

|         |                        |
|---------|------------------------|
| Book    | 1ST DRAFT POLICY CLEAN |
| Section | 6000 Finances          |
| Title   | DEPOSITORY OF FUNDS    |
| Number  | po6100                 |
| Status  |                        |

6100 - **DEPOSITORY OF FUNDS**

The Board of Education of the Mauston School District requires assets or collateral of any banking institution to secure deposits made at each institution which are in excess of F.D.I.C. and State and Wisconsin guarantee.

Last Modified by Jennifer Hagemann on June 15, 2018

|         |                        |
|---------|------------------------|
| Book    | 1ST DRAFT POLICY CLEAN |
| Section | 6000 Finances          |
| Title   | AUTHORIZED SIGNATURES  |
| Number  | po6100.01              |
| Status  |                        |

6100.01 - **AUTHORIZED SIGNATURES**

The signatures of the Board President, the Board Clerk and the Board Treasurer shall be required on all checks expending general school district and student activity funds. Facsimile signatures may be used in accordance with State law and established procedures. Student activity fund expenditure requests are signed by the advisor and authorized by the building principal.

Last Modified by Jennifer Hagemann on June 15, 2018

Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title CHECK SIGNING  
Number po6100.02  
Status

6100.02 - **CHECK SIGNING**

The Board authorizes the use of automated check signing in accordance with the following provisions:

- A. The Treasurer, Clerk, and President shall sign checks in accordance with the provisions of Wisconsin Statutes. A digitized signature is used on all checks.
- B. The signing of blanks shall be prohibited.
- C. All void or spoiled checks shall be marked and retained

Last Modified by Jennifer Hagemann on June 15, 2018

Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title AUTHORIZATION TO MAKE ELECTRONIC FUND TRANSFERS  
Number po6108  
Status

#### 6108 - **AUTHORIZATION TO MAKE ELECTRONIC FUND TRANSFERS**

The Board of Education authorizes electronic fund transfers (EFTs) for any purpose including direct deposit, wire transfer, withdrawal, investment, or payment, provided such EFTs are consistent with the provisions of Wisconsin's Uniform Electronic Transactions Code, Chapter 137, Subchapter II. Upon the recommendation of the Business Manager, the Board shall approve the financial institutions that are authorized to receive monetary transactions through electronic or other medium.

Upon the recommendation of the Business Manager, the Board shall then approve written agreements with financial institutions with whom EFTs will be made.

Such agreements shall set forth internal controls required by State law and State Administrative Code that will provide adequate integrity, security, confidentiality, and auditability of business transactions conducted by electronic commerce, including, but not limited to, the following:

- A. the official title of the bank account(s) subject to the agreement and each type of transaction approved, such as deposits, disbursements or transfers, shall be specified;
- B. the manual signatures of the Board President, Superintendent Business Manager, and the employees authorized to initiate EFTs shall be contained therein;
- C. a requirement that the District maintain documentation signed by the initiator and authorizer of the EFTs to confirm the authenticity of the EFTs;
- D. a requirement that, when funds are properly delivered to the receiving institution, that institution agrees to become responsible for prompt and diligent processing of the funds;
- E. a requirement that written or printed documentation from the financial institution acknowledging such transactions, including but not limited to deposit slips, debit and credit memos, trust receipts, transfer acknowledgements, or canceled warrants, shall be provided so that it may be kept in the official files of the District, which shall be maintained in a manner which facilitates easy review and validation of transactions.

All District staff shall comply with the provisions of this policy when creating, generating, sending, communicating, receiving, storing, processing, using, and relying upon electronic records. Further, all District staff and other persons who use electronic signatures when completing transactions with the Board shall do so in compliance with State law.

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Legal Wis. Stat. Chapter 137, Subchapter II  
15 U.S.C.A. 1693, as amended

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Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title FEDERAL FUNDS  
Number po6110  
Status

#### 6110 - **FEDERAL FUNDS**

It is the objective of the Board of Education to provide equal educational opportunities for all students within the District. Therefore, it is the intent of the Board to study Federal legislation to enhance educational opportunities, the educational environment, and the physical and mental growth for each student.

The Superintendent shall review new Federal education legislation and prepare proposals for programs s/he deems would be of aid to the students of this District. The Superintendent shall approve each such proposal prior to its submission, and the Board shall approve all grants resulting from such proposals.

The Board regards available Federal funds of aid to local school districts and communities as a public trust. It forbids the use of Federal monies for partisan political activities and for any use that would not be in accord with Federal guidelines on discrimination. All Federal funds received by the District will be used in accordance with the applicable Federal regulations and guidelines. The Superintendent shall ensure that each draw of Federal monies is as close as administratively feasible to the related program expenditures.

No Federal funds received by the District shall be used (1) to develop or distribute materials, or operate programs or courses of instruction directed at youth, that are designed to promote or encourage sexual activity, whether homosexual or heterosexual; (2) to distribute or to aid in the distribution by any organization of legally obscene materials to minors on school grounds; (3) to provide sex education or HIV-prevention education in schools unless the instruction is age appropriate and includes the health benefits of abstinence; or (4) to operate a program of contraceptive distribution in the schools.

#### Grant Proposal Development

- A. All grant proposals must support at least one (1) District goal or priority.
- B. For projects where grant funds will not cover the entire cost of project implementation, additional fund sources must be identified, documented, and approved during the internal review process.

#### Grant Proposal Internal Review

- A. Each grant proposal shall be reviewed and approved by the Superintendent prior to submission to the funding source.

#### Grant Administration

- A. The administration of grants will adhere to all applicable Federal, State, local and grantor rules and regulations, including the terms and conditions of the Federal awards, as well as District policies and administrative guidelines.
- B. The Superintendent is responsible for the efficient and effective administration of grant awards through the application of sound management practices.
- C. The Superintendent is responsible for administering grant funds in a manner consistent with underlying agreements, program statutes, regulations and objectives, and the terms and conditions of the grant award.
- D. The District, in recognition of its unique combination of staff, facilities, and experience, shall employ internal controls, including organizational and management strategies necessary to assure proper and efficient administration of grant awards.
- E. All Federal funds received by the District will be used in accordance with the applicable Federal law and regulations and the terms and conditions of the Federal award. The Superintendent shall require that each draw of Federal monies be aligned with the District's payment process (whether reimbursement, cash advance or a combination). If funds are permitted to be drawn in advance, all draws will be as close as administratively feasible to the related program expenditures and that, when restricted, such monies are used to supplement programs and funding and not to supplant or replace existing programming

or current funding.

- F. The Superintendent is authorized to sign related documents for grant administration, including documents required for submittal of grant proposals.
- G. Program reports including but not limited to audit, site visits and final reports shall be submitted to the Superintendent for review and distribution to the Board and other appropriate parties.

#### Financial Management

The financial management of grant funds shall be in compliance with all applicable Federal, State, local and grantor rules, regulations, and assurances as well as District policies and administrative guidelines.

The Superintendent shall provide for the following:

- A. Identification, in District accounts, of all grant awards received and expended and the programs under which they were received. For Federal programs and awards, identification shall include the Catalog of Federal Domestic Assistance (CFDA) title and number, Federal award identification number and year, name of the Federal agency and name of the pass-through entity, as applicable.
- B. Accurate, current, and complete disclosure of the financial results of each Federal award or program in accordance with the reporting requirements of the grant.
- C. Records that identify adequately the source and application of funds provided for Federally-funded activities. These records must contain information pertaining to Federal awards, authorizations, obligations, unobligated balances, assets, expenditures, income and interest and be supported by source documentation.
- D. Effective control over and accountability for all funds, property, and other assets.

The District must adequately safeguard all assets and assure that they are used solely for authorized purposes.

Further, the District must:

- 1. establish and maintain effective internal control over the Federal award that provides reasonable assurance that the District is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award;
  - 2. comply with Federal statutes, regulations and the terms and conditions of the Federal award;
  - 3. evaluate and monitor the District's compliance with statutes, regulations and the terms and conditions of the Federal award;
  - 4. take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings; and
  - 5. take reasonable measures to safeguard protected personally identifiable information and other information the Federal awarding agency or pass-through entity designates as sensitive consistent with applicable Federal, State, local, and tribal laws regarding privacy and obligations of confidentiality.
- E. Comparison of expenditures with budget amounts for each Federal award.
  - F. Recordkeeping and written procedures to the extent required by Federal, State, local and grantor rules and regulations pertaining to the grant award and accountability, including, but not limited to the following areas:
    - 1. cash management
    - 2. allowability
    - 3. conflict of interest
    - 4. procurement
    - 5. equipment management

6. conducting technical evaluations of proposals and selecting recipients

7. compensation and fringe benefits

8. travel

G. Disclosure of any potential conflict of interest and all mandatory violation disclosures potentially affecting the Federal award/grant to the Federal awarding agency or pass-through agency in accordance with applicable Federal policy.

H. Insurance coverage for real property and equipment, if applicable, equivalent to such property owned by the District.

#### Cost Principles

The Superintendent is responsible for the efficient and effective administration of grant funds through the application of sound management practices. Such funds shall be administered in a manner consistent with the associated agreements/assurances, program objectives, and the specific terms and conditions of the grant award.

Costs may be allowable to a specific grant award if the cost is necessary and reasonable for the performance of the grant program initiative, is in accordance with generally accepted accounting principles (GAAP), and is allocable to the grant award if the goods or services involved are charged in accordance with relative benefits accrued to the initiative. A cost is reasonable if it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the purchasing decision is made.

#### Program Income

Program income means gross income earned by a grant recipient that is directly generated by a supported activity or earned as a result of the Federal award during the grant's period of performance.

It includes, but is not limited to, income from fees for services performed, the use or rental of real or personal property acquired under Federal awards, the sale of commodities or items fabricated under a Federal award, license fees and royalties on patents and copyrights, and principal and interest on loans made with Federal award funds. Interest earned on advances of Federal funds is not program income. Except as otherwise provided in Federal statutes, regulations or the terms and conditions of the Federal award, program income does not include rebates, credits, discounts and interest earned on any of them. Additionally, taxes, special assessments, levies, fines and other such revenues raised by a recipient are not program income unless the revenues are specifically identified in the Federal award or Federal awarding agency regulations as program income. Finally, proceeds from the sale of real property, equipment or supplies are not program income.

Unless it has received prior approval to use a different method or the terms and conditions of the grant authorize a different method, the District uses the deduction method of accounting for program income. Under the deduction method, program income is deducted from total allowable costs to determine the net allowable costs. Program income will only be used for current costs unless the District is otherwise directed by the Federal awarding agency or pass-through entity.

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Legal                                    34 C.F.R. 75.707, 76.563, 76.565, 76.707  
    2 C.F.R. 200.56, 200.71, 200.77, 200.80, 200.112, 200.113, 200.302, 200.307  
    2 C.F.R. 200.309, 200.310, 200.313, 200.318 - .320, 200.343(b) & (e), 200.403  
    2 C.F.R. 200.404 and 200.406  
    Compliance Supplement for Single Audits of State and Local Governments  
    20 U.S.C. 7906

Last Modified by Jennifer Hagemann on June 15, 2018

Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title INTERNAL CONTROLS  
Number po6111  
Status

#### 6111 - **INTERNAL CONTROLS**

The Superintendent shall establish and maintain effective internal controls over Federal awards that provide reasonable assurance that the District is managing all awards in compliance with applicable statutes, regulations and the terms and conditions of the awards. The District will have a process that provides reasonable assurance regarding the achievement of the following objectives:

- A. effectiveness and efficiency of operations
- B. reliability of reporting for internal and external use
- C. compliance with applicable laws and regulations

The internal controls must provide reasonable assurance that transactions are properly recorded and accounted for in order to permit the preparation of reliable financial statements and Federal reports; maintain accountability over assets; and demonstrate compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. The internal controls must also provide reasonable assurance that these transactions are executed in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award that could have a direct and material effect on a Federal award, as well as any other Federal statutes and regulations that are identified in the Compliance Supplement. Finally, the District's internal controls must provide reasonable assurance that all Federal funds, property, and other assets are safeguarded against loss from unauthorized use or disposition.

The District shall:

- A. comply with Federal statutes, regulations, and the terms and conditions of the Federal awards;
- B. evaluate and monitor its compliance with statutes, regulations, and the terms and conditions of the award;
- C. take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings; and
- D. take reasonable measures to safeguard protected "personally identifiable information" (PII) and other information the awarding agency or pass-through entity designates as sensitive or the District considers sensitive consistent with applicable Federal, state, local, and tribal laws and District policies regarding privacy and obligations of confidentiality.

PII is defined at 2 C.F.R. Section 200.79 as "information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual."

However, the definition of PII is not anchored to any single category of information or technology. Rather, it requires a case-by-case assessment of the specific risk that an individual can be identified.

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Legal Applicable Laws, Regulations, and Guidance:  
2 C.F.R. 200.61-.62  
2 C.F.R. 200.79  
2 C.F.R. 200.303

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Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title CASH MANAGEMENT OF GRANTS  
Number po6112  
Status

#### 6112 - **CASH MANAGEMENT OF GRANTS**

In order to provide reasonable assurance that all assets, including Federal, State, and local funds, are safeguarded against waste, loss, unauthorized use, or misappropriation, the Superintendent shall implement internal controls in the area of cash management.

The District's payments methods shall minimize the time elapsing between the transfer of funds from the United States Treasury or the Department of Public Instruction (pass-through entity) and disbursement by the District, regardless of whether the payment is made by electronic funds transfer, or issuance or redemption of checks, warrants, or payment by other means.

The District shall use forms and procedures required by the grantor agency or pass-through entity to request payment. The District shall request grant funds payments in accordance with the provisions of the grant. Additionally, the District's financial management systems shall meet the standards for fund control and accountability as established by the awarding agency.

The Superintendent is authorized to submit requests for advance payments and reimbursements at least monthly when electronic fund transfers are not used, and as often as deemed appropriate when electronic transfers are used.

When the District uses a cash advance payment method, the following standards shall apply:

- A. The timing and amount of the advance payment requested will be as close as is administratively feasible to the actual disbursement for direct program or project costs and the proportionate share of any allowable indirect costs.
- B. The District shall make timely payment to contractors in accordance with contract provisions.
- C. To the extent available, the District shall disburse funds available from program income (including repayments to a revolving fund), rebates, refunds, contract settlements, audit recoveries, and interest earned on such funds before requesting additional cash payments.
- D. The District shall account for the receipt, obligation and expenditure of funds.
- E. Advance payments will be deposited and maintained in insured accounts whenever possible.
- F. Advance payments will be maintained in interest bearing accounts unless the following apply:
  - 1. The District receives less than \$120,000 in Federal awards per year.
  - 2. The best reasonably available interest-bearing account would not be expected to earn interest in excess of \$500 per year on Federal cash balances.
  - 3. The depository would require an average or minimum balance so high that it would not be feasible within the expected Federal and non-Federal cash resources.
  - 4. A foreign government or banking system prohibits or precludes interest bearing accounts.
- G. Pursuant to Federal law and regulations, the District may retain interest earned in an amount up to \$500 per year for administrative costs. Any additional interest earned on Federal advance payments deposited in interest-bearing accounts must be remitted annually to the Department of Health and Human Services Payment Management System (PMS) through an electronic medium using either Automated Clearing House (ACH) network or a Fedwire Funds Service payment. Remittances shall include pertinent information of the payee and nature of payment in the memo area (often referred to as "addenda records" by Financial Institutions) as that will assist in the timely posting of interest earned on Federal funds. Pertinent details include the Payee Account Number (PAN) if the payment originated from PMS, or Agency information if the payment originated from ASAP, NSF or another Federal agency payment system.

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Legal                      Applicable Laws, Regulations, and Guidance:  
2 C.F.R. 200.305

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Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title COST PRINCIPLES - SPENDING FEDERAL FUNDS  
Number po6114  
Status From Neola

6114 - **COST PRINCIPLES - SPENDING FEDERAL FUNDS**

The Superintendent is responsible for the efficient and effective administration of grant funds through the application of sound management practices. Such funds shall be administered in a manner consistent with all applicable Federal, State and local laws, the associated agreements/assurances, program objectives and the specific terms and conditions of the grant award.

Cost Principles

Except where otherwise authorized by statute, costs shall meet the following general criteria in order to be allowable under Federal awards:

- A. Be necessary and reasonable for proper and efficient performance and administration of the Federal award and be allocable thereto under these principles.

To determine whether a cost is reasonable, consideration shall be given to:

1. whether a cost is a type generally recognized as ordinary and necessary for the operation of the District or the proper and efficient performance of the Federal award;
2. the restraints or requirements imposed by such factors as sound business practices, arm's length bargaining, Federal, State, local, tribal and other laws and regulations;
3. market prices for comparable goods or services for the geographic area;
4. whether the individuals concerned acted with prudence in the circumstances considering their responsibilities;
5. whether the cost does not represent any significant deviation from the established practices or Board policy which may increase the expense.

Whether an expenditure is necessary is determined based on the needs of the program. The expenditure must be necessary to achieve an important program objective and it must be established that the expenditure addresses and existing need.

When determining whether a cost is necessary, consideration may be given to whether:

- a. the cost is needed for the proper and efficient performance of the grant program;
- b. the cost is identified in the approved budget or application;
- c. there is an educational benefit associated with the cost;
- d. the cost aligns with identified needs based on results and findings from a needs assessment
- e. the cost addresses program goals and objectives and is based on program data.

A cost is allocable to the Federal award if the goods or services involved are chargeable or assignable to the Federal award in accordance with the relative benefit received.

- B. Conform to any limitations or exclusions set forth as cost principles as required by law or in the terms and conditions of the Federal award.

- C. Be consistent with policies and procedures that apply uniformly to both Federally-financed and other activities of the District.
- D. Be afforded consistent treatment. A cost cannot be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been assigned as an indirect cost under another award.
- E. Be determined in accordance with generally accepted accounting principles
- F. Be representative of actual cost, net of all applicable credits or offsets.

The term "applicable credits" refers to those receipts or reductions of expenditures that operate to offset or reduce expense items allocable to the Federal award. Typical examples of such transactions are: purchase discounts; rebates or allowances; recoveries or indemnities on losses; and adjustments of overpayments or erroneous charges. To the extent that such credits accruing to or received by the State relate to the Federal award, they shall be credited to the Federal award, either as a cost reduction or a cash refund, as appropriate.

- G. Be not included as a match or cost-share, unless the specific Federal program authorizes Federal costs to be treated as such.
- H. Be adequately documented:
  1. in the case of personal services, the Superintendent shall implement a system for District personnel to account for time and efforts expended on grant funded programs to assure that only permissible personnel expenses are allocated;
  2. in the case of other costs, all receipts and other invoice materials shall be retained, along with any documentation identifying the need and purpose for such expenditure if not otherwise clear.

#### Selected Items of Cost

The District shall follow the rules for selected items of cost at 2 C.F.R. Part 200, Subpart E when charging these specific expenditures to a Federal grant. When applicable, District staff shall check costs against the selected items of cost requirements to ensure the cost is allowable. In addition, State, District and program-specific rules, including the terms and conditions of the award, may deem a cost as unallowable and District personnel shall follow those rules as well.

#### Cost Compliance

The Superintendent shall require that grant program funds are expended and are accounted for consistent with the requirements of the specific program and as identified in the grant application. Compliance monitoring includes accounting for direct or indirect costs and reporting them as permitted or required by each grant.

#### Determining Whether a Cost is Direct or Indirect:

- A. Direct costs are those costs that can be identified specifically with a particular final cost objective, such as a Federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy.

These costs may include: salaries and fringe benefits of employees working directly on a grant-funded project; purchased services contracted for performance under the grant; travel of employees working directly on a grant-funded project; materials, supplies, and equipment purchased for use on a specific grant; and infrastructure costs directly attributable to the program (such as long distance telephone calls specific to the program, etc.).

- B. Indirect costs are those that have been incurred for a common or joint purpose benefiting more than one cost objective, and not readily assignable to the cost objectives specifically benefited, without effort disproportionate to the results achieved. Costs incurred for the same purpose in like circumstances shall be treated consistently as either direct or indirect costs.

These costs may include: general data processing, human resources, utility costs, maintenance, accounting, etc.

Federal education programs with supplement not supplant provisions must use a restricted indirect cost rate. In a restricted rate, indirect costs are limited to general management costs. General management costs do not include divisional administration that is limited to one component of the District, the governing body of the District, compensation of the Superintendent, compensation of the chief executive officer of any component of the District, and operation of the immediate offices of these officers.

The salaries of administrative and clerical staff should normally be treated as indirect costs. Direct charging of these costs may be appropriate only if all of the following conditions are met:

1. Administrative or clerical services are integral to a project or activity.
2. Individuals involved can be specifically identified with the project or activity.
3. Such costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency.
4. The costs are not also recovered as indirect costs.

Where a Federal program has a specific cap on the percentage of administrative costs that may be charged to a grant, that cap shall include all direct administrative charges as well as any recovered indirect charges.

Effort should be given to identify costs as direct costs whenever practical, but allocation of indirect costs may be used where not prohibited and where indirect cost allocation is approved ahead of time by the Wisconsin Department of Public Instruction (DPI) or the pass-through entity (Federal funds subject to 2 CFR Part 200 pertaining to determining indirect cost allocation).

#### Timely Obligation of Funds

##### When Obligations are Made

Obligations are orders placed for property and services, contracts and subawards made, and similar transactions during a given period that require payment by the non-Federal entity during the same or a future period.

The following table illustrates when funds are determined to be obligated under the U.S. Department of Education regulations:

| If the obligation is for:   | The obligation is made:   |
|---|---|
| Acquisition of Property   | On the date the District makes a binding written commitment to acquire property |
| Personal services by an employee of the District  | When the services are performed   |
| Personal services by a contractor who is not an employee of the District  | On the date the District makes a binding agreement to obtain the services       |
| Public utility services   | When the District receives the services   |
| Travel  | When the travel is taken  |
| Rental property   | When the District uses the property   |
| A pre-agreement cost that was properly approved by the Secretary under federal regulations, 2 CFR part 200, Subpart E | On the first day of the project period  |

#### Period of Performance

All obligations must occur on or between the beginning and ending dates of the grant project. This period of time is known as the period of performance.

In the case of a State-administered grant, obligations under a grant may not be made until the grant funding period begins or all necessary materials are submitted to the granting agency, whichever is later. In the case of a direct grant, obligations may begin when the grant is awarded, unless otherwise stated in the grant.

For both State-administered and direct grants, regardless of the period of availability, the District shall liquidate all obligations incurred under the award not later than ninety (90) days after the end of the funding period unless an extension is authorized, or other terms are provided for in the grant. Any funds not obligated within the period of performance or liquidated within the appropriate timeframe are said to lapse and shall be returned to the awarding agency. Consequently, the District shall closely monitor grant spending throughout the grant cycle.

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Legal 2 C.F.R. 200.403-.406, 200.413(a)-(c), 200.430(a), 200.431(a) and 200.474(b)

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Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title TIME AND EFFORT REPORTING  
Number po6116  
Status

#### 6116 - **TIME AND EFFORT REPORTING**

As a recipient of Federal funds, the District shall comply with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. Section 200.430 of the Code of Federal Regulations requires certification of effort to document salary expenses charged directly or indirectly against Federally-sponsored projects. This process is intended to verify that compensation for employment services, including salaries and wages, is allocable and properly expended, and that any variances from the budget are reconciled.

Compensation for employment services includes all remuneration, paid currently or accrued, for services of employees rendered during the period of performance under the Federal award, including but not necessarily limited to wages and salaries. Compensation for personal services may also include fringe benefits, which are addressed in 2 C.F.R. 200.431 Compensation-fringe benefits. Costs of compensation are allowable to the extent that they satisfy the specific requirements of these regulations, and that the total compensation for individual employees:

- A. is reasonable for the services rendered, conforms to the District's established written policy, and is consistently applied to both Federal and non-Federal activities; and
- B. follows an appointment made in accordance with the District's written policies and meets the requirements of Federal statute, where applicable.

#### Time and Effort Reports

Unless specifically authorized by the Department of Public Instruction (pass-through entity) all salaries and wages charged to Federally-sponsored projects must be based on records (time and effort reports) that accurately reflect the work performed by the employee. A time and effort report is required regardless of whether such time is paid by a Federally-sponsored agreement, a private foundation, or is an unpaid contribution, i.e. cost share match. Committed cost sharing, either voluntary or mandatory, must be included in effort reports.

#### The reports:

- A. are supported by a system of internal controls which provide reasonable assurance that the charges are accurate, allowable, and properly allocated;
- B. are incorporated into the official records of the District;
- C. reasonably reflect the total activity for which the employee is compensated by the District, not exceeding 100% of the compensated activities;
- D. encompass both Federally assisted and other activities compensated by the District on an integrated basis;
- E. comply with the District's established accounting policies and practices;
- F. support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one (1) Federal award; a Federal award and non-Federal award, an indirect cost activity and a direct cost activity, two (2) or more indirect activities which are allocated using different allocation bases, or an unallowable activity and a direct or indirect cost activity.

The District will also follow any time and effort requirements imposed by the pass-through entity to the extent that they are more restrictive than the Federal requirements. The Payroll Office is responsible for the distribution, collection, and retention of all employee effort reports. Individually reported data will be made available only to authorized auditors.

#### Reconciliations

Budget estimates are not used as support for charges to Federal awards. However, the District may use budget estimates for interim accounting purposes. The system used by the District to establish budget estimates produces reasonable approximations of the activity actually performed. Any significant changes in the corresponding work activity are identified by the District and entered into the District's records in a timely manner.

The District's internal controls include a process to review after-the-fact interim charges made to a Federal award based on budget estimates and ensure that all necessary adjustments are made so that the final amount charged to the Federal award is accurate, allowable, and properly allocated.

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| Legal | Applicable Laws, Regulations, and Guidance |
|       | 2 C.F.R. 200.430, 200.431                  |

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Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title INVESTMENT INCOME  
Number po6144  
Status

6144 - **INVESTMENT INCOME**

The Board of Education authorizes the Business Manager to make investments of available monies from the funds of the District on a competitive basis in:

- A. time deposits in any credit union, bank, savings bank, trust company, or savings and loan association which is authorized to transact business in the State, if the time deposits mature in not more than three (3) years;
- B. bonds or securities issued or guaranteed as to principal and interest by the Federal government or by a commission, board, or other instrumentality of the Federal government;
- C. bonds or securities of any county, city, drainage district, technical college district, village, town, or school district in the State;
- D. other securities authorized by 66.0603;
- E. the local government pooled-investment fund.

The purpose of the investments is to maximize the returns on the District's cash balances consistent with safety of those monies and with the desired liquidity of the investments.

The Business Manager is authorized to contract with a depository for the operation of a cash management system under the following conditions:

- A. the contract is in writing
- B. the contract provides for the investment of funds by the depository with the written approval of the Business Manager
- C. the depository keeps all records concerning investment cash management
- D. the investments are made in accordance with State law with maturities not to exceed three (3) years.

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Legal 25.50, 66.0603, 67.10, Wis. Stats.

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Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title BORROWING  
Number po6145  
Status

6145 - **BORROWING**

Upon a two-thirds (2/3's) affirmative vote of the entire membership of the Board of Education, the Business Manager shall prepare the data and applications regarding the borrowing of funds needed for the immediate operation of the District. Such borrowing shall be in accordance with the provisions of 67.12(8).

Quotations shall be solicited for all short term loans which the Board has authorized. Funds shall be borrowed from the responsible organization offering the most favorable terms, as approved by the Board.

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Legal 66.0607(7) Wis. Stats.  
67.12, Wis. Stats.

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Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title POST ISSUANCE TAX EXEMPT BOND COMPLIANCE  
Number po6146  
Status

#### 6146 - **POST ISSUANCE TAX EXEMPT BOND COMPLIANCE**

The Board of Education may from time to time issue bonds and other obligations. These interests are excludable from gross income for Federal income tax purposes or are excludable from interest that is paid in whole or in part by the Federal government or which bonds otherwise enjoy certain preferential treatment under the Internal Revenue Code of 1986, as amended, (the "code") or regulations promulgated implementing the Code (the "regulations"). The Board adopts this policy to ensure that proper procedures are followed to protect the tax-favored status of each bond issue.

The general purpose of the policies set forth herein is to ensure compliance with post-issuance Federal tax requirements generally falling into the following two categories:

A. Qualified Use of Proceeds and Financed Property

Qualified use requirements generally require monitoring of the various direct and indirect uses of bond-financed property over the life of the bonds and calculations of the percentage of nonqualified uses.

B. Arbitrage Yield and Rebate

Arbitrage requirements also require monitoring over the life of the bonds to determine whether the yield on investments acquired with bond proceeds are properly restricted and the district must file Form 8038-T to pay a yield reduction payment and/or rebate payment.

#### Responsible Official

The Board designates the Business Manager as the Bond Compliance Officer with primary responsibility in post-issuance compliance. The compliance officer is authorized to obtain the assistance of the following in carrying out necessary functions under this policy:

- A. Bond Counsel – the District’s legal counsel that assists in the bond issuance
- B. External Financial Advisors – the District’s accounting firm or other financial advisor
- C. Bond Paying Agent/Trustee
- D. Rebate Analyst

All personnel that are responsible for ensuring post-issuance compliance with the tax rules must receive training or educational resources, as determined appropriate by the Bond Compliance Officer.

#### Post-Issuance Duties

The Bond Compliance Officer will engage in a detailed review of post-issuance tax compliance with the tax rules to identify instances of noncompliance and prevent violations from occurring, or timely correct identified violations, if possible. When failures to comply with post-issuance compliance requirements are identified, the Bond Compliance Officer will promptly consult with bond counsel to determine if remedial action is available, or if some other action is required.

#### Private Use

Bond-financed projects are subject to rules and limitations on private use. Private use includes non-governmental activity through leases, management agreements, research agreements, and other type of activity in which a non-governmental entity obtains a benefit or interest in the bond-financed project beyond that normally provided to the public. In the event such special usage is contemplated, the Bond Compliance Officer must assure compliance with applicable tax regulations.

### Use of Bond Proceeds

The Bond Compliance Officer shall assure that bond funds are used for the purpose for which the bond issue is authorized and that any project with a combination of authorized expenses from bond proceeds and other funds, result in expenses paid for with bond proceeds that are clearly identified and properly recorded.

The Bond Compliance Officer must assure that investment activities are conducted at fair market value, and may employ bidding procedure to establish a safe harbor. The Bond Compliance Officer shall be aware of any yield restrictions on any bond issue and monitor such. In the event that reimbursement is required, the Bond Compliance Officer shall work with the District's advisors to complete and record those transactions and to assure proper filings with the IRS.

### Recordkeeping Requirements

The Bond Compliance Officer is responsible for the maintenance of records relating to the bond financings, and for the transfer of all such records to his/her successor. In the event that different persons are responsible for different aspects of compliance with the tax rules (for example, the investment of bond proceeds and expenditure of bond proceeds on projects), the Bond Compliance Officer will assure coordination with all involved and retention of complete records. The following records, as applicable, shall be retained:

- A. audited financial statements of the School District throughout the period of the bond issue
- B. appraisals, surveys, and studies pertaining to the facilities financed with the proceeds of bonds, as well as any and all contracts entered into for the construction, renovation or purchase of bond-financed facilities
- C. all public discourse concerning the bonds, including informative materials distributed by the District, as well as other publications, such as third party studies, newspaper articles, etc.
- D. paying Agent or trustee statements
- E. all records regarding the management of bond funds, including investments and the gains (or losses) from such investments; and including specifically trustee statements regarding investments, investment contracts, or other such instruments
- F. Board resolutions authorizing reimbursement of bond funds or earned interest, and accounting of any such disbursements
- G. ledger of bond expenditures (including costs of issuance) and the dates and amounts of such expenditures (including requisitions, draw schedules, draw requests, invoices, bills and cancelled checks with respect to such expenditures)
- H. records of the sale of any bond-financed facilities, including Board resolutions, sales documents, and accounting of proceeds from such sale
- I. record of any private business uses of bond-financed facilities after the issue, including leases and subleases, licenses, management contracts, research contracts, naming rights agreements or other arrangements which provide special legal entitlements to nongovernmental persons or entities
- J. arbitrage rebate reports and records of rebate and yield reduction payments, if any
- K. resolutions or minutes of Board meetings at which any action was taken by the Board pertaining to the bond issue or subsequent treatment, including any formal elections under the Code or Regulations
- L. copies of each Form 8038-T and Form 8038-R filed with the IRS and any other forms or documents filed with the IRS, and
- M. any other documents or Board minutes regarding the Bond issue, financing, facilities, investments, reimbursements, governmental review reports, etc.

### Recordkeeping Requirements

The Bond Compliance Officer is responsible for the maintenance of records relating to the bond financings and for the transfer of all such records to his/her successor. In the event that different persons are responsible for different aspects of compliance with the tax rules (for example, the investment of bond proceeds and expenditure of bond proceeds on projects), the Bond Compliance Officer will assure coordination with all involved and retention of complete records.

Records of appraisals, surveys, and studies pertaining to the facilities financed with the proceeds of bonds, as well as any and all contracts entered into for the construction, renovation or purchase of bond-financed facilities, as applicable, shall be retained.



Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title TUITION INCOME  
Number po6150  
Status

**6150 - TUITION INCOME**

The Board of Education shall assess tuition for attendance in District schools by students who are not entitled to receive a free, public education in this District and whose enrollment has been approved by the Board .

Tuition rates shall be determined in accordance with 121.83 and reviewed annually by the Board. Rates will be available before the beginning of the school year or before the student's attendance commences. Charges shall be the maximum permitted by law.

The Business Manager shall be responsible for the assessment and collection of tuition. Tuition billing may be assessed daily in advance of the period for which the billing is made.

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Legal 121.75 et seq., Wis. Stats.

Last Modified by Jennifer Hagemann on June 15, 2018

Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title BAD CHECKS  
Number po6151  
Status

6151 - **BAD CHECKS**

When the District receives a check from a student or parent that, when deposited, is returned marked "insufficient funds", the Superintendent shall provide an opportunity for the payer to make proper payment or to arrange for a satisfactory payment schedule. If payment is not received within thirty (30) days, the payment schedule is not adhered to, or the monies do not appear to be collectable, the Board of Education authorizes the Superintendent to remove the fee or charge from the District's Accounts Receivable and to take appropriate action against the student and/or the parents.

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Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title STUDENT FEES, FINES, AND CHARGES  
Number po6152  
Status

#### 6152 - **STUDENT FEES, FINES, AND CHARGES**

The Board of Education may levy certain charges to students to facilitate the utilization of adequate, appropriate learning materials used in the course of instruction. If the District determines that a student is in serious financial need, it may choose to provide any or all such materials free of charge.

A charge shall not exceed the combined cost of the material used, freight and/or handling charges, and nominal add-on for loss. Money received from resale of such material shall be returned to the District Office with an accurate accounting of all transactions.

#### Fines

When school property, equipment, or supplies are damaged, lost, or taken by a student, a fine will be assessed. The fine will be reasonable, seeking only to compensate the school for the expense or loss incurred.

The late return of borrowed books or materials from the school libraries will be subject to appropriate fines.

Any fees or fines collected by members of the staff are to be turned into the bank within twenty-four (24) hours after collection.

In the event the above course of action does not result in the fee being collected, the Board authorizes the Business Manager to take the student and/or his/her parents to Small Claims Court for collection. The District shall not permit or elicit the assistance of volunteers in efforts to collect unpaid student fees or expenses, including food service balances.

Nothing in this policy restricts the right of access of a parent or student to school records or to receive copies of such records, as required by Federal and State laws.

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Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title FISCAL PLANNING  
Number po6210  
Status

#### 6210 - **FISCAL PLANNING**

The Board of Education shall collect and assemble the information necessary to discharge its responsibility for the fiscal management of the School District and to plan for the financial needs of the educational program. The Board will strive toward maintaining both short and long range projections of District financial requirements.

Because of resource limitations, sometimes fiscal concerns overshadow the educational program. Recognizing this, it is essential that the District take specific action to make sure education remains central and that fiscal matters are ancillary and contribute to the educational program. This concept shall be incorporated into Board operations and into all aspects of District management and operations.

Accordingly, the Board directs the Business Manager to:

- A. include cost estimates in all ongoing financial requirements;
- B. prepare a long range maintenance and replacement plan of facilities and equipment;
- C. maintain a plan of anticipated local, State, and Federal revenues;
- D. report to the Board any serious financial implications that emerge from the District's ongoing fiscal planning.

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Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title BUDGET PREPARATION  
Number po6220  
Status

6220 - **BUDGET PREPARATION**

The District's operation and educational plan is reflected in its budgets. Each year, the Board of Education will cause to have prepared and then review and approve Fund budgets.

Each budget shall be designed to carry out District operations in a thorough and efficient manner, maintain District facilities properly, and honor continuing obligations of the Board.

A proposed budget requires the critical analysis of every member of the Board prior to approval; once adopted, the budget deserves the support of all members of the Board regardless of their position before its adoption.

The Board directs the Business Manager to present the budgets to the Board along with all available information associated with each budget in sufficient time to allow for proper analysis and discussion prior to the hearing.

When presented to the Board for review and/or adoption, the information shall include, as appropriate:

- A. the proposed expenditure and revenue in each financial category for the ensuing year;
- B. the actual unaudited expenditures for the current year and actual audited expenditures for the previous year.

Legal 65.90, Wis. Stats.

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Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title BUDGET HEARING  
Number po6230  
Status

#### 6230 - **BUDGET HEARING**

The annual budget adopted by the Board of Education represents the Board's position on the allocation of resources required to operate an appropriate system of education. All reasonable means shall be employed by the Board to present and explain that position to all interested parties. A public budget hearing will be conducted at the annual meeting.

The report will include the Treasurer's report and the budget summary required under s. 65.90 of the Wisconsin Statutes.

Each member of the Board and the Superintendent shall be sufficiently acquainted with the budget and its underlying purposes to answer questions from members of the public.

A simplified form of the budget may be prepared annually and may be sent to appropriate parties and distributed to each person attending the annual budget hearing.

A simplified budget may include the expenditure in each major category of current expense for the current year and the coming year and a summary of anticipated receipts as well as a brief explanation of significant increases and decreases from the preceding budget.

The final budget approved by the Board shall be made available to the public in the form and places as required by law.

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Legal 65.980, Wis. Stats.  
120.11(3), Wis. Stats. (for common or union high districts only)

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Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title BUDGET IMPLEMENTATION  
Number po6231  
Status

6231 - **BUDGET IMPLEMENTATION**

The Board of Education places the responsibility of administering the budget, once adopted, with the Superintendent. S/He may consult with the Business Manager when major purchases are considered and shall keep the Board informed as to problems or concerns as the budget is being implemented.

The Superintendent is authorized to proceed with making financial commitments, purchases, and other expenditures within limits provided in the budget, limitations stated in Board policies, and within legal authority expressed in State statutes.

Listings of expenditures, appropriate financial reports, and budget comparison reports shall be submitted monthly to the Board to keep members informed as to the status of the budget and overall financial condition of the District. Once each month, the Board minutes shall include a statement of the receipts and expenditures in the aggregate.

If the actual revenues are less than estimated revenues, including the available equity upon which the appropriations from the fund were based, the Superintendent shall present to the Board recommended amendments to the budget that will prevent expenditures from exceeding revenues. S/He shall ensure that such recommendations shall be in accordance with requirements of the law. Budget amendments must be approved by a two-thirds vote of the full Board.

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Legal 66.0607(7), 120.11(4) Wis. Stats.

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Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title GENERAL FUND BALANCE  
Number po6235  
Status

#### 6235 - **GENERAL FUND BALANCE**

The general fund balance is the amount by which assets exceed liabilities. The Board believes there is a need to maintain a general fund balance to:

- A. Provide for an adequate cash flow.
- B. To serve as a safeguard against emergency expenditures and/or unrealized revenues.
- C. To generate sufficient interest income from investments to offset the interest expense from temporary borrowing for cash flow needs.
- D. To cover operating costs until the deferred tax revenue is received in August.
- E. To give the district the best possible bond rating, which allows for the lowest interest rate available.

The District's system of accounting shall comply with all requirements of the Governmental Accounting Standards Board, Statement No. 54 (GASB 54). In accordance with GASB 54, the District will report its fund balances in the following categories:

- A. Nonspendable fund balance - amounts that cannot be spent because they are either (a) not in a spendable form (which includes items that are not expected to be converted to cash – e.g., inventories or prepaid amounts) or (b) legally or contractually required to be maintained intact (e.g., the corpus of an endowment fund).
- B. Restricted fund balance - amounts constrained to specific purposes by their providers (such as grantors, bondholders, and higher levels of government), through constitutional provisions, or by enabling legislation.
- C. Committed fund balance - amounts constrained to specific purposes by the Board; to be reported as committed, amounts cannot be used for any other purpose unless the Board takes action to remove or change the constraint.
- D. Assigned fund balance - amounts the Board *intends* to use for a specific purpose but are neither restricted nor committed; intent can be expressed by the Board or by an official or committee to which the Board delegates the authority.
- E. Unassigned fund balance - amounts that are available for any purpose; these amounts are reported only in the general fund.

The Board's goal is to maintain a General Fund balance of at least 15%, but less than 20% of budgeted expenditures. To provide the best fiscal management of the fund balance, it will be required that appropriation for expenditures from the reserve will require a 2/3 majority vote of the full board.

Legal Government Accounting Standards Board Statement 54

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Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title PURCHASING  
Number po6320  
Status

## 6320 - **PURCHASING**

Procurement of all supplies, materials, equipment, and services paid for from District funds shall be made in accordance with all applicable Federal and State statutes, Board policies. Standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award, and administration of contracts are established in Policy 1130, Policy 3230, and Policy 4230 – Conflict of Interest.

All procurement transactions shall be conducted in a manner that encourages full and open competition and in accordance with good administrative practice and sound business judgment.

The School District of Mauston shall follow a policy of centralized purchasing. An online requisition or local purchase order must be submitted to the immediate supervisor for all items to be purchased before a purchase order can be processed. All purchases shall be made by purchase order and must be authorized by the Superintendent or his/her designee.

The Superintendent is authorized to make purchases of up to \$25,000 without Board approval.

### Purchasing Items with Federal Grant Funds

When purchasing items with Federal funds a District shall:

- A. give consideration to whether separating or combining purchases will provide for a more cost-effective approach to avoid acquisition of unnecessary or duplicative items;
- B. where appropriate, conduct an analysis of lease versus purchase options and the most economical and beneficial method shall be pursued;
- C. conduct an evaluation of the availability and feasibility of entering into inter-governmental agreements to procure the goods or services required on a shared basis;
- D. in the case of a time and material contract, make a determination that no other arrangement is suitable and that the contract places a ceiling price that protects the District.

The Board reserves the right to reject any and all bids.

### General Provisions

The Superintendent is authorized to purchase all items within budget allocations.

The Superintendent is authorized to make emergency purchases, without prior approval, of those goods and/or services needed to keep the schools in operation. Such purchases shall be brought to the Board's attention at the next regular meeting.

Employees may be held personally responsible for anything purchased without a properly signed purchase order or authorization.

The Board may acquire office equipment by lease, installment payments, lease-purchase agreements, or by lease with an option to purchase, provided the contract sets forth the specific terms, including price, of such a purchase.

### Debarred Contractors Excluded

The District shall not award any contract, agreement or subcontract for goods or services to any party that has been suspended or debarred from receiving contracts or subcontracts by the Federal Acquisition Regulations (FAR).

For any contract or subcontract with a value in excess of \$25,000, the District shall verify that the contractor or subcontractor and any principle is not listed on the General Services Administration's list of debarred or suspended contractors in the Excluded Parties Listing System (EPLS).

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Legal                            120.12(24), 66.0133, Wis. Stats.  
   2 C.F.R. Section 200.213; 200.318 - 200.326  
   48 C.F.R. Section 9.4

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Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title PROCUREMENT – FEDERAL GRANTS/FUNDS  
Number po6325  
Status

#### 6325 - **PROCUREMENT – FEDERAL GRANTS/FUNDS**

Procurement of all supplies, materials, equipment, and services paid for from Federal funds including any District matching funds shall be made in accordance with all applicable Federal, State, and local statutes and/or regulations, the terms and conditions of the Federal grant, Board policies, and administrative procedures.

The Superintendent shall maintain a procurement and contract administration system in accordance with the USDOE requirements (2 C.F.R. 200.317-.326) for the administration and management of Federal grants and federally-funded programs. The District shall maintain a contract administration system that requires contractors to perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. Except as otherwise noted, procurement transactions shall conform to the provisions of the District's documented general purchasing policy and administrative guidelines (Policy 6320 and AG 6320A).

All District employees, officers, and agents who have purchasing authority shall abide by the standards of conduct covering conflicts of interest and governing the actions of its employees, officers, and agents engaged in the selection, award, and administration of contracts as established in Policy 1130, Policy 3230, and Policy 4230 – Conflict of Interest.

The District will avoid acquisition of unnecessary or duplicative items. Additionally, consideration shall be given to consolidating or breaking out procurements to obtain a more economical purchase and, where appropriate, an analysis shall be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach. These considerations are given as part of the process to determine the allowability of each purchase made with Federal funds.

To foster greater economy and efficiency, the District may enter into State and local intergovernmental agreements where appropriate for procurement or use of common or shared goods and services.

#### Competition

All procurement transactions shall be conducted in a manner that encourages full and open competition and in accordance with good administrative practice and sound business judgement. In order to promote objective contractor performance and eliminate unfair competitive advantage, the District shall exclude any contractor that has developed or drafted specifications, requirements, statements of work, or invitations for bids or requests for proposals from competition for such procurements.

Some of the situations considered to be restrictive of competition include, but are not limited to, the following:

- A. unreasonable requirements on firms in order for them to qualify to do business
- B. unnecessary experience and excessive bonding requirements
- C. noncompetitive contracts to consultants that are on retainer contracts
- D. organizational conflicts of interest
- E. specification of only a "brand name" product instead of allowing for an "*or equal*" product to be offered and describing the performance or other relevant requirements of the procurement
- F. any arbitrary action in the procurement process

Further, the District does not use statutorily or administratively imposed State, local, or tribal geographical preferences in the evaluation of bids or proposals, unless 1) an applicable Federal statute expressly mandates or encourages a geographic preference; or 2) the District is contracting for architectural and engineering services, in which case geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.

### Solicitation Language

The District shall require that all solicitations incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description shall not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, shall set forth those minimum essential characteristics and standards to which it shall conform if it is to satisfy its intended use. Detailed product specifications should be avoided if at all possible.

When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a "brand name or equivalent" description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which shall be met by offers shall be clearly stated; and identify all requirements which the offerors shall fulfill and all other factors to be used in evaluating bids or proposals.

The Board will not approve any expenditure for an unauthorized purchase or contract.

### Contract/Price Analysis

The District shall perform a cost or price analysis in connection with every procurement action in excess of \$150,000, including contract modifications. A cost analysis generally means evaluating the separate cost elements that make up the total price, while a price analysis means evaluating the total price, without looking at the individual cost elements.

The method and degree of analysis is dependent on the facts surrounding the particular procurement situation; however, the District shall come to an independent estimate prior to receiving bids or proposals.

When performing a cost analysis, the District shall negotiate profit as a separate element of the price. To establish a fair and reasonable profit, consideration is given to the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work.

### Time and Materials Contracts

The District uses a time and materials type contract only 1) after a determination that no other contract is suitable; and 2) if the contract includes a ceiling price that the contractor exceeds at its own risk. Time and materials type contract means a contract whose cost to the District is the sum of: the actual costs of materials, and direct labor hours charged at fixed hourly rates that reflect wages, general and administrative expenses, and profit.

Since this formula generates an open-ended contract price, a time-and-materials contract provides no positive profit incentive to the contractor for cost control or labor efficiency. Therefore, the District sets a ceiling price for each contract that the contractor exceeds at its own risk. Further, the District shall assert a high degree of oversight in order to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls.

### Suspension and Debarment

The District will award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of the proposed procurement. All purchasing decisions shall be made in the best interests of the District and shall seek to obtain the maximum value for each dollar expended. When making a purchasing decision, the District shall consider such factors as 1) contractor integrity; 2) compliance with public policy; 3) record of past performance; and 4) financial and technical resources.

The Superintendent shall have the authority to suspend or debar a person/corporation, for cause, from consideration or award of further contracts. The District is subject to and shall abide by the nonprocurement debarment and suspension regulations implementing Executive Orders 12549 and 12689, 2 CFR Part 180.

Suspension is an action taken by the District that immediately prohibits a person from participating in covered transactions and transactions covered under the Federal Acquisition Regulation (48 C.F.R. Chapter 1) for a temporary period, pending completion of an agency investigation and any judicial or administrative proceedings that may ensue. A person so excluded is suspended. (2 C.F.R. Part 180 Subpart G)

Debarment is an action taken by the Superintendent to exclude a person from participating in covered transactions and transactions covered under the Federal Acquisition Regulation (48 C.F.R. Chapter 1). A person so excluded is debarred. (2 C.F.R. Part 180 Subpart H)

The District shall not subcontract with or award subgrants to any person or company who is debarred or suspended. For contracts over \$25,000, the District shall confirm that the vendor is not debarred or suspended by either checking the Federal government's System for Award Management, which maintains a list of such debarred or suspended vendors at [www.sam.gov](http://www.sam.gov); collecting a



certification from the vendor; or adding a clause or condition to the covered transaction with that vendor. (2 C.F.R. Part 180 Subpart C)

### Bid Protest

The District maintains the following protest procedures to handle and resolve disputes relating to procurements and, in all instances, discloses information regarding the protest to the awarding agency.

A bidder who wishes to file a bid protest shall file such notice and follow procedures prescribed by the Request For Proposals (RFPs) or the individual bid specifications package, for resolution. Bid protests shall be filed in writing with the Office of the Superintendent within seventy-two (72) hours of the opening of the bids in protest.

Within five (5) days of receipt of a protest, the Superintendent shall review the protest as submitted and render a decision regarding the merits of the protest and any impact on the acceptance and rejection of bids submitted. Notice of the filing of a bid protest shall be communicated to the Board and shall be so noted in any subsequent recommendation for the acceptance of bids and awarding of contracts.

Failure to file a notice of intent to protest, or failure to file a formal written protest within the time prescribed, shall constitute a waiver of proceedings.

### Maintenance of Procurement Records

The District maintains records sufficient to detail the history of all procurements. These records will include, but are not necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price (including a cost or price analysis).

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|       |                                 |
|-------|---------------------------------|
| Legal | Applicable laws and regulations |
|       | 2 C.F.R. 200.317 - .326         |

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Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title LEASING SCHOOL PROPERTY  
Number po6330  
Status

6330 - **LEASING SCHOOL PROPERTY**

The Board of Education is authorized to lease for a term exceeding fifteen (15) years school sites, building, and equipment, not needed for school purposes to any person for any lawful use at a reasonable rental fee if approved at an annual or special school district meeting. Lease agreements entered into, modified or extended before April 17, 2004, may not exceed fifteen (15) years.

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Legal 120.13(25) Wis. Stats.

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Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title USE OF CREDIT CARDS  
Number po6423  
Status

#### 6423 - **USE OF CREDIT CARDS**

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

Credit cards shall not be used to circumvent the general purchasing procedures established by Board policy. The Board affirms that credit cards shall only be used in connection with Board-approved or school-related activities and that only those types of expenses that are for the benefit of the District and serve a valid and proper public purpose shall be paid for by credit card. Under no circumstances shall credit cards be used for personal purchases or the purchase of alcoholic beverages regardless of whether the purchase of such beverages is made in connection with a meal.

Inappropriate or illegal use of the credit card may result in a loss of credit card privileges, disciplinary action, up to and including termination, personal responsibility for any and all inappropriate charges, including finance charges and interest assessed in connection with the purchase, and/or possible referral to law enforcement authorities for prosecution.

The Board directs the Superintendent to determine and specify those employees authorized to use District credit cards. The Superintendent shall be responsible for giving direction to and supervising such employees' use of District credit cards.

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Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title PURCHASING CARDS  
Number po6424  
Status

#### 6424 - **PURCHASING CARDS**

The Board of Education recognizes that bank credit cards ("purchasing cards") offer an alternative to existing procurement processes and provide a convenient, efficient method of purchasing minor goods and services. Board employees authorized by the Superintendent may use purchasing cards only for school-related purposes in accordance with this policy and any related guidelines. Purchasing cards shall not be used to circumvent the general purchasing procedures required by law and Board policy.

All approved cardholders must agree to abide by purchasing card procedures and regulations set forth in this policy and related procurement card procedures. All transactions must be made by the individual to whom the card is issued.

Purchasing card providers shall be provided no individual cardholder information (e.g., credit records or social security numbers) other than the individual cardholder's work address.

The Business Manager or designee shall conduct independent regular reviews of each cardholder's activity to verify that the purchasing card is being used in accordance with this policy and guidelines.

Cardholders must use common sense and good judgment when using school resources. This policy and related guidelines cannot cover every issue, exception, or contingency that may arise during the cardholder's use of the purchasing card.

Cardholders will immediately surrender their cards upon request of the Business Manager for administrative reasons and shall surrender their cards upon separation from employment.

The purchasing card may never be used for alcohol, personal items or services, nor is the personal gain of credit card rewards such as bonus points, frequent flyer miles, or any other affinity program reward permitted under any circumstances.

Employees who spend over the per meal amounts approved by the Board are responsible for reimbursing the District for the balance.

All expenditures on the purchasing cards require the submission of receipts immediately after purchase or the employee will be held responsible for reimbursing the District for the amount charged. Receipts will be submitted to the Business Office.

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Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title COOPERATIVE PURCHASING  
Number po6440  
Status

6440 - **COOPERATIVE PURCHASING**

The Board of Education recognizes the advantages of centralized purchasing in that volume buying tends to maximize value for each dollar spent. The Board, therefore, encourages the administration to seek advantages in savings that may accrue to this District through joint agreements for the purchase of supplies, equipment, or services with the governing body(ies) of other governmental units.

The Board authorizes the Business Manager to negotiate such joint purchase agreements for services, supplies, and equipment which may be determined to be required from time to time by the Board and which the Board may otherwise lawfully purchase for itself, with governmental contracting units as may be appropriate in accordance with State law, the policies of this Board, and the dictates of sound purchasing procedures.

Cooperative or joint purchases require an agreement approved by the Board and the participating contracting body(ies) which shall specify the categories of equipment and supplies to be purchased; the manner of advertising for bids and of awarding contracts; the method of payment by each participating party and such other matters as may be deemed necessary to carry out the purposes of the agreement. Such agreements are subject to all legal bidding requirements.

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Legal Section 16.73 Wis. Stats.

Last Modified by Jennifer Hagemann on June 15, 2018

Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title LOCAL PURCHASING  
Number po6450  
Status

6450 - **LOCAL PURCHASING**

The Board of Education recognizes its position as a major purchaser in this community, and while it is the intention of the Board to purchase materials and supplies of quality at the lowest possible cost through widespread competition, if all other considerations are equal, the Board prefers to purchase within the District from established local merchants.

It shall be the policy of this school District to purchase locally, provided goods of equal quality and at competitive prices are available from local suppliers.

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Last Modified by Jennifer Hagemann on June 15, 2018

Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title BIDDING REQUIREMENTS  
Number po6451  
Status

#### 6451 - **BIDDING REQUIREMENTS**

Every effort shall be made to secure equipment, materials, and services with the desired quality at the least cost. Competitive bids and/or quotations shall be used for items or services whenever practical.

The district's purchasing agents shall be authorized to make decisions based on their knowledge or existing market conditions. He/she shall, however, be expected to use competitive bids or quotations whenever possible. Timeliness may require administrator consideration and decisions on specific items such as gasoline and heating fuel.

- A. The district purchasing agent may participate in cooperative bidding programs through CESA #5, or other groups when such programs are able to provide products or services according to the principals of district policy.
- B. The engagement of specialized professional services (auditors, architects, etc.) shall be subject to provisions of the bidding policy where practical. The district reserves the right to contract for such services on the basis of any unique considerations applicable to the circumstances including, but not limited to, the level of service desired or the expertise and ability of the proposed provider.
- C. Every effort shall be made to ensure that more than one quotation is received by the district whenever competitive bidding is used.

When bidding procedures are used, bids shall be advertised appropriately to secure competition from all those interested in securing contracts. Suppliers shall be invited to have their names placed on the mailing list to receive invitations to bid. When specifications are prepared, they will be mailed to all merchants and suppliers who have indicated an interest in bidding.

No bid shall be accepted which does not conform to the specifications furnished. All contracts shall be awarded to the lowest responsible bidder, except that the lowest bid may be rejected if, in the opinion of the Board or administrator, there is dissatisfaction with the vendor in prior agreements or unsatisfactory products.

Last Modified by Jennifer Hagemann on June 15, 2018

Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title CAPITALIZATION AND DEPRECIATION  
Number po6452  
Status

6452 - **CAPITALIZATION AND DEPRECIATION**

This capitalization and depreciation policy is established to safeguard assets, enhance accountability and provide for more accurate and uniform financial reporting in compliance with the Generally Accepted Accounting Principals in the United States of America (GAAP) and Governmental Accounting Standards Board (GASB) Statement No. 34.

- A. All fixed asset purchases in excess of \$5,000 for items that have a useful life of more than one year shall be capitalized.
- B. Certain categories of assets costing less than \$5,000 but greater than \$1,000 shall be inventoried and tracked, although not in the general ledger. These items will not be depreciated.
- C. In accordance with GAAP, assets must be depreciated over their estimated useful lives.

|  |            |
|--|------------|
| a. Computer Equipment                    | 3 years    |
| b. Vehicles                              | 5 years    |
| c. Other Equipment                       | 5-10 years |
| d. Site Improvements                     | 20 years   |
| e. Buildings                             | 50 years   |
| f. Subsequent modernization to Buildings | 50 years   |

- D. For depreciation purposes, only the salvage value of assets is estimated to be immaterial. Therefore, assets will be depreciated at 100% of cost.
- E. The "half-year" convention will be utilized whereby one-half of depreciation is recorded in the fiscal year of acquisition and the fiscal year of disposition.
- F. Straight-line depreciation will be calculated for all depreciable property.

Last Modified by Jennifer Hagemann on June 15, 2018



Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title VENDOR RELATIONS  
Number po6460  
Status

6460 - **VENDOR RELATIONS**

The Board of Education shall not enter a contract knowingly with any supplier of goods or services to this District under which any Board member or officer, employee, or agent of this School District has any pecuniary or beneficial interest, direct or indirect, unless the person has not solicited the contract or participated in the negotiations leading up to the contract. This prohibition shall not prevent any person from receiving royalties upon the sale of any textbook of which s/he is the author and which has been properly approved for use in the schools of this District.

For the purpose of this policy "beneficial interest" shall be determined in accordance with 946.13.

Board members and school personnel shall not accept any gifts or favors from vendors which might, in any way, influence their recommendations on the eventual purchase of equipment, supplies, or services.

All sales persons, regardless of product, shall be approved by the Superintendent before contacting any teachers, students, or other personnel of the School District. Purchasing personnel shall not show any favoritism to any vendor. All agreements must be approved by the Superintendent. Each order shall be placed in accordance with policies of the Board on the basis of quality, price, and delivery with past service a factor if all other considerations are equal.

Legal 118.12(2), 946.13, Wis. Stats.

Last Modified by Jennifer Hagemann on June 15, 2018

Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title PAYMENT OF CLAIMS  
Number po6470  
Status

6470 - **PAYMENT OF CLAIMS**

The Board of Education directs the prompt payment of legitimate claims by suppliers of goods and services to the School District.

Each bill or obligation of this Board must be itemized fully, and verified before a warrant can be drawn for its payment.

When an invoice is received, the Business Manager shall verify that a voucher is submitted properly, that acceptable goods were received or satisfactory services rendered, that the expenditure is included in the Board's budget and funds are available for its payment, and that the amount of the invoice is correct. Each verified claim is to be paid within thirty (30) days.

All payments shall be submitted for Board review in the form of a listing that includes the vendor name; the number and amount of the check; and the description of the item.

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Legal 66.0607, 66.0135, Wis. Stats.

Last Modified by Jennifer Hagemann on June 15, 2018

Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title PAYROLL AUTHORIZATION  
Number po6510  
Status

#### 6510 - **PAYROLL AUTHORIZATION**

The most substantial payment of public funds for the operation of the School District is that which is made to the employees of the Board of Education for services rendered. To ensure that each person so compensated is validly employed by this District and that the compensation remitted fairly represents the services rendered, this policy is promulgated.

All district personnel shall receive their payroll checks on the 15th and the last working day of the month. In the event there is no school on those days, checks may be issued the last day school is in session prior to those dates.

Employment of all District personnel whether by the year, term, month, week, day, or hour in contract, temporary, or substitute form must be approved by the Board except where authority to appoint certain personnel of the District has been delegated to the Superintendent.

Each motion of the Board to employ or reemploy a staff member shall include the name of the individual and the position title.

Eligible District personnel employed on a school year basis may voluntarily request payment over a twelve (12) month period for service performed during the school year, pursuant to 109.03, Wis. Stats, unless such payment is prohibited by a valid collective bargaining agreement. Employees that wish to receive their compensation over a twelve (12) month period must complete the District form. .

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Legal 109.03, Wis. Stats.

Last Modified by Jennifer Hagemann on June 15, 2018

Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title PAYROLL DEDUCTIONS  
Number po6520  
Status

#### 6520 - **PAYROLL DEDUCTIONS**

The Board of Education directs the Superintendent to ensure that deductions are made from an employee's paycheck as required by law (e.g., State and Federal withholding and employment taxes). The Board also authorizes payroll deductions for the following purposes:

- A. Wisconsin Retirement System (Standard Contribution)
- B. Wisconsin Retirement System (Voluntary Additional Contribution)
- C. Section 125 deductions (cafeteria plans)
- D. savings in a bank or chartered credit union
- E. payment of group insurance premiums for a plan in which District employees participate
- F. Any such deduction must be expressly authorized in writing by the employee.

The Board declares its willingness to enter into an agreement with any of its employees whereby the employee agrees to take a reduction in salary with respect to amounts earned after the effective date of such agreement in return for the Board's agreement to use a corresponding amount to purchase an annuity for such employee (or group of employees desiring the same annuity company) from any company authorized to transact the business as specified in law in accordance with Section 403(b) of the Internal Revenue Code, and in accordance with the District's approved list. . However, it shall be clearly understood that the Board's only function shall be the deduction and remittance of employee funds.

Said agreement shall comply with all of the provisions of law and may be terminated as said law provides upon notice in writing by either party. Employees shall notify the Superintendent's Office in writing if they wish to participate in such a program.

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Last Modified by Jennifer Hagemann on June 15, 2018

|         |                        |
|---------|------------------------|
| Book    | 1ST DRAFT POLICY CLEAN |
| Section | 6000 Finances          |
| Title   | CROWDFUNDING           |
| Number  | po6605                 |
| Status  |                        |

#### 6605 - **CROWDFUNDING**

This policy applies to the use of any form of crowdfunding utilizing an online service or website-based platform for the financial benefit or gain of the District – be it a specific classroom, grade level, department, school, or curricular or extra-curricular activity. “Crowdfunding” refers to a campaign to collect typically small amounts of money from a large number of individuals to finance a project or fundraise for a specific cause. Through the use of personal networking, social media platforms, and other Internet based resources, funds are solicited or raised to support a specific campaign or project.

Crowdfunding activities aimed at raising funds for a specific classroom or school activity, including extra-curricular activity, or to obtain supplemental resources (e.g., supplies or equipment) that are not required to provide a free, appropriate, public education to any students in the classroom may be permitted, but only with the specific approval of the Superintendent.

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Last Modified by Jennifer Hagemann on June 15, 2018

Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title STUDENT ACTIVITY FUND  
Number po6610  
Status

#### 6610 - **STUDENT ACTIVITY FUND**

Student Activity Fund accounts shall be established to handle receipts and disbursements for organizations and activities identified with the school district but not directly connected to the curricular activities. All student activity funds shall be under the financial control of the Board of Education and shall be managed in accordance with sound budgetary and accounting procedures.

The District Office shall keep records of receipts, disbursements and account balances for each individual activity account. Complete records relating to student activity funds shall be submitted for audit at the end of each fiscal year. The audit of student activity funds shall be made at the same time as the annual audit of school District funds. The cost of such audit shall be paid by the district.

- A. Each class, club or organization shall be assigned a faculty advisor who will be responsible to the principal. This advisor will be responsible for:
1. Supervising the collection of all funds due to the organization and turning these funds over to the District Office.
  2. Supervising the disbursement of funds from the organization with proper documentation and approval.
  3. Supervising the management of the funds of the organization to see that the funds are used for their intended purpose and that there are sufficient funds to cover expenditures.
- B. All receipts should be turned in to the building's central office on a daily basis with documentation stating name of organization, amount of deposit and source of funds. All funds will be deposited in the district's activity fund account. Any interest received on this account will be distributed at the end of each fiscal year based on the average account balance through the year. Any bank charges will be deducted from the interest before allocation.
- C. Disbursements of class, club or organization funds may be made only with the approval of the faculty advisor and the principal. Disbursements may be requested using either a requisition, voucher request form, or a local purchase order – all of which require the approval of the faculty advisor and the principal. Students will not be allowed to purchase items without a signed purchased order. No student activity fund shall be obligated for purchases made by students unless supported by a written purchase order with an authorized signature.
- D. The District Office will issue monthly reports to the individual activity advisors showing monthly and year to date activity in the account. Any discrepancies or errors should be reported to the District Office as soon as possible.
- E. No student organization shall be allowed to operate with a deficit balance. Special exceptions may be made with the approval of the Superintendent and the principal based on a reasonable expectation that such negative balance is a temporary condition – lasting not more than 6 months – that will be corrected by incoming receipts. Advisors must submit a request to operate on a deficit balance to the building principal before any funds are expended which would put them at a deficit. Organizations which are found to be in a deficit situation will not be allowed to expend any additional funds until the deficit is eliminated or the request to operate at a deficit has been approved.
- F. At the end of the school year, all balances of class, club or organization funds will be carried forward to the next school year with the exception of the graduating class fund balance. The graduating class shall designate how any remaining balance will be disposed of or spent. This designation must be made in writing, signed by the class officers, and submitted to the high school principal before the end of the school year. Funds may be donated to another class, a charity, or used to purchase a gift for the school from the graduating class. This donation of the class will be made by the district as soon as all of the bills for the graduating class have been paid. Any undesignated funds which remain in a class treasury on September 30 of the year following graduation will be transferred to the Golden Eagle Capital Improvements account in the activity fund. Expenses from this account will benefit all students in the district and be overseen by the Superintendent.

G. If an account has had no activity for twelve consecutive months, it may be considered inactive and will be closed by the Superintendent. Funds from inactive accounts shall be transferred to the Golden Eagle Capital Improvements account in the activity fund.

Legal 120.16(2) Wis. Stats.

Last Modified by Jennifer Hagemann on June 15, 2018

Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title GATE RECEIPTS AND ADMISSIONS  
Number po6611  
Status

**6611 - Gate Receipts and Admissions**

Admissions receipts of school events shall be adequately controlled. The Principal is responsible for the administration and supervision of all phases of school events for which an admission is charged.

Persons presenting season, faculty, or special passes will be admitted to all events. Free admission passes to district-sponsored athletic contests will be available to persons 62 years of age or older. Athletic passes may be given to school district employees and their spouses. Mauston High School Students may use their picture ID cards for admission to district-sponsored athletic contests. Pre-School aged students are admitted free to district-sponsored athletic contests when accompanied by an adult.

Adequate records shall be maintained to provide chronological and accounting data for subsequent review and analysis.

The Board shall review periodically and set prices for high school varsity athletic events in accordance with conference by-laws.

Last Modified by Jennifer Hagemann on June 15, 2018



|         |                            |
|---------|----------------------------|
| Book    | 1ST DRAFT POLICY CLEAN     |
| Section | 6000 Finances              |
| Title   | REVENUES FROM SCHOOL SHOPS |
| Number  | po6612                     |
| Status  |                            |

**6612 - REVENUES FROM SCHOOL SHOPS**

All revenues from school operated shops will be recorded separately; however, the funds may be invested as part of the district's investment program.

Last Modified by Jennifer Hagemann on June 15, 2018

Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title REVENUES FROM SCHOOL-OWNED REAL ESTATE  
Number po6613  
Status

**6613 - REVENUES FROM SCHOOL-OWNED REAL ESTATE**

Revenue derived from school-owned real estate (such as the school forests) will be receipted into the District's accounts as directed by the Board of Education. Monies not directed for expenditure shall be invested according to the District's rules for investments.

Last Modified by Jennifer Hagemann on June 15, 2018

|         |                        |
|---------|------------------------|
| Book    | 1ST DRAFT POLICY CLEAN |
| Section | 6000 Finances          |
| Title   | PETTY CASH             |
| Number  | po6620                 |
| Status  | From Neola             |

#### 6620 - **PETTY CASH**

The Board of Education recognizes the convenience afforded the day-by-day operation of the schools by the establishment of one (1) or more petty cash funds. The Board shall require the imposition of such controls as will prevent abuse of such funds.

Each custodian of a petty cash fund shall ensure that the funds in his/her care shall be disbursed only for minor expenditures not readily deferred. No petty cash fund may be used to circumvent the purchasing procedures required by law and the policies of this Board. A request for petty cash funds must be made in writing, be signed by the person making the request, and include such supporting documentation as may be appropriate. The petty cash box must be secured daily.

Expenditures shall be carefully itemized with receipts or other supporting documents on file.

Last Modified by Carolyn Fillman on May 30, 2018

Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title CASH IN SCHOOL BUILDINGS  
Number po6622  
Status

**6622 - CASH IN SCHOOL BUILDINGS**

Money accumulated at the school building level shall be deposited in a timely manner. Large sums of money held in schools is both undesirable and unnecessary.

Collections for school lunches, admission ticket sales, student fees and fines, student funds and all other district receipts shall be deposited on a daily basis or as directed by the Superintendent.

Staff collections from students purchasing materials for resale shall be receipted in the building office on a daily basis.

Last Modified by Jennifer Hagemann on June 15, 2018

Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title TRUST AND AGENCY FUNDS  
Number po6670  
Status

**6670 - TRUST AND AGENCY FUNDS**

The Board of Education directs the establishment of Trust and Agency Funds for the financial administration of trusts operated by and duly approved by the Board.

The Business Manager shall be responsible for the administration of Trust and Agency Funds. Funds will be audited annually and will be administered under appropriate accounting controls. The books of account will record income and expenses separately for each approved area.

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Legal 66.0603, 120.11, Wis. Stats.

Last Modified by Jennifer Hagemann on June 15, 2018

|         |                        |
|---------|------------------------|
| Book    | 1ST DRAFT POLICY CLEAN |
| Section | 6000 Finances          |
| Title   | RECOGNITION            |
| Number  | po6680                 |
| Status  |                        |

#### 6680 - **RECOGNITION**

The purpose of this policy is to permit the Board of Education to honor its staff, former Board members, and other nonemployee persons with plaques, pins, token retirement gifts and awards, and other amenities.

The Board wishes to also honor staff, students, citizens, and advisory groups for their contributions with appropriate recognitions and authorizes administrators to purchase meals, refreshments, and/or other amenities to further the interests of the District.

The Board hereby affirms that the expenses incurred as listed above do serve a public purpose. The Board believes that "public purpose" serves for the promotion of education, rapport with the business community, community relations, and the encouragement of nonemployees to serve as volunteers as well as furthering other interest.

Last Modified by Jennifer Hagemann on June 15, 2018

Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title FAIR LABOR STANDARDS ACT (FLSA)  
Number po6700  
Status

#### 6700 - **FAIR LABOR STANDARDS ACT (FLSA)**

It is the Board of Education's policy to comply with the provisions of State and Federal Law and their respective implementing regulations, relating to minimum wages and overtime. To that end, the Board shall pay at least the minimum wage to all employees. Further, the Board recognizes the safe and efficient operation of the District may occasionally require covered, non-exempt employees to work more than forty (40) hours during a given work week. Such employees shall be paid overtime compensation.

Work week is defined as the seven (7) day period of time beginning on Sunday at 12:00 a.m. and continuing to the following Saturday at 11:59 p.m. (or Monday at 12:00 a.m. and continuing to the following Sunday at 11:59 p.m.)

Covered, non-exempt employees who work (i.e., perform work on behalf of or for the benefit of the Board) more than forty (40) hours in a given work week will receive overtime compensation at the rate of one and one-half (1 1/2) times the employee's regular hourly rate of pay for all hours worked in excess of forty (40) in the work week. Payment will be in the form of wages or, if the employee and the Superintendent agree, in the form of compensatory time off in the amount of one and one-half (1 1/2) times the number of overtime hours worked.

The Superintendent or his/her designee shall determine the necessity and availability of overtime work.

Overtime may be authorized only by a supervisor and will be used primarily to address circumstances of an emergency or temporary nature. Non-exempt employees who work overtime without prior approval from the Superintendent or a supervisor will be subject to disciplinary action, up to and including termination.

Non-exempt employees who perform compensable work that they are not authorized to perform, will be compensated for any actual worktime, but will be subject to disciplinary action.

Exempt employees are individuals who are exempt from the State and Federal overtime provisions. Generally, individuals employed in a bona fide executive, administrative, administrative academic, or professional capacity, and certain computer employees are considered exempt. To qualify for the exemption, employees generally must meet certain tests regarding their job duties and be paid on salary basis. The salary requirement does not apply to teachers. Being paid on a "salary basis" means an employee regularly receives a predetermined amount of compensation each pay period on a weekly, or less frequent, basis. Additionally, the predetermined amount cannot be reduced because of variation in the quality or quantity of the employee's work. Subject to certain exceptions, an exempt employee must receive the full salary for any work week in which the employee performs any work, regardless of the number of days or hours worked.

The Board reserves the right to make deductions from the pay of otherwise exempt employees under the following circumstances:

- A. the employee is absent from work for one (1) or more full days for personal reasons other than sickness or disability
- B. the employee is absent from work for one (1) or more full days due to sickness or disability if the deduction is made in accordance with a bona fide plan, policy or practice of providing compensation for salary lost due to illness
- C. to offset amounts employees receive as jury or witness fees, or for military pay
- D. for unpaid disciplinary suspensions of one (1) or more full days imposed in good faith for workplace conduct rule infractions
- E. for penalties imposed in good faith for infractions of safety rules of major significance

The Board shall also not be required to pay the full salary in the initial or terminal week of employment, or for weeks in which an exempt employee takes unpaid leave under the Family & Medical Leave Act.

The Board recognizes that with limited legally permissible exceptions, no deductions should be taken from the salaries of exempt employees. If an exempt employee believes that an improper deduction has been made to his/her salary, the employee should immediately report this information to the Business Manager or designee.

Reports of improper deductions will be promptly investigated. If it is determined that an improper deduction has occurred, the employee will be promptly reimbursed for any improper deduction made, and the Board will make a good faith commitment to avoid any recurrence of the error.

The Superintendent shall distribute this policy to all employees upon initial hire and on an annual basis.

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|       |                              |
|-------|------------------------------|
| Legal | 29 U.S.C. 201 et seq.        |
|       | 29 C.F.R. Part 541           |
|       | 104.01, Wis. Stats.          |
|       | DWD 274.03, Wis. Admin. Code |

Last Modified by Jennifer Hagemann on June 15, 2018



Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title SYSTEM OF ACCOUNTING  
Number po6800  
Status

#### 6800 - **SYSTEM OF ACCOUNTING**

As specified by the Department of Public Instruction, the Board of Education follows the Wisconsin Uniform Financial Accounting Requirements (WUFAR) as a listing of account classifications by which it keeps an accounting of all District funds. The Board has by resolution designated institutions to serve as depositories of all District funds and may, by resolution, designate additional or different institutions. The District's financial records shall show sources of revenue, amounts received, amounts expended, and the disposition of public property. The Business Manager shall complete an accounting of all capital assets to protect the financial investment of the District against catastrophic loss. Further, the Business Manager shall establish procedures and regulations necessary to properly account for capital assets and comply with generally accepted accounting principles (GAAP) and ensure that the District's capital assets are properly insured.

The District's system of accounting shall comply with all requirements of the Governmental Accounting Standards Board, Statement No. 54 (GASB 54). In accordance with GASB 54, the District will report its fund balances in the following categories:

- A. Nonspendable fund balance - amounts that cannot be spent because they are either (a) not in a spendable form (which includes items that are not expected to be converted to cash – e.g., inventories or prepaid amounts) or (b) legally or contractually required to be maintained intact (e.g., the corpus of an endowment fund).
- B. Restricted fund balance - amounts constrained to specific purposes by their providers (such as grantors, bondholders, and higher levels of government), through constitutional provisions, or by enabling legislation.
- C. Committed fund balance - amounts constrained to specific purposes by the Board; to be reported as committed, amounts cannot be used for any other purpose unless the Board takes action to remove or change the constraint.
- D. Assigned fund balance - amounts the Board *intends* to use for a specific purpose but are neither restricted nor committed; intent can be expressed by the Board or by an official or committee to which the Board delegates the authority.
- E. Unassigned fund balance - amounts that are available for any purpose; these amounts are reported only in the general fund.

The Board authorizes its auditors and directs its administrative staff to take all steps necessary to comply with the requirements of GASB 54. All revenue and funds will be designated to one of the above categories.

The Business Manager shall maintain a proper accounting of all District funds. S/He shall ensure that expenditures are budgeted under and charged against those accounts that most accurately describe the purpose for which such monies are to be or have been spent. Wherever appropriate and practicable, salaries of individual employees, expenditures for single pieces of equipment, and the like shall be prorated under the several accounts that most accurately describe the purposes for which such monies are to be or have been spent.

The Business Manager shall receive all vouchers for payments and disbursements made to and by the Board, and preserve them for the statutorily required period.

The Business Manager shall implement procedures and practices that will determine: (1) Capitalization policies for District assets (i.e., which assets will be capitalized and depreciated over their estimated useful life versus which assets will be expensed in year of purchase); (2) Methods for calculating annual and accumulated depreciation expense for assets including estimates for asset lives, residual asset values, and depreciation methodology; and (3) Procedures for recording gain or loss on sale of capital assets and proceeds from the sale of capital assets in compliance with GAAP Reporting of estimated cash values or replacement values to District insurance providers.

The Business Manager shall report to the Board on a monthly basis (or more often if required) the revenues and expenditures in the fund reporting categories established above. The Business Manager's statement shall show revenues and receipts from whatever source derived, the various appropriations made by the Board, the expenditures and disbursements therefrom, the purposes thereof,

the balances remaining in each appropriation, and the District's assets and liabilities. At the end of the fiscal year such statement shall be a complete exhibit of the District's financial affairs and may be published and distributed with approval of the Board.

The Business Manager is responsible for filing in a timely manner, on behalf of the Board, an annual report with the Department of Public Instruction, on prescribed forms, that states the following:

- A. amount of collections and receipts, and accounts due from each source;
- B. amount of expenditures for each purpose;
- C. amount of the District's debt, the purpose for which each item of such debt was created, and the provision made for the payment thereof; and
- D. other information as required by the Department, along with the audit report as approved by the Board.

The Board's annual financial statements shall also include information such as: 1) beginning and ending balances of capital assets; 2) beginning and ending balances of accumulated depreciation; and 3) total depreciation expense for the fiscal year.

Such reporting shall include description of significant capital asset activity during the fiscal year including: acquisitions through purchase or donation, sales or dispositions including the proceeds and gains or losses on the sale, changes in methods of calculating depreciation expense or accumulated depreciation, such as, estimates of useful life, residual values, depreciation methodology (e.g., straight line or other method).

Before implementing procedures or changing procedures, the Business Manager will review the proposed procedure with the auditor appointed by the Board to conduct the Board's financial audit. The procedures established shall comply with all statutorily required standards and generally accepted accounting procedures.

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Legal                            115.28(13), Wis. Stats.  
   115.30(1), Wis. Stats.

Last Modified by Jennifer Hagemann on June 15, 2018

Book 1ST DRAFT POLICY CLEAN  
Section 6000 Finances  
Title AUDIT  
Number po6830  
Status

6830 - **AUDIT**

The Board of Education requires that, after the close of the fiscal year (June 30th), an audit of all accounts of the District be made annually by an independent, certified public accountant. The audit examination shall be conducted in accordance with generally accepted auditing standards and shall include all funds over which the Board has direct or supervisory control.

The cost of the audit shall be paid from School District funds.

The Business Manager shall also prepare and submit a copy of the District's audit report to the Department of Public Instruction by each year.

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Legal 120.14, Wis. Stats.

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