

Indiana State Board of Accounts Extra-Curricular Workshop for Indiana Association of School Principals

Contact Information

■Phone number – (317) 232-2513

Address – 302 W. Washington St., RM E418

Indianapolis, IN 46204-2765

■Email – <u>schools.townships@sboa.in.gov</u>

■Website – <u>www.in.gov/sboa</u>

Website Resources

- Filed audit and examination reports
- Accounting Uniform Compliance Guidelines Manual for Extra-Curricular Accounts
- Accounting Uniform Compliance Guidelines Manual for Indiana Public School Corporations
- Accounting Uniform Compliance Guidelines Manual for Indiana Charter Schools
- The School Bulletin
- The Charter School Bulletin

Important Websites

Indiana Public Access Counselor

www.in.gov/pac

Indiana Commission on Public Records

www.in.gov/icpr

Indiana Department of Revenue

www.in.gov/dor

Indiana Department of Education

www.in.gov/doe

Internal Revenue Service

www.irs.gov

State Board of Accounts

Organizational Flowchart

- SBOA Board (State Examiner, 2 Deputies)
- Directors (2 per area)

Schools and Townships Cities/Towns and Special Districts Counties

- Audit Coordinators (5)
- Investigation Coordinators (5)
- Field Examiners (140)

State Board of Accounts

- Created in 1909 in response to widespread political corruption
- Mission Statement
 - We are dedicated to providing the citizens of the State of Indiana with complete confidence in the integrity and financial accountability of state and local government.
- Responsibilities
 - Perform audit/exams of governmental units
 - Prescribe forms and procedures used by governmental units
 - Various other duties including recounts, providing training for local officials, consulting services, etc.

Custodian Responsibilities

IC 20-41-1-3 states:

- (a) A person who has charge of the collection, custody, and disbursement of funds collected and expended to pay expenses incurred in conducting any athletic, social, or other school function, the cost of which is not paid from public funds, shall:
- (1) keep an accurate account of all money received and expended, showing the:
 - (A) sources of all receipts;
 - (B) purposes for which the money was expended; and
 - (C) balance on hand; and
- (2) file a copy of the account with the township trustee, board of school trustees, or board of school commissioners within two (2) weeks after the close of each school year.
- (b) An account filed under subsection (a)(2) is a public record open to inspection by any interested person at any reasonable time during office hours.

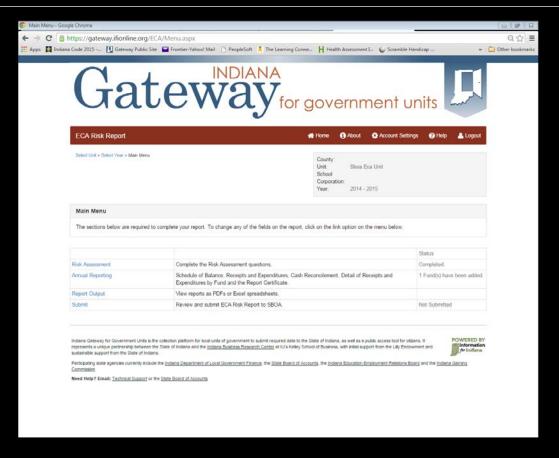
Custodian Responsibilities

- ECA accounts may be used for athletic, social, class, or other school functions.
- ECA accounts may <u>not</u> be used for functions which are educational in nature.
- Accounts for educational functions must be maintained in the school corporation records.

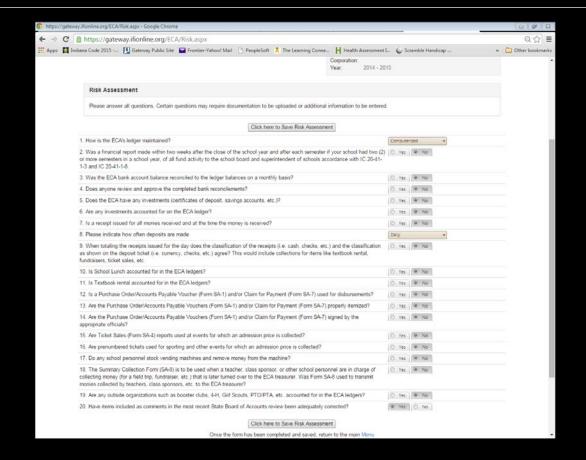
Custodian Responsibilities

- ECA accounts may <u>not</u> be established for functions conducted by outside organizations, for example PTOs, Booster Clubs, Staff groups.
- If the faculty wishes to have a staff fund, then we recommend that each school's faculty group designate a person to control the money.
- A report of the ECA account (SA-5) must be submitted within two weeks after the close of the school year to the school board.
- This report is a public record open to inspection by any interested person at any reasonable time during office hours.

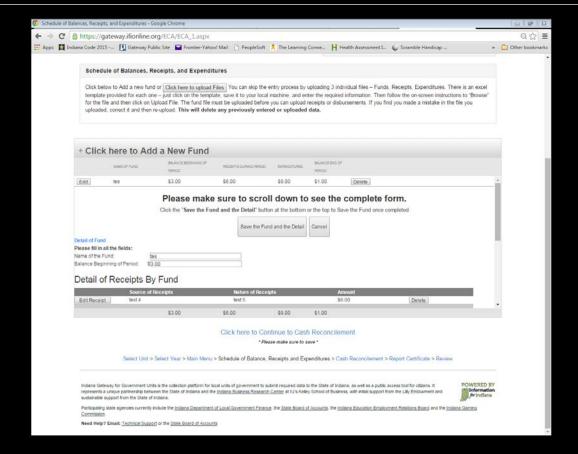
Extra-Curricular Risk Report Gateway Application



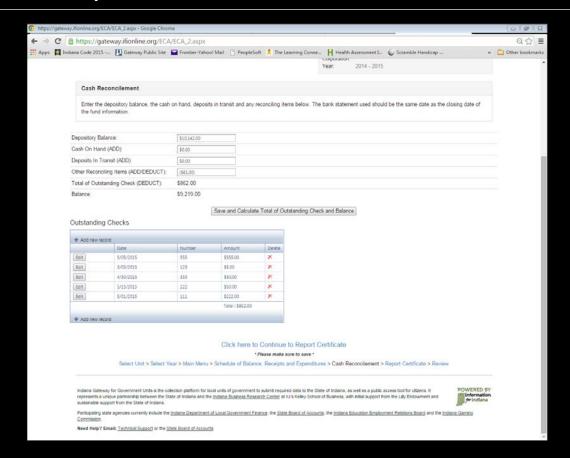
Risk Assessment



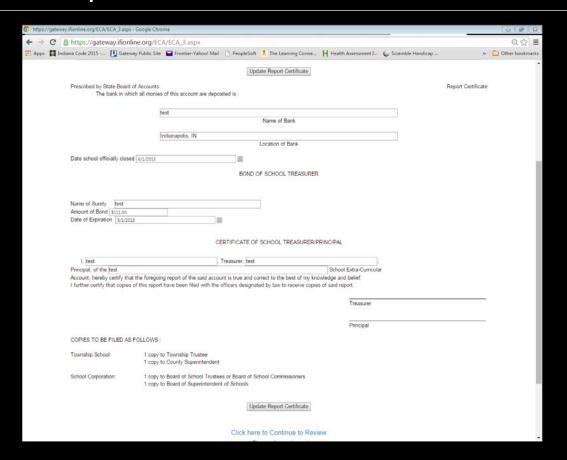
Annual Reporting



Annual Report Cont.



Annual Report Cont.



Submission

"Submission Rights" have been assigned to the fiscal officer of the school corporation because that is who is required to submit the Gateway Annual Report to the State Examiner.

"Edit Rights" can be assigned to whomever the School Corporation wants to assign them. We suggest completing the ECA Delegation of Authority Form (http://www.in.gov/sboa/files/Gateway ECA Delegation Form.pdf). You can complete the form, scan it, and email to gateway@sboa.in.gov.

After inputting information the ECA Treasurer will have the ability to produce and print the required SA-5 via the Report Output section.

Forms

IC 20-41-1-4 states:

- (a) All forms and records for keeping the accounts of the extracurricular activities in school corporations shall be prescribed or approved by the state board of accounts. The records and affairs of the extracurricular activities may be examined by the state board of accounts when the state examiner determines an examination is necessary. The forms prescribed or approved for keeping these accounts must achieve a simplified system of bookkeeping and shall be paid for, along with the bond required in this chapter, from the general fund.
- (b) The funds of all accounts of any organization, class, or activity shall be accounted separately from all others. Funds may not be transferred from the accounts of any organization, class, or activity except by a majority vote of its members, if any, and by the approval of the principal, sponsor, and treasurer of the organization, class, or activity. However, in the case of athletic funds:
- (1) approval of the transfer must be made by the athletic director, who is regarded as the sponsor; and
- (2) participating students are not considered members.

All expenditures of the funds are subject to review by the governing body of the school corporation.

Forms

- All ECA forms and records shall be prescribed or approved by the SBOA.
- As of April 1, 2014, there is a new form approval process detailed in the March 2014 School Administrator.
- ECA records shall be examined by SBOA as determined by the State Examiner.
- The cost of prescribed or approved ECA records and the bond of the ECA treasurer shall be paid for from the General Fund of the School Corporation.
- Separate funds are required for each class or activity.

Transfers

- Funds may not be transferred from the accounts of any organization, class, or activity except by a majority vote of its members, if any, and by the approval of the principal, sponsor, and treasurer of the organization, class, or activity.
- Approval of the transfer of athletic funds must be made by the principal, treasurer, and the athletic director, who is regarded as the sponsor; participating students are not considered members.
- All expenditures of the funds are subject to review by the governing body of the school corporation.

Requirement of Treasurer

IC 20-41-1-5 states:

- (a) A public school must have a treasurer for the purposes of this chapter. The treasurer must be:
 - (1) the superintendent or principal of the particular school;
 - (2) a clerk of the school corporation; or
 - (3) a member of the faculty appointed by the superintendent or principal.

This designation must be made immediately upon the opening of the school term or the vacating of the office of treasurer. Claims shall be filed and paid under sections 7 and 8 of this chapter. The employing or appointing officials of a school may appoint and engage a school treasurer or clerk.

- (b) A school corporation may appoint one (1) or more assistant or deputy treasurers.
- (c) A treasurer is not personally liable for an act or omission occurring in connection with the performance of the duties set forth in this chapter, unless the act or omission constitute gross negligence or an intentional disregard of the treasurer's duties.

Requirement of Treasurer

- A public school (IC 20-18-2-15 defines public school as a school maintained by a school corporation) must have a treasurer.
- A treasurer must be named immediately upon the opening of the school term or when the office of treasurer is vacated.
- Claims shall be filed and paid under 20-41-1-7 and 20-41-1-8.

Requirement of Treasurer

- The employing or appointing officials of a school may appoint and engage a school treasurer or clerk.
- A school corporation may appoint one (1) or more assistant or deputy treasurers.
- A treasurer is not personally liable for an act or omission occurring in connection with the performance of the duties set forth in 20-41, unless the act or omission constitute gross negligence or an intentional disregard of the treasurer's duties.

Treasurer Bonding Requirements

IC 20-41-1-6 states:

- (a) The treasurer shall give a bond in an amount fixed by the superintendent and principal of the school approximating the total amount of the anticipated funds that will come into the possession of the treasurer at any one (1) time during the regular school year. Bonds shall be filed with the trustee or board of school trustees. The surety on the bonds must be a surety company authorized to do business in Indiana. However, the requirement for giving the bond and the requirement to deposit the receipts in a separate bank account, as required in section 9 of this chapter, do not apply to any school for which the funds, as estimated by the principal, will not exceed three hundred dollars (\$300) during a school year.
- (b) The requirements of this chapter may be fulfilled by providing a comprehensive bonding instrument, including a single blanket position bond, for all extracurricular treasurers. A comprehensive bonding instrument is acceptable instead of individual separate personal position bonds

Treasurer Bonding Requirements

- The treasurer shall give a bond in an amount fixed by the superintendent and principal of the school.
- The amount of the bond should approximate the total amount of the anticipated funds that will come into the possession of the treasurer at any one time during the regular school year.
- Bonds shall be filed with the trustee or board of school trustees.
- The surety on the bonds must be a surety company authorized to do business in Indiana.

Treasurer Bonding Requirements

- The requirement for giving the bond and the requirement to deposit the receipts in a separate bank account, as required in IC 20-41-1-9, do not apply to any school for which the funds, as estimated by the principal, will not exceed three hundred dollars (\$300) during a school year.
- The bonding requirements may be fulfilled by providing a comprehensive bonding instrument, including a single blanket position bond, for all extracurricular treasurers. A comprehensive bonding instrument is acceptable instead of individual separate personal position bonds.
- If either school lunch funds or textbook rental funds are handled through an extra-curricular account, the governing body of the school corporation shall approve the amount of the bond of the treasurer (IC 20-41-2-6)

Additional Bonding Requirements

- P.L. 188-2016 HEA 1372 amended IC 20-26-4-5 effective July 1, 2016 to state:
- (a) For each school year commencing July 1: (1) the treasurer of each governing body and the governing body's school corporation; (2) a deputy treasurer, if so appointed; and (3) any individual whose official duties include receiving, processing, depositing, disbursing, or otherwise having access to funds: (A) that belong to a school corporation or the governing body of a school corporation; and (B) in an amount that exceeds five thousand dollars (\$5,000) per year; shall give a bond for the faithful performance of the treasurer's, deputy treasurer'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 deputy treasurer appointed as provided in section 1 of this chapter. (b) A governing body may authorize the purchase of a blanket bond that: (1) is endorsed to include faithful performance to cover the faithful performance of all employees and individuals acting on behalf of the governing body or the governing body's school corporation, including the individuals described in subsection (a); and (2) includes aggregate coverage sufficient to provide coverage amounts specified for each individual who is required to give a bond under this section.

Additional Bonding Requirements

The governing body must determine who must be bonded under the statute. The term "official duties" is not defined. It is our position that "official duties" may include duties set forth in a job description, duties that are customary or routinely performed, or duties that are assigned but not frequently performed. For example, cafeteria cashiers, teachers who routinely collect lunch money from students, and employees who collect textbook rental fees must be bonded. The statute does not require the individual to be an employee of the school corporation. So, for example, parents volunteering in the school lunchroom or at an extracurricular sporting event must be bonded if their official volunteer duties include receiving public funds such as lunch money or admission fees assuming they will collect over the *de minimis* amount.

There is a dollar threshold or *de minimis* exception in the statute. If an individual whose official duties include receiving, processing, depositing, disbursing, or otherwise having access to public funds are required to be bonded if the amount involving their duties exceeds \$5,000 per year. For example, an athletic director and/or athletic secretary who handles tens of thousands of dollars per year is required to be bonded. However, a teacher who collects field trip money from her kindergarten class is not required to be bonded unless she will collect over \$5,000 per year.

We recommend that all bonds be filed with and kept by the trustee or board of school trustees.

Responsibilities of Treasurer

IC 20-41-1-7 states:

- (a) The treasurer has charge of the custody and disbursement of any funds collected by a collecting authority and expended to pay expenses:
- (1) approved by the principal or teacher in charge of the school;
- (2) incurred in conducting any athletic, social, or other school function (other than functions conducted solely by any organization of parents and teachers);
- (3) that cost more than twenty-five dollars (\$25) during the school year; and
- (4) that are not paid from public funds.
- (b) The principal or teacher in charge of the school shall designate a collecting authority to be in charge of the collection of any funds described in this section. Upon collection of any funds, the collecting authority shall deliver the funds, together with an accounting of the funds, to the custody of the school treasurer. The principal may designate different collecting authorities for each separate account of funds described in this section.

Responsibilities of Treasurer

- The treasurer has charge of the custody and disbursement of any funds collected by a collecting authority and expended to pay expenses:
 - (1) approved by the principal;
 - (2) incurred in conducting any athletic, social, or other school function
 - (3) that cost more than (\$25) during the school year; and
 - (4) that are not paid from public funds.
- The principal shall designate a collecting authority to be in charge of the collection of any funds.

Responsibilities of Treasurer

- Upon collection of any funds, the collecting authority shall deliver the funds, together with an accounting of the funds, to the custody of the school treasurer. The principal may designate different collecting authorities for each separate account of funds.
- Functions conducted solely by any organization of parents and teachers shall not be accounted for in the ECA records. Therefore, activities and organizations which are not extra-curricular in nature should be responsible for their own accounting and cash handling systems.
- The extra-curricular account should not collect, receipt, remit, or disburse outside organization's monies.

Treasurer – Duties

IC 20-41-1-8 states:

- (a) The treasurer shall keep an accurate account of all money received by the collecting authority and expended, showing:
- (1) the sources of all receipts;
- (2) the purposes for which the money was expended; and
- (3) the balance on hand.
- A copy of the report, together with all records and files of extracurricular activities, shall be filed as required under section 3 of this chapter.
 - (b) However, in a school that has two (2) or more semesters in any one (1) school year, the treasurer of the school shall file a copy of the treasurer's financial report of receipts and disbursements with the township trustee, board of school trustees, or board of school commissioners not more than two (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 (1) school year.
 - (c) A copy of the report shall be filed with and kept by the city superintendent having jurisdiction and the county superintendent where the superintendent has jurisdiction.
 - (d) The records under this section shall be kept for five (5) years, after which they may be destroyed.

Treasurer – Duties

- The treasurer shall keep an accurate account of all money received by the collecting authority and expended, showing:
 - (1) the sources of all receipts;
 - (2) the purposes for which the money was expended; and
 - (3) the balance on hand.
- A copy of the report, together with all records and files of extracurricular activities, shall be filed as required in IC 20-41-1-3.

Treasurer – Duties

- In a school that has two or more semesters in any one school year, the treasurer of the school shall file a copy of the treasurer's financial report of receipts and disbursements (SA5-1) with the board of school trustees not more than two 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.
- A copy of the report shall be filed with and kept by the superintendent of schools.
- The records under this section shall be kept for five years, after which they may be destroyed.

IC 20-41-1-9 states:

- (a) The treasurer shall deposit all receipts in one (1) bank account. The receipts shall be deposited without unreasonable delay. The account is known as the school extracurricular account. The records of each organization, class, or activity shall be kept separate so that the balance in each fund may be known at all times.
- (b) The money in the school extracurricular account may be invested under the conditions specified in IC 5-13-10 and IC 5-13-10.5 for investment of state money. However, investments under this section are at the discretion of the principal. The interest earned from any investment may be credited to the school extracurricular account and need not be credited proportionately to each separate extracurricular fund. The interest earned from the investment may be used for any of the following:
 - (1) A school purpose approved by the principal.
 - (2) An extracurricular purpose approved by the principal.
- (c) Amounts expended under this section for the purposes described in this section are in addition to the appropriation under IC 20-26-5-4(3).

- The treasurer shall deposit all receipts in one bank account.
- The receipts shall be deposited without unreasonable delay.
- The account is known as the school extracurricular account.
- The records of each organization, class, or activity shall be kept separate so that the balance in each fund may be known at all times.

- The money in the school extracurricular account may be invested under the conditions specified in IC 5-13-10 and IC 5-13-10.5 for investment of state money.
- Investments are at the discretion of the principal.
- The interest earned from any investment may be credited to the school extracurricular account and need not be credited proportionately to each separate extracurricular fund.

- The interest earned from the investment may be used for any of the following:
 - (1) A school purpose approved by the principal.
 - (2) An extracurricular purpose approved by the principal.
- Receipts shall be deposited in the same form in which they are received.
- All disbursements from ECA funds must be made by check or credit card, if you have a board approved policy.

Funds, Records, Accounts, Reports

- The ledger forms prescribed for use by school extra-curricular account treasurers include a control account.
- All receipts, disbursements and the balance of all activity funds combined should be recorded in the control account.
- Posting to the control should be made each day from the receipt and check registers in individual amounts or accumulated by receipt and check number.

Funds, Records, Accounts, Reports

- Subsidiary ledgers shall also be kept of the transactions of each activity, showing each receipt, each disbursement and the balance of each particular fund.
- Posting to the fund of each individual activity should be made from the receipt and check registers by recording each transaction separately or by grouping receipts with consecutive serial numbers and checks with consecutive serial numbers if such are issued for the same source or purpose respectively.

Overdrawn Funds

- No fund shall be overdrawn.
- The ECA treasurer should advise the activity sponsor periodically, preferably monthly, of the current balance in the fund of their activity.
- If done monthly, comparisons can be made and differences reconciled before transactions become past due or particulars are difficult to recall.

Extra-Curricular Mileage Claims

- Individuals requesting reimbursement for driving personal vehicles for extra-curricular purposes should properly complete a Mileage Claim, General Form 101, prior to receiving reimbursement.
- Reimbursed mileage shall not include travel to and from the officer's or employee's home and the governmental office in which he works, unless otherwise authorized by statute.

Grant Funds and Educational Fees

- IC 20-26-4-1 concerning duties of the School Corporation Treasurer, states in part: "The treasurer is the official custodian of all funds of the school corporation and is responsible for the proper safeguarding and accounting for the funds . . ."
- All grant monies and properly authorized fees at an individual building should be transferred to the School Corporation Central Office on a timely and regular basis for receipting into the appropriate school corporation fund.
- The School Corporation Attorney should provide written guidance concerning whether fees are appropriate in regards to Constitutional provisions.

Receipting of Educational Fees

The following types of items should not be assessed, collected or receipted to a school extracurricular account:

Air Conditioning Fees

Parking Fees

Instructional Fees

Bus Rider Fees

Fees for Payroll Positions

(Nurses, Principals, Counselors, etc.)

Receipting of Educational Fees

The following items erroneously appear in funds of the extra curricular account. Accounting for them should be in the general fund of the school corporation.

Adult Education Fees
Apples in Education
Art Fees
Distributive Education
Equipment Sale or Rental
Facilities Rental
Grants (State, Federal and Other)
Kindergarten Fees
Typing Fees
Locker Fees
Vocational Education Fees

Rent of School Facilities
Science Fees
Special Education
Driver Education Fees
Summer School Fees
Supplies
Towel Fees
Library Fines and Fees
Visual Education
Night School Fees

Receipting of Educational Fees

- All authorized educational fees (the School Board should be able to justify any educational fees and ensure Constitutional problems do not exist) must be receipted to the General Fund of the school corporation.
- Textbook rental funds maintained at a school building may be used to temporarily record proper fees collected (as a convenience during the collection process of textbook rental).
- Proper educational fees belong in the school corporation general fund and should be transferred timely.

Accounting for Gifts & Donations

- Cash donations that are extra-curricular in nature may be accounted for in the Extra-Curricular Account.
- Any School Corporation donations shall be accounted for in the school corporation records.
- The acceptance of these donations shall have prior approval by the Board of School Trustees.
- Either the School Corporation Treasurer or Extra-Curricular Treasurer will be responsible for the accounting of these funds as applicable.

Approval of Expenditures

- 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 the general administration policies of the school corporation since the law provides that all expenditures shall be subject to review by the local school board. [IC 20-41-1-4]
- Distribution of extra-curricular funds to students, teachers or others should not occur unless authorized by statute.

School Lunch Program

- The preferred method of accounting for a school food and nutrition program is through a School Lunch Fund (School Food Service Fund) in the school corporation account.
- Authority is provided to account for the program in an extra-curricular account or accounts. (IC 20-41-2-4)
- If the school lunch funds are accounted for in the ECA accounts, the school board shall approve the amount of the official bond of the treasurer of the extra-curricular account in an amount deemed sufficient to protect the account for all funds coming into the custody of ECA treasurer. (IC 20-41-2-6)

Recording Prepaid School Lunch Transactions

When student makes payment – a receipt should be recorded to the Prepaid Food fund (8400).

When a student receives a school meal—a transfer should be made from the Prepaid Food (disbursement) fund to the School Lunch fund (receipt).

The Prepaid Food fund balance should be reconciled to the detail of individual student account balances routinely.

Columns to account for Prepaid Transactions have been provided on the form SF-2, SF-3, and SF-4. (see ECA Manual Ch. 3, pg. 3)

Collection of Amounts Due

Governmental units have a responsibility to collect amounts owed to the governmental unit pursuant to procedures authorized by statute.

Bad Debts and Uncollectible Accounts

- The governing body of a governmental unit should have a written policy concerning a procedure for the writing off of bad debts, uncollectible accounts receivable, or any adjustments to record balances.
- Documentation should exist for all efforts made by the governmental unit to collect amounts owed prior to any writeoffs.
- Officials or employees authorizing, directing or executing writeoffs or adjustments to records which are not documented or warranted may be held personally responsible.

Textbook Rental

- The preferred method of accounting for a textbook rental program is through a Textbook Rental Fund in the school corporation account.
- Where no textbooks have been purchased and no financial commitments or guarantees for such purchases have been made by the school corporation, authority is provided to account for the textbook rental program in the extra-curricular account or accounts. (IC 20-41-2-5)
- If textbook rental is accounted for in the ECA accounts, the school board shall approve the amount of the official bond of the treasurer of the extra-curricular account in an amount deemed by the school board sufficient to protect the account for all funds coming into the custody of said treasurer. (IC 20-41-2-6).

Amended IC 36-1-8-11

Authorizes a political subdivision or municipally owned utility to charge a reasonable fee for convenience when accepting a credit card or bank card for payments. Provides that a convenience fee imposed by a political subdivision or municipally owned utility on a credit card transaction may not exceed \$3, must be uniform regardless of the bank card or credit card used, and may be collected regardless of retail merchant agreements between the bank and credit card vendors that may prohibit such fees.

- The State Board of Accounts consistently has been of the audit position to not take an audit exception to a school extra curricular account having a general fund if the fund consists of revenues received from functions (vending machines or sales of a similar nature, etc.) not generated by students for a specific class or organization (for which a fund should be established).
- Our audit position has been with the provision that the functions for which the expenditures are made benefit the student body as a whole (as opposed to a select group of students, school employees or administrators).
- Examples of appropriate expenditures would be convocations, field trips which the entire student body has the opportunity to take during the course of the school year, etc.

- Our audit position has been based in part upon the substance of the transaction (the revenues are primarily from students or parents paying into vending machines, picture money, etc.).
- We would not take audit exception to a public policy of a school corporation which would provide that a general fund does not exist and that money from these type of functions be used to offset the cost of the function (reduced prices of vending machine items, reduce the costs of pictures, etc.).

- IC 20-41-1-9 concerning investment income funds (interest income funds) specifically provides authorization for either corporation or extra-curricular type of expenditures.
- The General School Powers Act (IC 20-26-5-4) provides general, as well as specific, powers and duties of the governing board in carrying out the school purposes of the school corporation which they govern.

- Included in the specific powers with which the board is charged is the responsibility to ". . . take charge of, manage, and conduct the educational affairs of the school corporation and to establish, locate, and provide the necessary schools, school libraries, and other libraries where permitted by law, other buildings, facilities, property, and equipment."
- IC 20-41-1-4 provides in part, concerning extra-curricular funds: "Funds may not be transferred from the accounts of any organization, class or activity except by a majority vote of its members. . ."
- IC 20-41-1-4 also provides, concerning extra-curricular expenditures: "All expenditures shall be subject to review by the local school board."

- Inquiries have questioned the use of a general fund or student activity fund for educational expenditures (copy machines, computers, educational materials, supplies, etc.) which would normally be from school corporation funds.
- The State Board of Accounts' audit position is as stated above. However, we will not take audit exception to a school having disbursements from an extra-curricular "general fund" or "student activity fund" for authorized school corporation type expenditures, such as equipment, supplies, etc., with the following conditions:
 - 1. A policy has been adopted by a school board in a public meeting authorizing these types of expenditures.
 - 2. Providing there are no objections from a majority of an applicable student body to these types of expenditures.
 - 3. Equipment purchases would still require separate approval from the local school board.

Since alternatives exist for funding educational expenditures (i.e., taxes, authorized investment income expenditures, etc.) and other alternatives for the use of a general fund are available (i.e., reducing the cost of items to students and/or parents), we must emphasize the adoption of the aforementioned would be a public policy decision for which the local board of school trustees must accept any and all responsibility.

- We have received numerous questions on if Spell Bowl fees can be paid out of the ECA General Fund.
- We will not take exception to the membership fee to the Dept. of Student Programs, which includes participation in academic competitions, art contests, Student Day at the Legislature, etc. being paid from the Student Activity Fund.
- The entry fee for the specific competition should be paid from the school corporation general fund or by the participants in the competition.

Fundraisers

- Governmental units which conduct fund raising events should have the express permission of the governing body for conducting the fund raiser as well as procedures in place concerning the internal controls and the responsibility of employees or officials.
- School Board would also need to approve/accept donations to be received.

Fundraisers

We have received many questions about fundraising activities and where the financial transactions should be accounted.

We have not found any statutes that address who has control over fundraising activities. Therefore, we would not take exception to the local school board passing required procedures if the fundraising activity uses school property or is associated with a school event.

Fundraisers

In the absence of a local policy, our opinion would be that each fundraising activity needs to be looked at individually to determine if the school corporation is running the activity or if an outside organization is running the activity.

Things to keep in mind would be that if school employees are participating in the fundraising activity on school time, then the fundraiser activity should be accounted for in the school records or you run the risk of ghost employment issues.

Donations to Outside Organizations

We will not take exception to club/organizations donating money to an outside organization based on a majority vote of its members.

Documentation must be retained to provide approval of a majority of the members.

The warrant/check should be written to an organization and not an individual.

Gift Cards

- The State Board of Accounts has updated our position on gift card purchases.
- We will not take exception to the use of gift cards by an extra-curricular unit provided the following criteria are observed:
- 1. The school board must authorize gift card purchases through a resolution, which has been approved in the board minutes.
- The purposes for which gift cards may be issued must be specifically stated in the resolution.

Gift Cards

- 3. Purchase and issuance of gift cards should be handled by an official or employee designated by the school principal.
- 4. The designated responsible official or employee shall maintain an accounting system or log which would include the name of the business from which gift cards were purchased, their amounts, fund and account numbers to be charged, date the card was issued, person gift card was issued to, proof that the gift card was received by the person it was issued to, etc.

Gift Cards

- 5. Gift cards shall not be used to bypass the accounting system. One reason that purchase orders are issued is to provide the fiscal officer with the means to encumber and track appropriations to provide the school board and other officials with timely and accurate accounting information and monitoring of the accounting system.
- 6. Procedures for payments should be no different than for any other claim. The school principal must approve the expenditure and supporting documents such as paid bills and receipts must be available. Additionally, any purchase or issuance of gift cards without proper documentation may be the responsibility of that officer or employee.

Vending, Concessions or Other Sales Controls

- Internal controls over vending operations, concessions or other sales should include, at a minimum, a regular reconcilement of the beginning inventory, purchases, distributions, items sold and ending inventory to the amount received.
- Any discrepancies noted should be immediately documented in writing to proper officials.
- The reconcilement should provide an accurate accounting.
- Persons with access to vending should be properly designated and access should be limited to those designated.

Vending Machine Commissions and/or Profits

- There should be a clearly defined procedure adopted by the governmental unit concerning placement, use, maintenance, and commissions and/or profits of vending machines on their property.
- All revenues generated and costs incurred in operating vending machines located on the government premises should be accounted for through the governmental unit's records.
- If vending machines are located in restricted areas (areas other than those available to the public) and if the governmental body and chief executive officer wish for those revenues to be restricted for the use and benefit of those employees who use the machines and generate the revenues, the State Board of Accounts takes no exception to such action in an audit.

Vending Machine Commissions and/or Profits

The decisions must be authorized by proper resolution or ordinance of the governing body.

- If vending machines are located in areas where the public makes use of the machines and generates the resulting revenues, we advise officials to place the revenues in the general fund for the benefit of the general public, the machine users.
- Any alternative procedure should be authorized by resolution or ordinance of the governing body.

Vending Machine Commissions and/or Profits

- In the event personnel other than the governmental unit's personnel maintain, stock, and clean up around vending machines, we take no audit exception when such persons are paid for these services.
- A written agreement should be entered into listing the services to be rendered, the amount to be paid for such services, timing of payments, and any other areas deemed necessary by the governmental unit.

Vending Machine Commissions and/or Profits to Faculty/Staff

If a vending machine is accessible to the students or the public, the proceeds from that machine should be receipted into the Student Activity fund.

If a school has a vending machine that is only accessible by the faculty/staff and wishes to allow the faculty/staff to benefit from the proceeds, we would not take exception to the school providing the faculty/staff group those proceeds.

If the vending company will only issue one check to the school, we have suggested that the ECA Treasurer receipt the proceeds into whatever ECA fund that they normally do and then issue a check/warrant to the designated faculty/staff member for the vending machine that is only accessible to the staff.

Non-Session School Activities - Camps

- Examples: Athletic Camps, Cheerleading Camps, Band Camps, Summer Weightlifting, etc.
- According to IC 20-30-15-6: "(a) When public schools are not in session, a governing body may employ personnel to supervise the following: (1) Agricultural education club work. (2) Industrial education club. (3) Home economics education club work. (4) Music activities. (5) Athletics. (b) Activities described in subsection (a) must be open and free to all individuals of school age residing in the attendance unit of the school corporation that is paying all or part of the cost of the activity.

Non-Session School Activities- Camps

- Any camps that charge a fee would be considered to be hosted by a Booster Club or Outside Organization.
- Therefore, accounting for the receipts and disbursements should not be recorded in the Extra-Curricular Accounts.
- We have seen individual coaches "donate" proceeds from summer camps to their subaccount in the Athletic Fund, but would not be required.

INTERNAL CONTROL STATUTE REQUIREMENTS

IC 5-11-1-27

- (e) "The internal control standards and procedures shall be developed to promote government accountability and transparency."
- (g) Any time after June 30, 2016, the School Board shall be able to ensure that (1) the minimum internal control standards have been adopted. (2) shall ensure that "personnel" have received training on the minimum internal control standards.
- (h) Any time after June 30, 2016, the fiscal officer shall be able to certify in writing that (1) the minimum internal control standards have been adopted. (2) that "personnel" have received training on the minimum internal control standards. The certification shall be filed electronically as part of the Gateway Annual Financial Report.

INTERNAL CONTROL CERTIFICATION

Adopt minimum standards via Resolution, By-laws, or School Policy

Personnel, as defined in IC 5-11-1-27(c) required to be trained by using approved training found on SBOA website

- Additional approved training contact following vendors:
 - Central Indiana Education Service Center (CIESC)
 - Safe Schools

Certify on FY 2016 Gateway Annual Financial Report, due August 29, 2017

• Check "Yes" for items listed in the Unit Questions section

INTERNAL CONTROL STATUTE REQUIREMENTS (Continued)

What happens if you are in noncompliance with the statute?

- ∘ After June 30, 2016, SBOA will
 - Issue a comment in the audit report
 - If during the second review period, you still have not complied, you will have 60 days to comply and let us know
 - If you still don't, we will notify the DLGF and they will not approve a budget or additional appropriations until you comply

What are Internal Controls?

- A system designed to provide government reasonable assurance that objectives will be achieved
- Designed to prevent or detect situations in which government has failed to achieve an objective
- Preventative controls are those such as requiring dual signatures on checks or having password-protected files. This type of control protects and limits access to business assets.
- Detective controls include reconciling the bank or inventory counts. Typically these internal controls are performed periodically to see if any need to be corrected. They will often turn up internal errors or problems, as well as any external errors (such as bank errors).

Why are they important?

- Promote government accountability and transparency
- Essential tool in government's ability to make proper decisions
- Accountability and transparency
- Internally quickly evaluated; inefficiencies addressed and corrected
- Externally encourage efficient use of government time and resources
- Conveys to citizens commitment to detect fraud, waste, abuse
- Reduces costs timely completion of responsibilities / prevents fraud, waste, abuse
- Better internal controls can result lower audit costs
- Help identify and correct inefficiencies in governments processes

How do you implement them?

- Identify areas of Risk
- Develop policies and procedures to address the areas of risk
- Monitor that policies and procedures are being followed and have addressed the risks identified

Segregation of Duties –

- One of the biggest obstacles for a sufficient internal control system
- The fundamental premise of segregation of duties is that an individual or small group of individuals should not be in a position to initiate, approve, undertake, and review the same action. Separating the ability to record, authorize, and approve the transactions along with the handling of the related asset reduces the risk of error or fraudulent actions. It also reduces the risk of management override.
- In very small governmental units, such segregation may not be practical. In this case, compensating activities should be implemented which may include additional levels of review for key operational processes, random and/or periodic review of selected transactions.

DUTIES THAT "SHOULD" BE SEPARATED

<u>Receipt roles</u> - Collecting, Depositing, Recording and Reconciling functions.

<u>Purchasing roles</u> – Ordering, Receiving, Claim Creation/Approval, Payment, and Reconciling functions.

<u>Inventory roles</u> - Requisition, Receipt, Disbursement, Conversion to scrap and Receipt of scrap proceeds functions.

DOCUMENTATION

For audit purposes one of the key elements of internal controls that is forgotten is to document the process.

- Who does what and when
- Proof that procedures and policies are being followed
- Evaluation of how effective the policies and procedures are
- Corrective actions taken to address identified problems

Common areas to address:

Collections –

School Lunch

Athletic Events

Curricular Materials Rental

School Dances

School Play

Vending Machines

Fundraisers

Asset Protection –

Cash Balances

Purchase of Goods

Inventory of Goods

Information Technology

Risks identified for Athletic Event collections:

- Skimming of cash collections
- Admission without payment
- Charging incorrect admission
- Not depositing collections intact
- Destroying or not retaining accountable items (tickets, lists, deposit ticket, etc.)
- Making cash payments out of collections

Event Ticket Taking Activity



SA-4 TICKET SALES FORM

GAME DATE	
GAME DATE	
	TOTAL
	MOUNT SALES
2 1	
TOTAL	
Made by Verified and Approved by	
(Title) (Officia	al or Sponsor)

Possible Event Admissions Procedures

- Training for key individuals or individuals that will oversee the application of the internal control activities
- ECA Treasurer provides tickets and cash change box to Athletic Director, document transfer
- Prior to event Athletic Director completes initial portion of Ticket Sale report (SA-4), including starting numbers of all ticket series
- Athletic Director provides ticket taker with tickets, cash change, list for signines, and SA-4 form
- During the event the ticket taker receives payments, retains ticket stubs, documents sport pass attendees and ensures sign-ins list names and organizations
- During the event the Athletic Director completes any established internal control activities; could include observing ticket taker, noting/estimating number of attendees, etc.

Possible Event Admissions Procedures cont.

- After the event the ticket taker will complete the SA-4; include documenting last ticket sold, counting ticket stubs, counting cash change box, documenting any explanations for differences, and finally signing the "Made by" section on the SA-4 form
- After the ticket taker signs the SA-4 form, the Athletic Director would verify the information on the report, include verifying last ticket sold, recounting ticket stubs and cash change box, and finally signing the "Verified and Approved by" section on the SA-4 form
- Within 24 hours the Athletic Director would remit the SA-4 form, ticket stubs, and cash change to the ECA Treasurer
- The ECA Treasurer would review the SA-4 form, retain the ticket stubs, issue an ECA Receipt (SA-3) to the Athletic Director, deposit the funds with the Bank without unreasonable delay, and post the receipt to the Athletic Fund in the ECA records

Possible Purchasing Procedures

- Organization members decide to make a purchase
- Sponsor starts to complete SA-1 and gets approval from ECA
 Treasurer to complete the order
- Sponsor reviews shipped products and approves receipt of goods
- ECA Treasurer gathers supporting documentation and submits the SA-1 for approval
- Principal approves SA-1 for payment

Possible Purchasing Procedures cont.

- ECA Treasurer makes the payment and posts disbursement to ECA fund
- ECA Treasurer provides Sponsor with monthly fund report
- Sponsor reviews fund report and notifies the ECA Treasurer of any discrepancies
- ECA Treasurer reconciles the funds ledger to bank statement.
- Principal reviews and verifies bank reconcilement

Possible Curricular Materials Rental Procedures

- School Board sets the rental fee for each curricular material
- Treasurer reviews rental fee to ensure it does not exceed 25% of retail price of curricular material
- Principal appoints collecting authorities for curricular material program
- Collecting authorities receive payments and complete the Textbook Rental Receipt form (TBR-2)
- Collecting authorities remit collections and copies of TBR-2s to ECA
 Treasurer
- ECA Treasurer verifies the amount collected with TBR-2s and deposits into the bank

Possible Curricular Materials Rental Procedures cont.

- ECA Treasurer posts receipts to ECA ledger
- ECA Treasurer reconciles ledger to bank statement
- Principal reviews reconcilement for completeness and accuracy
- School Corporation Treasurer randomly samples receipts and verifies correct amount was deposited to the bank and posted to the Curricular Materials Rental fund

Other helpful prescribed forms for internal control activities

- SA-6 fund balance and activity of each ECA fund
- SA-7 purchases of goods and services
- ∘ SA-8 collections for fundraisers, field trips, etc.
- SA-9 items sold and inventory remaining; curricular materials, concessions, vending machines
- SF series School Lunch Activities