

# North Muskegon Public Schools

## Business Operating Procedures And Federal Awards Administration Manual

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# North Muskegon Public Schools

## Business Operating Procedures and Federal Awards Administration Manual

### Overview

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Purpose – This manual has been prepared to document the policies and procedures for the administration of federal awards of North Muskegon Public Schools (the “District”) and general business procedures. The Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles and Audit Requirements [34 CFR Part 80, 2 CFR Part 213 and Part 6 of the Office of Management and Budget (OMB) UGG - Uniform Grant Guidance Compliance Supplement] require all sub-recipients of federal funds to establish and maintain internal controls designed to reasonably ensure compliance with Federal laws, regulations and program compliance requirements. Written policies and procedures are part of the necessary internal controls and are required as a precondition to receiving federal funds. These policies and procedures are intended to be sufficiently comprehensive to adequately meet such requirements. However, in no case are these policies and procedures intended to supersede or limit federal or state laws or regulations, or the provisions of individual grant agreements.

Hierarchy of Authority – In the event that conflicting guidance on the administration of Federal awards is available, the District has deemed Federal guidance to be most authoritative, followed by guidance from MDE, and finally other State or local agencies.

Revisions – Guidance provided by the Federal government through the OMB UGG - Uniform Grant Guidance Compliance Supplement and guidance provided by MDE through the Michigan School Accounting Manual are expected to be updated each year. Such updates are considered by the District as they become available and policies and procedures will be revised accordingly.

The Director of Business Services (designated by authority of the Superintendent) is authorized and required to establish and document operating procedures to ensure compliance with the provisions of federal and state regulations and the provisions of grant agreements. Such procedures are documented herein, and will be reviewed and updated as necessary, but not less than once every three years.

Training – District accounting and finance personnel, and program administrators of Federal awards will be provided the necessary training through various mechanisms, such as: (1) reviewing monthly State Aid Financial Status Report Updates, accompanying State aid payments (2) consulting with the District’s auditors as needed for clarification, (3) participating in various training opportunities, such as those offered by appropriate professional organizations, (4) reviewing daily legislative updates from multiple sources, (5) membership and participation in monthly meetings of the Michigan School Business Officials, (6) certification of respective positions by the Michigan School Business Officials i.e.: Business Office Manager, Business Office Specialist, Chief Financial Officer, Human Resource Specialists, School Payroll Specialists & School Technology Management (7) coordination and collaboration with individuals performing similar job functions at local Districts within the District and at similar Intermediate School Districts (8) conducting quarterly business manager meetings for business managers of schools within the District in order to share information and ideas.

Compliance Failures – Compliance failures, whether noted internally by management or through the external audit process, will be addressed immediately by reviewing the reason for the failure with responsible personnel and devising an improved process to encourage compliance in the future.

**North Muskegon Public Schools**  
Business Operating Procedures and Federal Awards Administration Manual  
**A1. General Accounting and Financial Management**

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It is the policy of North Muskegon Public Schools (the “District”) to comply with all statutory, regulatory, and contractual requirements in the conduct of and accounting for its financial operations. The official books of record for the District will be maintained subject to the following provisions:

**Board Policies:** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- Records
- Audits

**Additional Policies and Procedures:** The following policies and procedures will also be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

1. The District will account for its operations in accordance with the Generally Accepted Accounting Principles (GAAP) applicable to local units of government.
2. The District will comply with all applicable circulars issued by the Office of Management and Budget (OMB), including, but not limited to Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance).
3. The District will comply with all contractual requirements detailed in its duly executed grant agreements with awarding agencies.
4. The Board of Education will contract annually with an independent CPA firm for the purposes of conducting the District’s external financial audit. To the extent that the District has expended federal awards in excess of \$750,000, the District will have a single audit performed in accordance with the Uniform Guidance.
5. To ensure continuing compliance with all applicable accounting requirements, the Board of Education may, at its discretion, contract with a CPA firm to provide internal auditing and/or consulting services.
6. The Superintendent or designee (Director of Business Services) shall be responsible for the maintenance of all accounting and financial records (including journals, timesheets, bank statements, audit reports, and similar documents). Such records shall be retained as required by contractual or regulatory requirements as described in the section of this manual titled “Records Retention”.

**North Muskegon Public Schools**  
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**A2. Purchasing and Procurement**

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It is the policy of North Muskegon Public Schools (the “District”) to ensure that all disbursements of District funds are properly reviewed and authorized, and consistent with sound financial management principles. In order to meet these objectives, all disbursements of District funds shall be subject to the following provisions:

**Board Policies:** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- 3600 - *Reimbursement for Expenses*
- 3405 - *Electronic Transaction of Funds*
- 3550 - *Authorized Signatures*
- 3570 - *Petty Cash Accounts*
- 3520 - *District Expenditure of Funds*
- 3600 - *Reimbursement of Expenses*
- *District Credit/Procurement Cards*
- 3610 - *Purchasing Goods and Services*
- *Procurement Policy*
- 3620 - *Administrative Leeway* (emergency situations)
- 3650 - *Cooperative Purchasing*
- 3690/3750 - *Payment Procedures*
- 3800 - *Fundraising and Student Activity Fund*
- 4770 - *Selection of an Architect/Engineer/Construction Manager*
- 4890 - *Supervision of Construction* (change orders)
- 4900 - *Fair Employment Clause* (awarding of contracts)
- 5330 - *Travel Expenses*
- 3800 - *Student Activities* (activity fund management)

**Additional Policies and Procedures:** The following policies and procedures will also be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

1. The Business Office shall suggest checking more than one vendor pricing for small purchases (currently below \$9,999). If the purchase is \$10,000 to state bid threshold we request 3 quotes from vendors. A formal/competitive quote is needed if it’s over the state bid threshold as well as needing board approval for the purchase. A competitive proposal is needed for all goods and services as specified by Board policy and State Law purchases over \$150,000 and required board approval.
2. For small purchases (up to \$9,999) of supplies and services of supplies and services charged to federal grants we suggest checking on more than one place. For other small purchases (\$10,000 to state bid threshold) we require 3 quotes.
3. If the competitive bid threshold issued by the State of Michigan Department of Education differs with Board policy, the lower threshold will be utilized. This applies to the activities below under the relevant sections of the Revised School Code. The Superintendent or designee (Director of Business Services) will be responsible for obtaining information on the annual adjustments to these amounts corresponding to changes in the Consumer Price Index (CPI) as published by MDE.
  - a. Contracts will be awarded to the responsible firm whose proposal is most advantageous to the program.

- b. The organization may only use qualification-based methods, whereby competitor’s qualifications are evaluated and the most qualified competitor is selected, in the procurement of the architectural/engineering professional services.

Expenditure Type	Michigan Revised School Code Section
District procurement of supplies, materials and equipment	623a
District award value limit	634 and 1814
District gift value limit (monthly)	635
School building construction, addition, renovation, or repair	1267
School District or Public School Academy procurement of materials, and equipment	1274

- 4. Disbursements will be supported by approved vendor invoices.
  - a. The approved invoice will be attached behind the check stub and filed electronically in the on-line document management system.
  - b. A copy of the check will be stapled to the original invoice in order to prevent duplicate payment.
  - c. Invoices are typically paid once a week and normally on Wednesday of each week.
  - d. Packing slips are sent to the financial services office. Each slip is reviewed and filed in the financial services office. If there is a notation of a discrepancy, the appropriate measures are taken to rectify the problem.
  - e. If the invoice references a purchase order number: the purchase order and invoice are compared to see if the order is complete, to verify vendor name and address, and to verify pricing.
- 5. Purchase Orders are to be used. Requisitions are entered into the financial software at the building and/or department level. Information includes item description, quantity, unit price, and the appropriate account number.
  - a. Requisitions require department head/principal approval.
  - b. Purchase orders are released for printing by the accounting manager. The system assigns the next consecutive number to each purchase order. Three copies are made with the following distribution: one copy mailed to vendor, one copy sent to building/department, one copy to accounting manager.
- 6. The Superintendent or designee (Director of Business Services) is authorized to make purchases for allowable and necessary items within the Board-approved budget allocation.
- 7. Purchases made with federal funds in excess of \$150,000 will require cost or price analysis, including independent estimates. Where such regulations differ from general District policy, the more restrictive of the requirements shall apply.
- 8. All approved check requests will be processed by the financial specialists (or other financial staff appointed by the Director of Business Services). Disbursements will be made by check with the exception of purchase card purchases, debt service payments, and payroll-related expenses.
- 9. Prior to processing the weekly check run, the Director of Business Services will approve each voucher for payment and compare the voucher to the invoice for accuracy.

10. Checks are sequentially numbered by the financial software package and verified during check runs. Unused check stock is stored in the Business Office. Since the entire check form/image is generated through the printing process (i.e., the check stock is blank), it will not be deemed necessary to use a physically secure location. Checks will be endorsed by MICR during the printing process.
  - a. When all invoices have been entered, the financial specialist prepares a report to compare the anticipated payment amount and the invoice(s) amount.
  - b. A check run is generated electronically in MUNIS and sent to the MICR printer, located in the closet of the financial services office. A duplicate copy of the check is printed and stapled to the invoice and purchase order.
  - c. The checks and any necessary enclosures are mailed the day the check is issued.
11. Claims and invoices will be paid timely based on the conditions of the vendor invoice. It will not be considered acceptable to incur late and/or finance charges on invoice payment.
12. Checks will only be made payable to a specific payee. It is prohibited to issue a check to “cash” or “bearer”. Similarly, it is prohibited to sign a blank check.
13. The District may account for the activities of certain student groups and organizations. Since these activities represent outside parties and are not subject to the oversight of the Board and/or District management, they will be accounted for in a trust and agency fund. Such disbursements will be subject to the same policies and procedures and other District disbursements.
14. When an employee incurs work-related expenses to be reimbursed by the District, the following requirements apply:
  - a. The Superintendent or designee (Director of Business Services) will develop a standard employee expense process which will be made available to all employees through Employee Self Service. All employee expense reimbursements are required to be submitted to the payroll person and reimbursement is processed through the next payroll.
  - b. The employee expense will be approved by both the employee’s direct supervisor (or other administrator knowledgeable of the employee’s work activities), and the Director of Business Services.
  - c. Receipts will be attached to the expense claim for all expenses (excluding mileage). If a receipt is not available, the employee will not be reimbursed.
  - d. An employee will not be reimbursed for any expense that is disallowed by Federal cost principles.
  - e. Expense reports of the Cabinet (i.e.: administrative leadership team) will be submitted to the Superintendent or designee (Director of Business Services) for review and approval. Expense reports of the Superintendent will be submitted to the Director of Business Services for review and approval. It will not be acceptable for any employee to approve his/her own expense report.
  - f. Approved expense reports will be submitted to the Administrative Assistant who will verify that expenses are appropriate and supporting documentation is attached.

- g. The Business Office will not process any expense reimbursements for payment until all necessary signatures have been obtained.
  - h. An employee making a disbursement using personal funds on behalf of the District may be subject to State sales tax, while payments made by the District directly are exempt from such tax due to its status as a local unit of government. As such, an employee will only incur a work-related expense with personal funds to the extent that it is not practical or reasonable for the purchase to be made directly by the District.
15. Voided checks will be marked “VOID”.
16. The Superintendent or designee (Director of Business Services) will be responsible for compiling information on disbursements and presenting this information to the Board of Education at its monthly (or other period) meetings. This information will include:
17. Non-check disbursements (such as ACH transfers for Purchase Cards and Employee Insurance) will be prepared by the Accountant, non-check disbursements (such as ACH transfers for payroll, retirement and TSAs) will be prepared by the Administrative Assistant and non-check disbursements (such as ACH transfers dental insurance) will be prepared by the Accountant and initiated in the online banking software by the Accountant.

**North Muskegon Public Schools**  
**Business Operating Procedures and Federal Awards Administration Manual**  
**A3. Cash Receipts**

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In order to safeguard the funds of the District, cash receipts will be deposited promptly and in-tact according to the following policies:

**Board Policies:** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- *Depository of Funds*
- *Monies in School Buildings*
- *Authorized Signatures*

**Additional Policies and Procedures:** The following policies and procedures will also be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

1. Cash receipts will be recorded as needed, based on the amount of collections.
2. Cash will be initially received by the Administrative Assistant. Check stubs and any supporting documents are retained. If no check stub is available, a copy of the physical check is made and retained to support the receipt.
3. Once checks (and/or cash) are recorded and placed in the safe, the Administrative Assistant prepares a deposit.
4. The Administrative Assistant deposits all checks via an online system through the bank. There is no need to go to the bank unless it is cash. Receipts are given to the Accountant reconciles the amount with the documentation that the Administrative Assistant gave to him or her.
5. The information is entered into the accounting software once a month. The Accountant will post the batch to the general ledger and approve the transaction in the bank reconciliation module of financial software.
6. The accountant is responsible for reconciling the bank statement with the manual spreadsheet and the accounting software. The Director of Business Services reviews and approves activity at least on a monthly basis through review of the bank reconciliation.
7. Food Service Deposits
  - a. Each day, the cash reconciliations are filed out by the building leader. Two food service employees sign that the cash per register is correct. That register reconciliation is then sent to the Food Service Director. The food service employees then give the money to the Administrative Assistant with a form telling him or her how much is in the deposit.
  - b. The Food Service Director will record the deposit on a spreadsheet that is shared with the Accountant. The Accountant reconciles the deposits from the spreadsheet with the bank statement.
8. Athletic Deposits
  - a. The coaches submit deposits to the Athletic Treasurer, who in turn double checks everything and turns the money into the Administrative Assistant who prepares the deposit. Deposits are made as needed.
  - b. The deposit tickets are coded with the account code.
  - c. The information is reconciled with the bank and then entered into the accounting software at least twice per month.
9. Trust and Agency Deposits
  - a. The teacher submit deposits to the Administrative Assistant who prepares the deposit. Deposits are made as needed.

- b. The information is entered into the accounting software at least once per month.
10. Deposit slips will be filed internally along with the deposit receipt from the bank and any check stubs/supporting documentation.
  11. Receipts of currency are deposited by individual departments after verification by two members of that department and receipts are sent to the Business Office. Cash register receipts are reconciled daily by each department. Cashing of checks out of the cash register is prohibited. Cash register receipts are pre-numbered and issued in sequential order.
  12. Wire transfers and ACH payments will be recorded through Munis
  13. For billings generated by various departments, the accountant creates the invoice based on the supporting documentation. When the payment is received, the accountant applies the payment to the invoice that is goes with.
  14. Billing for grant money is done on an as needed basis and depends on the grant in question. The Director of Business Services prepares the draw request for Title 1, and Title 2. The Director of Business Services prepares the draw request for all special education related grants. The Accountant reviews and approves the draw requests.

**North Muskegon Public Schools**  
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**A4. Payroll and Timekeeping**

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The following provisions apply to the payment of employees and recording of time and effort (as required) in accordance with Federal Cost Principles.

**Board Policies:** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- *Compensation and Benefits* (Superintendent)
- *Administrative Personnel* (Central Office and Building Level)
- *Payroll Procedures and Schedules*
- *Equal Employment Opportunity*
- *Qualifications and Training* (job descriptions)
- *Hiring*
- *Compensation Guides and Contracts – Non-Certified Staff*

**Additional Policies and Procedures:** The following policies and procedures will also be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

1. Personnel, Employment and Rate authorizations
  - a. Employees are hired by the Appropriate Department and approved by the Board of Education. A payroll status sheet is given to the payroll department. All necessary paperwork is filled out by the employee. A file is started in the payroll department.
  - b. Personnel files are maintained for each employee. Files in the Superintendent's Office contain applications and reference investigations, earnings records, original and updated pay rates and positions, and termination data. Files in the Payroll Department contain W-4 forms, authorizations for payroll deductions, payroll status sheets and benefit applications.
  - c. Credit union, annuities, employees portion of insurance, direct deposit, United Way, flex savings, garnishments are all authorized deductions from the employee's gross pay.
  - d. If an employee elects insurance, a form is placed in their insurance file.
  - e. Written terminations forms are placed in the file when an employee is terminated.
  - f. Files in the Superintendent's office are only accessible to employees working in those departments.
  - g. The employee's information, obtained from the payroll status sheet, is entered into the financial software by the Administrative Assistant.
  - h. The Administrative Assistant is responsible for maintaining all aspects of the financial software with regards to payroll.
2. Payroll Preparation and Timekeeping
  - a. Employees report their hours to the building secretary or administrator. Hours are recorded on a time card, signed by the administrator or a designee and sent to the payroll department for processing. Rate of pay is determined by the appropriate contract, which is Board approved.
  - b. Contract employees (teachers) are spread over 21 or 26 pays.
  - c. Absences are reported and recorded on their employee's timecard. The administrator or a designee approved each absence.
  - d. The Administrative Assistant enters employee hours into the MUNIS system. Checks are not issued until the manual spreadsheet matches the summary report from MUNIS.
  - e. Paychecks are numbered sequentially by the Munis software package. Check numbers are verified during the reconciliation process by the Accountant. Checks are MICR-signed by the printer with the Superintendent's signature.
  - f. Blank check stock is only accessible to employees in the Superintendent's Office.
  - g. Checks are drawn on an account separate from the general checking account.

- h. Voided or spoiled checks are marked “Void” and maintained in a file.
  - i. After payroll is processed, all reports are saved to the network which is accessed by Superintendent Office staff. Checks are locked in the safe and distributed on Friday.
  - j. Payroll checks are distributed by the interschool mail. No checks are held for pick up on a regular basis.
  - k. Access to payroll records and materials is limited to those with a need for such access.
  - l. Payroll is reviewed for accuracy through the monthly reconciliation process of bank statements and payroll liabilities.
  - m. The Director of Business Services reviews and approves payroll proof once payroll is complete but before it is disbursed and reviews any questions regularly with Administrative Assistant.
  - n. The allocation of hours between programs or departments should be based exclusively on the actual hours worked, and not be based on available budgets, or predetermined allocation schedules. In the event that an after-the-fact correction is necessary to an employee’s timesheet due to errors in the allocation of time worked, such corrections must be submitted to the Business Office, and approved in writing by both the employee and his/her supervisor.
3. Compensated Absences
- a. Payout of compensated absences (sick and/or vacation) should follow the collective bargaining agreements for Teachers, and Support Staff.
  - b. For Non-Affiliated Support
    - 1) Sick - shall be paid an amount equal to Thirty Five Dollars (\$35) times the number of his/her accumulated sick leave days. To be eligible, employee must qualify for an immediate pension from the Office of Retirement Services.
  - c. For Non-Affiliated Administrators
    - 1) Sick - shall be paid an amount equal to Fifty Dollars (\$50) times the number of his/her accumulated sick leave days. To be eligible, employee must qualify for an immediate pension from the Office of Retirement Services.
    - 2) Vacation – is not earned (does not have to work full year of employment to receive vacation). At the end of employment, the Business Office determines the amount of earned vacation (percentage of total year worked times number of days given). If the employee incurred less than the earned amount of vacation, then the remaining amount of earned vacation would be paid at their hourly rate. If the employee incurred more than the earned amount of vacation, then the employee’s final check would be reduced (hourly rate times overage of hours).
4. Payroll Bank Account & Electronic Transfer
- a. Transfer of the net pay to the payroll checking account is done by ACH. Federal and state taxes are transferred electronically by the Administrative Assistant. EPARS (annuities) are transferred electronically by the Accountant.
  - b. The accountant verifies the transfer information by reviewing the supporting documentation and through the bank reconciliation process.
5. 941’s & Year-End Preparation of W-2’s
- a. 941’s are prepared quarterly, placed in a book in the financial services office. They are reviewed by the Director of Business Services.
  - b. W-2’s are prepared by the Administrative Assistant. The total of W-2 wages, including taxable fringe benefits, is reviewed by the Director of Business Services.
  - c. W-2 forms are printed by North Muskegon Public Schools. The Administrative Assistant reconciles the W-2’s and distributes the ones that can be sent through interschool mail and mails the rest of them. W-2’s can also be found on Employee Self Service.
6. Substitute teachers are paid by EDUStaff. Absence slips are filled out, signed by the principal/designees and submitted to payroll. The Administrative Assistant reconciles AESOP bi-weekly. Payment is transferred by ACH to EDUStaff bi-weekly. A spreadsheet is sent biweekly to the Business Office from EDUStaff for review. A journal entry is prepared by the Accountant.

7. Salaried employees charged to a Federal grant will document time and effort according to an accepted method at the direction of the Director of Business Services and the Curriculum Director. If the employee's time is expensed based on budgetary data, a review shall occur at least quarterly. If an adjustment is determined to be needed, it will be made in order to agree the general ledger to the documentation.
  - a. The employee may document time and effort using a timesheet as described above. Timesheets must account for the total activity for which the employee is compensated, and be signed by the employee. It will not be acceptable for timesheets to include the hours worked on Federal grants only.
  - b. Or, the employee may complete personnel activity reports (PARs). Such reports will be prepared at least monthly to coincide with specific pay periods, reflect an after-the-fact distribution of the actual activity of the employee, account for the total activity for which the employee is compensated, and be signed by the employee.
  - c. Budgets, lesson plans, and calendars/daily planners will not be deemed allowable documentation to support personnel costs and therefore will not be accepted by the Business Office.
  - d. It is the responsibility of the employee being charged to a Federal award(s) to clarify documentation requirements with the Superintendent or designee (Director of Business Services) and provide appropriate documentation to the Business Office as it becomes available. The employee should retain a copy of the documentation for his/her personal records.
  
8. Salaried employees who work 100 percent of their time on a single Federal award or cost objective (regardless of the availability of Federal funding) shall have the option to complete semi-annual time certifications in lieu of timesheets or personnel activity reports (described above). The certifications will be prepared at-least semiannually and signed by either the employee and/or a supervisory official having first-hand knowledge of the work performed by the employee. Certifications should never be signed prior to the end date of the period being certified. Each certification should be provided to the Business Office when available. Employees should retain a copy of the certifications for his/her personal records.

**North Muskegon Public Schools**  
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**A5. Bank Reconciliations**

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The following procedures will apply to the reconciliation of bank accounts:

**Board Policies:** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

There are no existing Board policies over the reconciliation of bank accounts.

**Additional Policies and Procedures:** The following policies and procedures will also be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

1. Bank reconciliations will be performed monthly for each bank account.
2. Bank reconciliations will be completed on a timely basis after month-end.
3. The bank statements are printed or received/opened by the Accountant. The statements are then given to the Director of Business Services to be signed to verify the ending balances. Bank reconciliations for the bank accounts will be completed by the Accountant.
  - a. The bank statement is compared to the TM account within MUNIS.
  - b. The check number and amount is verified for each check that cleared by comparing to the check download from MUNIS and the bank statement.
  - c. Deposits are verified with the deposit download from MUNIS.
  - d. If necessary, the accountant makes journal entries to balance the system, with the approval of the Director of Business Services.
4. Bank reconciliations will be subjected to review and approval by the Director of Business Services. The reviewer will sign and date the reconciliation as evidence of the control.

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**A6. Journal Entries and Non-routine Transactions**

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The District will occasionally need to record a general journal entry or other non-routine transaction. Such transactions may relate to Federal awards. The following policies and procedures apply to all general journal entries:

**Board Policies:** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

There are no existing Board policies over journal entries and non-routine transactions.

**Additional Policies and Procedures:** The following policies and procedures will also be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

1. General journal entries will be an allowable transaction type for recording: corrections and adjustments, accruals and reversing entries, inter-fund activity, interbank activity, EFT payments, ACH transfers, etc., to the extent that the entries can be reasonably supported.
2. All general journal entries will be filed with adequate supporting documentation.
3. Each general journal entry will be signed/initialed and dated by the preparer.
4. All entries will be reviewed and approved by the Accountant and the Director of Business Services. Workflow approval will be captured in Munis, which will signify as evidence of the control.
5. The ability to post general journal entries in the accounting system will be limited to specific employees. The accountant posts all entries after the Director of Business Services approves the entry.

**North Muskegon Public Schools**  
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**A7. Investments**

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**INVESTMENT POLICIES:**

**Board Policies:** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- *Investments*

**Additional Policies and Procedures:**

- Authorization for acquisition and disposition of investments is vested with the District Board of Education.
- The Board of Education has formally adopted an investment policy (see above) that limits the school District's allowable investments and addresses the specific types of risk to which the school District may be exposed.
- The Business Office (designee – Director of Business Services) is charged with the responsibility of determining that investments are of the character and type permitted by legal requirements and that the income earned is dispersed for authorized purposes.
- Board or Superintendent (designee- Director of Business Services) approval is required before any money is deposited into any investment accounts.

**Safekeeping:**

- All persons having access to securities are authorized by the Board of Education.
- All securities are held in the name of the District.

**Recordkeeping:**

Detailed records are maintained including the following information:

- Date of acquisition, identification, purchase amount or cost
- Physical location of item
- Interest/dividend/income rates and accrual/receipt dates
- Ownership by fund
- Detail records are periodically reconciled to the general ledger control accounts and to safekeeping statements by the Director of Business Services (or designee- Accountant).
- Investment income is recorded on a timely basis. Investment earnings are credited to the fund "owning" the investment. Any adjustments of investment accounts are approved by the Director of Business Services (or designee- Accountant).
- Calculations of fair value and investment income are periodically reviewed for accuracy by the Director of Business Services (or designee- Accountant).
- Access to computerized investment records is limited to those with a logical need for access.

**North Muskegon Public Schools**  
**Business Operating Procedures and Federal Awards Administration Manual**  
**A8. Capital Assets**

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The following provisions will govern the purchasing, accounting, and inventory of capital assets:

**Board Policies:** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- *Fees, Payments and Rentals*
- *Safeguarding of Monies and Equipment*
- *Inventories – Fixed and Controlled Assets*
- *Surplus Books, Equipment and Supplies*
- *Surplus Land or Buildings*
- *Thefts and Vandalism*
- *School Vehicles*
- *Personal and Business Transportation Services*
- *Technology*
- *Retirement of Facilities*
- *Use of District Equipment, Supplies, Property and Materials*
- *Use of District Facilities*

**Additional Policies and Procedures:** The following policies and procedures will also be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

1. A *capital asset* is defined by the District as an individual item with a useful life in excess of 1 year and an individual cost of more than \$5,000, or as otherwise specified by Board policy (see referenced items above).
2. Procurement of capital assets will be governed by the Board of Education’s procurement and purchasing policies.
3. Donated capital assets will be recorded at estimated fair value at the date of donation.
4. Purchases of capital assets will be recorded as capital outlay expenditures in the governmental fund financial statements, and capitalized as noncurrent assets in the government-wide statements. Donated capital assets will be recorded as a government-wide adjustment only. All capital assets will be depreciated using the straight-line method over estimated useful lives.
  - a. At the end of the year, the Accountant searches the 6000’s object code and all accounts payable checks and credit cards to capture all fixed assets. This information is reviewed by the Director and Business Services and a determination of useful life for that item.
  - b. Information is sent to the auditors by the Accountant.
  - c. The determination for the disposal of fixed assets is made between the leadership team, at least annually.
5. Capital asset purchases financed through bonds payable will be made in compliance with the Bulletin for School District Audits of Bonded Construction and of Sinking Funds issued by the State of Michigan Department of Treasury.
6. Capital assets with useful lives (i.e., excluding land and construction in progress) will be depreciated using a consistent and systematic approach allowable under GAAP or as specified by Board policy.
7. Construction or other capital projects in progress at year-end will be reported as “construction in progress” until the related asset is placed into service. No depreciation expense will be incurred on such assets. Outstanding construction commitments at year-end will be disclosed in the District’s audited financial statements.

8. If the District determines that depreciation expense cannot be reasonably allocated by function, it will be deemed allowable to report all or a portion of depreciation expense as “Depreciation – unallocated” in the government-wide statement of activities, to the extent that this approach remains allowable under GAAP.
9. The District may outsource the maintenance of depreciation schedules to a third-party consultant or its external auditors. In those instances, additions (along with the estimated useful lives) and disposals will be identified by the Director of Business Services.
10. To the extent that capital assets are purchased with Federal funds, such items will be flagged as “Federally-funded” in the financial accounting records in order to ensure the appropriate use of proceeds on sale (if applicable) in accordance with Federal guidelines.
11. To the extent that the District has purchased capital assets with Federal funds, a complete inventory will be complete not less than once every two years. As part of this process:
  - a. Capital assets will be physically inventoried and compared to the records used for financial accounting purposes. Inconsistencies will be investigated and resolved and the financial accounting records will be adjusted accordingly;
  - b. A detailed listing of capital assets from the financial accounting records will be provided to building principals and other department heads for input on accuracy, completeness, and existence of assets. Inconsistencies will be investigated and resolved and the financial accounting records will be adjusted accordingly.
  - c. Remaining useful lives of capital assets will be reviewed for reasonableness and adjusted when considered necessary and appropriate.
2. Other policies and procedures related to compliance with the provisions of the OMB compliance supplement are included within this manual in the section titled “Equipment and Real Property Management”.

**North Muskegon Public Schools**  
**Business Operating Procedures and Federal Awards Administration Manual**  
**A9. Long-term Debt**

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The following provisions will govern the issuance of long-term debt (including, but not limited to: bonds and notes payable, capital assets, installment purchase agreements, State Aid Anticipation Notes, compensated absences, and severance agreements/early retirement incentives):

**Board Policies:** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- *Borrowing and Debt Service*

**Additional Policies and Procedures:** The following policies and procedures will also be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

1. The issuance of long-term debt will be subject to approval by the Board of Education and the Michigan Department of Treasury.
2. The issuance of long-term debt will be recorded as an “other financial source” in the governmental fund financial statements, along with any premium or discount thereon. Costs of issuance will be reported in the governmental fund financial statements as a component of debt service expenditures.

In the full-accrual government-wide statements, long-term debt and any related discounts, premiums will be reported as a liability. Deferred charges related to bond refundings will be reported as deferred outflows of resources or deferred inflows of resources, as applicable. Bond issuance costs will be expensed when incurred and reported as a component of interest expense in the government-wide statement of activities.

3. Short-term debt (such as State Aid Anticipation Notes) with an initial maturity of less than one-year will be recorded as a liability in the governmental fund financial statements, along with accrued interest payable thereon.
4. Compensated absences payable will be recorded in the government-wide statements for earned but unused sick and vacation time, as provided for in bargaining agreements and/or personnel policies. Such accruals will be limited to the maximum payout based on these policies.
5. Severance agreements/early retirement incentives will also be recorded liabilities in the government-wide statements. Multi-year agreements will be reported at the net present value using a discount rate equal to the rate management expects to earn on the assets used to liquidate such liabilities. A current portion will be recorded each year, based on the payment schedule in the severance agreement.

**North Muskegon Public Schools**  
Business Operating Procedures and Federal Awards Administration Manual  
**A10. Grant Administration**

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**Board Policies:** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- *State and Federal Funding Proposals and Applications*

**Additional Policies and Procedures:** The following policies and procedures will also be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

1. Grant Development, Application, and Approval –

- a. Legislative Approval – The point at which legislative approval is required is determined by the requirements of the grant program. If the grant must be submitted by “an individual authorized by the legislative body”, then *Board of Education* approval is required prior to submitting the application. If such legislative approval is not specifically required by the written terms of the grant, then the Superintendent or designee (Director of Business Services or Curriculum Director) may, at his or her discretion, approve grant applications.
- b. Matching Funds – Grants that require cash local matches must be coordinated through the Business Office. At a minimum, funds must be identified within the existing budget to provide the match, or a budget amendment will be required. Depending on the nature of the grant, there may also be some policy implications that will bear discussion. (For example, will the grant establish a level of service that cannot be sustained once the grant funds are depleted?)

In all cases involving matching funds, the grant applicant should contact the Business Office to determine the strategy for securing matching funds.

Refer to the section within this manual titled “Matching, Level of Effort, and Earmarking” for additional information on compliance with the provisions of the OMB Compliance Supplement.

- c. Grant Budgets – Most grants require the submission of an expenditure budget. The Superintendent or designee (Director of Business Services or Curriculum Director) should review this portion of the grant request prior to submission. Frequently, a technical review will discover inconsistencies in the calculations, cost centers that might have been overlooked, or identify reimbursable expenses of which program staff may not be aware—particularly in the area of indirect costs.

Grant applicants should contact the Superintendent or designee (Director of Business Services or Curriculum Director) to request a technical review of a grant proposal budget.

2. Grant Program Implementation –

- a. Notification and Acceptance of an Award – Official notification of a grant award is typically sent by a funding agency to the program director and/or other official designated in the original grant proposal. However, the authorization to actually spend grant funds is derived from the Board of Education through the approval of a grant budget. Such notification should also be directed to the Business Office.

Adoption of the grant budget as a component of the District-wide operating budget is deemed to be sufficient approval.

- b. Establishment of Accounts – The department that obtained the grant will provide the Superintendent or designee (Director of Business Services) with information needed to establish revenue and expense accounts for the project. Ordinarily, this information will include a copy of a summary of the project and a copy of the full project budget.

To the extent that the grant awarded is included in the Michigan School Accounting Manual, such guidance will be followed without exception.

- c. Purchasing Guidelines – All other District purchasing guidelines apply to the expenditure of grant funds. The use of grant funds does not exempt any purchase from normal purchasing requirements. All typical paperwork and bidding requirements apply. All normal staff approvals apply. When in doubt, the program director should contact the Superintendent or designee (Director of Business Services) for further assistance.

### 3. Financial and Budgetary Compliance –

- a. Monitoring Grant Funds – Departments may use some internal mechanism (such as a spreadsheet) to monitor grant revenues, expenditures and budgetary compliance. The Superintendent or designee (Director of Business Services) maintains all this information in financial software system as well; this is considered to be the District’s “official” accounting system by the granting agencies. Program Directors are strongly encouraged to use financial software reports provided by the Superintendent or designee (Director of Business Services) for their grant tracking.

If any “off-system” accounting records are maintained, it is the responsibility of the Program Director to ensure that the program’s internal records agree to the District’s accounting system.

- b. Fiscal Years – Occasionally, the fiscal year for the granting agency will not coincide with the District’s fiscal year. This may require adjustments to the District’s internal budget accounts and interim financial reports as well as special handling during fiscal year-end close. It is the responsibility of the Program Director to bring such discrepancies to the attention of the Superintendent or designee (Director of Business Services) at the time the grant accounts are established.

- c. Grant Budgets – When the financial accounting software for a specific grant is designed, it will include the budget that was prepared when the grant application was submitted. The terms of each specific grant will dictate whether any budget transfers between budgeted line items will be permitted. In no case will the program director be authorized to exceed the total budget authority provided by the grant.

If grant funds have not been totally expended by fiscal year-end, it is the responsibility of the program director to notify the Superintendent or designee (Director of Business Services) that budget funds need to be carried forward to the new fiscal year, and to confirm the amounts of such carry-forwards. Carry-forwards of grant funds will be subjected to maximum allowable amounts/percentages based on the grant award agreement and/or the OMB Compliance Supplement.

- d. Capital Assets – The District is responsible for maintaining an inventory of assets purchased with grant monies. The District is accountable for them and must make them physically available for inspection during any audit. The Superintendent or designee (Director of Business Services) must be notified immediately of any sale of these assets. Customarily, the proceeds of the sale can only be used on the grant program that purchased them. (Refer to the specific regulations governing the original grant).

The Superintendent or designee (Director of Business Services) will coordinate this grant requirement. All transactions that involve the acquisition or disposal of grant funded fixed assets must be immediately brought to the attention of the Superintendent or designee (Director of Business Services). Refer to the sections of this manual titled “Capital Assets” and “Equipment and Real Property Management” for additional information.

4. Record Keeping –

- a. Audit Work-papers – The District’s external auditors audit all grants at the end of each fiscal year. The Superintendent or Director of Business Services) will prepare the required audit work-papers. Program Directors may be asked to assist in this process, if necessary.
- b. Record Keeping Requirements – Grant record keeping requirements may vary substantially from one granting agency to another. Consequently, a clear understanding of these grant requirements at the beginning of the grant process is vital. The Superintendent or designee (Director of Business Services) will maintain copies of all grant draw requests, and approved grant agreements (including budgets). The program director should maintain all other records.

Refer to this section of this manual titled “Records Retention” for additional information.

5. Other Guidelines – Specific information on policies and procedures related to compliance with the provisions of the OMB Compliance Supplement have been addressed later in this manual and should be considered along with the information in this section.

**North Muskegon Public Schools**  
Business Operating Procedures and Federal Awards Administration Manual  
**A11. Year-end Closing and Reporting**

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The following provisions will govern the year-end close-out process of the District for purposes of external financial reporting:

1. In accordance with the Michigan Department of Education requirement, the District's fiscal year end for external reporting purposes will be June 30.
2. Accruals will be recorded as needed to ensure that revenues and expenditures are reported in the appropriate accounting period:
  - a. Accounts Payable Disbursements – Invoices for goods or services received during the previous fiscal year will be recorded as expense/accounts payable as of June 30. Such determinations will be made by the Accounts Payable Clerk and reviewed for accuracy and completeness by the Director of Business Services.
  - b. Payroll-related Accruals – Costs of hourly personnel paid after June 30 for services performed during the previous year will be recorded as expenditures/salaries payable at June 30. The amount will be based on hours worked during the fiscal year multiplied by the employee's hourly rate. Additional consideration will be made for FICA taxes, retirement benefits, health insurance, and related employee benefits.

Salaried teachers and other employees working during the academic year only may elect to receive their annual salary over the course of the academic year or over the course of the 12 months ended August 31 of each year. In the former, all salary payments will have been made prior to June 30 and no additional accrual is necessary. In the latter, the difference between the total salary and the amount paid through June 30 will be recorded as expense/salaries payable at June 30 since the period of service is complete at that time. Additional consideration will be made for FICA taxes, retirement, health insurance, and related employee benefits.

Health insurance and other benefits for employees working on an academic year only will be accrued according to each union's contract and recorded as expenditures/benefits payable at June 30.

Payroll accruals will be prepared and documented by the Administrative Assistant and reviewed by the Director of Business Services.

1. After the last pay in June, the Administrative Assistant reviews all employees with remaining pays on their contracts.
  2. A separate "accrued expense payroll" is generated for the summer pays.
  3. The financial software accrues the remaining contracts, as well as the wage and insurance benefits.
- c. Prepays – Payments made prior to year-end that cover goods or services to be received in a future period will be recorded as prepaid items as of June 30. The District may elect to not record prepaid items in governmental funds in accordance with GASB Codification 1600.127 *Other Expenditure Recognition Alternatives*. Any amounts identified will be recorded with a journal entry by the Accounts Payable Clerk
  - d. Inventory – If deemed material, a physical inventory of school building supplies and vocational education program materials will be performed after the completion of the academic school year, but no later than June 30. Amounts will be valued at current cost and provided to the Business Office for review and adjustment in the general ledger. Certain inventories may be stored at third-party locations. In order to appropriately account for these items, the District will contact the third-party at year-end for verification of the quantity of product on hand.

e. Receivables – General – Cash received after year-end for which a good or service was provided during the previous fiscal year will be recorded as revenue/accounts receivable. All such adjustments will be supported by appropriate documentation, such as remittance advices or dated sub-ledgers.

f. Receivables – Grant – After all year-end expense accruals have been recorded, an entry will be recorded for the difference between grant expenditures and related grant receipts as of June 30 as revenue/grants receivable. Grant receivables will only be recorded to the extent that sufficient amounts remain in the grant award. Expenditures that will not be reimbursed through grant awards due to lack of available funding will be transferred to a non-grant cost center.

g. Receivables – State Aid – State Aid is provided to Michigan School Districts in 11 installments from October through August. Therefore, since the July and August State Aid receipts are intended to finance the previous fiscal year, such amounts will be recorded as revenue/receivable at June 30.

3. The preparation of the year-end financial statements in accordance with GAAP will be done in consultation with the independent external auditors, based on the District's trial balance and reconciling schedules. The draft financial statements ghost-written by the auditors will be reviewed in detail by the Superintendent and Director of Business Services. Any auditor-proposed journal entries will be reviewed by the Accountant and Director of Business Services to ensure propriety and that the audited financial statements agree to the District's books and records. Refer to the policy on "audits" within this manual for further information on audit requirements and related School policies
4. To the extent that the District is required to have a single audit completed in accordance with Uniform Grant Guidance, the District will accumulate the information necessary to prepare a schedule of expenditures of federal awards (SEFA or the "schedule") in accordance with Federal and State requirements. This schedule will be characterized as follows:
  - a. The schedule will include all federal financial assistance, including: grants, contracts, property, loans, loan guarantees, interest subsidies, cooperative agreements, insurance, or direct appropriations. Amounts will be reported whether received directly from the Federal government or through a pass-through agency (given that the District is determined to be a sub-recipient and not a vendor).
  - b. Non-cash assistance (such as food commodities) will be described as such in the schedule or in the notes to the schedule.
  - c. The schedule will be prepared on the same basis of accounting as the related financial statements.
  - d. Federal grants received through the Michigan Department of Education will agree to, or reconcile with, the Grant Auditor Report, as applicable.
  - e. Federal awards will be grouped based on Federal awarding agency. Each Federal award with current expenditures will be listed along with its CFDA number, pass-through grantor name (if applicable) and award/pass-through grantor number (if applicable). Such information will agree to the award documentation.
  - f. If the CFDA number of a Federal award cannot be reasonably determined, it shall be reported in the schedule using the two-digit prefix for the related Federal agency, followed by "UNKNOWN".
  - g. To the extent that amounts are passed-through to sub-recipients, a schedule of federal awards provided to sub-recipients, including all necessary information to meet the requirements of the Michigan Department of Education, will be prepared.
  - h. In addition to current year expenditures, the schedule will list approved award/grant amount, accrued/deferred revenue at the beginning of the year, current year cash received, current year actual

expenditures, and accrued/deferred revenue at the end of the year. If expenditures were incurred relative to this award in the prior year(s), this amount should be disclosed as memorandum-only.

- i. Any adjustments to prior year awards, expenditures, and balances (including transfers between grants) will be disclosed in the footnotes to the schedule.
- j. Accrued/deferred revenue in the schedule shall agree to the amounts recorded as receivable/deferrals in the related financial statements.
- k. To the extent that a separate line item is included in the financial statements for Federal revenue, this amount shall agree to expenditures in the schedule. Any reconciling items will be disclosed in the footnotes to the schedule.
- l. The footnotes to the schedule will disclose the significant accounting policies used in preparing the schedule and the fact that management has utilized the MDE Cash Management System (CMS) Grant Auditor Report (GAR) in preparing the schedule. The footnotes will also indicate whether the de minimis rate for indirect costs has been utilized.

**North Muskegon Public Schools**  
**Business Operating Procedures and Federal Awards Administration Manual**  
**B1. Chart of Accounts**

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North Muskegon Public Schools will maintain its chart of accounts in accordance with the requirements of the Michigan School Accounting Manual.

**Board Policies:** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- Records

**Additional Policies and Procedures:** The following policies and procedures will also be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

1. Each account will be assigned a 26-digit number, as follows:

Fund	Function	Object	Program	Grant	Location	Other
XX	XXXX	XXXX	XXX	XXX X	XXXX X	XXX X

Numbers assigned to each category above will be based on the specific requirements of the District Accounting Manual.

2. As applicable, Federal awards revenue and expenditures will be assigned certain program codes.
3. The chart of accounts will facilitate the preparation of the Financial Information Database (FID) and will agree to the audited financial statements.
4. A complete chart of accounts for GASB 34 adjustments will not be maintained formally within the District's accounting system. Such adjustments are made once per year, for external financial reporting only, and therefore will be determined through use of separate spreadsheets, and integrated into the audit by the District's independent auditors. The Superintendent or designee (Director of Business Services) will review all such adjustments for accuracy prior to the issuance of the audited financial statements.

**North Muskegon Public Schools**  
Business Operating Procedures and Federal Awards Administration Manual  
**B2. Annual Audit**

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Every Michigan public school must have a financial statement audit completed each year by a certified public accounting firm.

**Board Policies:** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- *Audits*

**Additional Policies and Procedures:** The following policies and procedures will also be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

1. The District will have a financial statement audit completed annually as of its fiscal year ended June 30.
  2. The audit will be completed in accordance with *Government Auditing Standards* (the “Yellow Book”).
  3. An adequate written agreement (the “engagement letter”) will be signed by the District and its independent auditors. It will contain information on: period to be audited, support to be provided, reporting requirements, fees, time requirements, contractual information, and a statement that the engagement is intended to meet governmental oversight agencies’ requirements (Michigan School Auditing Manual, OMB, GAAS and GAS). A copy of the engagement letter will be provided each year to the Board of Education.
  4. The Superintendent or designee (Director of Business Services) shall be responsible for overseeing the process of preparing for the annual audit. In order to minimize errors in this process, all audit schedules and work-papers should be reviewed by an individual other than the preparer.
  5. To the extent that expenditures of federal awards equal or exceed \$750,000, the District will also have a single audit completed in accordance with Uniform Guidance. Refer to the section of this manual titled “Year-end Closing and Reporting” for information on the schedule of expenditures of federal awards.
  6. The audit will be submitted electronically to the Michigan Department of Education Office of Audits on or before November 1 of each year. The electronic submission will be performed by the District’s independent auditors.
  7. If a single audit is conducted, the data collection form and reporting package will be submitted electronically to the Federal Audit Clearinghouse as a joint effort between the District and its independent auditors.
  8. The Superintendent or designee (Director of Business Services) will submit written corrective action to any findings identified in the audit process as either part of the single audit report or as a separate letter to the Michigan Department of Education.
  9. If the District issues general obligation bonds to finance capital projects, a bond audit will be performed by the District’s independent auditors within 120 days of substantial completion of the project. The bond audit will be submitted to the Michigan Department of Treasury.
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**North Muskegon Public Schools**  
Business Operating Procedures and Federal Awards Administration Manual  
**B3. Budgets and Budgetary Compliance**

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North Muskegon Public Schools (the “District”) uses budgets and budgetary accounting in order to fulfill its requirements from the Michigan Department of Education and as an internal management tool for monitoring expenditures and identifying abnormalities. Policies and procedures regarding the budgetary process are as follows:

**Board Policies:** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- *Powers and Duties*
- *Duties of the Superintendent*
- *Budget Planning*
- *Annual Operating Budget*
- *Line Item Transfer Authority*

**Additional Policies and Procedures:** The following policies and procedures will also be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

1. An operating budget will be prepared for the general fund and each special revenue fund consistent with GAAP and the uniform chart of accounts (see previous section titled “Chart of Accounts”).
2. The minimum level of legal control will be determined based on the specification of the Michigan School Accounting Manual.
3. In accordance with MCL 141.411-415 and MCL 15.261-275, a public hearing on the budget will be held prior to formal adoption by the Board of Education.
4. The budget will be formally adopted by the Board of Education prior to the commencement of the fiscal year.
5. The adopted budget will include:
  - a. Revenue and expenditure data for the most recently completed fiscal year and estimated revenue and expenditures for the ensuing fiscal year.
  - b. The amount of surplus or deficit that has accumulated from prior fiscal year, along with an estimate of the amount of surplus or deficit expected in the current fiscal year.
  - c. An estimate of the amounts needed for deficiency, contingent, or emergency purposes.
  - d. Other data relating to fiscal conditions that the Superintendent or designee (Director of Business Services) deems to be useful.
6. The budget will be amended by the Board of Education, as necessary, throughout the fiscal year. No budget amendments will be allowable after year-end.
7. In no instance will the total estimated expenditures, including an accrued deficit, exceed the total revenues, including available unappropriated surplus.
8. The budgets, or any adopted amendments to the budget, will be posted to the District’s website within 30 days of formal adoption.

9. Expenditures in excess of budget at the legal level of compliance will be disclosed in the annual audit.
10. The original budget, final amended budget, actual expenditures, and excess of expenditures over budget will be included for the general fund and each major special revenue fund in the annual audit.
11. Each Federal grant will have an award budget, which will be incorporated into the District-wide operating budget.
12. Management will review budget vs. actual reports on a periodic basis with the Board of Education in order to identify inconsistencies. Such reports will be prepared at the same as the adopted budget and include both revenues and expenditures.

**North Muskegon Public Schools**  
Business Operating Procedures and Federal Awards Administration Manual  
**B4. Additional Federal Awards Compliance Requirements**

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A substantial amount of the Federal awards received by the Sample School District are passed-through the Michigan Department of Education. In addition to the requirements of the OMB compliance supplement, which are applicable to all Federal grants (refer to next section of this manual for specific on each compliance requirement), the Michigan Department of Education has issued its own set of guidance on compliance with Federal awards. Management will consider both the OMB Compliance Supplement and the Michigan Department of Education School Auditing Manual in identifying applicable compliance requirements.

**Board Policies.** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

There are no existing Board policies over Michigan Department of Education requirements or additional federal awards compliance requirements.

**North Muskegon Public Schools**  
Business Operating Procedures and Federal Awards Administration Manual  
**C1. General Information**

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Source of Information – Each year the Federal government (Office of Management and Budget) issues a comprehensive document on the compliance requirements each grant recipient is obligated to follow in general terms, along with program-specific guidance on various grant awards. There are 14 compliance requirements identified, each of which is considered individually in this manual.

The following pages document the policies and procedures of the District related to compliance with such procedures, as applicable. In each year that the District is subject to a single audit, applicable compliance requirements are expected to be tested in detail by the District’s independent auditors.

Objectives – The objectives of most compliance requirements are generic in nature. While the criteria for each program may vary, the main objective of the compliance requirement is relatively consistent across all programs. As such, the policies and procedures of the District have been based on the generic sense of the compliance requirement. For selected compliance requirements, this manual addresses the specific regulations applicable to individual grants. This is not intended to imply that a program is not subject to such policies if it is not specifically mentioned here. It is the intention of the District that all Federal awards are subject to the following policies and procedures.

Controls over Compliance – In addition to creating policies and procedures over compliance with provisions of Federal awards, the District has implemented internal controls over such compliance, generally in the form of administrative oversight and/or independent review and approval. In order to document these control activities, all independent reviews are signed/initialed and dated.

Documentation – The District will maintain adequate documentation to support both the compliance with applicable requirements as well as internal controls over such compliance. This documentation will be provided to the District’s independent auditors and/or pass-through grantor agencies, as requested, during the single audit and program audits.

**Board Policies.** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- *Federal Program Administration*

**North Muskegon Public Schools**  
Business Operating Procedures and Federal Awards Administration Manual  
**C2. Activities Allowed/Unallowed and Allowable Costs/Cost Principles**

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Source of Governing Requirements – The requirements for activities allowed or unallowed are contained in program legislation, Federal awarding agency regulations, and the terms and conditions of the award.

The requirements for allowable costs/cost principles are contained in the A-102 Common Rule (§\_\_\_22), 2 CFR section 215.27, program legislation, Federal awarding agency regulations, and the terms and conditions of the award.

In order to ensure compliance with these requirements, North Muskegon Public Schools has implemented the following policies and procedures:

1. All grant expenditures will be in compliance with the Uniform Guidance, State law, District policy, and the provisions of the grant award agreement will also be considered in determining allowability. Grant funds will only be used for allowable costs and costs must meet the following general criteria to be allowable under Federal awards:
  - a. Be reasonable and necessary for the performance of the program and allocable thereto (see detail below);
  - b. Conform to any limitations or exclusions set forth in applicable regulations or in the award itself;
  - c. Be consistent with policies and procedures that apply uniformly to federally-financed activities and other activities of the non-Federal entity; and
  - d. Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.
  - e. Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period.
  - f. Be adequately documented.
2. 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 decision was made to incur the cost. In determining reasonableness of a given cost, consideration must be given to:
  - a. Whether the cost is ordinary and necessary for the proper and efficient performance of the Federal award;
  - b. The requirements imposed by such factors as: sound business practices; arms-length bargaining; Federal, state, local, tribal and other laws and regulations; and
  - c. Market prices for comparable goods or services.
3. A cost is allocable to a particular Federal award if the goods or services involved are chargeable or assignable to that Federal award in accordance with the relative benefits received. This standard is met if the cost:
  - a. Is incurred specifically for the Federal award;
  - b. Benefits both the Federal award and other work of the non-Federal entity and can be distributed in proportions that may be approximated using reasonable methods; and

- c. Is necessary to the overall operation of the non-Federal entity and is assignable in part to the Federal award.
- 4. Applicable credits refer to those receipts or reduction of expenditure type transactions that offset or reduce expense items allocable to the Federal award. To the extent that such credits relate to allowable costs, they must be credited to the Federal award either as a cost reduction or cash refund, as appropriate.

The Federal award may be subject to statutory requirements that limit the allowability of costs. Payments made for costs determined to be unallowable must be refunded (including interest) to the Federal Government unless Federal statute or regulation directs otherwise.

- 5. Grant expenditures will be approved by department heads/program managers initially through the purchase order or purchase card procurement process, and again with the bill or invoice is received. This will be evidenced by signature or initials and date on the invoice. Accounts payable disbursements will not be processed for payment by the Business Office until necessary approval has been obtained.
- 6. Payroll costs will be documented in accordance with Uniform Guidance as described in the section of this manual titled "Payroll and Timekeeping".
- 7. Indirect costs will be charged to federal grants at the federally negotiated indirect cost rate (if available) or the de minimis rate of 10% permitted by the Uniform Guidance. The selected rate will be applied to Modified Total Direct Costs (MTDC). The District may, at its discretion, choose to use all available grant funds for program purposes and not charge an indirect cost rate to a federal awards.
- 8. To the extent that the District passes through federal awards to subrecipients, the District will review the subrecipient's grant budgets for compliance with allowable/unallowable costs.

**North Muskegon Public Schools**  
Business Operating Procedures and Federal Awards Administration Manual  
**C3. Cash Management**

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Source of Governing Requirements – The requirements for cash management are contained in the A-102 Common Rule (§ \_\_\_\_.21), 2 CFR section 215.22, program legislation, Federal awarding agency regulations, and the terms and conditions of the award.

In order to ensure compliance with these requirements, North Muskegon Public Schools has implemented the following policies and procedures:

1. Substantially all of the District's grants are awarded on a reimbursement basis. As such, program costs will be expended and disbursed prior to requesting reimbursement from the grantor agency.
2. Cash draws will be initiated by the Director of Business Services who will determine the appropriate draw amount. Documentation of how this amount was determined will be retained and signed/dated.
  - a. The Accountant determines the draw amounts and provides the support to the Director of Business Services. Then the Director of Business Services approves the draw amount and certifies the amount within CMS.
  - b. The Director of Special Education will prepare the draw amounts for all IDEA grants and the Director of Business Services will approve the request.
  - c. The Director of Business Services will prepare the draw amounts for other grants with the approval from the department directors.
3. The physical draw of cash will be processed in CMS (for Michigan Department of Education grants) or through the means prescribed by the grant agreement for other awards by the Superintendent or designee (Director of Business Services).
4. Supporting documentation from CMS (for grant through the Michigan Department of Education) or a copy of the cash draw paperwork will be filed along with the approved paperwork described above and retained for audit purposes.
5. To the extent that the District passes through federal awards to subrecipients, the District will make payments to subrecipients within 30 calendar days after receipt of billing unless the District reasonably believes the request to be improper.

**North Muskegon Public Schools**  
Business Operating Procedures and Federal Awards Administration Manual  
**C4. Eligibility**

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Source of Governing Requirements – The requirements for eligibility are contained in program legislation, Federal awarding agency regulations, and the terms and conditions of the award.

**Board Policies.** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

There are no existing Board policies.

**Additional Policies and Procedures.** The following policies and procedures will also be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

1. Federal grants will only benefit those individuals and/or groups of participants that are deemed to be eligible.
2. Free and reduced lunch applications will be available at District offices, on the District’s website, and will be mailed to each postbox in the District’s geographical area prior to the commencement of the school year.
  - a. In accordance with grant guidelines, an eligible student from the immediately preceding school year will be deemed eligible for the first 30 school days of the next academic year, or until a revised application is submitted.
  - b. Letters will be generated prior to the end of the 30-day grace period to notify families that eligibility will cease at the end of this period if a revised application indicating student eligibility is not submitted.
  - c. Income eligibility guidelines will be updated annually based on a letter provided to the District by the Michigan Department of Education. Completed applications will be input into the food service software by the Director of Food Service and the software will make the eligibility determination automatically. The Director of Business Services will oversee this process and double-check data input periodically for accuracy. Paper applications will be retained and filed alphabetically by year. If a revised application is submitted during the school year, it will be stapled in front of the previous application.
3. On an annual basis, the District will verify the current free and reduced price eligibility of households selected from a sample of applications that it has approved for free and reduced price meals. The sample size will be based on the lesser 3 percent of the total number of approved applications on file as of October 1st, or 3,000. Follow-up action will be taken for children whose eligibility status has changed as a result of the verification activities. This verification process will be the responsibility of Director of Food Service.
4. Eligible attendance areas under the Title I program will be determined annually based on free and reduced lunch counts and total enrollment counts from the same period.

**North Muskegon Public Schools**  
Business Operating Procedures and Federal Awards Administration Manual  
**C5. Equipment and Real Property Management**

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Source of Governing Requirements – The requirements for equipment are contained in the A-102 Common Rule (§ \_\_ .32), 2 CFR section 215.34, program legislation, Federal awarding agency regulations, and the terms and conditions of the award.

In order to ensure compliance with these requirements, North Muskegon Public Schools has implemented the following policies and procedures:

**Board Policies.** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- *Powers and Duties*
- *Inventories – Fixed and Controlled Assets*

**Additional Policies and Procedures.** The following policies and procedures will also be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

1. All equipment will be used in the program for which it was acquired or, when appropriate, other Federal programs.
2. When required, purchases of equipment will be pre-approved by the grantor or pass-through agency. The Superintendent or designee (Director of Business Services) will be responsible for ensuring that equipment purchases have been previously approved, if required, and will retain evidence of this approval.
3. Equipment records (inventory) will be maintained and an appropriate system shall be used to safeguard equipment, as described in the section of this manual titled “Capital Assets”. Equipment should be assigned to a program and physical location on the inventory. If such equipment is moved, it will be noted on the inventory.
4. When equipment with a current per unit fair market value of \$5,000 or more is no longer needed for a Federal program, it may be retained or sold with the Federal agency having a right to a proportionate amount of the current fair market value. Proper sales procedures shall be used that provide for competition to the extent practicable and result in the highest possible return.
- 5.

**North Muskegon Public Schools**  
Business Operating Procedures and Federal Awards Administration Manual  
**C6. Matching, Level of Effort and Earmarking**

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Source of Governing Requirements – The requirements for matching are contained in the A-102 Common Rule (§ \_\_.24), 2 CFR section 215.23, program legislation, Federal awarding agency regulations, and the terms and conditions of the award. The requirements for level of effort and earmarking are contained in program legislation, Federal awarding agency regulations, and the terms and conditions of the award.

**Board Policies.** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- There are no board policies that specifically address this area.

**Additional Policies and Procedures.** The following policies and procedures will also be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

North Muskegon Public Schools defines “matching”, “level of effort”, and “earmarking” consistent with the definitions of the OMB Compliance Supplement:

Matching or cost sharing includes requirements to provide contributions (usually non-Federal) or a specified amount or percentage of match Federal awards. Matching may be in the form of allowable costs incurred or in-kind contributions (including third-party in-kind contributions).

Level of effort includes requirements for (a) a specified level of service to be provided from period to period, (b) a specified level of expenditures from non-Federal or Federal sources for specified activities to be maintained from period to period, and (c) Federal funds to supplement and not supplant non-Federal funding of services.

Earmarking includes requirements that specify the minimum and/or maximum amount of percentage of the program’s funding that must/may be used for specified activities, including funds provided to sub-recipients. Earmarking may also be specified in relation to the types of participants covered.

In order to ensure compliance with these requirements, North Muskegon Public Schools has implemented the following policies and procedures:

1. Compliance with matching, level of effort, and earmarking requirements will be the responsibility of the Superintendent or designee (Director of Business Services, Director of Special Education, or Curriculum Director).
2. Adequate documentation will be maintained to support compliance with matching, level of effort, and earmarking requirements. Such information will be made available to school administration, auditors, and pass-through or grantor agencies, as requested.
3. Maintenance of effort for grants through the Michigan Department of Education will be determined at the State level.

**North Muskegon Public Schools**  
Business Operating Procedures and Federal Awards Administration Manual  
**C7. Period of Performance**

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Source of Governing Requirements – The requirements for period of performance of Federal funds are contained in the A-102 Common Rule (§ \_\_.23), 2 CFR sections 215.28 and 215.71, program legislation, Federal awarding agency regulations, and the terms and conditions of the award.

In order to ensure compliance with these requirements, North Muskegon Public Schools has implemented the following policies and procedures:

1. Costs will be charged to an award only if the obligation was incurred during the funding period (unless pre-approved by the Federal awarding agency or pass-through grantor agency).
2. All obligations will be liquidated not later than 90 days after the end of the funding period (or as specified by program legislation).
3. Compliance with period of availability requirements will initially be assigned to the individual approving the allowability of the expense/payment. This will be subject to review and approval in the central office as part of the payment processing.
4. No more than 15 percent of the District’s annual Title I allocation will be carried over to the subsequent year. In situations where the remaining unspent award exceeds this percentage, a waiver can be formally requested from the Michigan Department of Education.

**North Muskegon Public Schools**  
**Business Operating Procedures and Federal Awards Administration Manual**  
**C8. Procurement, Suspension and Debarment**

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Source of Governing Requirements – The requirements for procurement are contained in the A-102 Common Rule (§\_\_\_\_.36); 2 CFR sections 215.40 through 215.48, program legislation, Federal awarding agency regulations, and the terms and conditions of the award.

The requirements for suspension and debarment are contained OMB guidance in 2 CFR part 180, which implements Executive Orders 12549 and 12689, Debarment and Suspension; Federal agency regulations in 2 CFR implementing the OMB guidance; the A-102 Common Rule (§\_\_\_\_.36); OMB Circular A-110 (2 CFR section 215.13); program legislation; Federal awarding agency regulations; and the terms and conditions of the award.

In order to ensure compliance with these requirements, North Muskegon Public Schools has implemented the following policies and procedures:

1. Purchasing and procurement related to Federal grants will be subject to the general policies and procedures of the District (described in the section of this manual titled “Purchasing and Procurement”).
2. Contract files will document the significant history of the procurement, including the rationale for the method of procurement, selection of the contract type, contractor selection or rejection, and the basis of contract price.
3. Procurement will provide for full and open competition.
4. The District is prohibited from contracting with or making subawards under covered transactions to parties that are suspended or debarred or whose principals are suspended or debarred.

“Covered transactions” include those procurement contracts for goods and services awarded under a nonprocurement transaction (i.e., grant or cooperative agreement) that are expected to equal or exceed \$25,000 or meet certain other specified criteria. All nonprocurement transactions (i.e., subawards to subrecipients), irrespective of award amount, are considered covered transactions.

5. The District will ensure that compliance with suspension/debarment requirements through one of the following controls:
  - a. Including a suspension/debarment clause in all written contracts in which the vendor/contractor will certify that it is not suspended or debarred. The contract will also contain language requiring the vendor/contractor to notify the District immediately upon becoming suspended or debarred. This will serve as adequate documentation as long as the contract remains in effect.
  - b. Requiring vendors and contractors to sign a statement certifying that they are not suspended or debarred and agreeing to notify the District immediately upon being suspended or debarred. This would also serve as adequate documentation as long as the contract/vendor relationship remains in effect.
  - c. Periodically searching the federal excluded parties database at [www.sam.gov](http://www.sam.gov) for the vendor name. Any potential match would be followed-up on immediately. A listing of the vendors search and the date of the procedures would be retained.
2. If a vendor is found to be suspended or debarred, the District will immediately cease to do business with this vendor.

**North Muskegon Public Schools**  
Business Operating Procedures and Federal Awards Administration Manual  
**C9. Program Income**

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Source of Governing Requirements – The requirements for program income are found in the A-102 Common Rule (§\_\_\_\_.21 (payment) and §\_\_\_\_.25 (program income)); OMB Circular A-110 (2 CFR section 215.2 (program income definition), 2 CFR section 215.22 (payment), and 2 CFR section 215.24 (program income)), program legislation, Federal awarding agency regulations, and the terms and conditions of the award.

In order to ensure compliance with these requirements, North Muskegon Public Schools has implemented the following policies and procedures:

1. Program income will include (but will not be limited to): income from fees for services performed, the use or rental of real or personal property acquired with grant funds, the sale of commodities or items fabricated under a grant agreement, and payments of principal and interest on loans made with grant funds. It will not include interest on grant funds unless otherwise provided in the Federal awarding agency regulations or terms and conditions of the award.
2. North Muskegon Public Schools will allow program income to be used in one of three methods:
  - a. Deducted from outlays
  - b. Added to the project budget
  - c. Used to meet matching requirements

Absent specific guidance in the Federal awarding agency regulations or the terms and conditions of the award, program income shall be deducted from program outlays.

3. Program income, when applicable, will be accounted for as a revenue source in the same program code as the Federal grant. See additional information on the uniform chart of accounts in the section of this manual titled “Chart of Accounts”.

**North Muskegon Public Schools**  
**Business Operating Procedures and Federal Awards Administration Manual**  
**C10. Reporting**

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Source of Governing Requirements – Reporting requirements are contained in the following documents:

102 Common Rule – Financial reporting, §\_\_\_\_.41, Performance reporting, §\_\_\_\_.40(b), 2 CFR section 215 (Performance reporting) 2 CFR section 215.51 (program legislation) Federal awarding agency regulations, and the terms and conditions of the award.

In order to ensure compliance with these requirements, North Muskegon Public Schools has implemented the following policies and procedures:

1. Reports will be submitted in the required frequency and within the required deadlines. For Federal grants through the Michigan Department of Education, a final expenditure report can be filed when the total expenditures equal all approved funds or within 60 days of the grant ending date.
2. Reports will be completed using the standard forms (as applicable) and method of delivery (i.e., e-mail, grantor website, postal service, etc.).
3. Regardless of the method of report delivery, a copy of the submitted report will be retained along with any documentation necessary to support the data in the report. The report will evidence the date of submission in order to document compliance with timeliness requirements.
4. Financial reports will always be prepared based on the general ledger using the required basis of accounting (i.e., cash or accrual). In cases where financial data is tracked outside of the general accounting system (such as in spreadsheets or paper ledgers), this information will be reconciled to the general ledger prior to report submission.
5. Any report with financial-related data will either be prepared or reviewed by the Superintendent or designee (Director of Business Services).
6. Copies of submitted reports with preparer and, if applicable, reviewer signatures and data will be filed with supporting documentation and any follow-up correspondence from the grantor or pass-through agency. Copies of all such reports will be made available to school administration, auditors, and pass-through or grantor agencies, as requested.

**North Muskegon Public Schools**  
Business Operating Procedures and Federal Awards Administration Manual  
**C11. Sub-recipient Monitoring**

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Source of Governing Requirements – The requirements for subrecipient monitoring are contained in 31 USC 7502(f)(2)(B) (Single Audit Act Amendments of 1996 (Pub. L. No. 104-156)), OMB (§\_\_\_.225, §\_\_\_.310(d)(5), §\_\_\_.400(d)), A-102 Common Rule (§\_\_\_.37 and §\_\_\_.40(a)), and 2 CFR section 215.51(a), program legislation, 2 CFR parts 25 and 170, and 48 CFR parts 4, 42, and 52 Federal awarding agency regulations, and the terms and conditions of the award.

This requirement has not historically been applicable to any of the Federal grants of North Muskegon Public Schools. Grant administrators are aware of existence of such compliance requirements and will monitor grant agreements for any change in applicability. Formal policies and procedures will be developed, as needed, to meet changes in circumstances.

**North Muskegon Public Schools**  
Business Operating Procedures and Federal Awards Administration Manual  
**C12. Special Tests and Provisions**

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Source of Governing Requirements – The laws, regulations, and the provisions of contract or grant agreements pertaining to the program

**Board Policies.** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- *Recruitment* (Title I compliance)
- *Parent(s)/Guardian(s) Involvement Policy*

**Additional Policies and Procedures.** The following policies and procedures will also be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

In order to ensure compliance with these requirements, North Muskegon Public Schools has implemented the following policies and procedures:

1. The Superintendent or designee (Director of Business Services) will be assigned the responsibility for identifying financial-related compliance requirements for special tests and provisions, determining approved methods for compliance, and retaining any necessary documentation. Program-related compliance requirements will be the responsibility of the department administering the grant.
2. In any given fiscal year that the District's Title I award is more than \$500,000, an amount equal to at least 1 percent of the grant award will be set-aside for parent involvement activities. Of this amount, at least 95 percent will be distributed. The District will use separate general ledger account(s) to track the expenditure of such funds.
3. Annually, the District will offer participation in its Title I program to private schools within the District's eligible attendance area. Correspondence will be made by the Curriculum Director and copies will be retained. The District will request that the private school respond in writing whether the offer is accepted or rejected. This documentation will also be retained.
4. Teachers and instructional paraprofessionals will meet the definition of "highly qualified". Documentation to support highly qualified status will be retained in the employee's personnel file and made available to auditors or grantor agencies upon request. The Curriculum Director and Special Education Director will be responsible for ensuring that all teachers and instructional paraprofessionals in Title I classrooms meet this standard and have adequate documentation on file.
5. Set-asides may be required for Priority and Focus schools. Refer to Mi Excel for additional information.

**North Muskegon Public Schools**  
Business Operating Procedures and Federal Awards Administration Manual  
**D1. Conflict of Interest**

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Transactions involved Federal awards are subject to all conflict of interest policies, as applicable:

**Board Policies.** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- *Board Member or District Administrator Conflict of Interest*
- *Board Member Conflict of Interest, Ethics, and Responsibilities*
- *Purchasing Goods and Services*
- *Procurement Policy*
- *Employee Conflict of Interest - Purchases*
- *Employee Conflict of Interest and Ethical Responsibilities*

**Additional Policies and Procedures.** The following policies and procedures will also be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

1. Board members will disclose any conflict of interest (whether in fact or in appearance). When a member of the Board determines that the possibility of a person interest conflict exists, he/she should, prior to the matter being considered, disclose his/her interest in a public meeting (which will be noted in the official meeting minutes). The individual shall abstain from discussing or voting on this matter.
2. Any related party transactions will be disclosed as part of the annual audit.
3. Board members and District employees (including contractual employees through the District's staffing company) will not accept money or gifts from current or potential vendors of the District if such items are valued in excess of the threshold published annually by the State of Michigan.
4. District employees (including contractual employees through the District's staffing company) are prohibited from using District equipment, materials, and supplies for personal benefit.

**North Muskegon Public Schools**  
Business Operating Procedures and Federal Awards Administration Manual  
**D2. Records Retention**

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The District has developed various policies and procedures regarding the retention of financial and other grant-related records. Transactions involved Federal awards are subject to all such policies, as applicable:

**Board Policies.** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- *Records*
- *Personnel Records*
- *Student Activities*
- *Student Records*

**Additional Policies and Procedures.** The following policies and procedures will also be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

1. Record retention policies will be designed to mirror those suggested by the State of Michigan. Periodically, the Business Office will review the most recent information released by the State and determine if the District's practices continue to meet these standards.

**North Muskegon Public Schools**  
Business Operating Procedures and Federal Awards Administration Manual  
**D3. Information Technology**

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North Muskegon Public Schools identifies the efficiencies and risks that come with the increased reliance on information technology. As such, policies have been adopted to govern the use of information technology:

**Board Policies.** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- *Technology*
- *Computer Network*
- *Unauthorized Release of Information (data security)*
- *Employee Use of Electronic Communications Devices*
- *Computer Assisted Instruction*
- *Electronic Communications Devices - Students*

**Additional Policies and Procedures.** The following policies and procedures will also be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

1. Staff passwords must be changed regularly, as specified by the District or service provider policy.
2. The responsibility of assigning user access rights to financial-related applications will be assigned to the Director of Business Services. User rights will be reviewed annually to accurately reflect current employees and job responsibilities.
3. Back-ups of the financial accounting system are handled by Tyler Munis. Backups of the system are taken daily and stored at an off-site location.

**North Muskegon Public Schools**  
**Business Operating Procedures and Federal Awards Administration Manual**  
**D4. Supplies**

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North Muskegon Public Schools utilizes various supplies in its operations. The following policies and procedures will govern the purchase, use, and recording of such items:

**Board Policies.** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- *Surplus Books, Equipment and Supplies*
- *Use of District Equipment, Supplies, Property and Materials*
- *Student Activities* (shop and laboratory class materials)

**Additional Policies and Procedures.** The following policies and procedures will also be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

1. Purchase – The purchase of supplies will be subject to the same purchasing and procurement requirements as general District expenditures. Refer to the “Purchasing and Procurement” section of this manual.
2. Accounting – Supplies will be recorded as expenditures when purchased. Once per year, in conjunction with the annual audit, department heads will inventory unused supplies. Refer to the section of this manual titled “Year-end Closing and Reporting” for additional information.

Certain supplies on-hand at year-end (such as office supplies) will be deemed immaterial and not inventoried or recorded in the year-end financial statements.

3. USDA-Donated Commodities – The District will maintain accurate and complete records with respect to the receipt, distribution, and inventory of USDA-donated foods, including end products processed from donated foods. These records will be reconciled to the year-end inventory and corrective action will be taken immediately for discrepancies.
4. Controls – It will be the responsibility of the building principals and department heads to determine the appropriate access to supplies, based on cost v. benefit considerations.

**North Muskegon Public Schools**  
**Business Operating Procedures and Federal Awards Administration Manual**  
**D5. Copyrights**

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All employees, administrators, and students of the District are subject to the provisions of the Copyright Act of 1976. As such, North Muskegon Public School's Board of Education has adopted the following guidelines. These policies are deemed to be applicable to printed materials, internet materials, computer software, audio visual materials, and sheet music.

**Board Policies.** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- *Printing and Duplicating Service – Copyright*
- *Use of Commercially Produced Video Recordings*

**Additional Policies and Procedures.** The following policies and procedures will also be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

1. Unlawful copies of copyrighted materials will not be produced using District-owned equipment, nor will such materials be distributed.
2. Teachers and administrators are responsible for the determination of whether photocopies are legal. The District will not be responsible for any fees imposed on its employees or administrators for misuse of copyrighted materials, nor will legal representation be provided in the event of wrongdoing.
3. The Superintendent or designee will be responsible for communicating copyright guidelines to District employees and students and monitoring compliance with these guidelines.

This policy is deemed applicable to all transactions, including those with Federal funds.

**North Muskegon Public Schools**  
Business Operating Procedures and Federal Awards Administration Manual  
**D6. District Credit Card Procedures**

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The Superintendent or designee (Director of Business Services) shall be responsible for the issuance, accounting, monitoring, retrieval, internal controls and generally overseeing the use of District credit cards for Board Members and employees. All credit cards issued to and in the name of North Muskegon Public Schools shall be held and supervised by the Superintendent or designee (Director of Business Services).

Board Policies: The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- Use of Credit/Debit Cards

The following fundamental requirements shall be in place:

- Cards shall be used for official school business, and never for personal purchases.
- All purchases shall be supported by proper documentation, which will be kept on file as directed by the Director of Business Services.
- Credit cards may not be used to circumvent the normal purchasing process.
- Purchases shall only be made as approved within the district budget and/or proper fundraising sources.
- All full and timely accounting of each card account shall be kept as directed by the Director of Business Services.

The staff member to whom a credit card is issued shall be responsible for its use and shall not allow the card to be used by anyone else or for any unauthorized purchases. Any charges made on the card during the time that the card is in the possession of the employee are the responsibility of that employee. Unauthorized charges must be paid by the person to whom the card is assigned, and such unauthorized use shall subject the card holder to disciplinary action in accordance with law, District policy, and/or the terms of a negotiated agreement.

The person to whom a credit card is issued is responsible for the protection and custody of the card. If a District card is lost or stolen, the person to whom the card was issued shall immediately notify the Superintendent or Business Office designee (Director of Business Services). The Business Office will notify the issuing company to cancel the card if necessary.

The Business Office shall reconcile the credit card statements to the invoices relating to credit card transactions. Any charges appearing on statement that are missing invoices or other documentation will be investigated by the Business Office staff.

**North Muskegon Public Schools**  
Business Operating Procedures and Federal Awards Administration Manual  
**D7. Training and Sanctions**

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TRAINING:

North Muskegon Public Schools will provide training to all staff involved in these procedures through activities such as:

- Orientation of new staff
- Distribution of federal laws, regulations and guidance
- Distribution of District policies and procedures
- Developing templates, checklists and other guidance documents as appropriate
- Internal training sessions
- Routine staff meetings
- Informal technical assistance.

The Business Office staff will meet with District staff as necessary to ensure that these procedures are followed. These meetings may occur either on an individual basis or in a group setting.

EMPLOYEE ACCOUNTABILITY AND SANCTIONS:

Failure to follow the provisions of these procedures will subject the individuals responsible for the violation(s) to administrative and/or disciplinary actions in accordance with District disciplinary procedures and the judgment of management. Sanctions may include comments on employee evaluations, suspension and/or dismissal.

**North Muskegon Public Schools**  
**Business Operating Procedures and Federal Awards Administration Manual**  
**D8. Travel**

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Source of Governing Requirements. Lodging and subsistence costs incurred by employees for travel will comply with the non-Federal entities written travel policies (§ 200.474(b0)),

**Board Policies.** The following policies have been separately reviewed and approved by the Board of Education, and are incorporated here by reference:

- Board policy name/number
- Board policy name/number

**Business Office Procedures.** The following procedures will be applied, to the extent that they do not conflict with or contradict the Board policies listed above:

1. Travel must receive pre-approval for conferences and meetings outside of the county.
2. Superintendent or Designee must sign off on conference forms.
3. Reimbursements will follow district guidelines.





## North Muskegon Public Schools Semi-Annual Certification

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### EMPLOYEE TIME CERTIFICATION

I certify that I have worked 100% of my time on the [INSERT FEDERAL COST OBJECTIVE] from [INSERT SIX-MONTH PERIOD].

Employee Name(s):

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Employee Signature:

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Date:

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### CONCURRENCE

Supervisor Name:

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Supervisor Signature:

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Date:

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*Employees should retain a copy of the signed certification for his/her records. Certification should be signed no later than the end of the period covered by the certification.*



# North Muskegon Public Schools

## Certification Regarding Suspension and Debarment

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By signing below, I agree that my company/organization of any of its principals, personnel, division or affiliates presently or in the past have not been debarred or suspended from entering into contracts with any federal, state or local governmental entity.

The company/organization has not been convicted or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under public transaction; violation of Federal or State anti-trust statutes, or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property.

The company/organization is not presently indicted or otherwise criminally or civilly charged by a government entity (Federal, State or local).

The company/organization has not had one or more public transactions (Federal, State or local) terminated for cause or default.

The certifications made in this statement are deemed to be valid as long as the company/organization continues to conduct business transactions with Sample School District unless notification is made in writing to the District. The company/organization will notify the District immediately if any of the certifications made in this statement become invalid.

Company/Organization Name: \_\_\_\_\_

Certification Made by (Name and Title): \_\_\_\_\_

Date: \_\_\_\_\_



## North Muskegon Public Schools Conflict of Interest Disclosure Form For Employees in a position to influence decisions

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Employees in a position to influence decisions on purchase or contracts for North Muskegon Public Schools (the “District”) shall not have a personal financial interest either directly or indirectly in any contract or purchase of the District or benefit directly or indirectly from any financial transaction or contract of the District unless that interest has been fully disclosed and the person involved has removed him/herself from the decision-making process.

Purchases of or use of Agency property, materials and manpower by employees shall be accomplished in accordance with good business practices and within the framework of applicable laws and regulations.

The Superintendent, and any other District employee deemed by the Superintendent to be in a position to influence the purchase of any goods or services, shall sign and file the following information.

For purposes of this document, the following definitions are used:

AGENCY: North Muskegon Public Schools

SUPPLIER: any person, partnership, trust, corporation, or other business entity that supplies materials, equipment, real estate or services to the District.

FINANCIAL INTEREST: means any stock, bond or other debt, obligation, option or right to purchase stock, share in profits, investment, partnership interest or other interest of any nature. Ownership in securities in a corporation shall not be considered to constitute a financial interest for this purpose if all the following conditions are met:

- a. The securities are traded on a national securities exchange or regularly reported in over-the-counter quotations in the financial press
- b. The securities owned by you and to your knowledge or belief, owned by your near relatives don't exceed 1% of the outstanding securities of such corporation of the same class, and
- c. The market value of the securities of such corporation so owned does not exceed 50% of your gross annual income.

FAMILY MEMBER: means your spouse, children, spouse(s) of your children; parent(s)/guardian(s); sisters and brothers of yourself and your spouse; and the spouse(s) of your brothers and sisters, and the nieces and nephews of you and your spouse. All relationships include those created by adoption or marriage. It is not necessary to interrogate the members of your family. It is sufficient to give the facts, as you know them or believe them to be.

We require complete honesty and candor of all employees asked to submit this form subject to penalties under Sec. 2 or Public Act 317.

Should you have inadvertently omitted a company in your statement and later there is a transaction involving that company come before the Board, you have a clear obligation to make that interest known. If after this statement is signed you acquire an interest in a company doing business with the District, that interest should be made public as soon as practical. Failure to disclose this may subject you to disciplinary action up to and including dismissal.



**North Muskegon Public Schools**  
**Conflict of Interest Disclosure Form**  
For Employees in a position to influence decisions

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a. At any time since January 1, \_\_\_\_\_, have you, or to your knowledge and belief has any family member or member of your household, had any direct or indirect financial interest in any supplier of good and/or services to Agency?

Yes \_\_\_\_\_ Provide details

No \_\_\_\_\_

b. At any time since January 1, \_\_\_\_\_, have you been a Director, officer, sole proprietor, partner, agent, representative, employee or paid consultant or received any fee or commission from any business enterprise doing business with Agency?

Yes \_\_\_\_\_ Provide details

No \_\_\_\_\_

c. At any time since January 1, \_\_\_\_\_, have you been paid from another source for hours worked during time that you are working for North Muskegon Public Schools. Essentially being paid from two or more sources for the same time frame. Example: Coaching

Yes \_\_\_\_\_ Provide details

No \_\_\_\_\_

Please sign and date below:

I declare that to the best of my knowledge and belief, the answers I have given and any statements attached are true and correct.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Full Name

\_\_\_\_\_  
Date



## North Muskegon Public Schools Receipt Exception Form

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It is the policy of North Muskegon Public Schools (the “District”) to require employees to submit receipts for all expenses (excluding mileage) being claimed for reimbursement. If an employee is unable to provide a receipt for a claimed reimbursement, the following form should be attached to the expense report in lieu of the receipt.

Employee Name: \_\_\_\_\_

Amount Claimed for Reimbursement  
Without Receipt: \_\_\_\_\_

Reason for not Providing Receipt: \_\_\_\_\_

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My signature certifies that I have incurred the expense reported above using personal funds as part of my job duties at Sample School District.

Employee Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Supervisory Approval: \_\_\_\_\_

Date: \_\_\_\_\_

Business Office Approval: \_\_\_\_\_

Date: \_\_\_\_\_

# North Muskegon Public Schools

## Business Office Procedures and Federal Awards Administration

### Appendix

## 2 CFR 200 Subpart E: Cost Principles – Selected Items of Cost

*This table is for reference purposes only and is not exhaustive of all changes or requirements; therefore, grantees are encouraged to consult the full text of the regulations in 2 CFR 200.*

Reference	Title	Noteworthy Additions, Changes, or Clarifications
200.425	Audit services.	Costs associated with audits not conducted in accordance with Single Audit requirements and audits that fall below the Single Audit threshold are unallowable. Under the cost principles, those costs were allowable if included in the indirect cost rate or approved by awarding agency as a direct cost. Financial statement audit and agreed upon procedures
200.428	Collections of improper payments.	New – The costs incurred by a non-Federal entity to recover improper payments are allowable as either direct or indirect costs, as appropriate.
200.430	Compensation – personal services.	Charges for employee compensation must be based on records accurately reflecting work performed; however, no specific types of documentation (e.g., personnel activity reports) are required. Documentation standards that grantees must meet are listed. Substitute systems, if approved by cognizant Federal agency, are allowed State, local, and tribal government.
200.432	Conferences.	Requires conference hosts/sponsors to ensure that conference costs are appropriate, necessary and managed in a manner that minimizes costs to the Federal award. The costs of identifying, but not providing, locally available dependent-care resources are allowable.
200.433	Contingency provisions.	Allowable in limited circumstances, with appropriate methodology used to create estimates, and must be consistent with the cost principles and other requirements in this Part (see also Standards for Financial and Program Management of Subpart D and section 200.403 Factors Affecting Allowability of Costs); be necessary and reasonable for proper and efficient accomplishment of project or program objectives, and be verifiable from the non-Federal entity's records.
200.435	Defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringements.	Language streamlined for consistency and now specifically references Whistleblower Protection Act.

200.436	Depreciation.	Change to GAAP standards. Donated assets valued at time of donation and may be depreciated or claimed as matching but not both. Eliminates the use allowance method of recovering costs associated with recovering building costs.
200.437	Employee health and welfare costs.	Employee morale costs are unallowable. Costs incurred in accordance with the non-Federal entity's documented policies for the improvement of working conditions, employer-employee relations, employee health, and employee performance are allowable, but must be equitably distributed to all activities of the non-Federal entity.
200.438	Entertainment costs.	Unallowable unless costs have a programmatic purpose and are authorized in the approved budget for the Federal award or costs have prior written approval from the Federal awarding agency.
200.441	Fines, penalties, damages, and other settlements.	Added Tribal law violations. Now states that "alleged violations" and not just "violations" are unallowable except when they result directly from complying with the terms of a Federal award or are approved in advance by the Federal awarding agency.
200.449	Interest.	Establishes the date of January 1, 2016, as the date that non-Federal entities whose fiscal year starts on or thereafter may be reimbursed for financing costs associated with patents and computer software.
200.453	Materials and supplies costs, including costs of computing devices.	Changes/additions to definitions
200.455	Organization costs.	Unallowable to all organizations unless specific approval by the awarding Federal agency.
200.456	Participant support costs.	Defined and allowable with prior approval. The treatment of participant support costs is in the definition of modified total direct costs and in the appendices on indirect costs rates, Appendix IV to Part 200.
200.460	Proposal costs.	Changed the language that allowed for other than indirect treatment of these costs, though rule remains that these costs should normally be treated as indirect. Proposal costs of past accounting periods will be allocable to the current period.
200.461	Publication and printing costs.	Resolves a long-standing issue with charges necessary to publish research results, which typically occur after expiration, but are otherwise allowable costs of an award.

200.463	Recruiting costs.	Clarifies that special emoluments, fringe benefits, and salary allowances that do not meet the test of reasonableness or do not conform to the established practices of the entity are unallowable. Specifically addresses allowability of short-term travel visa costs.
200.464	Relocation costs of employees.	Repayment of funds is required if employee resigns for reasons within the employee's control within 12 months after hire date.
200.465	Rental costs of real property and equipment.	Includes "sale and lease back" and "less-than-arm's-length" restrictions and home office space.
200.469	Student activity costs.	Costs incurred for intramural activities, student publications, student clubs, and other student activities are unallowable unless specifically provided for in the Federal award.
200.474	Travel costs.	Provides that temporary dependent care costs that result directly from travel to conferences and meet specified standards are allowable.