



September 22, 2022

**MEMORANDUM**

To: Dallas Lee, Instructional Director  
Cluster 9

Leatriz D. Covington, Principal  
Isaac J. Gourdine Middle School

From: Michele Winston, CPA, Director  
Internal Audit

Re: Student Activity Funds Financial Audit as of May 31, 2022

An audit of the financial records of **Isaac J. Gourdine Middle School** was completed for the period May 1, 2018 through May 31, 2022. The audit indicates that the school's financial records and procedures require improvement to be in accordance with the Accounting Procedures Manual for School Activity Funds (APM) and Board of Education policies and procedures. The exceptions noted are included in the attached report.

As the principal of the school, you will be responsible for preparing an action plan by **October 21, 2022**, indicating steps that will be taken to ensure compliance with the APM. Please note that you are required to provide your signed and dated action plan using the attached Microsoft word template and any other correspondence to the Internal Audit Office, email address: [internal.audit@pgcps.org](mailto:internal.audit@pgcps.org). A copy of the action plan should be forwarded to Danyelle Washington, Business Analyst, email address: [dany.washington@pgcps.org](mailto:dany.washington@pgcps.org); and Katrina Greene, email address: [katrina.greene@pgcps.org](mailto:katrina.greene@pgcps.org).

cc: Juanita Miller, Ed. D., Board Chair  
Monica Goldson, Ed. D., Chief Executive Officer of Schools  
Members, Board of Education  
Mychael Dickerson, Chief of Staff  
Michael Herbtzman, Chief Financial Officer  
J. Michael Dougherty, Director, Financial Services  
Helen Coley, Ed. D., Chief of School Support and Leadership  
David Curry, Ed. D., Associate Superintendent  
Joeday Newsom, Esq., Director, Board of Education Staff Office  
Robin Welsh, Director of Monitoring, Accountability and Compliance  
Katrina Greene, School Activity Fund Support Specialist  
Janice Walters-Semple, CPA, Supervisor Internal Audit  
Benjamin Hanks, Internal Auditor II

# Internal Audit Report

Isaac J. Gourdine Middle  
School Activity Funds

**For the Period Ended May 31, 2022**

**Isaac J. Gourdine Middle School  
School Activity Funds  
Internal Audit Report  
For Period Ended May 31, 2022**

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Internal Auditor's Report

We have examined the School Activity Funds (SAF) of Isaac J. Gourdine Middle School for the period May 1, 2018 to May 31, 2022. Isaac J. Gourdine Middle School's principal is responsible for the administration of the SAF. Our responsibility is to express an opinion based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and Generally Accepted Government Auditing Standards and, accordingly, included examining, on a test basis, evidence supporting SAF, and performing such other procedures, as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion.

Our examination disclosed the following findings:

- *Restricted Fund Account Deficits;*
- *Monthly Financial Reporting;*
- *Record Retention;*
- *Mismanagement of Disbursements;*
- *Administration of Voided Checks;*
- *Administration of Vending Contract; and*
- *Management Oversight*

The findings resulted in a material deviation from Board of Education (BOE) policies and procedures and the requirements of the Accounting Procedures Manual for the School Activity Funds (APM).

In our opinion, considering the deviations from the criteria described in the preceding paragraph, the SAF referred to above has not been administered in compliance with BOE policies and procedures and the APM, in all material respects, for the period ended May 31, 2022.



Michele Winston, CPA  
Director, Internal Audit

**Isaac J. Gourdine Middle School  
School Activity Funds  
Internal Audit Report  
For Period Ended May 31, 2022**

**SUMMARY**

An audit of the school activity funds (SAF) of Isaac J. Gourdine Middle School was completed for the period May 1, 2018 to May 31, 2022. The audit was conducted as part of the annual audit plan.

The audit indicated that the school's financial records and procedures require improvement to be in accordance with the Accounting Procedures Manual for School Activity Funds (APM) and Board of Education (BOE) policies and procedures.

This audit report includes **7** findings which occurred under the leadership of the current principal. A listing of the findings and the personnel responsible are included in the appendix at the end of the audit report. Detailed findings from the current audit are cited on the following pages.

**OBJECTIVES**

The objectives of the audit were to determine the effectiveness of the system of internal controls and whether the school was in compliance with the policies and procedures of the APM and the BOE. It is important to recognize that, while the audit report focused on deficiencies, it was intended to be constructive. The audit was not designed and conducted to evaluate the effectiveness of the educational programs in the school. Therefore, the absence of comments related to the educational programs should not be construed to imply that these programs are either adequate or deficient.

**SCOPE**

The audit was based on our examination of selected bank statements, financial reports, cancelled checks, all voided checks and Monetary Transmittal Form (MTF) envelopes submitted for the period May 1, 2018 to May 31, 2022. Also, available receipts, disbursements and supporting documentation were reviewed for the said period. Audit results were based on available documentation. Certain documents were not on file for review. (*See 2022.03 Record Retention*)

This is an audit of funds related to students' activities at the school and does not include SOR funds or any funds not derived from students' activities for the audit period.

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**FINDINGS AND RECOMMENDATIONS**

The audit resulted in the following findings and recommendations:

**2023.01 Restricted Account Deficits**

There were **5** restricted fund accounts where deficits were identified as of May 31, 2022. *This finding was noted during the previous audit period ended April 30, 2018* where the fund account deficits totaled (\$1,502.06).

<b>Account Number</b>	<b>Account Name</b>	<b>Account</b>
212.65	Boys Basketball Sports Equipment	(\$ 0.07)
216.15	Boys Soccer Coach Uniforms	(\$59.96)
233.15	Girls Soccer Coach Uniforms	(\$59.96)
307.00	Drama Club	(\$81.47)
450.20	PSA-Food	(\$705.44)
<b>Total</b>		<b>(\$906.90)</b>

According to the APM, expenditures for all restricted fund accounts are limited to the amount of funds collected for those activities. Therefore, if restricted accounts exceed the available cash, the account is insolvent. As the fiduciary agent for the SAF, the principal should ensure that restricted accounts are solvent at all times.

A soccer uniform purchase was originally funded by accounts 216.00 *Boys Soccer Allotment* and 233.00 *Girls Soccer Allotment*. This error was subsequently corrected to apply the expenditure of \$59.96 to the correct fund accounts 216.15 *Boys Soccer Coach Uniforms* and 233.15 *Girls Soccer Coach Uniforms*. The available balance in both accounts was \$0.00 when these corrections were made, resulting in deficits of (\$59.96) in each account.

A purchase of Drama Play supplies of \$83.72 was funded by account 307.00 *Drama Club* via a transfer of funds from account 605.00 *Allotment*. The transfer that was performed to fund the purchase was later reversed with a note that unrestricted funds cannot be transferred to a restricted fund account. Reversing the transfer of funds left account 307.00 *Drama Club* with an available balance of \$2.25. The expenditure was not voided and the funds were not transferred from another source, resulting in an account deficit of (\$81.47).

Account 450.20 *PSA-Food* was identified in the school's previous audit with an account deficit of (\$1,235.15) which occurred due to spending without regard for the PSA fund account balance. During the audit period the account disbursed a total of \$1,969.00 to

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correct checks posted to the wrong account, and received \$2,498.71 in funds transferred to clear the deficit, reducing the account deficit to (\$705.44).

Overspending from restricted fund accounts constitutes noncompliance with the policy documented in the APM. Funds that should have provided benefits to students were reduced. Students did not receive the maximum possible benefit from the resources that should have been available to them.

**Recommendation:** The recordkeeping staff should continue to transfer funds available funds to resolve fund account deficits. Careful review of expenditures and supporting documents should be performed to ensure that disbursement transactions are accurately posted to the fund accounts. The principal and recordkeeping staff should continue to monitor restricted fund accounts to ensure that the school's resources are expended only when such resources are available. This can be accomplished by ceasing expenditures from the restricted fund accounts until the deficits are resolved and ensuring that funds are available in relevant fund accounts before approving purchases.

**2023.02 Monthly Financial Reporting**

There were **3** instances where monthly reporting was not completed by the recordkeeping staff and reviewed by the principal as required. Monthly financial reports for March, 2022 were not reviewed by the principal. Reports for July and August, 2021, were completed and reviewed 34 and 25 days late, respectively. *This finding was noted during the previous audit period ended April 30, 2018.*

According to APM section 5.1.2 *Monthly Reconciliation and Financial Reporting*, recordkeeping staff is required to complete the reconciliation within 7 days of receiving the bank statement. All financial reports should be completed by the 15<sup>th</sup> of each month and submitted to the principal for review and approval.

The school was working to complete year-end procedures during the COVID-19 pandemic response and was unable to coordinate a time for the principal and recordkeeping staff to produce and review the financial reporting for July and August, 2021 in a timely manner. The school did not comply with policies and procedures for completing March 2022's monthly financial reporting.

The principal did not adequately implement the recommendations from the school's previous audit for the period ended April 30, 2018 regarding monthly financial reporting and did not provide effective oversight to adequately identify and address weaknesses in the school's control environment.

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The principal's fiscal responsibility is compromised when monthly financial reporting is not reviewed timely. The principal is also unable to make informed fiscal decisions when monthly financial reporting is not reviewed and approved.

**Recommendation:** The principal and recordkeeping staff should implement procedures, including establishing a set time each month, to ensure that monthly financial reporting is accomplished in accordance with scheduled requirements included in the APM (bank reconciliation within 7 days after receiving the statement from the bank and the review and approval completed by the 15<sup>th</sup> of each month).

**2023.03 Record Retention**

There were **16** instances where the financial records could not be located to substantiate SAF transactions. *This finding was noted during the previous audit period ended April 30, 2018.*

- **8** End of Year Sealed MTF Envelopes from **7** staff members
- **1** MTF and related documentation to support a deposit
- **1** Disbursement documentation to support an expenditure
- **2** Cancelled Check images
- **4** Voided Checks

According to APM section *6.12 Record Retention*, all SAF records must be retained for a period of 7 years and/or until audited, including the current fiscal year. This includes, but is not limited to, financial reports, bank statements, receipts, disbursement authorities, Monetary Transmittal Forms, School Funds Expenditure Forms, cancelled checks, and contracts.

The 2020 year-end MTF process was overlooked while the school performed year-end closing procedures during the beginning of the COVID-19 pandemic response.

The principal did not adequately implement the recommendations from the school's previous audit for the period ended April 30, 2018 regarding record retention, and did not provide effective oversight to adequately identify and address weaknesses in the school's control environment.

The absence of an effective records management system impacts the retrieval and accessibility to requested documentation. Evidence for determining that internal controls for ensuring all SAF policies and procedures are followed is removed when financial records are unavailable for review.



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**Recommendation:** The principal and recordkeeping staff should establish an adequate records management system which ensures that all financial documents are retained in an organized manner. The principal should remind staff that all MTF envelopes should be retained and submitted at the end of the school year to the principal or a designee. Special provision should be made for compliance in extenuating circumstances.

**2023.04 Mismanagement of Disbursements**

The following instances of noncompliance regarding disbursements were noted. *This finding was noted during the previous audit period ended April 30, 2018.*

- ***Disbursements Not Properly Approved:*** There were 4 instances where disbursements were not properly approved. The School Funds Expenditure Form (SFEF) was not signed by the principal in the first instance. SFEFs were approved without verifying the amount of funds available in 2 instances. In the final instance the SFEF was not approved by the principal and the funds available line was not completed.
- ***Delinquent Payments:*** There was 1 instance where a vendor payment was not processed in a timely manner. Check #10057 in the amount of \$822.54 was issued to BSN SPORTS LLC on 11/14/2019 and the due date of the invoice was 10/23/2019.

According to APM section 4.5.3.1 *Cash Disbursements Procedures*, a School Funds Expenditure Form must be completed and signed by the principal prior to ordering or purchasing goods or services. The requirement also require invoices to be paid within 30 days of receipt, or by the due date stated on the invoice.

Reportedly, there were instances where verbal purchase approvals were provided to staff members by the principal. Requesting staff failed to obtain and submit a SFEF to document expenditure approval. Invoices received in the mail were sometimes misplaced and were not given directly to the recordkeeping staff for payment.

The principal did not adequately implement the recommendations from the school's previous audit for the period ended April 30, 2018 regarding management of disbursements, and did not provide effective oversight to adequately identify and address weaknesses in the school's control environment.

When funds are not adequately approved, it puts the school at risk for fraud, waste, and abuse. In addition, it threatens the solvency of the school's account. When invoices are paid late it reduces the public trust when doing business with the school.

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**Recommendation:** The principal should establish procedures to ensure that all disbursements are made in accordance with the APM. The principal and recordkeeping staff must ensure that all SFEFs are properly completed, reviewed and approved before purchases are made. The principal should establish procedures to ensure that all invoices for SAF transactions are provided to the recordkeeping staff upon receipt. The recordkeeping staff and the principal should ensure that all invoices are paid according to the agreed-upon terms, and that invoices are processed within 30 days or by the invoice's due date.

**2023.05 Administration of Voided Checks**

There were 4 instances of noncompliance regarding the administration of checks. *This finding was noted during the previous audit period ended April 30, 2018.*

- ***Voided Checks Not Properly Defaced:*** There were 3 instances where voided checks were not properly defaced by removal of the signature line.
- ***Voided Checks Not Entered into SFO:*** There was 1 voided check identified with the school's records that was not entered into the SFO accounting system. Check 10023 was rendered unusable after a printing error, and was labeled "VOID" and properly defaced, but was not entered into the SFO accounting system. Check #10023 was not listed in SFO as of the date of issuance of this audit report.

According to APM section 4.5.3.1 *Cash Disbursements Procedures*, voided checks must be defaced and filed with cancelled check images. Checks are also required to be entered into the accounting system.

The recordkeeping staff was unfamiliar with the requirement for voiding checks including clerical errors were required to be entered into SFO. The recordkeeping staff did not follow the policies and procedures specified by the BOE regarding the processing of voided checks.

Inappropriate administration of voided checks exposes the school to fraud, waste, and abuse of its resources. Failure to properly void checks could result in unauthorized check use and negotiation.

**Recommendation:** The recordkeeping staff should reference the APM in instances where there is uncertainty regarding BOE policies and procedures pertaining to voided checks. The principal must periodically review the void check folder to ensure compliance by the recordkeeping staff. The recordkeeping staff must be held accountable for following the requirements for voiding checks.

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**2023.06 Administration of Vending Contracts**

A copy of the current vending contract for the school's 2 vending machines could not be located for review. *This finding was noted during the previous audit period ended April 30, 2018.*

According to APM Section 9.8 *Vending Machine Sales* states that "all schools with vending machines must have a signed contract stipulating commissions due to the school and frequency that these commissions are remitted.

Recordkeeping staff was not able to locate the vending machine contract for the current school year. The principal did not adequately implement the recommendations from the school's previous audit for the period ended April 30, 2018, and did not provide effective oversight to adequately identify and address weaknesses in the school's control environment.

Failure to keep a formal vending machine contract in place constitutes non-compliance with BOE policies and procedures. There is an increased risk of inadequate maintenance of the machines and insufficient commission revenue without a formal agreement with the vending machine company.

**Recommendation:** The recordkeeping staff and the principal should review the APM to become familiar with the requirements of school contracts and specific policies and procedures regarding the administration of vending machines. The principal must ensure that a current vending machine contract is obtained, renewed annually, and maintained on file in compliance with BOE policies and procedures. Purchasing and Supply Services must be consulted in the event a current vending contract cannot be obtained.

**2023.07 Management Oversight**

The principal did not exercise proper oversight in the administration of the SAF during the audit period. The previous audit included 9 findings, 7 of which are repeated in this audit report. *This finding was noted during the previous audit period ended April 30, 2018.*

According to APM Section 3.2.1 *Principals*, the principal acts as the fiduciary agent for the SAF. As such, responsibility for accounting, safeguarding, and managing the SAF in accordance with PGCPS policies and procedures rests solely with the principal.

The principal did not adequately implement the recommendations from the school's previous audit for the period ended April 30, 2018, and did not provide effective oversight to adequately identify and address weaknesses in the school's control environment

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Several BOE policies and procedures as established in the APM were not followed, resulting in the school's internal controls being compromised. Students are not receiving the maximum possible benefit of the resources available to them.

**Recommendation:** The principal should carefully review the policies and procedures as defined in the APM and develop internal controls to ensure compliance. There should be consistent involvement in the school's daily operations relating to the administration of the school's resources. Improvement of the internal control environment should be emphasized by focusing on these **5** basic principles:

- Clearly Defined Lines of Authority and Responsibility;
- Segregation of Duties;
- Maintenance of Adequate Documents and Records;
- Limited Access to Assets; and
- Independent Checks on Performance

**STATUS OF PRIOR AUDIT FINDINGS**

The previous audit report for Isaac J. Gourdine Middle School was issued for the period ended April 30, 2018. The principal and recordkeeping staff were in their current positions during that audit. There were **9** findings noted as a result of the previous audit and **7** are repeated. The current status is summarized below:

- **Mismanagement of Funds Received** – Condition was not noted during this audit.
- **Mismanagement of Disbursements** – Condition still exists. See **Finding 2022.04** regarding *Mismanagement of Disbursements*.
- **Administration of Voided Checks** – Condition still exists. See **Finding 2022.05** regarding *Administration of Voided Checks*.
- **Financial Reporting** – Condition still exists. See **Finding 2022.04** regarding *Untimely Completion of Monthly Financial Reporting*.
- **Fundraiser Forms** – Condition was not noted during this audit.
- **Record Retention** – Condition still exists. See **Finding 2022.03** regarding *Record Retention*.
- **Administration of Vending Contracts** – Condition still exists. See **Finding 2022.06** regarding *Administration of Vending Contracts*

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- **Principal Sponsored Activities Fund Account Deficits** – Condition still exists. See **Finding 2022.04** regarding *Restricted Account Deficits*; and
- **Management Oversight** – Condition still exists. See **Finding 2022.07** regarding *Management Oversight*.

**ACKNOWLEDGEMENT**

We would like to thank the principal and staff of Isaac J. Gourdine Middle School for their cooperation and assistance extended during the audit.

**Prince George's County Public Schools  
Internal Audit Department  
School/Office: Isaac Gourdine MS  
Response Date October 21, 2022**

	<b>Findings</b>	<b>Recommendations</b>	<b>Concur Non- Concur Partially Concur</b>	<b>Action Plan</b>	<b>Corrective Action Date</b>	<b>Status Implemented Partially Implemented Not Implemented</b>
1.	<b><u>2023.01 Restricted Account Deficits</u></b>	The recordkeeping staff should continue to transfer funds available funds to resolve fund account deficits. Careful review of expenditures and supporting documents should be performed to ensure that disbursement transactions are accurately posted to the fund accounts. The principal and recordkeeping staff should continue to monitor restricted fund accounts to ensure that the school's resources are expended only when such resources are available. This can be accomplished by ceasing expenditures from the restricted fund accounts until the deficits are resolved and ensuring that funds are available in relevant fund accounts before approving purchases.	Concur	a) The recordkeeping staff will ensure that available funds are transferred in a timely manner to resolve fund account deficits. Recordkeeping staff will review expenditures and all documentation to ensure transactions are accurately posted to the fund accounts. The principal and recordkeeping staff will cease expenditures from restricted fund accounts if fund accounts are in the deficit before approving purchases to ensure that the school's resources are expended only when such resources are available.	October 2022	Implemented

**Principal Signature** Leatriz Covington

**Date** 10/21/2022

2.	<b><u>2023.02 Monthly Financial Reporting</u></b>	The principal and recordkeeping staff should implement procedures, including establishing a set time each month, to ensure that monthly financial reporting is accomplished in accordance with scheduled requirements included in the APM (bank reconciliation within 7 days after receiving the statement from the bank and the review and approval completed by the 15 <sup>th</sup> of each month).	Concur	a) The principal will require the recordkeeping staff to establish 2 days a week to monitor transactions and ensure all transactions are accurately entered in the SFO system. The recordkeeping staff will ensure that the Bank Reconciliation is completed 5 days before the Monthly Financial Report is due on the 15 <sup>th</sup> of each month.	October 2022	Partially Implemented
3.	<b><u>2023.03 Record Retention</u></b>	The principal and recordkeeping staff should establish an adequate records management system which ensures that all financial documents are retained in an organized manner. The principal should remind staff that all MTF envelopes should be retained and submitted at the end of the school year to the principal or a designee. Special provision should be made for compliance in extenuating circumstances.	Concur	a) The principal and recordkeeping staff will establish a records management system to maintain all SAF documents in separate color coded binders to include but not limited to, financial reports, bank statements, receipts, monetary transmittal forms, school expenditure forms, cancelled checks and contracts. All records will be retained for a period of 7 years and/or until audited. Principal will inform the designated administrator, of the records management system for filing and retrieval of financial records in their absence. These records will be kept in a location that the Principal designates.	October 2022	Implemented

Principal Signature Leatriz Covington

Date 10/21/2022

				Recordkeeping staff who does not adhere to this policy documentation will be provided.		
4.	<b><u>2023.04</u></b> <b><u>Mismanagement</u></b> <b><u>of</u></b> <b><u>Disbursements</u></b>	The principal should establish procedures to ensure that all disbursements are made in accordance with the APM. The principal and recordkeeping staff must ensure that all SFEFs are properly completed, reviewed and approved before purchases are made. The principal should establish procedures to ensure that all invoices for SAF transactions are provided to the recordkeeping staff upon receipt. The recordkeeping staff and the principal should ensure that all invoices are paid according to the agreed-upon terms, and that invoices are processed within 30 days or by the invoice's due date.	Concur	a) The Principal has reviewed the APM and will ensure that all disbursements are completed according to the APM. The Principal and recordkeeping staff will ensure that all SFEFs are completed accurately and approved before purchases are made during the weekly financial meetings. The recordkeeping staff will establish procedures to ensure all invoices are recorded and submitted to the principal upon receipt. The principal and recordkeeping staff will ensure that all invoices are paid within 30 days of receipt or by the vendor due date. The Principal will ensure that Ms. Young gives all vendor invoices that are received through the mail, to the recordkeeping staff immediately upon receipt. The Principal will review invoices and statements for past due amounts with the recordkeeping	October 2022	Implemented

Principal Signature Leatriz Covington

Date 10/21/2022



				staff and ensure that payments are made in a timely manner. Recordkeeping staff who do not adhere to this policy will be held accountable by the Principal. Documentation will be provided for non-compliance.		
5.	<b><u>2023.05 Administration of Voided Checks</u></b>	The recordkeeping staff should reference the APM in instances where there is uncertainty regarding BOE policies and procedures pertaining to voided checks. The principal must periodically review the void check folder to ensure compliance by the recordkeeping staff. The recordkeeping staff must be held accountable for following the requirements for voiding checks.	Concur	a) The Principal and recordkeeping staff fully understand the policies and procedures outlined in the APM regarding voided checks. If there is an instance where there is uncertainty regarding the BOE policy pertaining to voided checks, the recordkeeping staff will reference the APM and contact the Accounting and Financial Reporting Office. All voided checks will be entered into School Funds Online (SFO) and maintained in a separate binder labeled "Voided Checks." Recordkeeping staff who do not adhere to this policy will be held accountable by the Principal.	October 2022	Partially Implemented

Principal Signature Leatriz Covington

Date 10/21/2022

6.	<b><u>2023.06</u></b> <b><u>Administration</u></b> <b><u>of Vending</u></b> <b><u>Contracts</u></b>	The recordkeeping staff and the principal should review the APM to become familiar with the requirements of school contracts and specific policies and procedures regarding the administration of vending machines. The principal must ensure that a current vending machine contract is obtained, renewed annually, and maintained on file in compliance with BOE policies and procedures. Purchasing and Supply Services must be consulted in the event a current vending contract cannot be obtained.	Concur	a) The Principal and recordkeeping staff have reviewed the APM and are familiar with the requirements for maintaining school contracts and specific policies and procedures pertaining to the administration of vending machines. The recordkeeping staff has contacted the current vendor and obtained copies of the vending contracts for SY2021-22 and SY2022-23. The Principal is aware that all contracts obtained by the school must be renewed annually and maintained on file in compliance with BOE policies and procedures. Recordkeeping staff who does not adhere to this policy will be held accountable by the Principal.	October 2022	Implemented
7.	<b><u>2023.07</u></b> <b><u>Management</u></b> <b><u>Oversight</u></b>	The principal should carefully review the policies and procedures as defined in the APM and develop internal controls to ensure compliance. There should be consistent involvement in the school's daily operations relating to the administration of the school's resources. Improvement of the internal control environment should be emphasized by focusing on these <b>5</b> basic principles:	Concur	a) The Principal has carefully reviewed the APM and has a better understanding with respect to the administration of the school's finances. The Principal will take a more consistent hands-on approach and utilize the 5 basic principles 1) Clearly Defined Lines of Authority and Responsibility, 2)	October 2022	Implemented

Principal Signature Leatriz Covington

Date 10/21/2022

		<ul style="list-style-type: none"> <li>• Clearly Defined Lines of Authority and Responsibility;</li> <li>• Segregation of Duties;</li> <li>• Maintenance of Adequate Documents and Records;</li> <li>• Limited Access to Assets; and</li> <li>• Independent Checks on Performance</li> </ul>		<p>Segregation of Duties, 3) Maintenance of Adequate Documents and Records, 4) Limited Access to Assets, and 5) Independent Checks on Performance. These 5 basic principles will be incorporated in the school's policies and procedures.</p>		
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**Principal Signature** Leatriz Covington

**Date** 10/21/2022