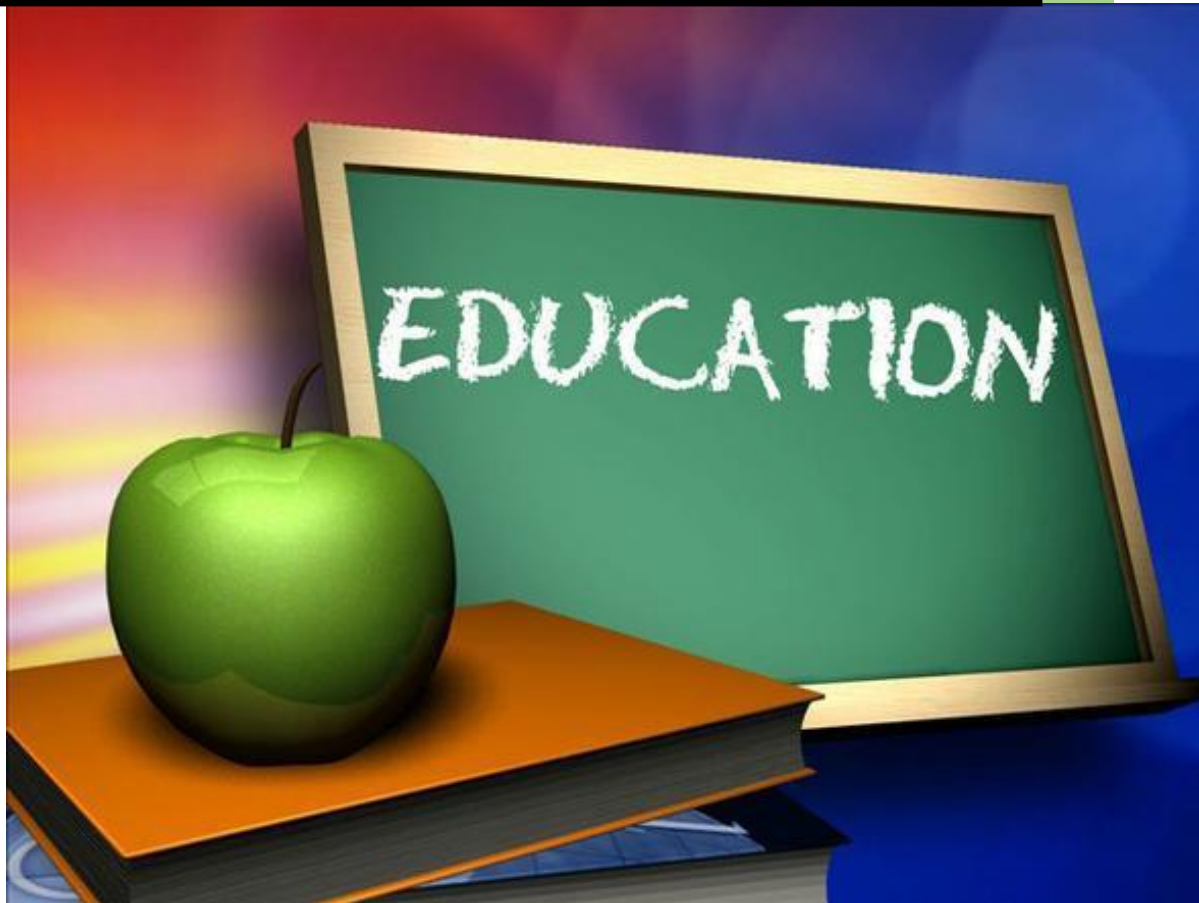




2026-2027

School Activity Fund Regulations



Fauquier County Public Schools

Department of Finance

July 1, 2026

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Introduction

The purpose of the School Activity Fund Regulations is to establish policies and procedures which provide reasonable assurance that the daily management of School Activity Funds are conducted in an efficient and effective manner, and that funds are used in accordance with the underlying principles of the Superintendent and adequately safeguarded from the risks of fraud, waste, and abuse. Student activity accounts are not considered a savings account and therefore should be spent during the same school year the money is collected. The Virginia Department of Education has issued guidelines pertaining to the management of School Activity Funds in accordance with the Virginia Administrative Code (these documents are available from the Finance Department upon request). These regulations are consistent with the Department of Education's Guidelines for School Activity Funds.

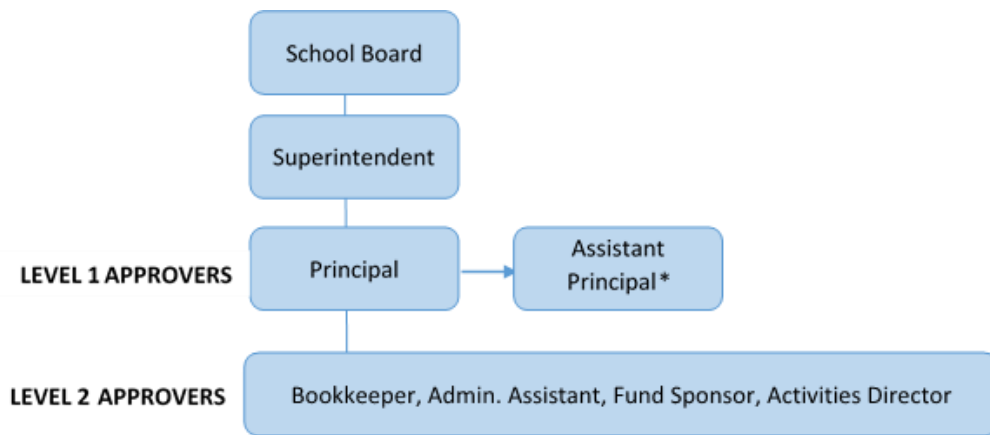
School Activity Funds

According to the regulations of the Virginia Board of Education, School Activity Funds are defined as, "All funds derived from extracurricular school activities, such as entertainment, athletic contests, cafeteria, club dues, etc., and from any and all activities of the school involving personnel, students, or property..." A school activity must be conducted for this purpose and not to produce revenues or unnecessary expenditures. Revenues necessary to make the activity self-supportive are essential and acceptable. For the purpose of these regulations, the term "student activity funds" is synonymous with the term "school activity funds."

Underlying Principles of the Superintendent

1. School activity funds shall be used solely in accordance with the purpose for which such funds are collected, and shall never be used for cash advances, salary advances, or loans.
2. Projects for the raising of school activity funds shall, in general, contribute to the educational experience of pupils and shall not conflict with the instructional program.
3. Funds derived from the student body as a whole shall be expended in ways that benefit the student body as a whole and in ways that benefit those pupils currently in school who have contributed to the accumulation of such funds. Student body representation shall be involved to manage funds.
4. Management of school activity funds shall be in accordance with best business practices. Principals, through their representatives, shall prepare, modify, and interpret policies, regulations, and procedures affecting student body affairs.
5. Schools are required to use the automated accounting system for school activity funds which has been approved by Fauquier County Public Schools ("FCPS").

§I – Lines of Authority



**The Assistant Principal is a Level 1 approver only for duties that have been delegated by the Principal.*

1. School Board – The School Board should adopt policies to govern the establishment and operation of all activity funds. The external auditors should review these policies for sound accounting and reporting principles.
2. Superintendent – The Superintendent should have the direct authority to implement all policies and rules pertaining to the supervision and administration of school activity funds in schools in accordance with established policies and regulations.
3. Principal – The Principal is ultimately responsible for safeguarding, accounting for, and managing the school activity funds in accordance with established policies and regulations. The duties to be performed in providing proper management and security of the funds may be delegated to the degree desired by the Principal, but the responsibility for managing school activity funds remains with the Principal.
4. Bookkeeper/Administrative Assistant – The bookkeeper/administrative assistant, under the supervision of the Principal shall receive, receipt, deposit, account for, and disburse all funds flowing through the school activity funds, except otherwise directed by the Principal.
5. Fund Sponsor or Activities Director – The fund sponsor or activities director shall be responsible for supervising all activities under the direction or control of the Principal.

§II – Approval, Duties, and Responsibilities

Any approvals processes outlined in this regulation require at least one Level 1 and one Level 2 approver. Some processes require initiation by a Level 1 Approver.

1. Level 1 Approver – The Principal or the Assistant Principal (if duties have been delegated by the Principal).
2. Level 2 Approver – The bookkeeper, administrative assistant, school activities directors (athletic director, band director, etc.) or fund sponsor.

The table in Appendix A summarizes the duties and responsibilities discussed throughout this regulation that must be performed to achieve proper security and management of the School Activity Funds.

§III – General Regulations

A. School Activity Fund Forms

1. All required forms referenced in this regulation are located in Appendix B: Required Forms. Forms that are optional are located in Appendix C: Optional Forms. Other forms and information are located in Appendix D: Other Forms and Information.
2. Correction fluid (white-out) must never be used on any supporting forms or documentation (Auditor recommendation).
3. Any changes made to forms after obtaining the Level 1 approval, must have initials and date by the Level 1 to document the approval of the change.

B. Establishment of Accounts in the School Activity Fund Accounting System

1. All school activity funds shall be accounted for within one set of clearly identified, segregated accounts, or subaccounts, under control and direction of the Principal. School activity funds shall not be maintained in one general account. All accounting records must be maintained in ink rather than pencil.
2. A school activity account shall be established only with the approval of the Principal. Requests for new accounts must be sent to the Finance Department, Accounting Division.
3. The title of the account should reflect the purpose for which the fund account is established.
4. For tracking purposes, staff funded accounts (e.g., Sunshine, Hospitality, Teacher Vending, Jean Day, Social, Flower) may be recorded in the school activity fund accounting system. However, they are not school activity funds.

C. Deficit Balances

School activity fund accounts may contain deficit or negative balances during the year. Negative balances are not permitted at year end in any accounts.

D. Year End Balances

According to the School Board Policy, elementary and middle schools should not have a remaining balance in excess of \$150,000 as of June 30th each fiscal year. All high schools should not have a June 30th remaining balance in excess of \$300,000. These limits are contingent on the contents of the annual financial plan. Should a school determine that a multi-year fundraising campaign is needed to reach a stated goal, a request for an exception should be submitted to the Superintendent or his/her designee for review/approval. If a June 30th Activity Fund balance exceeds the above established limits and no exceptions have been granted, the Superintendent, or his/her official designee, will establish a committee to prepare action plans as to how these excess funds shall be expended. The committee should be comprised of members of the community who assisted in the raising of these funds (parents, teachers, PTO members, students, etc.). It should be this committee's goal to expend these excess funds for the betterment of the students at the school prior to the next year end date.

E. Account Transfers

1. An Interfund Transfer Voucher must be completed and properly approved by a Level 1 approver prior to transfer of the funds. The school activity fund accounting system reference number is required to be documented on the form. The accounting system (JE Proof) report must be attached to the transfer form for audit trail purposes.
2. Transfers to staff-funded accounts are not permitted from student funded accounts. See page 12, D. Other Revenues, 1.b. for the only exception.

F. Petty Cash Funds

Petty cash funds cannot be established from school activity funds. If a school has a petty cash fund that was created from school activity funds, the funds must be closed out. The funds must be deposited back into the account they were originally disbursed from to create the unauthorized petty cash fund. Any petty cash fund must be authorized in advance by the Executive Director of Budget & Planning. If authorized, these funds will be taken from school operating funds and the school will be responsible for following the School Board Petty Cash Policy. Petty Cash funds are not considered the same as Change Funds.

G. Change Funds

1. Funds may be provided for change-making operations in connection with an activity (e.g., fees, library, school store). Change funds shall be limited to activities that have proven needs, and the amounts shall be limited to the minimum amounts that will serve the change-making needs.
2. Each Change Fund form must be completed in its entirety to document the change fund. The top section is completed prior to disbursement and then the bottom section is completed upon the return of change funds.
3. For library fees, the cash box containing the change fund is to be secured properly in the library or returned to the school finance office each day to be stored in the safe or vault for security purposes. Funds collected from library fees shall be delivered to the school finance office for deposit either weekly or when \$10.00 in revenue has been collected. There should be no change fund in existence at the end of the school year.
4. Issuances and returns of change funds are required to be disbursed, received, and categorized in the change fund account in the accounting system.
5. The balance in the change fund account must have a zero balance at year-end.
6. Issuance of Funds
 - a. A PR must be completed and approved by a Level 1 approver to request the change fund.
 - b. Change funds shall be issued in the name of the individual responsible for the proper safeguarding and timely return of the funds. Change funds checks are never issued for "Cash" or in the name of the bank. Change funds shall be documented in the memo section of the check.
7. Return of Funds
 - a. Change funds shall be returned in full to the bookkeeper for redeposit to the checking account. The transaction entries must provide positive identification of the funds returned (i.e., a cross-reference indicated between the issue and return of funds used for change).

- b. In some cases, there may be a need that continues for several consecutive months or through most or all of the school year such as school store, library, or athletic activities that occur on a seasonal basis. For the school store and library, the cash box containing the change fund is to be secured properly with the school store or library or returned to the school finance office each day to be stored in the safe or vault for security purposes.
- c. For athletic sports, each activity is considered a separate activity. Therefore, change funds should be returned to the school finance office at the end of the season and be redeposited. Change funds are not permitted to be shared across athletic events and activities.
- d. There should be no change fund in existence at the end of the school year.
- e. The responsible individual shall be held financially liable for loss of or failure to return money issued for change operations. Change funds shall not be used for making disbursements or advances for expenditures. Schools shall not provide change for the cafeteria.

H. Scholarship Funds

- 1. Regulations of the Virginia Board of Education specify that school activity funds are to be applied to the benefit of students who contributed to the accumulation of such funds.
- 2. Funds received by the school in recognition of scholarship achievement by student groups (e.g., "It's Academic", or as a gift or bequest for general scholarship purposes) must be applied for scholarship awards. All scholarship awards shall normally be made to an institution on behalf of a student rather than directly to the student.
- 3. Contributions from school activity funds to scholarship funds established by outside organizations and beyond the purview of the Principal are prohibited. Scholarship funds should remain within the school activity funds for application under the established guidance of the Principal and school staff members.

I. Parent Teacher Organizations

Parent Teacher Organizations (PTOs) are separate organizations with separate activities and individual financial records that are not school organizations. These organizations are prohibited from using the School's Federal Tax ID number. Parent Teacher Organization finances are not recorded in school activity funds.

J. Loss of Cash

- 1. Any loss of cash, including checks or other items with monetary value, shall be promptly reported by telephone to the School Superintendent and the Fauquier County Government and Public Schools Finance Director. If the loss of the amount is greater than \$25 or if theft is involved or suspected, and if the School Superintendent and the Fauquier County Government and Public Schools Finance Director so directs, a report shall be made to the Sheriff's Office. In the case of theft or suspected theft by an FCPS employee, the Fauquier County Government and Public Schools Human Resources Director shall also be notified. The telephonic report shall be followed up within 48 hours by a written report to the School Superintendent and the Fauquier County Government and Public Schools Finance Department. Data system and building security access shall be immediately removed. The employee's name must be removed from bank accounts. All passwords must be re-established.
- 2. In case of robbery, or attempted robbery, regulations indicated above for theft shall then be followed.

§IV – Banking

A. Use of Approved Banks

School activity funds shall be deposited with a banking facility that carries deposit insurance coverage with the Federal Deposit Insurance Corporation, or an equivalent agency, and is considered a qualified public depository by the state of Virginia. The employer identification number to be used by schools when opening bank accounts is 54-6001276 (individual Social Security numbers shall not be used). All bank accounts shall be monitored carefully to avoid having funds on deposit not covered by insurance for any significant length of time.

In the event any staff member is on the signature card at the bank, the person's name must be removed prior to the last day of employment. A new signature card must be obtained as soon as possible to add the new individual. In the event the Principal is leaving the school, their name must be removed from the signature card prior to the last day of employment and the new Principal, Assistant Principal or designee added.

B. Checking and Certificate of Deposit (CD) Accounts

1. Accounts shall be established for each school's activity funds and titled in the name of the school. Certificates of deposit are justified only for the purpose of accumulating funds to cover planned-for, or anticipated future major expenditures, or to increase revenue through depositing temporarily idle funds to interest-bearing accounts.
2. School Activity Fund accounts are prohibited from the use of a debit card.
3. All P-cards must be turned in prior to the end of employment.
4. Each school is required to have at least three authorized check signers.
5. All transactions, including the creation of a CD, require two signatures. The primary signatory shall be the Principal, who shall designate the alternate signatory.
6. The bookkeeper charged with maintaining the school activity fund records may not be designated as an alternate signatory but may be an authorized cosigner.
7. A signature stamp shall not be used in lieu of any signature.
8. The principal, alternate signatories and cosigners shall not sign checks payable to themselves, "cash", "bearer", or to the name of the bank.
9. Checks are required to state the following on the front of the check. *Checks require 2 authorized signatures. Checks are void after 180 days.*
10. Stop payments are not recommended on checks that are less than the fee charged by the bank.
11. Check stock must be kept secured in the school vault, unless being used. All records to include check stock are records of the school and are prohibited from being kept outside of the school, unless being internally reviewed by the Fauquier County Government and Public Schools, Finance Department or externally audited by a certified public accounting or accounting firm approved by the School Board.

12. All bank statements, including statements for Certificates of Deposit (CDs), for accounts using the School's Federal ID number and that are within the control of the school must be maintained and reconciled to school activity fund accounting system. Statements must be submitted to the Finance Department the month they are received (monthly, quarterly, or yearly) with that month's school activity fund submission for review.

C. Bank Reconciliation

1. Schools request their banks issue monthly checking account statements with the cutoff date being the last business day of the month.
2. The bank reconciliation report must be completed on a monthly basis, upon receipt of the bank statement. The monthly bank reconciliation report certification must be signed and dated by the Principal.
3. Transactions that are directly reflected in the bank account do not require a primary or secondary receipt. These must be recorded into the school activity fund accounting system to complete the reconciliation process, and must be categorized accordingly:
 - a. Debit or credit memorandums returned with the monthly bank statement. These should be kept with the bank statement with which they were returned.
 - b. Monthly interest received through the monthly bank statement.
 - c. Automatic electronic deposits from various vendors for fundraising, rebates, or refunds.
 - d. Bank charges and fees (Note: Schools should not be incurring any bank charges or fees other than check printing costs. When additional fees are charged, the bank should be contacted and requested to reverse the charges and stop any future charges).

§V – Revenue

A. Revenue Principles

1. General revenue should be applied to the support of the activity generating the revenue as well as for the benefit of the entire student body. GoFan software may be used for athletic events only. Other school goods / services should use School Cash Online, whenever possible. However, cash/checks must continue to be acceptable method of payment.
2. Specific revenue is obtained from a one-time approved project or event that is conducted by and for a specific purpose or a specified group of students (e.g., Red Cross donations, car wash, candy sale, dues, field trips). Specific revenue should be applied only for the benefit of the student groups or organizations concerned or for the specific purpose for which the revenue was obtained.
3. All general and specific revenue classified as school activity funds shall be receipted into the school activity fund records promptly and intact, i.e., no disbursements of revenue received shall be made until such revenue has been receipted into the records and deposited in the checking account.

B. Outside the School Finance Office

1. Collection of funds for any purpose or event shall be properly documented with the issuance of activity receipts, or use of tickets, rosters, or inventory forms to document the revenue collected.

2. When receipts are greater than \$1.00, one of the approved forms of documentation shall be provided to the bookkeeper by the individual collecting the funds. An audit trail is required between the form of receipt used, the school finance office deposit slip, and the school activity fund accounting system receipt number. Fund sponsors or teachers who submit receipt documentation to the school finance office are responsible for reviewing the receipts.

3. Activity Receipts

- a. At the beginning of each year, the bookkeeper/administrative assistant must compile a list of individuals assigned receipt books and a sequential number. Receipt books must not be shared. The list must be updated throughout the school year as needed.
- b. All funds received in the classrooms, by clubs, or by any staff, must be acknowledged by a receipt, pre-numbered tickets, roster, or inventory form.
- c. The receipt shall be prepared in a triplicate activity receipt book with the original (first copy) given to the person from whom funds are being collected. If the original receipt is not given and left in the receipt book, notation should be made on the receipt indicating the reason.
- d. The second copy shall be turned into the bookkeeper along with money collected.
- e. The third copy remains in the activity receipt book.
- f. Activity receipts must be issued in numerical order within the activity receipt book.
- g. The activity receipt is written to the person or vendor.
- h. Instances where checks are received, the activity receipt must list the check number.
- i. Activity receipts must be signed and dated by the person issuing the receipt.
- j. Any changes or corrections to the activity receipt after the receipt is issued must be made to all copies, including the copy remaining in the activity receipt book. The change or correction must be initialed and dated by the person who initiated the receipt.
- k. If an activity receipt is voided, at least one copy must be submitted to the office in order to track the sequential order of receipts. At least one copy must remain in the activity receipt book.

4. Collection Document, List of Payers, or Student Rosters

- a. For collection of small fees of \$10.00 or less, per student, the collector may prepare a list, or roster, showing payers' names, date the funds are collected, and amounts collected (if individuals do not demand a receipt). The student roster replaces the activity receipt. As with the activity receipt, this list or roster must be completed in ink, totaled at the bottom of the roster, signed, and dated by the individual collecting funds. The list or roster must be turned in daily to the bookkeeper along with the money collected. Total funds collected must agree with the sum of the cost per student participating in the event. Any discrepancies must be noted on the list or roster.
- b. In instances when rosters are used for the collection of small fees of \$10.00 or less per student, if an individual pays more than \$10.00, an activity receipt must be issued. The individual will be listed on the roster and issued an activity receipt.

- c. For collection of small fees \$1 or less per student/person, the collector is not required to issue or provide supporting documentation.
- d. Instances where group collections are used, each teacher must prepare a separate roster.

5. Report of Ticket Sales

- a. All activities that involve students, the faculty, and the school facilities, and for which an admission fee is charged, normally will be controlled by the use of sequentially numbered tickets, which will be surrendered at the door or gate at time of entry. Pre-numbered tickets should be used for events requiring an admission fee such as athletic events or dances.
- b. A Report of Ticket Sales should also be completed in its entirety by the ticket seller and the person designated as the box office manager to track the number of tickets sold and revenue earned. Any discrepancies should be documented on the Report of Ticket Sales. Funds collected from the event along with completed Report of Ticket Sales shall be submitted to the bookkeeper for verification, issuance of an office receipt, and depositing. The bookkeeper must sign and date the Report of Ticket Sales after verification.
- c. All sequentially numbered tickets shall be under the control and management of a person, or persons designated to be responsible for the accounting and disposition of the tickets.

6. Report of Inventory Sales

- a. Funds collected for sales of concessions at games or events are not to be combined with ticket sales on the Report of Ticket Sales. A Report of Inventory Sales is to be used to record beginning and ending inventories of items for sale and to track the number of items sold and revenue earned. Items that are preordered such as plants or donuts do not require inventory. However, items received in addition to preordered items (free items that will be sold) require inventory. Any discrepancies must be documented.
- b. Items that are preordered and prepaid such as plants or donuts do not require inventory. Also, items directly purchased from the vendor by students / parents, rather than the school, do not require inventory.

C. Inside the School Finance Office

- 1. Revenue collected and associated receipts and/or forms shall be delivered daily to the bookkeeper by a specified cut-off time each day to ensure security and timely deposit of the funds. Funds are never to be held overnight by the individual collecting them or sent through the mail or the interoffice system. For instances where funds are collected after school hours, and access to the safe in the main office is not available, funds must be either secured in a locked cabinet at the school or at the bank through the night drop.
- 2. A Report of Late Submission of Funds and Receipts may be completed, signed, and dated to document instances where funds were held by school staff and not delivered to the school finance office the same day collected.
- 3. Currency Verification
 - a. All currency bills must be verified using a counterfeit detector pen when funds are received in the school office and prior to issuing a receipt from the accounting system.

- b. For the security of staff, staff **should not** attempt to confront or detain anyone suspected of submitting counterfeit currency. Staff **should not** return the funds to the individual submitting the currency.
- c. Any currency detected to be counterfeit **should not** be receipted in the school accounting system and **must** be delivered to the school's banking institute. The banking institution will report the suspected currency accordingly to the required governmental agencies.
- d. A written statement documenting the following elements must be included with the deposit:
 - 1. Indication that counterfeit currency was not receipted in the accounting system and was withheld from deposit.
 - 2. The date counterfeit currency was collected and detected as fraudulent.
 - 3. The total dollar amount and bill denomination of the counterfeit currency.
 - 4. The date the counterfeit currency was delivered to the banking institution.
 - 5. Signature and date of the bookkeeper and Level 1 approver.
- e. Any loss due to counterfeit currency shall be promptly reported to the Superintendent and the Finance Director.
- f. Should the appropriate government agencies find currency previously detected as counterfeit to be valid, the banking institution will be notified, and the currency deposited to the school bank account. At this time, the funds would be receipted in the school accounting software.

4. Receipt of Funds

- a. School activity fund accounting system receipts must be issued and distributed to each individual or vendor submitting funds on the same day it is received in the school finance office, regardless of the amount (except for electronic scripts, such as e-script, and interest postings on the bank statement).
- b. Receipts (primary or secondary) must be issued in numerical order, signed, and dated. Instances where the primary school activity fund accounting system receipt is issued by the bookkeeper require verification (initials and dates) by another Level 1 or Level 2 approver. When possible, it is preferred the bookkeeper not issue any activity receipts to avoid situations where the primary (activity) and secondary (school activity fund accounting system) receipt is issued by the same individual.
- c. Checks receipted with a primary school activity fund accounting system receipt are required to be stamped with the received date on the check stub. If a check stub is not provided, the check number must be clearly notated on the primary school activity fund accounting system receipt.
- d. School staff is expected to verify the school activity fund accounting system receipt issued by the bookkeeper matches the amount and supporting documentation submitted to the school finance office. All Accounting system receipts issued must match the total of the associated activity receipts or documentation.
- e. All receipts must be categorized in the accounting system.

- f. Primary receipts issued by school staff must be attached to the school activity fund accounting system receipt. This includes SchoolCash Online system receipts.
- g. Secondary verification (initial and date) can be made on the Deposit Analysis or directly on the accounting system receipt.
- h. A SchoolFunds Online Receipt Register must be reviewed daily to confirm receipt of SchoolCash Online payments. When online payments are received, the SchoolCash Online Batch Report is printed and attached to the receipt register.

5. Depositing of Daily Receipts

- a. Funds received by the school finance office must be safeguarded and deposited in the checking account intact. A dedicated, private area with minimal traffic and access should be used for deposit preparation tasks.
- b. Deposits must be recorded in the school activity fund accounting system in the order in which they are received and reconciled to the Deposit Summary, prior to completing the deposit slip.
- c. Once the funds are deposited at the bank, the bank deposit confirmation should be matched to the Deposit Summary.
- d. All deposits must be made in a timely manner. In addition to the timeliness of deposits, deposits shall be made on an irregular time schedule to avoid a detectable habit concerning the time of day that deposits are made.
- e. Deposits are made twice a week or the same day the threshold is met (\$300 for elementary and middle schools, \$500 for high schools), whichever occurs first.
- f. Each deposit made to the checking account shall be evidenced by a copy of a bank deposit slip kept on file.
- g. Deposit documentation for cash/check payments should follow this order: Deposit Summary, deposit confirmation from the bank, the primary and secondary receipts, and any other supporting documentation. Deposit documentation for online payments would include the SchoolFunds Online receipt register and the SchoolCash Online Batch Report. Files are to be maintained daily, or as deposits are made.

D. Other Revenue Items

1. School Board Office Revenue

Certain types of funds, such as parking fees, security officer fees, musical instrument rental fees, activity fees, and lost textbook fees, etc., are collected at the school to be submitted to the Finance Department as operating revenue. These fees are deposited in an associated school activity fund account then sent to the Finance Department through a corresponding school activity fund disbursement payable to Fauquier County Treasurer. All payments due to FCPS for revenue collected, must be submitted to the Finance Department, Accounting Division monthly. Due to the cost of disbursing checks for instances where the funds collected (for all collections due to FCPS) total less than \$100.00, a check does not need to be submitted until the total is \$100.00 or greater. This **does not** apply at year end. For financial reporting purposes, year end funds are required to be sent for any amounts greater than \$20.00. These

special exceptions do not apply to p-card payments which are required to be sent to Finance Department, Accounting Division by the 20th of the month, for collections from the prior month.

2. Building Use Funds

- a. The building use money collected is to cover the employee costs, and any associated taxes, first.
- b. The building use money collected can be used at the principal's discretion, for reasonable expenses for personnel, students, or property.

3. Journal Entries

For all funds received directly to the bank, a journal entry will need to be completed. Each journal entry will also need to be categorized.

4. Grants

- a. All grants including local, state, and federal grants must be sent to the School Budget & Planning Office regardless of the dollar amount. A Grant Authorization Form must be submitted to the School Budget Planning Office for approval **prior** to applying for any grant.
- b. A copy of the State or Federal grant documentation during the pre-award and post-award stage(s) is to be sent to the Finance Department.

5. Field Trips

- a. Generally, school activity funds, other than specific field trip collections, may not be used to fund field trips unless it can be demonstrated that the field trip will benefit the student body. Any decision to use school activity funds for a field trip shall be made by the Principal, who should use extreme caution and good judgment.
- b. Costs or fees associated with field trips shall not be charged to the students if the field trip or event is covered by the school's operating fund. Charges may not exceed the cost of the field trip. If a field trip, for which fees were collected, is paid for by the operating fund, the school must either refund the fees to the students or submit payment from the field trip account for the field trip to the Transportation Department.
- c. Any field trip costs not covered by the school's operating fund, may be passed on to the students if authorized by the Level 1 approver.
- d. Funds collected for field trips must be properly receipted and submitted to the bookkeeper daily.
- e. A spreadsheet may need to be maintained by the school to record and track field trip costs incurred by students and those covered by the operating fund to determine payments to be made to the Transportation Department.
- f. Field trip accounts may be maintained by grade level or combined in one field trip account on the chart of accounts but are not to be combined with any other funds.

6. Fundraising Activities

- a. All fundraising regardless of whether it generates a profit or not, requires a Fundraising Request Form to be completed and authorized by the Principal prior to any fundraising or charitable event. Fundraising approval may not be delegated.
- b. The Principal is responsible for verifying the legitimacy and financial soundness of any organization prior to authorizing fundraising events or donations.
- c. Participation in fundraising activities is always voluntary.
- d. Fundraising programs that utilize individual incentives or quotas will not be permitted. Participation or milestones of the fundraising activity may be celebrated for the progress of the group. No student shall be individually rewarded or enriched based on level of participation in a fundraising activity.
- e. Prizes and activities (e.g., pizza party) for all students/groups who participate in fundraising activities may be provided as long as they adhere to the nutrition guidelines and do not substantially interfere with instructional programs.
- f. Student grades, extra credit, academic, or extra-curricular activity indicators are strictly prohibited from being linked to any fundraising activity.
- g. Schools are prohibited from sponsoring fundraisers that consist of bingo, raffles, sales of raffle tickets, and other forms of charitable gaming, as defined by § 18.2-340.16 of the Code of Virginia, as well as illegal gambling, as defined by §18.2-325 of the Code of Virginia.
- h. Fundraising proceeds from school-sponsored activities shall not be applied for the private benefit of individual students or staff members. Fundraising proceeds and benefits must be allocated equally to the entire student body or specific group (e.g. third grade, drama club, etc.).

7. Book Fair

Book fair receipts from a cash register for the total amount collected (cash, checks, and credit cards) act as supporting documentation in place of an activity receipt. Please reference V. Revenue, Section B, 3. on requirements of activity receipts. Daily cash register receipts must be printed, attached, and reconciled to the daily amount collected.

8. School Store

- a. No state sales taxes shall be charged to the school store customers.
- b. Sales through the school store are to be recorded daily using a Report of Inventory Sales form. The cash box containing the change fund is to be secured properly with the school store or returned to the school finance office each day to be stored in the safe or vault for security purposes. The Report of Inventory Sales and the funds collected from the sales are to be delivered to the school finance office for deposit either weekly or when \$10.00 in sales has been collected. There should be no change fund in existence at the end of the school year.
- c. Cash from sales shall not be used in lieu of a change fund or to make cash payments.

9. Dishonored Checks

- a. Checks accepted by the school and dishonored by the makers' banks shall be reversed in the checking account and fund accounts immediately upon receipt of the debit memorandum or bank statement.
- b. The Principal must determine whether to redeposit the original check, request a new check, or require cash from the maker to cover the dishonored check. Any write-offs must be authorized by the Principal.
- c. The dishonoring of a check is sufficient grounds for refusal to accept check payment from makers of such checks. Any fees charged the school by the bank for the dishonored check may be passed on to the maker of the check. To reduce the burden of pursuing recovery of dishonored checks, recovery can be handled through Transmodus, a third-party vendor. (See Appendix F for Instructions on using Transmodus).
- d. For schools preferring to handle collections of dishonored checks by the bookkeeper rather than as a Transmodus participant, the following applies:
 1. Begin collection efforts immediately upon notification of dishonored check and follow up on all outstanding items every 30 days
 2. Document all verbal, written, or telephonic collection efforts
 3. Evaluate all outstanding items at year end
 4. Recovery from the maker shall be receipted separately and should be clearly identified as a replacement for the dishonored check

§VI – Expenditures

A. Procurement Policy

1. The following procurement policies must be followed for disbursements:

Threshold	Requirement
Less than \$10,000	One (1) fair and reasonable price.
\$10,000 or greater but less than \$150,000	Four (4) quotations must be sought. Procurement 4-Bid Form should be used for documentation.

2. Purchases of goods or services for operating, fundraising, etc., exceeding \$10,000 that affect all schools (e.g., yearbooks or school photos) and/or multiple schools shall be made through the use of either the competitive bid or competitive negotiation process, either centrally through the Procurement Division or if done independently, following the procurement guidelines based on the appropriate dollar threshold. If done through the Procurement Division schools will utilize the resulting contract and have a selection of authorized vendors to choose from for a specified period of time. This process ensures that procurement requirements are met.
3. Conflicts may arise from agreements that schools make with independent vendors whose goods and services will ultimately be purchased by pupils of the schools (e.g., photography services, class rings, caps and gowns, graduation announcements, and similar items). Regardless of the school's objective in contracts (fundraising or

non-fundraising) there shall be a conscious effort to avoid situations in which any FCPS employees or the school receive free goods or services from the supplier in connection with that supplier's performance for the school. It is important to adhere to the policies set forth by the Procurement Policy:

No employee having official responsibility for a procurement transaction shall solicit, demand, accept, or agree to accept from a bidder, offeror, contractor, or subcontractor any payment, loan, subscription, advance, deposit of money, services, or anything of more than nominal value, present or promised, unless consideration of substantially equal or greater value is exchanged. The Fauquier County School Board may recover the value of anything conveyed in violation of this section.

4. Procurement Methods and Procedures

- a. The following chart outlines the requirements for competition and the procurement methods for each threshold. Methods are outlined in greater detail later in this section.

Threshold	Method of Procurement
< \$10,000	• Single verbal or written quote • Purchase order, payment stamp OR voucher • Delegated to Using Department/Purchaser
>\$ 10,000 – <\$ 150,000	• Requires minimum of 4 written/faxed quotes be sought and documented using the required Procurement 4-Bid form. • Purchase order, quotes attached • Delegated to Using Department/Purchaser
Sole Source	• Requires Sole Source Justification form, with backup documentation if applicable • Using Department completes form; Purchasing Agent signature/approval required • Publicly posted for purchases > \$150,000
Emergency	• Requires Emergency Justification form • Using Department completes form; Purchasing Agent signature/approval required • Publicly posted for purchases >\$150,000
Any dollar value, Contract Purchases	• No quote required unless a condition of the contract; valid contract number or reference must be on purchase order • Contracts other than those generated by the Procurement Department require advance approval by the Purchasing Agent
Exceptions:	• Exceptions to competitive procurement requirements are outlined in detail in Section VI, G of the Policy • Use of Cooperative Contracts (riding other public bodies' agreements); no limit on dollar amounts; cannot use cooperative agreements for Construction (as defined in the Procurement Policy) of any size.
Bid, Payment, and Performance Bonds On-Call or As-Required A/E Contracts	• Required primarily on Construction projects valued at or greater than \$500,000 and/or in accordance with the project specific solicitation. • Bonds may be requested for any contract of any amount. • Up to \$1,500,000 per task and \$6 million per year per awarded Firm. Tracked via round-robin in each individual Department

B. Purchasing Procedures and Requirements

1. General Provisions

- a. Credit card statements or cancelled checks are not acceptable forms of documentation in support of reimbursements unless accompanied by a proper pre-approval.
- b. Expenditures are required to be properly classified to the corresponding school activity fund account.
- c. Memberships purchased with school activity funds, such as Amazon Prime, Costco, BJ's, shall not be used for personal transactions.
- d. Employee personal funds are never to be commingled with school activity funds.
- e. Staff purchases, including food for staff meetings, are required to be paid from the staff accounts. Meetings that have a business purpose must have an agenda and the attendees attached if food is purchased. Otherwise, the food provided will be taxable to the employee(s).
- f. Travel using School Activity Funds must follow the Fauquier County Public School's travel policy.

2. Using Purchase Requests (PRs) or Purchase Orders (POs)

- a. Schools must use either PR or a PO for each disbursement. The appropriate Level 1 and Level 2 approvers shall review each PR or PO and supporting documentation to ensure purchases and expenditures are appropriate.
- b. Prior to issuing PRs or POs, vendors should be verified in the accounting software to ensure accuracy of contact information. If a vendor is not an active vendor, a completed W-9 form must be obtained from the vendor and submitted with a Vendor Request form to the Finance Department, Accounts Payable Division for creation of the vendor record and number in the accounting system.
- c. POs must be issued sequentially.
- d. PRs or POs may be initiated by persons authorized to act for organizations that have accounts within the school activity fund structure.
- e. Pre-authorization by the Level 1 approver is required for all PRs or POs. Pre-approval on a PR or PO must be dated prior to, or the same day as, and not after, the purchase.
- f. Verbal approvals, noted on the PR or PO, or copies of an email attached to the PR or PO verifying pre-approval are also acceptable. Contracts attached to PR or PO verifying pre-approval are also acceptable.
- g. Blanket POs are permitted for recurring purchases or in cases where a person is given an allotment to spend over a period of time.
- h. Open purchase orders must document the amount paid and the remaining balance after each payment. A PO History report may be attached with each payment in lieu of documenting each payment.
- i. Prices entered on the PR or PO shall be the actual price, if known, or the closest estimates possible, if prices are not known. Estimates are to be noted as such. Any changes, (including correcting estimates to actual payments amount) made to the PR or PO must be initialed and dated by the Level 1 approver.

3. Disbursements

- a. All disbursements must be supported by proof of purchase such as an original invoice, sales ticket, or receipt and shall be recorded in the proper school activity fund and disbursed from the school activity fund checking account.
- b. After receiving evidence of the receipt of goods or services, the correct amount to be paid is verified prior to disbursement.
- c. The bookkeeper/administrative assistant shall verify the supporting documentation against the PR or PO. Any changes made to the PR or PO require a Level 1 signature and date to indicate knowledge of the change to the payment.
- d. Once payment is made, the PR or PO, the invoice and/or sales tickets and receipts, and other supporting documents shall be attached to the school copy of the check, or check stub, and filed in the appropriate disbursement file.
- e. In the event, a refund is necessary, the school will make every effort to refund the monies paid in the current school year. Refunds must be issued in the name of the parent and not the student. PRs along with a copy of the classroom roster or activity receipt documenting when payment was originally received are required to be attached as supporting documentation. In the event the refund process cannot be handled by the school bookkeeper, the option is available for a single school activity fund check for the total amount of the refund to be disbursed to Fauquier County Public Schools (payable to Fauquier County Treasurer). The Finance Department, Accounts Payable Division will process the refunds. The school must provide a list with the parent/payee's name (the individual who originally was receipted or listed on the roster), payee address, amount to be disbursed, and supporting receipts or roster to use as supporting documentation for the disbursement.

4. Prompt Payment of Obligations

- a. Obligations are to be paid as soon as possible but must be paid within 45 days of the invoice date to be in compliance with the prompt payment provision of the Virginia Public Procurement Act, or according to the vendor's payment terms, whichever is earlier.
- b. Advantages should be taken to apply discounts offered and to avoid unwarranted late payment penalties. Any reasons for delay in payment should be documented on the invoice. When possible, a revised invoice, with a current date, should be requested.

5. Sales Tax

- a. Most purchases from school activity funds are exempt from payment of state sales tax and should not be paid or reimbursed in most circumstances. Tax exempt orders shall be accompanied by a Sales and Use Tax Certificate of Exemption form (ST12).
- b. The following purchases are subject to payment of sales tax:
 1. For use of faculty - except for items intended as gifts to the school.
 2. Vending machines.
 3. Charges for rooms, lodging, or accommodations furnished by any hotel, motel, inn, or similar place.

4. Employee expenses related to travel, lodging, and food that are reimbursed from school activity funds.
5. Reimbursements to employees authorized to make a purchase outside of business hours who incurred and paid sales tax. An employee incurring sales tax in these instances would be reimbursed for sales tax paid.

6. Checks

- a. During the day, when checks are not being used, they are to be kept in a locked drawer. After hours checks must be kept in a locked safe or other secure location. Blank check stock is never signed due to the risk of loss.
- b. The beginning check number on the check stock must be verified against the beginning check number in the accounting software prior to printing / disbursing.
- c. All expenditures must be made by check and never made from cash collected.
- d. Checks must be issued in sequential order and be recorded in the school activity fund accounting system in the order in which they occur.
- e. Checks are never to be made payable to "Cash", to the name of the bank, or to personnel for extra hours worked. Personal checks are prohibited from being cashed through school activity funds.
- f. Checks that have cleared the bank and have been returned to the school finance office shall be kept with the monthly bank statement on which the clearance is recorded and arranged in numerical sequence.
- g. Disbursement checks should be properly reviewed, authorized, and documented.
- h. Checks are also subject to the following requirements:
 1. Checks are signed only upon presentation of a proper invoice or receipt.
 2. Each check signer shall verify the payment against the invoice prior to signing the check.
 3. Checks are required to have two authorized signatures regardless of the amount.
- i. When necessary, the second signature may be obtained at the time of purchase. In instances where checks need to be pre-authorized, the check is not considered negotiable until a second authorized signature is obtained. The receipt and backup documentation are to be returned to the Level 2 approver by the next business day for verification and filing.
- j. An individual with signature authority to whom checks are written must not be a signer of the check.
- k. Checks that are voided for misprinting or reissuance are to be mutilated by writing "void" across the face of the check and removing the signature block. The void check is to be filed in a void check folder, or in numerical order in the monthly disbursement folder. Void checks are not discarded.
- l. Outstanding checks for more than 180 days old must be voided and transferred to the unclaimed property account.

- m. See Section VII.L for additional information regarding unclaimed property.

7. Stop Payment Action on Checks

If a school activity fund check has been issued and is then reported lost or stolen, stop payment action may be taken. The circumstances surrounding this situation should be carefully evaluated. If the check is for a small sum and is made payable to a vendor who has constantly dealt with the school, it may not be wise to incur the stop payment charge of the bank. If the check is for a large sum of money, the stop payment may be appropriate.

8. Purchase Cards (P-cards)

- a. P-cards issued through the Finance Department P-card program with Bank of America (BOA) may be used for School Activity Fund purchases. All other bank cards, credit cards, or store cards are not permitted.
- b. A check payable to Fauquier County Treasurer along with the BOA Expense Detail agreeing to the amount of the check should be remitted to the Finance Department, Accounting Division no later than the 20th of each month to reimburse the school operating funds for school activity fund purchases made on the P-card.
- c. Checks payable for school activity fund P-card purchases must be **in full**, even in instances where sales tax has been charged on a transaction. In instances where a refund is necessary from the vendor after sales tax has been paid, the vendor must issue a refund to the P-card or apply a credit to another purchase.
- d. The BOA Expense Detail Report and copy of the check must be included with the monthly bank reconciliation packet that is sent to the Finance Department, Accounting Division.
- e. Schools are required to make sure the courier is aware the envelope contains money and is to be delivered and handed directly to a staff member in the Finance Department, Accounting Division. This will avoid the envelope being left in the Finance mailbox and funds not being secured.
- f. Schools are required to maintain the original receipts for SAF P-card purchases within the school. Receipt copies do not need to be sent to Accounting or Procurement.

9. Reimbursement for Business Expenditures

- a. Requests for reimbursements must be pre-approved and submitted for payment within 90 days of purchase.
- b. Personal procures may not be used as a method of payment for purchases when reimbursements are requested.
- c. At fiscal year-end, all reimbursements must be submitted for that fiscal year by June 30th in order to record expenditures in the correct fiscal year. Any requests for reimbursements after June 30th, will not be approved.
- d. Request for reimbursements related to employee travel expenses must follow the methodology in the FCPS Travel Policy.
- e. Reimbursements to the Principal require pre-approval by the Superintendent.

10. Cash and Cash Equivalent Payments to Students and Employees

- a. Per IRS Publication 15b, students who receive cash prizes or cash equivalents awarded in excess of \$600 are required to be issued a Form 1099. The total of the awards is based on a calendar year.
- b. All scholarship awards shall be made to an institution on behalf of a student rather than directly to the student which will counteract the need for issuance of a Form 1099.
- c. Cash prizes or cash equivalents, including fringe benefits such as meals or gift cards/certificates, of any amount are required to be recorded on an employee's W-2 as income, also per IRS Publication 15b.

11. Gift Cards/Certificates

- a. Under certain circumstances, gift cards/certificates are permitted.
- b. They shall be purchased from the account that relates to the purpose of the gift card/certificate and shall follow IRS Publication 15b. Instances where money is donated to a school for staff purchases, such as PTO funds, if gift cards are purchased for the staff the monetary amount of the card will be reported as taxable income.
- c. Any gift cards that are purchased or donated require a Gift Card/Certificate Tracking Summary.
- d. A Gift Card/Certificate Tracking Summary must be completed in its entirety and maintained for each fiscal year to account for the purchase, inventory, and distribution of each gift card/certificate. A copy of the receipt documenting the purchase of the gift cards should be attached to the Gift Card/Certificate Tracking Summary.
- e. Any undistributed gift cards/certificates remaining at year end must be carried over and reported on a new Gift Card/Certificate Tracking Summary for the current year.
- f. Gift card purchases made with the P-card are required to notate in Bank of America if the purchase was for staff or students. Instances where the cards are purchased for staff, the employees must be listed.

12. Unclaimed Property

- a. Once a school activity fund payment is disbursed, the funds belong to that individual or entity. If the check is not cashed within 30 days, the bookkeeper should begin contacting the individual or entity by telephone to ascertain if the check should be reissued. If a payment remains un-cashed for an extended period of time it is considered abandoned. Any un-cashed payments that are 180 days or older are to be voided and transferred into an unclaimed property account set up in the school activity fund accounting system. Due diligence must be performed on all abandoned property (e.g., un-cashed checks) before it is submitted as unclaimed. Abandoned property payments shall be submitted to the State Treasury Department with an unclaimed property return. The dormancy period for checking accounts is 5 years; however, the State Treasury Department allows early submission on abandoned property. The deadline for filing and remitting unclaimed property reports and payments is November 1st. There is no minimum reportable amount, and all amounts must be reported. This reporting covers monies that were unclaimed as of the preceding June 30th. Each school shall request participation individually to obtain a unique participation number, but under the same School Federal ID number.

- b. See Forms section for an AP1 Form for Report of Unclaimed Property, Report of Unclaimed Property (AP2), and sample due diligence letters.
- c. Additional unclaimed property forms and information are available at the following website:
<http://www.trsvirginia.gov>.

§VII – Loans, Gifts, Donations, and Contributions

A. To the School Activity Fund

1. Schools are **not** permitted to take out loans to fund school activity funds.
2. No gifts shall be accepted or solicited without the approval of the Principal. Gifts accepted shall be for the beneficial use of the school or student body, unless dedicated to a specific use by the donor and accepted with that limitation by the Principal. The Principal is not obligated to accept any offered gift.
3. Gifts of cash accepted for a specific purpose shall be accounted for in the account concerned, or in an account established for the purpose. It is desirable that the purpose of cash gifts be specified in writing by the PTO, booster organizations, or other donors. If the donor intends that the cash gift be expended for a purpose for which other school activity funds are not authorized, it is mandatory that the donor's intention be specified and available for audit review.
4. For gifts of equipment, the donor shall be informed that all equipment located in a school facility is the property of the School Board and is subject to transfer or redistribution if need so dictates. Schools shall include donated equipment and materials in their school inventories.
5. Memorial gifts shall be accepted with a written record designating the purpose or intended use of the funds and accounted for accordingly. If such a record is not received, or if the donor declines to provide one, the funds shall be used as determined by the Principal to benefit the student body.
6. When participating in a donation or charity event, the following must occur:
 - a. Obtain written approval from your Principal prior to participating in any donation or charity event benefitting the school, programs of the school, or individual staff members as representatives of the school.
 1. All school division policies and regulations must be honored.
 2. Student information must always be protected.
 3. If there are any conditions for accepting money/goods/services, these must be submitted by the Principal to the Office of Budget and Planning for review and approval prior to participation.
 - b. Your school's secretary/bookkeeper must review documentation and reporting requirements prior to participation. If needed, please coordinate documentation and reporting requirements (i.e., insurance, background check, etc.) with the Finance Department (x8331) prior to your school participating in any donation or charity event.
 - c. All donations must serve the classroom students or the academic program in the school for the purposes defined and/or agreed upon by the grantor.
 - d. Upon receipt of any money/goods/services, the school secretary/bookkeeper must be notified immediately for documentation and reporting purposes.

B. From the School Activity Fund

1. Schools shall **not** make loans to individuals, PTOs, booster clubs, or similar groups with School Activity Funds.
2. Donations or contributions from school activity funds to any organization are prohibited unless specifically collected for that purpose.
3. Pass through fundraising events are fundraising events held for the benefits of an outside organization, such as a charitable organization. These events are permissible provided a Fundraising Request form (or Charitable Fundraising Request form) is properly completed and authorized and the funds are deposited to and disbursed from an account created specifically for the event.
4. School activity funds may not be given to PTOs or other organizations for any purpose including one that may ultimately benefit the school. Schools shall avoid any situation that may be construed as an attempt to circumvent FCPS policies or purchasing requirements.

C. Gifts to Students or Faculty Members

1. The presentation of gifts to students or staff and faculty members is discouraged. Presentation of gifts is authorized only under exceptional circumstances. This does not prohibit gifts for the benefit of the school (e.g., senior class gifts to the school). Gifts may be presented under the following circumstances:
 - a. Social courtesies may dictate the presentation of gifts on occasions such as retirement, transfer, extended illness, or death. Under these circumstances, gifts of a token nature may be appropriate. Such gifts may be purchased only from appropriate accounts (e.g., faculty or staff accounts for staff gifts).
 - b. Funds may be raised collectively by the students or faculty for a gift to honor a special achievement, to mark a special event, or to help someone who has experienced a serious loss or misfortune (e.g., a house fire). This type of gift should not be made routinely, annually, or for ongoing events or achievements. Gifts that are purchased for staff that are \$75, or less, and are infrequent are considered de minimis and are not taxable. For example, flowers are purchased for a teacher and the cost is \$75. The value of the gift is considered de minimis and falls under the threshold, so it would not be reported to Payroll as taxable income. When approved, funds collected and expended shall be accounted for in a clearing account established for the purpose. The purpose of the collection of the funds must be made clear to persons asked to contribute. Recipients of these types of gifts are expected to adhere to IRS reporting requirements related to their personal tax returns. Payments must be made payable directly to the intended recipient.

§VIII – Saleable Inventories

A. General Provisions

1. Inventories of school activity fund saleable merchandise represent, in the fullest sense, funds that are the property of the students and must be safeguarded and managed accordingly. One objective of sales operations shall be to generate a profit. Losses shall be avoided.
2. Sales that produce general revenue and involve inventoried merchandise such as athletic clothing, school store items, concession sales, etc., must be accounted for properly in the school activity fund accounting system. Only the revenue and expenses attributed to the sales activity shall be included in these accounts, except that profits may, of course, be transferred to appropriate accounts. Sales that produce minor specific revenue may be accounted for within the account of the sponsoring school activity.

B. Inventory Valuation

1. An inventory of saleable merchandise quantities should be performed frequently during the school year to help control and safeguard the inventory.

C. Sales Price of Inventoried Items

1. Each sales price shall be established at a level that will avoid losses or excessive profit rate. Pricing should take into consideration the need to make change (e.g., rounding prices) as well as prices charged by local vendors or stores.
2. Inventory items that are deemed not saleable at the normal price due to age, damage, shopworn condition, suitability, etc., should be disposed of by returning them to the vendor for credit, by reducing sales prices, or by giving items away.

D. Inventory Security

1. Substantial losses can occur due to losses of saleable inventory. The following regulations shall be followed to minimize such losses:
2. Inventory security is obviously best when inventory is kept to a minimum (particularly when school is closed) and when rapid turnover of merchandise occurs.
3. Access to stored inventory should be limited to those personnel charged with the responsibility for the merchandise. Merchandise should be secured with locks that are not on the master key system.

§IX – Reporting Requirements

1. Each school must submit the monthly financial reports and supporting documents to the Finance Department no later than the 20th of each month. The Principal will be notified if not received by the 30th of the month and the School Superintendent and/or Assistant Superintendent will be notified if not received within two months.
2. Required documents to be submitted:
 - a. Reconciliation Report
 - b. Bank Statements (including CD Statements)
 - c. Copies of Cleared Checks
 - d. Check Register
 - e. Receipt Register
 - f. Month to Date Report
 - g. Bank of America P-card Expense Report and SAF check paying the Expense, if applicable
3. On a quarterly basis, the Fauquier County Government and Public Schools Finance Department will verify banking institute records reconcile with the Virginia Treasury Security for Public Deposits Act website.

§X – External Audits and Internal Reviews

1. School activity funds are required by state regulation (8VAC20-240-40) to be audited at least once per year as soon as possible after the close of the fiscal year but no later than the end of the following fiscal year. The audit should be conducted by a certified public accountant or accounting firm approved by the School Board.
2. Reports of annual audits shall be published as soon as possible after completion of the audit work. All items appearing in the report shall be discussed with the Principal in an exit interview.
3. The audit reports shall be forwarded to the Superintendent or designee or Principal concerned and to all others deemed appropriate. Within 30 days, the Superintendent or designee is required to respond to the findings and recommendations.
4. Copies of the audit reports and response to the findings and recommendations shall be filed in the Superintendent's Office.
5. The Finance Department selects and conducts internal reviews of School Activity Funds when determined necessary by the Finance Director. The Finance Department will document its findings and communications regarding the internal review through notes, work papers, letters, memos, audio and / or video recordings.

§XI – Records Management and Data Security

1. Records must be retained in accordance to established retention schedules or according to the guidelines issued by the State Department of Education or the Library of Virginia, for whichever time frame is the longest.
2. School finance office files shall contain all records pertinent to school activity funds as well as copies of reports reflecting or commenting on the status of funds or the fund activity.
3. Schools are required to have a designated employee trained and able to access the accounting system to complete accounting responsibilities in the absence of the bookkeeper. Each authorized user of the accounting system shall be assigned an individual username and password.
4. Data system and building security access must be removed following the resignation, transfer, or termination of the bookkeeper. The separated employee's name must be removed from bank accounts and passwords re-established. The Finance Department, Accounting Division must be notified upon separation of a bookkeeper to ensure access is removed from the accounting system.