End in accounting system

Accounts Manager
 Corporation Treasurer
 Corporation Treasurer
 Accounts Manager

GATEWAY REPORTING:

Other Post Employee Benefits Report
 Prepare and Review Data from Accounting system
 Debt Management Report (prepare and submit)
 ECA Risk Report
 Annual Financial Report
 Prepare and Review Data from Accounting system
 Collective Bargaining Report
 Prepare Data from contract and Accounting system
 Collective Bargaining Upload
 Data from CBA
 Bargaining Status Form (Pre-Impasse)

Corporation Treasurer
 Accounts Manager
 Corporation Treasurer
 ECA Treasurer
 Corporation Treasurer
 Corporation Treasurer
 Corporation Treasurer
 Corporation Treasurer/Accounts Manager
 Corporation Treasurer
 Supt. & Exclsv Barg Rep
 Supt. & Exclsv Barg Rep

Corporation Treasurer Reviews and Submits

 School Principals review and Corporation Treasurer submits

 Corporation Treasurer Submits

Payroll Activities:

Prepare W-2's
 Order W-2 forms
 Print calendar year wage and PR deduction reports from accounting system
 Balance W-2's
 Print and distribute W-2 forms to employees
 Transmit W-2 files to state and federal governments
 Review and approve W-2 balancing report

Payroll Specialist
 Payroll Specialist
 Payroll Specialist
 Accounts Manager
 Payroll Specialist
 Accounts Manager
 Corporation Treasurer

Official Bonds

Whereas, IC 20-26-4-5 requires for each school year commencing July 1, the treasurer of each governing body and the governing body’s School Corporation and a Accounts Manager, if so appointed; and any individual whose official duties include receiving, processing, depositing, disbursing, or otherwise having access to funds that belong to a school corporation or the governing body of a school corporation; shall give a bond for the faithful performance of the treasurer’s, Accounts Manager’s, or individual’s duties written by an insurance company licensed to do business in Indiana, in an amount determined by the governing body. The treasurer shall be responsible under the treasurer’s bond for the acts of a Accounts Manager appointed as provided in section 1 of this chapter.

Bond approval is completed each year during the January Board of Finance meeting. We have bonds for the positions and amounts as follows:

Corporation Treasurer	\$300,000	
Corporation Deputy Treasurer	\$300,000	
Extra-Curricular Treasurer	\$25,000	
Athletic Secretary	\$15,000	
Elementary Secretaries	\$10,000	each
Food Service Director	\$10,000	
Cafeteria Managers	\$2,000	each

The bonds are recorded in the WellsCounty Recorder’s Office upon board approval.

PROCEDURE FOR RECEIVING AND PAYING FOR GOODS AND SERVICES

A. Receiving Goods.

Upon satisfactory receipt of purchased merchandise or services, the claim originator shall return the blue copy of the purchase order verifying satisfactory receipt of the material or services and return his/her purchase order copy to the treasurer via the principal or supervisor. Following this, the treasurer shall recommend the claim to the Board for payment.

B. Paying for Goods and Services

At each regular meeting, the treasurer shall present a list of claims for Board approval together with the actual claims for Board examination if so requested. The claim list will be arranged to show payee, amount of payment, total by fund, and a space for the Board members' authorization for payment.

All claims to be approved for payment by the Board at its monthly meeting must be received by the treasurer not later than the first of the month.

In the event of an emergency or in keeping with good business practice, claims may be paid by the treasurer in advance of Board approval for services and materials duly requisitioned, budgeted, or contracted. Claims paid in advance will be presented on the claim list for approval at the next regular Board meeting.

As a regular function of the corporation business office, the following time sensitive items can be paid in advance of formal board approval. These items will include charge card balances that otherwise would add late fees; pre-registration for conferences, workshops, and lodging; additional costs related to city crossing guards; and any other corporation billing that requires prepayment or would incur an additional fee if not paid on time.

Internal Controls Training

Indiana Code 5-11-1-27 requires Internal Control Policy Training

After June 30, 2016, [IC 5-11-1-27\(g\)](#) provides that the legislative body of each political subdivision must adopt the minimum internal control standards as defined by the State Board of Accounts. The legislative body must also ensure that personnel receive training concerning the internal control standards and procedures adopted by the political subdivision.

The fiscal officer must certify that the minimum internal control standards have been adopted and that personnel who are not otherwise on leave status have received training regarding these standards and procedures. This certification will be filed as part of the Annual Financial Report submission in Gateway.

In addition, a certification for each elected official, appointee, and employee should be signed as evidence of their individual training. A certification form is provided below and can also be found in the Appendix in the Uniform Internal Control Standards for Indiana Political Subdivisions manual. These certifications are to be maintained by the political subdivision. [Certification Form](#)

**INTERNAL CONTROL TRAINING CERTIFICATION
FOR ELECTED OFFICIALS, APPOINTEES, AND EMPLOYEES**

I, _____, the duly elected, appointed, or employed
(print name)
_____ for _____ certify that I
(position or title) (political subdivision)
received the following training concerning internal controls standards and procedures as required
by Ind. Code § 5-11-1-27(g)(2):

Title of Training	Time Spent
_____	_____
_____	_____
_____	_____

Date: _____
Signature _____

* This certification may be printed, signed, and retained in paper form or electronically. If signed electronically, the elected official, appointee, or employee must designate his or her signature by typing the last four (4) digits of their Social Security number in the signature line.

Uniform Internal Control Standards for Indiana Political Subdivisions

[Indiana Code 5-11-1-27\(e\)](#) provides that through the compliance guidelines authorized under [IC 5-11-1-24](#) the State Board of Accounts (SBOA) shall define the acceptable minimum level of internal control standards for internal control systems of political subdivisions, including the following: (1) Control Environment, (2) Risk Assessment, (3) Control Activities, (4) Information and Communication, and (5) Monitoring.

In response, the SBOA developed the [Uniform Internal Control Standards for Indiana Political Subdivisions](#) manual, which contains the acceptable minimum level of internal control standards that a political subdivision is expected to maintain.

Annual Training Calendar to include but not limited to topics such as:

- Payroll and Human Resource Compliance Issues
- Audit Requirements
- Legal Changes
- State and Federal Grants Management

- Financial Software
- Travel Guidelines
- Budget Development

Training Calendar

All training groups will receive instruction on the generalized topics, including the Internal Control Standards, their five components and the seventeen principles, the Budget Development Process, Audit Requirements, and Legal Changes. The State Board of Accounts has issued a power point presentation called the *Uniform Internal Control Standards for Indiana Political Subdivisions*. This document can be accessed with the link listed above. The training begins on Section 2, page 25.

January

Business Office staff shall be trained as a group to cover generalized topics such as Internal Control Standards, their five components and seventeen principles, the Budget Development Process, Audit Requirements, and Legal Changes. This training session will also include Payroll and Human Resource Compliance, Receipting, Disbursing and Procurement, Travel Guidelines, and State and Federal Grant Guidelines.

July/August

The Extra Curricular Treasurer and building secretaries shall meet at Central Office and receive training on generalized topics such as Internal Control Standards, their five components and seventeen principles, Budget Development Process, Audit Requirements, and Legal Changes. In addition, training will include more specialized topics in the area of their responsibility for Extra Curricular Accounting including, but not limited to: safeguarding of assets and money collected, receipting, recording transactions, depositing funds, returned checks, bank reconcilements, procurement and disbursement procedures, and quality reporting functions.

July/August

The Administrative Team including the Superintendent, Principals, Technology Director, Transportation, Facilities & Grounds, and Food Service, Athletic Director, and the Special Education Coordinator, counselors and nurses will also receive training on generalized topics such as Internal Control Standards, their five components and seventeen principles, Budget Development Process, Audit Requirements, and Legal Changes. This will be completed at the Back-to-School Annual Meeting.

Inventory and Asset Management

Each building principal shall maintain an up-to-date inventory on prescribed forms or electronic format supplied by the business office. Each teacher shall maintain an up-to-date inventory of equipment and supplies in his/her shop, laboratory, or classroom. The teacher shall submit a complete inventory on the prescribed form (paper or electronic) to the building principal prior to the teacher's leaving at the end of the school year. The building principal shall certify to the business office that the inventory has been checked and approved. There shall be two copies of the inventory: one filed with the building principal and one filed with the business office, or an electronic copy and a paper copy.

An equipment inventory will be maintained on all computers and capital outlay items exceeding \$ 5,000.00 in value. The inventory will serve the functions of both control and conservation.

The technology coordinator shall be responsible for assuring the maintenance of a comprehensive inventory

of administrative and instructional computer hardware and software.

The coordinator should work with the corporation technology department to develop procedures to be followed in maintaining such an inventory.

The librarian for each building shall be responsible for keeping a complete inventory of all audio-visual items in his/her building and providing the inventory information to the building principal, or by using electronic entry.

The running inventory shall be maintained on 1) building and grounds equipment; 2) furniture; 3) administrative equipment; 4) educational equipment; 5) vehicles; and 6) textbooks and supplementary books.

The maintenance supervisor and Corporation Treasurer shall be responsible for inventories relative to buildings and grounds equipment and vehicles. The building principal and Corporation Treasurer shall be responsible for the inventories relative to furniture, administrative equipment, educational equipment, and textbooks and supplementary books.

State and Federal Programs

The district receives a number of state and federal grants which support various activities of the district. Those include the following:

- Title I, II, III, VI
- IDEA: Section 611 & 619 (Federal Special Education Grant)
- Perkin Federal Grant
- Secured School Safety
- Career and Technical Education
- High Ability
- Non-English Speaking Grant (NESP)
- Any Other State or Federal Grants

All school employees who participate in grant awards are expected to comply with the following standards:

- 1.) Follow the grant guidelines as listed on the Grant Award Letter. Verify reporting requirements, amendments, and deadlines are followed.
- 2.) Verify if the grant is reimbursable after expenses incurred or if the grant is payable via cash request by the submission of the proper request form.
- 3.) Be sure to keep documentation on all expenditures and personnel transactions.
- 4.) As with all grants, follow the five (5) internal controls cited in the [Uniform Internal Control Standards for Indiana Political Subdivisions](#) which include the following:
 - a. Documented segregation of duties
 - b. For State and Federal reports, reimbursement requests, and bank reconciliations, for example, the SBOA will be looking to see if the document(s) have been reviewed (initialed) by a second party, other than the preparer.
 - c. Verification that all expenditures are allowable under the grant guidelines. All other local grants will follow the grant award guidelines.

Federal Cash and Financial Management

The district's financial management system and records will be sufficient for preparing required reports and for tracing expenditures to a level that establishes funds have been used according to federal statutes, regulations, and the terms and conditions of the federal award. This is in addition to maintaining a system of funds and accounts in accordance with state law and the accounting manual.

The district's financial management system will:

- Identify all federal awards received and expended, including specific information pertaining to the award: federal program name; CFDA title and number; identification number and year; and name of federal and any pass-through agency.
- Provide for accurate, current, and complete disclosure of the results of each federal award in accordance with reporting requirements.
- Include records and supporting documentation that identify the source and application of funds for federally funded activities, including authorizations, obligations, unobligated balances, expenditures, assets, income and interest.
- Enable the district to maintain effective internal controls to ensure accountability and proper safeguarding and use of all funds, property and other assets (for example, adequate segregation of duties).
- Provide a comparison of expenditures with budget amounts for each federal award.

In order for the district to comply with federal regulations for grant recipients, the superintendent will implement written procedures for 1) cash management; and 2) determining the allowability of costs in accordance with Cost Principles and the federal award terms and conditions.

Cash Flow Management

The district shall draw federal funds using a reimbursement method.

Reimbursement Payment Method

For reimbursements of federal funds, the district will:

- A. Monitor the fiscal activity (payments and reimbursements) under each grant on a continuous basis, and request timely reimbursement only for expenditures that have already been disbursed and comply with all applicable award requirements.
- B. Maintain source documentation/accounting records that reconcile to the reimbursement request at a level adequate to establish that funds have not been used in violation of any applicable statutory restrictions or prohibitions.

Interest Earned

- A. The district will retain interest earned amounts up to \$500 per year for administrative expenses.
- B. Earned interest will be calculated quarterly and submitted to the Indiana Department of Education.

Extra-Curricular Accounting

Daily Processes

- 1.1. The bonded building secretaries and ECA Treasurer shall receive and deposit all ECA Fund deposits and forward to the ECA Treasurer.
- 1.2. The ECA Treasurer shall receive, receipt, account for and disburse all funds flowing through the extra-curricular accounts. All transactions will be reviewed and signed by the building administrator

Monthly Processes

- 1.1. Fund balances – The extra-curricular treasurer should advise the activity sponsor periodically, preferably monthly, of the current balance in the fund of their activity
- 1.2. IC 5-13-6-1(e) The bank shall be reconciled to the books, or financial software, by the 15th day of the following month
- 1.3. Building administrator and ECA Treasurer complete and sign monthly check list stating that the following has been completed
- 1.4. Claims are properly executed with all supporting documentation attached
- 1.5. Receipts have been properly executed with all supporting documentation attached
- 1.6. Receipts balance to the financial software system
- 1.7. Bank statement balances to the financial software report, Summary of Receipts and Expenditures

Semi Annual and Fiscal Year Processes

- 1.1. Financial Report - IC 20-41-1-8 the ECA Treasurer shall file a copy of the treasurer's financial report of receipts and disbursements with the board of school trustees no more than 2 weeks after the close of each semester. Records and files of extracurricular activities for the entire school year shall be filed with the last financial semester report of any one school year. (Forms SA5-1 Financial Report of ECA's, SA5-2 Cash reconciliation, SA5-3 Detail of Receipts and Expenditures by Fund, and SA5-4 Report Certificate)
- 1.2. ECA Risk Assessment Report - Per IC 5-11-1-4 the Corporation Treasurer is required to provide electronically and in a manner prescribed by the State Examiner, financial reports for the fiscal year not later than **sixty days after the close of the fiscal year**.
- 1.3. Effective July 1, 2015, Public Law 181-2015 amended IC 5-11-1-25 to require the SBOA to develop risk based examination criteria and then determine the frequency each audited entity is required to be examined based on the results of a risk based assessment.
- 1.4. The ECA Risk Report filed through Gateway is a part of the financial reports required to be filed by the Corporation Treasurer per IC 5-11-1-4 and has been designed as the tool for school corporations to provide the risk based criteria for their extra-curricular accounts (ECAs) to allow SBOA to evaluate for an appropriate level of risk.

Separation of Duties

- 1.1. Part of the control activity component is segregation of duties. An individual should not be permitted to initiate, approve, undertake and review the same duty. Separating the ability to record and authorize reduces the risk of error and/or fraudulent activities. In a school setting,
- 1.2. Segregation is not practical due to the limited number of staff available. Therefore, compensating activities will be utilized. This includes the principal reviewing and approving ECA reports and bank statements.

- 1.3. Expenditures and Endorsement of Checks
- 1.4. IC 20-41-1-4 - Expenditures by the treasurer of the extra-curricular account are limited to those approved by the principal of the school and they should be in accordance with general administration policies of the school corporation since the law provides that all expenditures shall be subject to review by the local school board.
- 1.5. Unless specifically authorized by statute, payments made for goods or services which are not received shall not be made. Payments made in advance of receipt of goods and services may be the personal obligation of the responsible official or employee
- 1.6. All checks will be signed by both the extra-curricular treasurer and building administrator.
- 1.7. Bank Reconciliation – Bank reconciliation shall be done by the treasurer monthly, no later than the 15th day of the month following the reconciling month. The completed reconciliation shall be reviewed and approved by the building administrator.

Entering and Posting Data

- 1.1. The ECA Treasurer is expected to keep current with the accounting of ECA funds, including entering and posting receipts and expenditures on a daily basis.

Purchasing and Receiving Functions

- 1.1. Purchase orders shall be created at the approval and direction of the building administrator
- 1.2. Compensation and any other payments for goods and services should not be made in advance of receipt of the goods or services unless specifically authorized by statute.
- 1.3. Orders will be checked in by the teacher/club sponsor. Signed packing slips will be attached to the purchase order along with the approved invoice.
- 1.4. Receipts – A receipt is to be issued for any and all money received.
- 1.5. The cash receipts collected by and for the benefit of any activity fund should be in charge of some designated official or sponsor of the activity, until turned over to the treasurer of the extra-curricular account.
- 1.6. A receipt is to be properly issued, shall show the date, the name of the person from whom the money was received, the payment type, the activity fund for which it was received, the amount and the source of the receipt.
- 1.7. The receipt must be signed by the ECA Treasurer or collecting authority
- 1.8. The Administrative Assistant / ECA Treasurer shall deposit all receipts in one bank account without unreasonable delay.
- 1.9. Bank Deposits – IC 20-41-1-9 – the treasurer shall receive all funds and prepare a bank deposit. The deposit will be reviewed and approved by a second person. Deposits will be made without unreasonable delay.

Payroll

- 1.1. Administrative Assistant will complete time and attendance records for hourly employees reporting to that building. This report along with the time cards will be submitted to Central Office bi-weekly.

Monitoring of Segregation of Duties

- 1.1. The Corporation Treasurer shall make unannounced visits to the school buildings to review the Segregation of Duties. In addition, the ECA Treasurer shall report internal control issues identified while executing their duties. These issues will be documented and evaluated by the Corporation Treasurer. Corrective actions will be implemented if needed.

Gateway Reporting

The State Board of Accounts created the ECA Risk Report which is reported through Gateway. This report includes beginning balance, receipts and expenditures, along with questions designed to determine the risk level at each school building. The reporting period runs from July 1st through June 30th each year. It is due near the end of August. Please check on Gateway for the specific due date. Additional information can be found on the State Board of Accounts website at <http://www.in.gov/sboa/4449.htm>.

Bonding Requirements

- 1.1. Issued in an amount fixed by the Superintendent and Corporation Treasurer of the approximated amount totaling the anticipated funds that will come into the possession the treasurer at any one time during the regular school year.
- 1.2. Bonds shall be filed with the trustee or board of school trustees
- 1.3. IC 20-26-4-5 states a blanket bond may be purchased as long as it is endorsed to include faithful performance of all required bond holders and includes aggregate coverage for all of the specified amounts of the required bond holders.
- 1.4. SBOA update issued 10/22/15 states that SBOA will not take exception to coverage via a crime insurance policy as long as it is authorized by resolution and endorsed to cover faithful performance and includes aggregate coverage.
- 1.5. Will be required to submit a copy of the official bonds to the SBOA on subsequent submissions of the Gateway Annual Report

Cash Handling Practices

A Cash Change Fund has been established by the board of school trustees. The Cash Change Fund is established by a check drawn on the Extracurricular Account in the amount of \$_____ made payable to the ECA Treasurer (or employee who is the custodian of the Cash Change Fund). The custodian shall convert the same to cash and be held responsible for the safekeeping of such cash and the proper accounting thereof.

Cash shall be collected and turned over to the ECA Treasurer along with a SA-8 form detailing the deposit. The ECA Treasurer will verify the amount of the deposit with the SA-8 Form and will issue a receipt. The deposit will be prepared and taken to the bank. If the Treasurer is unable to get to the bank at that time, all cash, checks and money orders are required to be locked in the safe until they are able to make the deposit.

Athletics

Since most events take place in the evening hours when the ECA Treasurer is not on duty, a safe must be maintained by the Athletic Secretary and/or Athletic Director to lock up the proceeds from the game or event. The following business day, the Athletic Secretary and/or Athletic Director will complete a SA-8 Form and submit to the Treasurer.

Concessions

- 1.1. Internal controls should include, at a minimum, a regular reconciliation of the beginning inventory, purchases, distributions, items sold and ending inventory to the amount received.
- 1.2. Any discrepancies noted should be immediately documented in writing to proper officials

Gifts and Donations

The State Board of Accounts states that Cash donations that are extra-curricular in nature may be accounted for in extra-curricular accounts. The acceptance of the donations shall have prior approval by the Board of School Trustees.

Ticket Taking

- 1.1. Serially pre-numbered tickets by the printing supplier should be used for all athletic and other extra-curricular activities and events which admission is required.
- 1.2. Tickets for each group shall be different colors and or different series numbers.
- 1.3. The treasurer shall be responsible for the proper accounting of all tickets and should keep a record of the number purchased, the number issued for sale, and the number returned.
- 1.4. The treasurer receipt issued therefore should show the number of tickets issued to the seller, the number returned unsold and the balance remitted in cash.

Processing of Personnel Payments

- 1.1. Employee – Pay of teachers or other personnel for service at interscholastic athletic events such as ticket takers, scoreboard personnel, etc., are expenses of the Athletic Fund of the extra-curricular account.
- 1.2. Pay of concession stand supervisors and of ticket takers, etc., for fine arts events should be paid from the proceeds of the activity sponsoring the event. A claim shall be sent to the Payroll Department for processing through the financial software. The sponsoring club shall reimburse the expense.
- 1.3. Non-Employee – All non-employee vendors shall be paid by claim once a W-9 form has been obtained and entered into the financial system software.

Form Approval

- 1.1. IC 20-41-1-4 Officials and employees are required to use State Board of Accounts prescribed or approved forms in the manner prescribed
- 1.2. A desired change or addition to a prescribed form must be approved by the State Board of Accounts as discussed in the Accounting and Uniform Compliance Guidelines Manual for School Corporations at: www.in.gov/sboa/2821.htm
- 1.3. The use of computer-generated prescribed forms should be brought to the attention of the Field Examiner during the next regularly scheduled audit. The forms and computer system generating the forms are subject to a technical audit based upon the results of the Field Examiners risk assessment.
- 1.4. Write off Procedures
- 1.5. Documentation should exist for all efforts made to collect amounts owed prior to any write-off

Signature Stamps

A rubber stamp or other signing device should be used only under the personal direction of the public official and should be properly safeguarded when not in use since each official is responsible for his or her own signature

Disposition of Old Outstanding Checks

No later than March 1 of each year, the Treasurer shall prepare or cause to be prepared a list in duplicate of all checks outstanding for two or more years as of December 31 last preceding year. The original copy shall be filed with board of finance of the school corporation and the duplicate copy maintained by the ECA Treasurer. The ECA Treasurer shall enter the amounts so listed as a receipt to the fund or funds upon which they were originally drawn and remove the checks from the list of outstanding checks. If the fund on which the checks were originally drawn is not in existence, or cannot be ascertained, the amount of such checks shall be receipted to the General Fund. Each list prepared must show:

- The date of issue of each check
- The fund upon which the check was originally drawn
- The name of the payee
- The amount of each check issued
- The total amount represented by the checks listed for each fund

School Nutrition Program

Daily Procedures – Elementary

Patrons are able to deposit money into their “lunch account” in the Point of Sale (POS) to purchase meals and ala carte. The account is then used each day for purchases and is drawn down for the amount of the purchases. All money taken in is then deposited daily into the bank by the Food Service Director.

1. Each day, the Administrative Assistant and/or Teachers collect money for the students’ breakfast/lunch accounts and place them into a sealed collection envelope.
2. The collection envelope is delivered to the cafeteria.
3. The Food Service Cashier then opens each envelope and verifies the amount inside against the amount listed on the envelope.
4. The money amounts are then entered into each child’s lunch account in the POS.
5. The money is then counted by the Food Service Cashier and entered onto a daily count sheet and the total is entered into the daily deposit log and signed.
6. The money is then counted again to ensure accuracy by the Food Service Director and a second signature is entered into the deposit log. A deposit ticket is completed and the cash and coin is placed in a tamper proof bank bag. The Food Service Director takes deposit to bank.
7. The amounts are then entered into the POS close screen and a Receipt and daily Sales Activity Sheet is printed which lists the amount of cash, coin and checks. This amount is checked against the deposit and initialed by the Food Service Director on the daily Sales Activity Sheet. A copy is kept on file at the school and a copy is sent to the Food Service Director.
8. The Food Service Director then picks up the deposit and signs the deposit log and takes the deposit to the bank. The bank opens the deposit, counts the deposit and gives the Food Service Director the deposit ticket. The deposit ticket is then given to the Accounts Manager at Central Office the next day. The Food Service Director checks the deposit ticket total against the Sales Activity Total and initials the ticket.

Daily Procedures – Secondary

Patrons are able to deposit money into their ‘lunch account’ in the Point of Sale (POS) to purchase meals and ala carte. The account is then used each day for purchases and is drawn down for the amount of the purchases. All money taken in is then deposited daily into the bank by the Food Service Director.

1. Deposits into a patron’s lunch account are made at the POS by the Food Counter.
2. Each Cashier’s station is counted at the end of the day by the Food Service Director and totals are entered into the POS close screen and a receipt for each station is printed which lists the total of cash, coin and checks.
3. The money is then combined into one total deposit and the total is recorded in the deposit log and signed. The money is then counted again to ensure accuracy by the Cafeteria Cashier and a second signature is entered into the deposit log. The daily Sales Activity Sheet is printed and is checked against the deposit for accuracy and initialed by the Food Service Director. A copy is kept on file at the school and a copy is sent to the Food Service Director.
4. A deposit ticket is completed and the cash and coin is placed in a tamper proof bank bag for pickup by the Food Service Director.
5. The Food Service Director takes deposit to bank. The bank opens the sealed deposit, counts the deposit and gives the Food Service Director the deposit ticket. The deposit ticket is then given to the Accounts Manager the next day. The Food Service Director checks the deposit ticket total against the Sales Activity Total and initials the ticket.

Food Service Month End Processes

At the end of each month, the Food Service Director in conjunction with the Central Office Staff (COS) complete procedures to close the month.

1. Each week the Food Service Director totals the previous week's sales activity totals and deposit totals for each school and compares to be ensure they match, staples them together and initials each on the tape. Any discrepancies would be brought to the Food Service Director's attention at that time.
2. At the end of the month, the Food Service Director prints out the detailed list of all online patron deposits from the Point of Sale (POS) and compares them to the reconciliation information for each individual patron.
3. The bank statement is then cross checked for all online payments by the Accounts Manager and any outstanding deposits in transit are highlighted and totaled.
4. The monthly spreadsheet from the POS is printed that reflects the daily activity.
5. The total for each Account Type (i.e. Student Lunch, Student Breakfast, etc.) is entered into the 800 Fund of the Financial Accounting Software by the Accounts Manager.
6. The total change to Prepaid Food in Trust is entered into the 9000 Fund of the Financial Software by the Accounts Manager. The balance of 9000 Fund is then compared to the actual balance of Patron Accounts from the POS on the last day of the month.
7. Any catering, rebates or miscellaneous receipts deposited by the Food Service Director are entered into the 800 Fund of the Financial Accounting Software by the Accounts Manager.
8. The Food Service Director and Accounts Manager then sends the bank statement and patron deposit information to the Corporation Treasurer for reconciliation.
9. The Food Service Director prints out meal count spread sheet from POS.
10. The Food Service Director enters meal totals into CNP web claim site.
11. The Food Service Director prints out copy of claim and submits to Accounts Manager for review.

End of the Fiscal Year Process

At the end of the Fiscal Year, the Food Service Director completes tools and reports to close out the school year along with storage and destruction of appropriate records.

1. The Food Service Director and the Accounts Manager completes the Annual Financial Report (AFR) using info gathered from the Tool and other financial reports from the Financial Accounting Software.
2. The AFR is given to the Corporation Treasurer for review and signature.
3. Before September 1st, the AFR is submitted online to the Department of Education through the CNP web.
4. The approved copy is printed and given to the Corporation Treasurer for signature.
5. All paperwork from the school year is placed in storage for 3 years plus the current year.

Prepaid Food in Trust Description

Patrons are able to deposit money into their lunch accounts in excess of their purchases for future use (Prepaid Food in Trust) at the Point of Sale (POS) or through an E-Payment Vender online. This money does not actually belong to the Food Service Account until items have been purchased. The money must be accounted for in a separate fund until it has been used for purchases.

1. All deposits to patron accounts are accounted for in the POS system daily and broken down by the POS by actual Sales or Prepaid Food in Trust.
2. At the end of the month, the POS system generates the spreadsheet of the daily activity for the month including the change to Prepaid Food in Trust and is printed out by the Food Service Director.
3. The total for each Account Type (i.e. Student Lunch, Student Breakfast, etc.) is entered into the 800

Fund of the Financial Accounting Software by the Accounts Manager.

4. The total change to Prepaid Food in Trust is entered into the 9000 Fund of the Financial Software by the Accounts Manager.
5. The balance of the 9000 Fund should equal the balance of all Patron Accounts.
6. The balance of 9000 Fund is then compared to the actual balance of Patron Accounts from the POS on the last day of the month and a printout is given to the Central Office Staff member that reconciles the bank statement.

Food Service Bad Debt/Patron Balance Write Off Procedure

F175 COLLECTION AND FORGIVENESS OF DEBT

The Board understands it is required to collect all monies owed to it by patrons, employees, parents and students, including money owed through student lunch accounts and other extracurricular accounts. Every effort should be made by the school administration to collect the monies owed to the school corporation including collection procedures. Such efforts **must** be documented by school administration before the debt is forgiven, waived, or written off of the School Corporation accounts **and considered an uncollectable account.**

The School Corporation may forgive, waive, or write-off all or a portion of the debt if one of the following conditions is met:

1. The school administration determines that the student or the parent or guardian of the student is unable to pay the debt;
2. The payment of the debt could impact the health or safety of the student;
3. The cost to pursue and collect the debt from the student and his/her parents would cost more than the potential total debt collected; or
4. There are mitigating circumstances as determined by the superintendent that preclude the collection of the debt.

Every decision to forgive, waive, or write-off a debt must be documented and include the specific facts for the decision relating to one of the above stated reasons. **If the uncollectable debt is a student lunch account, it cannot be an expense to the school food service account and must be covered by non-Federal funds.**

The Superintendent may develop regulations addressing specific situations relating to the above conditions.

In the cases where a positive balance exists in the accounts, every effort must be made by the school administration to return the positive balance to the account holder when the person is no longer in the school corporation. If attempts made to refund the balance have been unsuccessful, the balance should be transferred to the corresponding school fund or if such transfer is not appropriate, to the School Corporation general fund.

Food Service Board Approval for Student and Staff Meal Prices

Each year it is required that the School Board approve Student and Adult Meal Prices. Also, each school year the School Food Authority (SFA) is charged with calculating their paid lunch price increase requirement to meet the requirements in Section 205 of the Healthy, Hunger-Free Kids Act of 2010. The

PLE Tool was created to help with the calculation. The completed PLE Tool is required to be sent to the Department of Education each school year.

1. The PLE tool is completed each spring to determine if a price increase is required. An exemption from raising prices can be requested if certain criteria are satisfied.
2. A student meal price recommendation is then submitted to the School Board for approval.
3. Adult lunch prices are required to be equal to or higher than the total cost of a high school student meal.
4. Adult prices are assessed each spring and based on the recommendation for student lunches, is calculated and submitted to the School Board for approval.

Separation of Duties

Internal Controls are set in place to provide for separation of duties and to ensure the integrity of the Food Service Program.

Bank Reconciliation

- 1.1. Completed by the Food Service Director and the Accounts Manager.
- 1.2. The Food Service Director matches all online deposits made to the Point of Sale (POS) online and reports any deposits in transit to the Accounts Manager.
- 1.3. Daily POS transactions are posted at the end of the month by the Accounts Manager into the Financial Accounting Software.
- 1.4. The Accounts Manager and Corporation Treasurer reconciles the bank statement.

Purchasing and Receiving

- 1.1. Completed by the Cafeteria Managers (CM) Food Service Director.
 - 1.1.1. Food and supplies
 - 1.1.1.1. Food Bids are advertised and awarded to one single prime vendor by the Food Service Director in May through the Regional Service Center.
 - 1.1.1.2. Food Orders are sent to the Food Service Director weekly by the CM.
 - 1.1.1.3. Food orders are checked over by the Food Service Director before placement.
 - 1.1.1.4. The Food Service Director places the order online.
 - 1.1.1.5. The Food Service Director checks in all food deliveries.
 - 1.1.2. Other Purchases
 - 1.1.2.1. Small purchase items not on the bid are placed by the CM in conjunction with the Food Service Director.

Contracts

- 1.1. Any items over the \$150,000 threshold will be bid with the assistance and guidance of the Corporation Treasurer
- 1.2. All invoice pricing is double checked against bid and quoted prices by the Food Service Director.
 2. Expenses are entered into the Financial Accounting Software by the Accounts Manager.
- 1.3. Checks, check registers and records are processed by the Accounts Manager and Corporation Treasurer.
- 1.4. All contracts are evaluated by the Food Service Director in cooperation with the Corporation Treasurer and signed by the School Board.

Free and Reduced Applications

- 1.1. Free and Reduced Applications are processed and entered into the Free and Reduced Meal Application (FARMA) Program by the Food Service Director within 10 days of receipt and signed

and dated.

- 1.2. An audit is completed each year on 10% of all processed applications, completed by the High School CM and signed and dated.

Payroll

- 1.1. All times sheets are collected by the Cafeteria Managers, checked for accuracy and signed.
- 1.2. Time sheets are turned into the Food Service Director and are double checked for accuracy and initialed by the Food Service Director.
- 1.3. Payroll is processed by the Payroll Specialist.
- 1.4. The Corporation Treasurer checks the payroll printout and signs off.

Monitoring

- 1.1. Audits are performed regularly by the Food Service Director.