

SECTION D: FISCAL MANAGEMENT

DA	Fiscal Management Goals
DB	Budget Planning
DC	Funding Proposals and Applications
DD	Revenues from Investments
DE	Bonded Employees and Officers
DF	Fiscal Accounting and Reporting
DG	Inventories (Fixed Assets)
DH	Audits
DI	Purchasing
DI Procedure	Purchasing Procedures
DJ	Expense Reimbursements
DJ Form-1	Professional Meeting Form
DJ Form-2	Monthly Transportation Statement
DK	Credit Card
DL	Insurance Coverage
DM	Education Management Information System (EMIS)
DN	School Properties Disposal
DO	Absence of Treasurer
DP	Student Fees, Fines, Charges
DQ	Duties and Responsibilities Related to Federal Grants
DR	Fundraising Activities and Projects
DS	FTE True Up Policy
DT	Employee Dishonesty and Faithful Performance of Duty Insurance Policy
DU	Appointment of the Fiscal Officer

FISCAL MANAGEMENT GOALS

The quantity and quality of learning programs are related to the funding provided and the effective, efficient management of those funds. It follows that the Findlay Digital Academy's purposes can best be achieved through prudent fiscal management.

Due to resource limitations, there is sometimes a temptation to operate so that fiscal concerns overshadow the educational program. Recognizing this, it is essential that the Board take specific action to make certain that education remains central and that fiscal management contributes to the educational program. This concept is incorporated into Board operations and into all aspects of Findlay Digital Academy management and operation.

As trustees of the community's investment in the facilities, materials and operational funds, the Board has a fiduciary responsibility to ensure that the investment is protected and used wisely. Competent personnel and efficient procedures are essential for sound management of fiscal affairs. The Board expects that the Executive Director/Superintendent/Superintendent and the Treasurer keep it informed through reports, both oral and written, of the fiscal management of the Findlay Digital Academy.

With the assistance of the Treasurer and other designated personnel, the Executive Director/Superintendent is expected to develop an efficient and effective procedure for fiscal accounting, purchasing and the protection of plant, grounds, materials and equipment through prudent and economical operation, maintenance and insurance.

The Board seeks to achieve the following goals:

- to engage in thorough advance planning, with staff and community involvement, in order to develop budgets and to guide expenditures to achieve the greatest educational returns for the dollars expended;
- to establish levels of funding, which provide high quality education for the Findlay Digital Academy's students;
- to use the best available techniques for budget development and management;
- to provide timely and appropriate information to all staff with fiscal management responsibilities and
- to establish effective procedures for accounting, reporting, business, purchasing and delivery, payroll, payment of vendors and contractors and all other areas of fiscal management.

[Adoption date: May 10, 2005]

[Reviewed: October 9, 2014]

BUDGET PLANNING

Budget planning is an integral part of program planning so that the annual operating budget may effectively express and implement all programs and activities of the Findlay Digital Academy. Budget planning is a year-round process involving broad participation by administrators and other personnel throughout the Findlay Digital Academy.

The Executive Director/Superintendent and Treasurer are responsible for preparing financial forecasts for at least four years beyond the current fiscal year.

The budget reflects the Findlay Digital Academy's goals, objectives and programs. Any changes or alterations in programs are approved by vote of the Board.

[Adoption date: May 10, 2005]

[Reviewed: October 9, 2014]

LEGAL REFS.: ORC 5705.01; 5705.28-5705.32; 5705.35; 5705.36; 5705.37; 5705.39; 5705.391

FUNDING PROPOSALS AND APPLICATIONS

The Board considers whether to apply for any private, State or Federal grants for which it is eligible. The Executive Director/Superintendent/designee evaluates federally funded programs, State grants, and private grants including their possible benefits to the students in the Findlay Digital Academy and apprises the Board of the worth of each and makes recommendations accordingly.

The Findlay Digital Academy participates to its limit of eligibility in the use of funds provided by the state for the educational benefit of its students.

[Adoption date: May 10, 2005]

[Reviewed: October 9, 2014]

LEGAL REF.: ORC 3313.20

REVENUES FROM INVESTMENTS

All monies are under the control of the Board, which extends to the Treasurer the responsibility of overseeing these funds. In addition to the objectives detailed below, all relevant sections of the Ohio Revised Code are adhered to at all times.

Objectives

The following objectives apply to the management of Findlay Digital Academy funds.

- Investments are made in order to seek preservation of capital in the overall portfolio. To attain this objective, diversification is required in order that potential losses on individual securities, whether by default or erosion of market value, do not exceed the income generated from the remainder of the portfolio.
- The Findlay Digital Academy's portfolio remains sufficiently liquid to enable the Findlay Digital Academy to meet reasonably anticipated operational requirements.
- The portfolio is managed in such a way as to exceed or at least equal the market average rate of return over the course of budgetary and economic cycles, taking into account Ohio law (which restricts the type of investments), safety considerations and cash flow requirements.
- Bank account relationships are managed in order to secure adequate services while minimizing costs.
- All deposits are concentrated in one account except where audit control considerations dictate otherwise.

Public Trust

All participants in the investment process act responsibly as custodians of public trust. Investment officials avoid any transactions that might impair confidence in the government of the School. The Board recognizes that in a diversified portfolio occasional measured losses are inevitable and must be considered within the context of the overall portfolio's investment return.

Investing Authority

The investing authority resides with the Treasurer. Such authority allows for the explicit delegation of authority to persons responsible for investment transactions.

The Treasurer signs and files the investment policies with the Auditor of State.

Authorized Financial Institutions and Dealers

U.S. Treasury and Agency securities and instrumentalities purchased outright are purchased through financial institutions located within the State of Ohio or through “primary securities dealers” located in the State of Ohio, as designated by the Federal Reserve Board, whenever possible. Changing portfolio needs may dictate the use of “primary securities dealers” outside of the State of Ohio. First considerations are given to State institutions.

Repurchase Agreements are transacted only through bank branches and/or through “primary securities dealers” located within the State of Ohio with which the Findlay Digital Academy has a signed Master Repurchase Agreement as required in ORC Chapter 135.

Certificates of Deposit are transacted through commercial banks or savings and loans with either FDIC or FSLIC coverage that have branches within the Findlay Digital Academy.

A list of these authorized institutions and dealers is maintained with the investing authority. Additions and deletions to this list are made when deemed in the best interest of the Findlay Digital Academy.

Authorized Investments

The investing authority may invest on behalf of and in the name of the Findlay Digital Academy in those instruments and other relevant sections of Chapter 135 ORC, at a price not exceeding their fair market value.

Maturity

Market conditions and cash flow requirements are considered in determining the term of an investment. Provided cash flow requirements have been satisfied, maturity length is determined by market conditions and interest rate forecasts, with the goal being to buy where relative value exists along the maturity spectrum.

Diversification

Investments of the Findlay Digital Academy are diversified to eliminate the risk of loss resulting from over concentration of assets in a specific maturity, a specific issue or a specific class of securities. Strategies to achieve this are determined and revised periodically.

Collateral

All investments and deposits are collateralized pursuant to the Ohio Revised Code.

Competitive Bids

All sales and purchases of securities are bid competitively and to the extent practical are placed with the institution yielding the highest return. The right is reserved to reject the bid yielding the

Governing Authority Board Policy

highest return on any investment if inconsistent with the investment strategy, i.e., maturity, risk, liquidity, etc.

Internal Controls

The investing authority establishes a system of internal controls, which are documented in writing. An independent auditor reviews the internal controls periodically. The controls are designed to prevent loss of public funds due to fraud, employee error and imprudent actions by employees and officers of the Findlay Digital Academy.

Reporting

The investing authority submits monthly an investment report that summarizes recent market conditions, economic developments and anticipated investment conditions. The report describes the portfolio in terms of security type, maturity and other features. The report contains all transactions executed that month. The report also explains the month's total investment return.

Performance Evaluation

The monthly investment report contains sufficient information to permit an independent organization to evaluate the performance of the investment program.

[Adoption date: May 10, 2005]

[Reviewed: October 9, 2014]

LEGAL REFS.: Intergovernmental Cooperation Act
ORC 135.01-135.21
3313.51

BONDED EMPLOYEES AND OFFICERS

At the time of appointment or re-appointment of the Treasurer, the Board authorizes the Treasurer to execute a bond in an amount determined and approved by the Board.

The Executive Director/Superintendent, Board President and employees who handle school funds are included, at Board expense, in a Position Schedule Bond. Position Schedule Bonds pertain to a specific position, not to an individual.

[Adoption date: May 10, 2005]

[Reviewed: October 9, 2014]

LEGAL REFS.: ORC 3.06
131.18
3313.25; 3313.83
3319.05
5705.412

FISCAL ACCOUNTING AND REPORTING

The Findlay Digital Academy's accounting system is in conformance with the Uniform School Accounting System as prescribed by the Auditor of State for the use of school districts. The Treasurer is responsible for receiving and properly accounting for all funds of the Findlay Digital Academy.

The financial records must be adequate to:

- guide the making or deferring of purchases, the expansion or curtailing of programs and the controlling of expenses;
- ensure that current data are immediately available and in such form that routine summaries can be readily made;
- serve as a guide to budget estimates for future years and to hold expenditures to the amounts appropriated and
- show that those in charge have handled funds within limitations established by law and in accordance with Board policy.

The Board receives financial statements from the Treasurer, which show receipts, disbursements, appropriations, encumbrances, balances, assets and liabilities. The Treasurer makes all other financial reports required by law or by State agencies and submits them to the proper authorities.

The Treasurer provides the Board with any other financial management reports that the Board determines necessary.

Financial records are permanent. The supporting documents may be destroyed only in compliance with the provisions of Ohio law and in compliance with specifications of the Findlay Digital Academy's records commission, the Auditor of State and the Ohio Historical Society.

[Adoption date: May 10, 2005]

[Reviewed: October 9, 2014]

LEGAL REFS.: ORC 117.101; 117.38; 117.43
3301.07
3313.29; 3313.32; 3313.94
3315.04; 3315.13
Chapter 1347
Chapter 5705

INVENTORIES (Fixed Assets)

The Board, as steward of this Findlay Digital Academy's property, recognizes that efficient management and full replacement upon loss requires accurate inventory and properly maintained property records.

The Findlay Digital Academy shall conduct a complete inventory every five years, by physical count, of all Findlay Digital Academy-owned equipment and supplies. For purposes of this policy, "equipment" means a unit of furniture or furnishings, an instrument, a machine, an apparatus or articles which retain shape and appearance with use, is nonexpendable and does not lose its identity when incorporated into a more complex unit.

This Findlay Digital Academy shall maintain a fixed asset accounting system. The fixed asset system shall maintain sufficient information to permit:

- preparation of year-end financial statements in accordance with generally accepted accounting principles;
- adequate insurance coverage and
- control and accountability.

Leased equipment that the Findlay Digital Academy will eventually own must be inventoried.

Any item that has a model number or serial number has that number noted in the description for full identification. All items assigned to a building are the building administrator's responsibility.

All equipment purchased, after the initial inventory, as capital outlay or replacement with a cost of \$1000.00 or more and with an estimated useful life of five years or more are tagged and made part of the equipment inventory.

Title I Asset Policy

Assets that are purchased with Title I funds and/or are provided by a federal agency are subject to additional statutes and regulations. These special rules and guidelines apply in addition to the rules and guidelines stated above. If there is a conflict, the specific provisions of this Policy shall prevail.

Management and Disposal of Equipment Provided by a Federal Agency

Governing Authority Board Policy

All assets that are provided by a federal agency shall be titled in the name of the Federal Government and shall be maintained and disposed of according to standards set or approved by the federal agency.

Management and Disposal of Title I Real Property.

All real property acquired with Title I funds shall be managed and disposed of according to the following rules and guidelines:

- the property shall be titled in the name of the School;
- the property shall only be used for such purposes that are permitted according to the terms of the grant;
- the School shall not sell, give, trade, or take any other action affecting the legal status of the title; and
- when the property is no longer being used for a permitted purpose, then it shall be disposed of in a manner indicated or otherwise approved by the agency who originally granted the funds.

Management and Disposal of Title I Equipment.

All equipment acquired with Title I funds shall be managed and disposed of according to the following rules and guidelines:

- the equipment shall be used in the program or project or which it was acquired so long as needed, whether or not the project or program continues to be supported by Federal funds;
- when the equipment is no longer needed for the original program or project, the equipment may be used in other activities currently or previously supported by a Federal agency, with priority being given to any programs or projects currently or previously supported by the same Federal agency;
- the School shall not use the equipment to provide services for a fee;
- when acquiring replacement equipment, the School must gain the approval of the Federal agency before either using the equipment as a trade-in or selling the equipment and putting the proceeds towards the cost of replacement equipment;
- when the original or replacement equipment is no longer needed, it may be retained, sold or otherwise disposed of, subject to the requirement that if the fair market value of the equipment exceeds \$5,000, the Federal agency may have a right to a portion of the fair market value of the equipment, as determined in accordance with 34 C.F.R. 80.31. State statutes may impose additional obligations upon the sale of such property.

A computer generated listing of all equipment is updated annually by the close of the Findlay Digital Academy year, or not later than the second Friday in June of each year. This updated listing is then submitted to the Treasurer's office for computer update.

The Treasurer is assisted by the staff in the performance of this function.

[Adoption date: May 10, 2005]
[Revision date: October 9, 2014]

LEGAL REF.: ORC 117.38; 117.09
OAC 117-2-02; 117-2-05
Federal: 34 C.F.R. 80.31, 34 C.F.R. 80.32

AUDITS

In accordance with State statutes, all Findlay Digital Academy financial records are subject to audit by the Bureau of Inspection and Supervision of Public Offices of the State Auditor's office. The Board has the right to request an independent audit with the approval of the State Auditor's office.

A copy of the Auditor's report is placed on file in the State Auditor's office; another copy is submitted to the Board. The Board makes the audit report available for public inspection.

[Adoption date: May 10, 2005]

[Reviewed: October 9, 2014]

LEGAL REFS.: ORC 117.10; 117.11; 117.12; 117.26; 117.27; 117.28
3313.29

PURCHASING

The function of purchasing is to serve the educational program by providing the necessary supplies, equipment and services. The Board's authority for the purchase of materials, equipment, supplies and services is extended to the Findlay Digital Academy administration through its adoption of the annual appropriations resolution.

The Board declares its intention to purchase competitively without prejudice and to seek maximum educational value for every dollar expended. The purchase of items and services found on lists from the appropriations resolution requires no further Board approval, except in those instances in which, by law or Board policy, the purchases or services must be put to bid.

The Board assigns the Treasurer the responsibility for the quality and quantity of purchases made. The Treasurer is charged with the responsibility to ensure that all purchases do not exceed appropriations and that they are consistent with the approved educational goals and programs of the Digital Academy Board.

[Adoption date: May 10, 2005]

[Reviewed: October 9, 2014]

LEGAL REFS.: ORC 3313.171; 3313.172; 3313.18; 3313.29; 3313.31; 3313.33; 3313.37;
3313.46
3319.04
3327.08
5705.38; 5705.40; 5705.41; 5705.412
Ohio Const. VIII, § 2e

PURCHASING PROCEDURES

Monies under the jurisdiction of the Board may not be expended except upon a warrant drawn against a specific appropriation and against a specific fund. Therefore, no contract or purchase order for the expenditure of money will be made unless there is attached to it a certificate of the Treasurer certifying that the amount required to meet the contract or purchase order has been appropriated and is in the treasury, or is in the process of collection, and is free from previous encumbrance.

Any contract or purchase order issued without such a certificate attached is void, except as the law allows later issuance within 30 days of the certificate and except that, if the amount involved is less than \$1,000, the Treasurer may authorize it to be paid without the ratification or affirmation of the Board. Under certain conditions, the law also allows the Treasurer to issue blanket certification, subject to limitations of time and amount as set by law.

Purchasing procedures are designed to ensure the best possible price for the desired products and services. Procedures for purchasing are developed to require that all purchases are made on properly approved purchase orders and that, for items not put up for bid, price quotations are solicited.

In compliance with the State Use Law, the Board directs the administration to determine if products and services needed by the Findlay Digital Academy may be purchased from the Ohio Industries for the Handicapped. If applicable and convenient, the Findlay Digital Academy will purchase products and/or services from the OIH.

Special arrangements may be made for ordering perishable and emergency supplies.

[Adoption date: May 10, 2005]

[Reviewed: October 9, 2014]

LEGAL REFS.: ORC 3313.46
3327.08
5705.41; 5705.412; 5705.44

EXPENSE REIMBURSEMENTS

Attendance at professional meetings by Findlay Digital Academy shall be governed by the following:

- The Professional Meeting form, provided by the administration office, shall be submitted to the supervisor at least two (2) weeks prior to the date of the meeting. A written approval or rejection will be returned to the applicant from the Executive Director/Superintendent's office.
- Automobile mileage will be reimbursed at the rate of \$0.45 per mile, for staff use of private automobiles. The mileage reimbursement form must be submitted before payment will be made.
- Actual personal expenses incurred as a result of attendance at professional meetings shall be reimbursed up to the following maximums:
 - Lodging – total actual cost is reimbursable. (Receipts must be submitted.)
 - Meals
 - Breakfast - \$4.00 }
 - Lunch -\$7.00 } or \$25.00 total per day
 - Dinner - \$14.00 }
 - (Receipts must be submitted.)
- Total costs of public transportation shall be reimbursable, including taxi fares to and from airports, etc., and/or car rental when necessary.
- Registration fee shall be a legitimate expense and totally reimbursable. When the cost of meals is included as a registration expense or if the meeting includes a banquet as a part of the program, the total cost of such is reimbursable.
- Actual costs of tolls and parking fees are legitimate expenses.
- Professional meeting within a radius of 500 miles of Findlay shall be considered an appropriate request. Those requesting permission to attend meeting outside that limitation may expect to bear additional costs of transportation, except as approved by the Executive Director/Superintendent.
- Attendance at professional meeting shall be authorized in accordance with the need of the Findlay Digital Academy and within the limitations of funds appropriated for this purpose. To accomplish this, the Executive Director/Superintendent may approve a total maximum expenditure to a given professional meeting by a staff member. Such notice shall be provided at the time the request is approved.

[Adoption date: May 10, 2005]

[Revision date: October 9, 2014]

FINDLAY DIGITAL ACADEMY
Professional Meeting Form

Name	Purchase Order #
Title of Meeting/Conference	Date(s) of Meeting
Purpose of Meeting	Location of Meeting

Estimated Cost of Trip		Actual Cost of Trip	
Miles @ \$0.45/mile	\$	Miles @ \$0.45/mile	\$
Receipts are required for all expenses listed below:		Receipts are required for all expenses listed below:	
Transportation/Air Fare/Taxi	\$	Transportation/Air Fare/Taxi	\$
Lodging	\$	Lodging	\$
Meals (Max \$25.00 per day)	\$	Meals (Max \$25.00 per day)	\$
Registration/Meeting Fees	\$	Registration/Meeting Fees	\$
Parking/Tolls	\$	Parking/Tolls	\$
Other (explain)	\$	Other (explain)	\$
TOTAL CLAIM	\$	TOTAL CLAIM	\$

Signature of Employee	Date	Signature of Employee	Date
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Signature of Supervisor	Date	Signature of Supervisor	Date
Approved _____	Disapproved _____		

Signature of Executive Director/Superintendent	Date	Signature of Executive Director/Superintendent	Date
Approved _____	Disapproved _____		

NOTE:

- Attach a copy of Purchase Order
- Attach receipts for all expenses
- Return claims within two (2) weeks after returning to work
- Claims shall not include tips, gratuities, telephone charges, telegrams, or postage
- Total claims shall not exceed the conference allocation for each individual or reimbursement policy of the Findlay Digital Academy.

[Approved May 5, 2005]
[Revision date: October 9, 2014]

FINDLAY DIGITAL ACADEMY
Findlay, Ohio

Monthly Transportation Statement

Date	Give Origin and Destination	Miles

I certify that this is a true statement of mileage on school business during the period
_____ to _____

Employee: _____
Supervisor: _____
[Approved May 5, 2005]
[Reviewed: October 9, 2014]

CREDIT CARD POLICY

The Board of Directors recognizes the efficiency and convenience afforded the day-to-day operation of the School by establishing a credit card account. A “credit card account” is any bank-issued credit card account, store-issued credit card account, financial institution-issued credit card account, financial depository-issued credit card account, affinity credit card account, or any other card account allowing the holder to purchase goods or services on credit or to transact with the account, and any debit or gift card account related to the receipt of moneys. A “credit card account” does not include a procurement card account, gasoline or telephone credit card account, or any other card account where merchant category codes are in place as a system of control for use of the card account.

A credit card account will be established in the name of the School and will be used for incidental purchases authorized by the Fiscal Officer or the Superintendent. All presentation instruments related to the credit card account shall bear the School’s name, including cards and checks. Credit cards shall not be used to circumvent the general purchasing procedures required by law and the policies of the Board. Purchases using the credit card shall be supported by a signed requisition and an itemized receipt. The Fiscal Officer and/or the Superintendent shall retain general possession and control of the credit card account and presentation instruments related to the account, including credit cards and checks. The credit card must be secured at all times in the Fiscal Officer’s or the Superintendent’s office, with request being made for use to the Fiscal Officer or Superintendent.

Officers or Positions Authorized to Use Credit Card

Only officers/employees of the Board who have received authorization from the Fiscal Officer or Superintendent may authorize and approve credit card transactions. The Fiscal Officer or Superintendent shall document the name and position title of any School officer/employee authorized to use the credit card.

Acquisition, Use and Management of Credit Card

Before an officer/employee may obtain and use the credit card account, credit card, or any checks associated with such account, he/she must sign an acknowledgment that he/she has read and understands this Board policy.

Expenses for which the Credit Card Account May be Used

The credit card may be used only for official business and for the benefit of the School. Credit card expenditures for the following are strictly prohibited: entertainment, alcoholic beverages, personal

services, and cash advances/withdrawals. A School officer/employee who utilizes the credit card in violation of Board policy may be subject to disciplinary action, including termination.

Cash Withdrawals and Maximum Credit Limit

Cash withdrawals may not be made with the credit card.

An authorized user may incur a level of debt equal to the approved purchase order amount. If the purchase is on an “open”, “blanket”, or “super blanket” purchase order, then the limit is equal to the authorized requisition as authorized by the Superintendent and Treasurer.

Submission of Itemized Receipts

Receipts for any transaction involving the credit card must be obtained by the officer/employee using the card to incur the expense and submitted to the Fiscal Officer or Superintendent at the time that the credit card is returned. If an officer/employee fails to submit a receipt to document a transaction involving the credit card, the officer/employee shall be liable for the expense.

Credit Card Issuance, Reissuance, Cancellation, and Reporting Lost or Stolen Credit Cards

Only the School Fiscal Officer or the Superintendent is authorized to request the issuance, reissuance, or cancellation of a School credit card. If a credit card is lost or stolen, the officer/employee responsible for the credit card’s use and possession shall immediately report that fact to the Fiscal Officer. The Fiscal Officer shall immediately report that the credit card has been lost or stolen to the company that issued the School the credit card, and shall take all action necessary to cancel that credit card so as to ensure that unauthorized purchases are not made with the card.

Misuse of the Credit Card

The following actions/omissions by an officer/employee qualify as misuse of the credit card and may subject the individual to disciplinary action, including termination or other sanctions:

- Use of the credit card for personal expenses
- Use of the credit card for expenses beyond those authorized by the Purchasing Agent and Fiscal Officer
- Permitting any other person to use or possess the credit card
- Using the credit card in any way which violates state or federal law or Board policy.
- Using the credit card for cash advances.

Knowing misuse of the School’s credit card is a criminal offense under O.R.C. §2913.21.

Report of Credit Card Rewards

The Fiscal Officer shall annually file a report with the Board detailing all rewards received based on the use of the credit card account.

LEGAL REF: O.R.C. §3314.52
Ohio Auditor of State Bulletin 2016-004

Adopted: December 6, 2018

INSURANCE COVERAGE

The Findlay City Schools in its role as the sponsor of Findlay Digital Academy shall purchase and maintain an insurance policy or policies sufficient to protect the School from major financial liability and loss. The duty to administer the insurance policies shall be Findlay City Schools.

Adequate insurance coverage shall include, but shall not be limited to, the following areas:

- property loss insurance coverage for all School buildings and their contents;
- comprehensive bodily injury and property damage coverage for all School-owned motor vehicles;
- any necessary specialty insurance coverage for equipment not adequately covered by existing insurance policies;
- worker's compensation coverage;
- employee insurance coverage as required by the Sponsor Contract or Board directive;
- professional liability insurance coverage for all Board Members, and officers and Findlay Digital Academy personnel; and
- any additional insurance required pursuant to the Sponsor Contract.

[Adoption date: October 9, 2014]

EDUCATION MANAGEMENT INFORMATION SYSTEM
(EMIS)

The Findlay Digital Academy will comply with all reporting required by the state's Education Management Information System.

[Adoption date: May 10, 2005]

[Reviewed: October 9, 2014]

[Reviewed and Readopted: April 1, 2019]

LEGAL REFS: ORC 3301.0714

SCHOOL PROPERTIES DISPOSAL

The Board directs the Executive Director/Superintendent to review the property of the Findlay Digital Academy periodically and to dispose of that material and equipment which is obsolete in accordance with the terms of this property.

Instructional Material

The Findlay Digital Academy reviews instructional materials (i.e. textbooks, library books, manuals, support materials, etc.) periodically to determine the relevance of such materials to the present world and instruction programs. Should the instructional materials be deemed no longer unusable, the following criteria are used to determine possible disposal:

- copyright date 10 or more years old;
- concepts or content do not support the current goals of the curriculum;
- information not current or
- worn beyond salvage.

Equipment

The Findlay Digital Academy inspects the equipment used in the instructional program periodically to determine the condition and usability of such equipment in the current educational program. Should the equipment be deemed no longer serviceable or usable, the following criteria are used to determine possible disposal:

- repair parts no longer readily available;
- repair records indicate no usable life remaining;
- obsolete and/or no longer contributing to the educational program;
- some potential for sale or
- creates a safety or environmental hazard.

Disposition

The Executive Director/Superintendent is authorized to dispose of obsolete instructional and other property by selling it to the highest bidder, by donation to appropriate parties or by proper waste removal. Disposal of surplus property purchased with federal funds shall be disposed of in accordance with federal guidelines.

[Adoption date: May 10, 2005]

[Reviewed: October 9, 2014]

LEGAL REF.: ORC 3313.40; 3313.41

ABSENCE OF THE TREASURER

Pursuant to ORC Section 3313.23, if the Board determines the Treasurer is incapacitated such that he/she is unable to perform the duties of his/her job, the Board may, by majority vote of its members, appoint a person to serve in his/her place pro tempore. During any such period of incapacitation, the Treasurer may be placed on a leave of absence. The Treasurer pro tempore shall perform all the duties and functions of the Treasurer and shall serve until the Board, by majority vote of its members, determines the Treasurer's incapacity is removed or until the expiration of the Treasurer's contract of employment, whichever occurs sooner. The treasurer pro tempore may be removed at any time for cause by a two-thirds vote of the members of the Board. The compensation of the Treasurer pro tempore shall be fixed by the Board. The Treasurer pro tempore shall execute a bond immediately after his/her appointment in accordance with ORC Section 3313.25.

The Board shall determine whether the Treasurer is incapacitated based on any medical report or statement received from (A) his/her physician, or (B) the District's school physician. If the Treasurer is absent or sick more than ten (10) consecutive scheduled work days or establishes an ongoing pattern of intermittent absenteeism, the Board may require medical verification of his/her capacity to serve. In the event of a dispute over such capacity between the Treasurer's physician and the District's school physician, a third opinion from a qualified physician will be sought, at Board expense, which third opinion shall be deemed determinative. The failure or refusal of the Treasurer to cooperate in obtaining medical verification of his/her capacity may be taken into account by the Board in making a decision on the question of his/her capacity under this Policy. The Treasurer may request a hearing before the Board on any action taken under this Policy with respect to his/her capacity, and shall have the same rights at any such hearing as are granted to a teacher in a Board hearing under ORC Section 3319.16.

[Adoption date: October 9, 2014]

LEGAL REF: ORC 3313.24; 3313.25; 331916

STUDENT FEES, FINES AND CHARGES

The Board may levy certain charges to students to facilitate the utilization of adequate, appropriate learning materials used in the course of instruction. Fees for these materials and supplies will be established at the beginning of every school year and may vary as the cost of materials and supplies fluctuates. A charge shall not exceed the combined cost of the materials used, freight and/or handling charges, and normal add-on for loss. Money received from resale of such materials shall be deposited as required by statute and accurate accounting of all transactions returned to the treasurer.

The Board directs the superintendent, treasurer and/or designee to prepare a schedule of fees for materials to be used in courses of instruction and also a schedule of charges that may be imposed for damage to school property (which could include books and other school property).

The district does not charge students eligible for free and reduced lunch under the national school lunch act or child nutrition act, a fee for any materials needed to participate fully in a course of instruction. Any fees charged to students eligible for free and reduced lunch under the national school lunch act or child nutrition act will be charged in compliance with state and federal law. This exception only applies to recipients of free lunch and not for students who receive reduced lunch. However, if the district determines that a student is in serious financial need, it may choose to provide any and all such materials at reduced rates or free of charge. This provision does not apply to extra-curricular activities, student enrichment programs or career and technical education, tools, equipment, materials necessary for work-force readiness training in our Millstream program.

Fines

When school property, equipment or supplies are damaged, lost or taken by individuals, a fine is assessed. The fine is reasonable, seeking only to compensate the school for the expense or loss incurred. Free lunch eligibility does not exempt a student from paying fines or damage to school property.

The late return of books, borrowed books, or materials from the school libraries is subject to appropriate fines. All fines collected are sent to the treasurer for deposit into the general fund of the Board of Education.

Collection of Student Fines and Fees

The administration may establish procedures for collection of student fees and fines.

In accordance with RC 3313.642, failure to pay fees and fines may result in the withholding of grades and credits and will not be made available to any student, graduate or anyone requesting the same on his or her behalf until all fees and fines for that student have been paid in full, except where required by law. In the event that the above course of action does not result in the fees being collected, the Board authorizes the superintendent and/or treasurer to take action with the

student and/or parents even to the recourse of small claims court for collection.

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. The principal will advise parents of fees due at the beginning of the school year.

[Adoption date: October 9, 2014]

LEGAL REF; ORC 3313.642

**DUTIES AND RESPONSIBILITIES RELATED
TO FEDERAL GRANTS**

The following duties and responsibilities are imposed upon the School when seeking, obtaining, monitoring, or otherwise administering grant money, as indicated below. This Policy supplements, rather than replaces, other existing and applicable Policies.

Grant Administration

The School shall designate an assigned employee who shall be responsible for ensuring compliance with all internal control measures related to grant money. In order to ensure that grants submitted and obtained by the School are effective and properly administered, the following duties and responsibilities are placed on the assigned employee:

- the duty to monitor all applications for federal grants that have been submitted but are still pending, and to prepare a report or summary regarding the status of all outstanding grant applications, which shall be submitted at each regularly scheduled Governing Authority meeting;

- the duty to monitor the expenditures made from each federal grant and to prepare a report detailing the accumulated amount and type of expenditures made from each grant, which shall be submitted at each regularly scheduled Governing Authority meeting; and

- the duty to review each final expenditure report federal grant for accuracy and completeness, and to reconcile that final expenditure report with the School's other financial records. The assigned employee must follow all internal control guidelines as set forth in the "Standards for Internal Control in the Federal Government" issued by the Comptroller General of the United States. In the event that an instance of noncompliance is identified by the assigned employee in an internal audit, prompt action must be taken by the School to correct such noncompliance. Contract Procurement

When federal grant funds are used to obtain a contract for goods or services, the School shall adhere to the rules below.

- All policies and procedures established by the federal agency providing the

grant are controlling, and, to the extent there is any conflict with these Policies, shall prevail.

Contracts shall be procured through a competitive process as required by law. If a bidding process is used, the contract shall be awarded to the bid which, from the perspective of the School, is most beneficial and cost-effective.

The School shall carefully review each contract funded with grant money to ensure that the products or services purchased are necessary.

With respect to equipment or other materials, the School shall compare the advantages and disadvantages associated with leasing versus purchasing.

The School shall perform a cost analysis before entering or approving any contract.

All solicitations for products or services which shall be paid with grant money shall contain a sufficient amount of detail and information as required by federal grant regulations.

The School shall take all necessary steps in assuring that each party it contracts with is willing, able, and intends to fulfill the contract requirements.

The School shall accurately document each step involved in procurement of a contract involving federal grant monies. This documentation shall indicate the process in which the contracts were procured, the reason for choosing that procurement process, the reason for awarding the contract to the contracting party, an explanation for the lack of competitive bidding, if applicable, and an analysis of the cost of the contract. These records shall be made available to the public upon request.

The School shall, to the extent reasonably possible, attempt to award contracts involving federal grant money to small businesses, as well as businesses owned or operated by women or minorities.

All procurement transactions must be conducted in a manner providing full and open competition consistent with 2 C.F.R §200.319. The School shall ensure that each contract funded with grant money shall contain all necessary elements and provisions as required by the applicable federal grant regulations. Furthermore, federal regulations may require that the party awarded a contract, whether through a bidding process or otherwise, fulfill certain bonding requirements. If such bonding requirements

are indicated, the School shall assure that they are carried out. The School must maintain 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, the basis for the contract price (including a cost or price analysis), and verification that the contractor is not suspended or debarred. The School may not subcontract with or award subgrants to any person or company who is debarred or suspended. For all contracts over \$25,000, the School verifies that the vendor with whom the School intends to do business with is not excluded or disqualified. To foster greater economy and efficiency, the School may enter into state and local intergovernmental agreements where appropriate for procurement or use of common or shared goods and services. *Contract Administration.* The School shall ensure that the contracting party complies with all requirements and other provisions imposed by the contract. This duty may be delegated as necessary.

Financial Management System The School maintains a proper financial management system in order to receive both direct and state-administered grants and to expend funds associated with a grant award under 2 C.F.R. § 200.302.

Identification

The School shall identify all federal awards received and expended and the federal programs under which they were received. Federal program and award identification must include the CFDA title and number, federal award identification number and year, name of the federal agency, and, if applicable, name of the pass-through entity.

Financial Reporting

Accurate, current, and complete disclosure of the financial results of each federal award or program must be made in accordance with the financial reporting requirements. The assigned employee is responsible for managing the budget and accounts payable of the School related to grant awards.

Accounting Records

The School must maintain records which adequately identify the source and application of funds provided for federally-assisted activities. These must be supported by source documentation.

The assigned employee shall be responsible for compiling timely and accurate financial reports, subject to the review and approval of the Governing Authority. The reports must be prepared and

submitted as specified by the financial reporting clause of each grant or contract award, and include monthly and cumulative expenditures, project budgets, and a balance remaining column.

Budgeting

Initial discussions regarding the budget shall begin prior to the School receiving the GAN. The School shall designate at the planning phase the parties involved in the initial budget discussions. The School shall base these early decisions on any prior year's grant award, if applicable, and make adjustments to this initial budget upon receipt of the GAN. The assigned parties shall take into account existing resources in determining the initial budget to determine if existing resources such as unused equipment could benefit the planned program.

The assigned employee reviews the items in the budget to ensure allowability. If it is determined that a cost is not allowable, then revisions to the budget must be made pursuant to this determination.

Once it is determined that all budgeted items are allowable, the budget is sent to the Governing Authority for final review and approval.

Upon receiving the GAN, the Governing Authority shall meet to discuss the initial grant budget and any adjustments which need to be made based on the GAN.

Amending the Budget

Budget revisions are required prior to obligations in an object/functions category exceeding 10% of the most current approved budget cell.

Budget Control

The School monitors its financial performance by comparing and analyzing actual results with budgeted results. The assigned employee shall prepare reports which compare actual expenditures to budgeted amounts at least quarterly.

Spending Grant Funds

The School shall follow any and all federal, state, and local requirements, including those requirements imposed by EDGAR and 2 CFR Part 200 the Uniform Administrative Requirements, and any imposed by the award or grant itself. All costs must be adequately documented.

Direct and Indirect Costs

Governing Authority Board Policy

Determining Whether a Cost is Direct or Indirect: Direct costs are costs 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. 2 C.F.R. § 200.413(a).

Indirect costs are

2 C.F.R. § 200.56.

Costs incurred for the same purpose in like circumstances must be treated consistently as either direct or indirect costs. 2 C.F.R. § 200.413(a).

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

Indirect Cost Rate: The School shall approve an indirect cost rate pursuant to 2 C.F.R. Part 230.

Applying the Indirect Cost Rate: Once the School has an approved indirect cost rate, the percentage is multiplied against the actual direct costs (excluding distorting items such as equipment, contracts in excess of \$25,000, pass-through funds, etc.) incurred under a particular grant to produce the dollar amount of indirect costs allowable to that award. 34 C.F.R § 75.564; 34 C.F.R. § 76.569.

Determining Allowability of Costs

When determining how the School will spend grant funds, the assigned employee shall review the proposed cost to determine whether it is an allowable use of federal grant funds *before* obligating and spending those funds on the proposed good or service. All costs supported by federal education funds must meet the standards outlined in EDGAR, 2 CFR Part 3474 and 2 CFR Part 200 (Subpart E). The assigned employee must consider these factors when making an allowability determination.

incurred for a common or joint purpose benefitting more than one cost objective, and

not readily assignable to the cost objectives specifically benefitted.

- Administrative or clerical services are integral to a project or activity;

- Individuals involved can be specifically identified with the project or activity;

- Such costs are explicitly included in the budget or have the prior written approval of the federal awarding agency; and

- The costs are not also recovered as indirect costs. 2 C.F.R. § 200.413(c).

- Be Necessary and Reasonable for the performance of the federal award.** A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision to incur the cost was made. When determining reasonableness of a cost, consideration must be given to:
 - Whether the cost is generally recognized as ordinary and necessary for the operation of the School or the proper and efficient performance of the federal award.

 - The restraints or requirements imposed by factors, such as: sound business practices; arm's-length bargaining; federal, state and other laws and regulations; and terms and conditions of the federal award.

 - Market prices for comparable goods or services for the geographic area.

 - Whether the individuals concerned acted with prudence in the circumstances considering their responsibilities to the School, its employees, its students, the public at large, and the federal government.

 - Whether the School significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the federal award's cost. 2 C.F.R. §200.404. When determining whether a cost is necessary, consideration may be given to:
 - Whether the cost is needed for the proper and efficient performance of the grant program.
 - Whether the cost is identified in the approved budget or application.
 - Whether there is an educational benefit associated with the cost.
 - Whether the cost aligns with results and findings from a needs assessment.
 - Whether the cost addresses program goals and objectives and is based on program data.

- Allocable to the federal award.** 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. This means that the federal grant program derived a benefit in proportion to the funds charged to the program. 2 C.F.R. §200.405.

- Consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the School.**
- Conform to any limitations or exclusions set forth as cost principles in the terms and conditions of the federal award.**
- Consistent treatment of costs for same purpose in like circumstances.**
- Adequately documented.**
- Be determined in accordance with general accepted accounting principles (GAAP).**
- Not included as a match or cost-share, unless the specific federal program authorizes federal costs to be treated as such.**
- Be the net of all applicable credits.** 2 C.F.R. §200.406.
- Consider all state and local requirements related to items not addressed by federal rules, such as mileage, hotel points, etc.** Additionally, employees must consult federal, State and School requirements when spending federal funds.

Compensation for Personal Services-Time and Effort Policy In accordance with this policy, all employees whose compensation is paid, in full or in part, with Federal funds or whose compensation is used as matching funds on a federally funded grant program must maintain time distribution records in accordance with these established criteria.

Employees must provide the information required on a timely basis and in accordance with these procedures. Time distribution records must be maintained to prevent disallowance of salary and wages charged to Federal grants. Federal Uniform Grant Guidance, 2 CFR Part 200.430 *Definitions* Cost Objective: A program, function, activity, award, organizational subdivision, contract, or work unit for which cost data are desired and for which provision is made to accumulate and measure the cost of the processes, products, jobs, capital projects, etc. See §200.28 Uniform Grant Guidance.

Employee Compensation: All amounts paid to an employee for services rendered during the award period. Compensation includes salaries, fringe benefits, stipends, bonuses and payments made under supplemental contracts. **Multiple Cost Objectives Employees:** An employee is considered to work on multiple cost objectives if he or she

works on:

- More than one Federal award;
- A Federal award and a non-Federal award;
- An indirect cost activity and a direct cost activity;
- Two or more indirect activities which are allocated using different allocation bases;
- An unallowable activity and a direct or indirect cost activity; or
- More than one activity within a Federal award that is separately tracked by the School. Personnel Activity Report (PAR): A document certifying that the amount of time a multiple cost objective employee spends on each cost objective. The PAR must reflect an after-the-fact distribution of the activities performed; account for the total activity for which the employee is compensated; is prepared at least monthly; coincides with one or more pay periods; and must be signed by the employee.

Semi-Annual Certification: A document certifying that a single cost objective employee worked solely on one cost objective. The certification must be prepared at least every six months and must be signed by the employee or supervisory official having first-hand knowledge of the work performed by the employee.

Procedure

All employees paid with Federal funds must complete the appropriate time and effort records. These procedures also apply to employees paid with non-Federal funds that are used as a match (or in-kind contribution) in a Federal program.

Single Cost Objective Employees

An employee who works on a single cost objective must complete a semi-annual certification that indicates the employee worked solely on that cost objective for the period covered by the certification. The certification must be prepared at least every six months. Either the employee or a supervisor with first-hand knowledge of the work performed by the employee must sign and date the semi-annual certification.

A semi-annual certification must:

- Be executed after the work has been completed;
 - State that the employee worked solely on activities related to a particular cost objective;
 - Name the employee and the employee's position;
 - Identify the single cost objective;
 - Specify the reporting period;
 - Be signed by the employee or a supervisor with first-hand knowledge of the work performed; and
- Be dated. *Multiple Cost Objective Employees* Employees working on multiple cost objectives must maintain Personnel Activity Reports (PARs) or equivalent documentation indicating the amount of time spent on each cost objective for the period covered by the PAR or equivalent documentation. The PAR or equivalent documentation must be prepared at least every month. The employee must sign and date the PAR or equivalent documentation. A PAR or equivalent documentation must:
- Be executed after the work has been completed (projections of how an employee is expected to work or position descriptions are not sufficient);
 - Account for the total activity for which each employee is compensated, including part-time schedules or overtime (total activity means all of the time an employee works, not just the amount of time worked on a Federal program) as well as any holiday, sick, and vacation time utilized;
 - Name the employee and the employee's position;
 - Identify all cost objectives including federal program name and CFDA # being worked upon;
 - Specify the reporting period;
 - Be prepared at least monthly and coincide with one or more pay periods;
 - Be signed by the employee (unlike a semi-annual certification a supervisor's signature is not sufficient); and

□ Be dated after the fact (when the work has been completed). The PAR must be supported with documentation of actual effort, not estimates. Supporting documentation could be a work calendar, work product, time log, or class schedules. All multiple cost objective employees must complete the PAR. *Supplemental Contracts*

If an employee works overtime, that time must be reflected in the employee's time and effort record. If, however, an employee works in two distinct positions the employee may maintain separate time and effort records for each position. *Stipends* Employees may receive compensation in the form of stipends to participate in activities such as professional development. Employees receiving such stipends for School sponsored activities may satisfy time and effort records by signing the sign-in and sign-out sheets provided at the activity. *Reconciliation* Employee compensation costs shall be charged to Federal programs based on budget estimates that reasonably approximate how an employee will work during the year. The School will reconcile payroll charged as compared to the effort incurred in each employee's time and effort records at least quarterly. If the School identifies a variance between how an employee's compensation was charged and how the employee actually worked, it will adjust its payroll charges so that the amount charged to Federal funds reflects the employee's actual time and effort. This shall be adjusted annually if an identified variance is less than 10%, or at least quarterly if an identified variance is 10% or more. The School will determine if the variance is an anomaly or if an amendment to the existing approved budget is required.

In-Kind Contributions and Matching Employees who are paid with non-Federal funds used to meet a Federal match requirement must comply with the time distribution reporting requirements. Employees paid with matching funds who work on multiple cost objectives must complete a personnel activity report. *Document Retention* Time and effort records including any employee supporting documentation must be maintained for a period of at least five (5) years.

Federal Cash Management Policy/Procedures

The School will comply with applicable methods and procedures for payment that minimize the time elapsing between the transfer of funds and disbursement by the School, in accordance with the Cash Management Improvement Act at 31 CFR Part 205.

If the School receives an advance in federal grant funds, the School will remit interest earned on the advanced payment quarterly to the federal agency, as provided for under 2 CFR § 200.305(b)(9).

Payment Methods

Governing Authority Board Policy

Reimbursements: The School will initially charge federal grant expenditures to nonfederal funds. The School Assigned employee will request reimbursement for actual expenditures incurred under the federal grants. All reimbursement requests must in writing and signed by the person requesting reimbursement. The Assigned employee has the right to request additional documentation from the party requesting reimbursement prior to submitting any request. All reimbursements are based on actual disbursements, not on obligations.

Consistent with state and federal requirements, the School will maintain source documentation supporting the federal expenditures (invoices, time sheets, payroll stubs, etc.) and will make such documentation available for the Department of Education review upon request.

Reimbursements of actual expenditures do not require interest calculations.

Advances: To the extent the School receives advance payments of federal grant funds; the School will strive to expend the federal funds on allowable expenditures as expeditiously as possible. Specifically, all drawn downs of federal funds must be expended within 72 hours of receipt.

Cash advances are limited to the immediate cash needs associated with the grant and all advances must be prorated to meet immediate cash needs.

The School will hold federal advance payments in interest-bearing accounts, unless an allowable exception applies. The School will begin to calculate interest earned on cash balances once funds are deposited into the School’s account.

Interest will be calculated quarterly. Total federal grant cash balances will be calculated on cash balances per grant and applying the School’s interest rate. Within 30 days of the end of the quarter, the School will remit interest earned on U.S. Department of Education grants. The School may retain up to \$500 of interest earned per year.

Timely Obligation of Funds

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.

If the obligation is for:	The obligation is made:
Acquisition of property	On the date which the School makes a binding written

	commitment to acquire the property
Personal services by an employee of the school	When the services are preformed
Personal service by a contractor who is not an employee of the School	On the date which the School makes a binding written commitment to obtain the services
Public utility services	When the school receives the services
Travel	When travel is taken
Rental property	When the school uses the property
A pre-agreement cost that was approved by the Secretary under the cost principles in 2 CFR part 200, Subpart E-Cost Principles.	One the first day of the project period

Period of Performance of Federal Funds

All obligations must occur on or between the beginning and ending dates of the grant project (“the period of performance”).

Regardless of the period of availability, the School must liquidate all obligations incurred under the award not later than 90 days after the end of the funding period unless an extension is authorized. Any funds not obligated within the period of availability or liquidated within the appropriate timeframe are said to lapse and must be returned to the awarding agency.

Carryover

State-Administered Grants: The Tydings Amendment extends the period of availability and permits recipients to “carryover” any funds left over at the end of the initial 15 month period for an additional 12 months. The Assigned employee is responsible for tracking carryover and

creating a carryover reporting sheet annually.

Direct Grants: School is authorized to extend a direct grant automatically for one 12-month period. The School must provide written notice of extension to the federal awarding agency at least 10 calendar days before the end of the period of performance specified in the award. This one-time extension may not be exercised merely for the purpose of using unobligated balances. The written notice must provide the reasons for the extension as well as the revised period of performance. Any proposed notice for extension must be approved by the Governing Authority at least 30 days' prior to the end of the period of performance.

The School will seek prior approval from the federal agency when the extension will not be contrary to federal statute, regulation or grant conditions and:

- The terms and conditions of the Federal award prohibit the extension;
- The extension requires additional Federal funds; or
- The extension involves any change in the approved objectives or scope of the project.

Conflict of Interest Requirements

Standards of Conduct

In accordance with 2 C.F.R. § 200.18(c)(1), the School maintains the following standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts.

No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.

The officers, employees, and agents of the School may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts, unless the gift is an unsolicited item of nominal value.

Any conflict of interest shall be immediately reported to the Assigned employee or the

Governing Authority. In the event of a conflict of interest, the officer, employee, or agent involved shall be immediately removed from the contract procurement transaction, which removal shall be documented.

The School shall disclose in writing any potential conflict of interest to the federal awarding agency or pass-through entity in accordance with applicable policies and laws. The annual audit must also include a description of all conflicts which arose throughout the year.

The School must disclose, in a timely manner, any federal criminal law violation involving fraud, bribery, or gratuity violations potentially affecting the federal award.

Disciplinary Actions

Any individual who violates the standards of conduct shall be disciplined in accordance with the School's employee discipline policies.

Record Keeping

Record Retention

The School maintains all records that fully show: (1) the amount of funds under the grant or subgrant; (2) how those funds are used; (3) the total cost of each project; (4) the share of the total cost of each project provided from other sources; (5) other records to facilitate an effective audit; and (6) other records to show compliance with federal program requirements. The School also maintains records of significant project experiences and results. These records and accounts must be retained and made available for programmatic or financial audit.

Collection and Transmission of Records

Records shall be collected and transmitted in accordance with 2 C.F.R. §200.336.

Access to Records

The School provides the awarding agency, Inspectors General, the Comptroller General of the United States, and the pass-through entity, or any of their authorized representatives the right of access to any documents, papers, or other records of the School which are pertinent to the Federal award, in order to make audits, examinations, excerpts, and transcripts. The right also includes timely and reasonable access

to the School's personnel for the purpose of interview and discussion related to such documents.

Privacy

The School shall take reasonable measures to safeguard protected personally identifiable information and other information that the awarding agency or pass-through entity designates as sensitive in accordance

with all federal, state, and local laws regarding privacy and obligations of confidentiality.

[Adoption date: December 1, 2016]

File: DR

[4640]

Fundraising Activities and Projects

All fundraising activities and projects must be approved by the Executive Director/Superintendent or his/her designee prior to commencing the activities. Approval must be obtained from the Executive Director/Superintendent or his/her designee and must be conducted in accordance with the School's fundraising guidelines. Employees must follow all forms; rules; and regulations; maintain accurate records, safeguard funds, and deposit funds appropriately.

Individuals interested in conducting a fundraising activity or project may obtain the forms, from the Executive Director/Superintendent or his/her designee.

[Adoption date: April 3, 2017]

File: DS

FTE True-Up Policy

Background

Pursuant to O.R.C. §3314.08, the School receives foundation funding. Foundation funding is determined by the School's annualized full-time equivalent ("FTE") enrollment. The School's final FTE is not known until after the fiscal year concludes and is subject to further adjustment by the Ohio Department of Education ("ODE"). Although final FTE is not known until after the fiscal year, the School receives foundation funding payments on a monthly basis during the fiscal year. These monthly payments are based on estimates of enrollment.

Accordingly, the School recognizes that after the fiscal year concludes, the School's final FTE may not reflect the monthly estimates of enrollment. Furthermore, the School recognizes that after the fiscal year concludes, the foundation funding received may need to be reconciled with ODE.

Applicable Agreements

Adjustments to FTE may affect payment obligations under certain agreements with third parties ("Applicable Agreements"). Applicable Agreements may include, but are not limited to, agreements where payment is based on a percentage of funds received or the School's FTE. Where adjustments occur after payment is made, the School is required to reconcile payment under Applicable Agreements ("True Up").

Whether an agreement both (1) is an Applicable Agreement and (2) requires a True Up is determined by the terms of each agreement. Therefore, the School must obtain a legal opinion from legal counsel to determine whether an agreement is an Applicable Agreement and a True Up is required. This practice is consistent with the recommendations of the Auditor of State.

The Governing Authority recommends that, where practicable, the School avoid entering agreements that require True Up.

True Up Payments

If a True Up is required, the School shall not begin True Up until after both:

- (1) ODE has issued its final FTE adjustment for the applicable fiscal year, and
- (2) any and all appeals involving the School's FTE calculation are adjudicated.

Terms of True-Up

Unless the Applicable Agreement includes provisions for conducting a True Up, the Board shall require a Board approved, written agreement with the third party specifying (1) the True Up amount, (2) the payment period, (3) whether the School is requiring collateral or other assurances for future re-payment, and (4) other applicable terms and conditions.

[Adoption date: December 7, 2017]

**EMPLOYEE DISHONESTY AND FAITHFUL PERFORMANCE OF DUTY
INSURANCE POLICY**

The Board shall use an employee dishonesty and faithful performance of duty insurance policy, rather than a surety bond, to cover losses caused by the fraudulent or dishonest actions of, and the failure to perform a duty prescribed by law for, officers, employees, or appointees that would otherwise be required to give an individual surety bond to qualify for the office or employment before entering upon the discharge of duties imposed by the office or employment. Said insurance policy shall apply to the officer, employee, or appointee before the beginning of the individual's term of office or employment and the officer, employee, or appointee shall not commence the discharge of duties until coverage is documented with the Board.

The coverage amount for an officer, employee, or appointee under an employee dishonesty and faithful performance of duty insurance policy shall be equal to or greater than
\$_____.

APPOINTMENT OF THE FISCAL OFFICER

As required by law, the Board of Directors shall have a designated Fiscal Officer. The Fiscal Officer shall hold a valid license to be a school district treasurer.

The Fiscal Officer shall be employed by or engaged under a contract with the Board of Directors. However, the Board of Directors may adopt a resolution waiving the Board of Directors as the party responsible to employ or contract with the designated Fiscal Officer, provided the Sponsor also approves the resolution. The resolution shall be valid for one year and shall be submitted to ODE. A new resolution shall be adopted for each year that the Board of Directors wishes to waive this requirement.