

SPRINGFIELD PUBLIC SCHOOLS

REPORT ON APPLYING STUDENT AGREED UPON PROCEDURES IN RELATION TO STUDENTACTIVITY FUNDS

YEAR ENDED JUNE 30, 2021

Yong Ju No, CPA Director of Internal Audit

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Office of Internal Audit

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THE CITY OF SPRINGFIELD, MASSACHUSETTS

OFFICE OF INTERNAL AUDIT'S REPORT ON APPLYING AGREED-UPON PROCEDURES IN ACCORDANCE WITH THE MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION AGREED-UPON PROCEDURES AND AUDIT GUIDELINES: STUDENT ACTIVITY FUNDS

October 25, 2022

To the Superintendent and School Committee Springfield, Massachusetts

I have inspected the financial records, reviewed policies and procedures and conducted tests of the internal control processes in place to administer the Student Activities of Springfield Public Schools for the year ended June 30, 2021. The purpose of this inspection was to determine if the financial records, policies and procedures, and internal control processes in place are sufficient to support the objectives of the School Committee of Springfield Public Schools as it relates to the Student Activities.

My procedures were designed using the Massachusetts Department of Elementary and Secondary Education Audit Guidelines: Student Activity Funds. These guidelines were used in reaching my conclusion.

As a result of my procedures, certain matters came to my attention that I have reported in the accompanying Schedule of Results.

Except for those matters reported in the accompanying Schedule of Results, I conclude that the financial records, policies and procedures, and internal control processes in place are sufficient to support the objectives of the management of the Student Activities of Springfield Public Schools.

I did not conduct an examination or review on the accompanying Schedule of Student Activity Balances – Cash Basis and Schedule of Activities- Cash Basis. Had I performed additional procedures, other matters might have come to my attention that would have been reported to you.

My inspection is not meant to be construed as an audit or opinion rendered by a Certified Public Accountant.

Respectfully submitted,

JUNE 30, 2021

ASSETS

Cash and cash equivalents	\$ 273,045
STUDENT ACTIVITY BALANCES	
CHESTNUT NORTH STUDENT COUNCIL	\$ 81
CHESTNUT SOUTH BOOK CLUB	76
COMMERCE BOYS BASEBALL CLUB	320
COMMERCE BOYS BASKETBALL	1,942
COMMERCE BOYS' VOLLEYBALL	176
COMMERCE CAP AND GOWN	1,013
COMMERCE CHEERLEADING	9
COMMERCE CLASS OF 2018	10
COMMERCE CLASS OF 2021	1,851
COMMERCE DRAMA CLUB	142
COMMERCE FOOTBALL CLUB	369
COMMERCE IB COMMUNITY SERVICE CAS	231
COMMERCE JROTC	2,065
COMMERCE KEY CLUB	11
COMMERCE LITERARY MAGAZINE	39
COMMERCE NATIONAL HONORS SOCIETY	69
COMMERCE PERFORMING ARTS	711
COMMERCE PRIDE ACADEMY	293
COMMERCE PEER MEDIATION STUDENT MENTORS	14
COMMERCE SCHOOL STORE CLUB	439
COMMERCE STUDENT GOVERNMENT	151
COMMERCE TRACK CLUB	344
COMMERCE TRACK AND FIELD	171
COMMERCE WALKING AND FITNESS CLUB	236
COMMERCE YEARBOOK CLUB	1,315
PUTNAM ALLIED HEALTH CLUB	25
PUTNAM ANIME CLUB	260
PUTNAM ART CLUB	2,372
PUTNAM BOYS SOCCER	577
PUTNAM BOYS BASEBALL CLUB	286
PUTNAM BOYS BASKETBALL CLUB	1
PUTNAM BIM CLUB	527

PUTNAM BOYS BASEBALL CLUB	286
PUTNAM BOYS BASKETBALL CLUB	1
PUTNAM BIM CLUB	527
PUTNAM BLACK HISTORY MONTH	895
PUTNAM BOYS' VOLLEYBALL	328
PUTNAM BREAST CANCER	4,783
PUTNAM CARPENTRY CLUB.	50
PUTNAM CHEERLEADING	17
PUTNAM CLASS OF 2021	16,880
PUTNAM CLASS OF 2022	13,599
PUTNAM CLASS OF 2023	4,660
PUTNAM CLASS OF 2023	20
PUTNAM EARLY EDUCATION CLUB	170
PUTNAM FOOTBALL CLUB	88
PUTNAM FFA CLUB	3,248
PUTNAM GIRLS BASKETBALL CLUB	221
PUTNAM GIRLS BASKETBALL	934
PUTNAM GIRLS SOFTBALL CLUB	62
PUTNAM GIRLS WHO CODE	300
PUTNAM GSA CLUB	243
PUTNAM HISTORY/ECONOMICS CLUB	166
PUTNAM INTERNATIONAL CLUB	172
PUTNAM JROTC	3,785
PUTNAM MACHINE TECH	96
PUTNAM MUSIC CLUB	24
PUTNAM NATIONAL HONORS SOCIETY	104
PUTNAM NJROTC CLUB	100
PUTNAM PROJECT PURPLE CLUB	755
PUTNAM RESTAURANT FOOD SERVICE CLUB	150
PUTNAM RETAIL CLUB	70
PUTNAM SKI & SNOWBOARD CLUB	1,376
PUTNAM SKILLSUSA CLUB	7,059
PUTNAM STUDENT PARENT CLUB	693
PUTNAM SCHOOL STUDENT TRIP	35
PUTNAM TRACK CLUB	183
PUTNAM VOLLEYBALL CLUB	484
CENTRAL HIGH 7 FLAGS CLUB	1,314
CENTRAL HIGH ACADEMIC RECOG CLUB	205
CENTRAL HIGH ACTING CLUB 1	692
CENTRAL HIGH ACTING CLUB 2	186

CENTRAL HIGH ACTING CLUB 3	206
CENTRAL HIGH ADVENTURE CLUB	309
CENTRAL HIGH AERIE CLUB	282
CENTRAL HIGH ART CLUB	411
CENTRAL HIGH BOYS SOCCER	549
CENTRAL HIGH BOYS BASEBALL CLUB	2,316
CENTRAL HIGH BOYS BASKETBALL CLUB	25
CENTRAL HIGH BAND CLUB	250
CENTRAL HIGH BEST BUDDIES CLUB	351
CENTRAL HIGH BOOK CLUB	650
CENTRAL HIGH BOYS TRACK	82
CENTRAL HIGH BUSINESS CLUB	10,110
CENTRAL HIGH CAP AND GOWN	24, 988
CENTRAL HIGH CHEERLEADING	1
CENTRAL HIGH CHRISTIAN CLUB	79
CENTRAL HIGH CINEMA CLUB	25
CENTRAL HIGH COLOR GUARD	49
CENTRAL HIGH COMPUTER	50
CENTRAL HIGH DANCE CLUB	311
CENTRAL HIGH ELECTRONICS	3
CENTRAL HIGH ENGLISH AP CLUB	887
CENTRAL HIGH ENGINEERING CLUB	4
CENTRAL HIGH ENGLISH CLUB	443
CENTRAL HIGH FASHION CLUB	70
CENTRAL HIGH FIELD TRIP CLUB	199
CENTRAL HIGH FIELD HOCKEY CLUB	39
CENTRAL HIGH FOOTBALL CLUB	682
CENTRAL HIGH FOREIGN LANGUAGE CLUB	11,278
CENTRAL HIGH FRENCH CLUB	1,990
CENTRAL HIGH GIRLS BASKETBALL CLUB	12
CENTRAL HIGH GIRLS PE CLUB	60
CENTRAL HIGH GIRLS SOCCER	2,536
CENTRAL HIGH GIRLS TRACK CLUB	148
CENTRAL HIGH GRAPHICS CLUB	302
CENTRAL HIGH GREENHOUSE CLUB	6
CENTRAL HIGH GSA CLUB	1,064
CENTRAL HIGH GUIDANCE CLUB	1,756
CENTRAL HIGH HOCKEY CLUB	81
CENTRAL HIGH KEY CLUB	1,848
CENTRAL HIGH KEY CLUB ROSES	9

CENTRAL HIGH KEY CLUB ROSES	2,778
CENTRAL HIGH LACROSSE CLUB	305
CENTRAL HIGH MATH HONORS SOCIETY	558
CENTRAL HIGH MISCELLANEOUS CLUB FUNDS	14
CENTRAL HIGH MUSICAL CLUB	8,134
CENTRAL HIGH NATIONAL HONORS SOCIETY	1,930
CENTRAL HIGH PEER ED CLUB	1,344
CENTRAL HIGH RENAISSANCE CLUB	425
CENTRAL HIGH ROBOTICS CLUB	172
CENTRAL HIGH SCHOOL STORE CLUB	1,092
CENTRAL HIGH SCIENCE CLUB	500
CENTRAL HIGH SHAKESPEARE CLUB	12,206
CENTRAL HIGH SKI & SNOWBOARD CLUB	55
CENTRAL HIGH SOFTBALL CLUB	381
CENTRAL HIGH SPED 1	23
CENTRAL HIGH SPED 2	88
CENTRAL HIGH SPORTS CLUB	1,312
CENTRAL HIGH STEP SQUAD CLUB	102
CENTRAL HIGH STUDENT GOVERNMENT	2,845
CENTRAL HIGH TEACHING ASIA CLUB	121
CENTRAL HIGH THE TALON CLUB	230
CENTRAL HIGH TRAVEL CLUB	265
CENTRAL HIGH VIDEO PRODUCTION CLUB	3,508
CENTRAL HIGH VOCAL CLUB	154
CENTRAL HIGH VOLLEYBALL CLUB	860
CENTRAL HIGH WRESTLING CLUB	200
CENTRAL HIGH YEARBOOK CLUB	508
SCI TECH BOYS BASKETBALL CLUB	490
SCI TECH BAND CLUB	29,363
SCI TECH SCHOOL BEAUTIFICATION CLUB	58
SCI TECH BLACK HISTORY MONTH	10
SCI TECH CAP AND GOWN	356
SCI TECH CHEERLEADING	195
SCI TECH CHINESE CLUB	49
SCI TECH CHOIR CLUB	130
SCI TECH CLASS OF 2021	105
SCI TECH CLASS OF 2022	3,813
SCI TECH CYBERCAT CROSSFIT	15
SCI TECH ELL ACADEMY CLUB	346
SCI TECH GIRLS BASKETBALL CLUB	160

SCI TECH GIRLS TRACK CLUB	640
SCI TECH GSA CLUB	15
SCI TECH GUIDANCE CLUB	266
SCI TECH HOSA CLUB	272
SCI TECH INTERNATIONAL CLUB	171
SCI TECH LIBRARY CLUB	9
SCI TECH NATIONAL HONORS SOCIETY	130
SCI TECH NJROTC CLUB	1,395
SCI TECH SCHOOL STORE CLUB	500
SCI TECH SOFTBALL CLUB	61
SCI TECH SWIM TEAM CLUB	456
SCI TECH VIDEO PRODUCTION CLUB	173
SCI TECH VOLLEYBALL CLUB	1,187
SCI TECH WRESTLING CLUB.	1,245
SCI TECH YEARBOOK CLUB	26
SCI TECH YOUNGLIFE	4,563
RENAISSANCE EIGTH GRADE	59
RENAISSANCE BOYS BASKETBALL CLUB	12
RENAISSANCE CHEERLEADING	319
RENAISSANCE CLASS OF 2021	2,123
RENAISSANCE CLASS OF 2022	6
RENAISSANCE CREW - LETELLIER'S	393
RENAISSANCE GIRLS SOFTBALL	41
RENAISSANCE INTENSIVES CLUB	1
RENAISSANCE LIBRARY CLUB	113
RENAISSANCE NATIONAL HONORS SOCIETY	348
RENAISSANCE SCHOOL STORE CLUB	10
RENAISSANCE SCIENCE FAIR	961
RENAISSANCE SENIOR PROM CLUB	705
RENAISSANCE SIXTH GRADE CLUB	1,656
RENAISSANCE SKI & SNOWBOARD CLUB	215
RENAISSANCE STUDENT ACTIVITIES CLUB	41
RENAISSANCE SWIM TEAM CLUB	47
RENAISSANCE VOLLEYBALL CLUB	152
RENAISSANCE YEARBOOK CLUB	4
STEM 5K STUDENT ACTIVITY	955
STEM INTERNATIONAL CLUB	201
STEM STUDENT ACTIVITIES CLUB	1,335
SOUTH END STUDENT ACTIVITIES CLUB	2,411
CHESTNUT TAG BAND CLUB	931

CHESTNUT TAG SCHOOL STORE CLUB	2,445
CHESTNUT TAG STUDENT COUNCIL	279
CHESTNUT TAG STUDENT GOVERNMENT	1,403
CHESTNUT TAG TRAVEL CLUB	81
CHESTNUT TAG YEARBOOK CLUB	817
DUGGAN EIGTH GRADE	432
DUGGAN NAT'L JUNIOR HONOR SOCIETY	404
DUGGAN SPANISH CLUB	805
DUGGAN STUDENT COUNCIL MIDDLE SCH	314
DUGGAN YEARBOOK CLUB	869
FOREST PARK EIGTH GRADE	851
FOREST PARK SCHOOL STORE CLUB	306
FOREST PARK YEARBOOK CLUB	43
KENNEDY STUDENT COUNCIL	311
KENNEDY YEARBOOK CLUB	178
KILEY EIGTH GRADE	100
CONSERVATORY ANIME CLUB	259
CONSERVATORY ART CLUB	48
CONSERVATORY BAND CLUB	850
CONSERVATORY CLASS OF 2020	1,062
CONSERVATORY CLASS OF 2021	2,056
CONSERVATORY CLASS OF 2022	524
CONSERVATORY KINDNESS KICKSTARTERS	511
CONSERVATORY STUDENT COUNCIL	72
CONSERVATORY YEARBOOK CLUB	440
UNKNOWN VARIANCE	13,503
TOTAL STUDENT ACTIVITY	
BALANCES	\$ 273,045

FOR THE YEAR ENDED JUNE 30, 2021

Receipts:	
Student activities	\$ 75,178
Disbursements:	
Student activities	(114,104)
Voids/Reversals/Transfers, Net:	
Student activities	1,648
Increase (decrease) in student activity balances	(37,278)
STUDENT ACTIVITY BALANCES AT BEGINNING OF YEAR	310,323
STUDENT ACTIVITY BALANCES AT END OF YEAR	\$ 273,045

FOR THE YEAR ENDED JUNE 30, 2021

SECTION I - ADMINISTRATION

Review School Committee Policy and Procedures

DESE Guideline

A. The School Committee should adopt policies and procedures for the creation, operation, control and public reporting of student activity accounts. These policies should be reviewed periodically and amended when necessary. The accounts by statute are the responsibility of the school principal and thus it is the direct responsibility of the principal to ensure that the statute, School Committee policies, and administrative procedures are fully adhered to in all aspects of operating student activity accounts.

Agreed Upon Procedures

- 1. Inquire and obtain evidence suggesting that policies have been adopted by the School Committee. Evidence should be included in School Committee minutes through a School Committee vote.
- 2. Review formal policies and procedures and determine if they are effective; consider the following:
 - a. Policies must require adequate internal control to ensure protection of student monies.
 - b. Policies must be complete and satisfy MGL.
 - c. Policies must only govern student activity money and not money that is governed under other MGL.
 - d. Procedures should be developed that support policy and provide for segregation of duties.
 - e. Policies and procedures must be updated when applicable.

Result

The procedures were performed without exception.

Authorization of Student Accounts

DESE Guideline

B. Although not required, it is good practice for the School Committee to approve each student activity annually. This should be done before the start of the school year unless activities are new and created during the year. The approval should include specific funding sources and objective/mission for each activity.

Agreed Upon Procedures

Obtain a listing of each active student activity and inquire if each student activity has been approved annually by the School Committee or if new, was approved during the year. Evidence should be included in the School Committee minutes through a School Committee vote.

FOR THE YEAR ENDED JUNE 30, 2021

Result

The procedures were performed without exception.

Appropriateness of Student Activity Accounts

DESE Guideline

C. A student activity account may be used for funds raised by student organizations, which will be expended by those students for their benefit. Funds raised or donated that are governed by laws other than the student activity laws cannot be deposited to a student activity account. In addition, funds belonging to staff through sunshine funds or vending machines or other activities not related to the students may not be deposited in the student activity account.

Agreed Upon Procedures

Obtain a listing of each active student activity. From this list, determine source of funding and objective of each student activity. Evaluate if funds have been properly deposited into the student activity account or if funds are more appropriately classified as revolving, gift, grant or other type of fund.

Result

The procedures were performed without exception.

Accounting System for Student Activity Funds

DESE Guideline

D. An accounting system for the student activity funds must be implemented and in a sufficient manner to facilitate basic reconciliation and control procedures. An accounting system may be an off-the-shelf accounting application, a properly designed electronic spreadsheet or for smaller student activity accounts, a manual system. The determination of the appropriate accounting system will vary school by school based on a variety of factors including volume and frequency of student activity transactions and the skills of those in charge with administering the day-to-day accounting for student activities.

Agreed Upon Procedures

- 1. Through inquiry and observation, verify that the accounting system used for the student activity funds will facilitate the following:
 - a. Accurate recording and reporting of cash receipts and disbursements by each student activity fund in the school student activity ledgers;
 - b. Recording of a general cash and/or investment account that can be reconciled with the bank checking account for student activity maintained by the Principal, combined with the agency savings account maintained by the City/Town/District Treasurer; and

FOR THE YEAR ENDED JUNE 30, 2021

c. General cash and/or investment accounts in aggregate can be reconciled to the aggregate detailed fund accounts within the student activity fund recorded for and held by each student activity.

Result

The procedures were performed without exception:

Training for Student Activities

DESE Guideline

E. The qualifications of the individuals involved with processing, recording and reporting student activity account transactions is adequate, and an ongoing process of training is in place to ensure that these individuals maintain the required level of skills to possess such duties.

Agreed Upon Procedures

- 1. Through inquiry, determine if all individuals who process, record, and report student activity transactions possess the skills necessary to perform the duties in an adequate manner.
- 2. Through inquiry, determine if there is an ongoing process of training in place.

Result

The procedures were performed without exception.

<u>SECTION II - STEWARDSHIP AND CUSTODIAL RESPONSIBILITY</u>

School Committee Votes

DESE Guideline

A. Section 47 of Chapter 71 of MGL as amended by Chapter 66 of the Special Acts of 1996, requires that once the School Committee has accepted the provisions of this law, an agency account must be set up by the City/Town/District Treasurer. These are generally established as an interest bearing savings account, and, if authorized by the School Committee, a checking account which acts as an imprest (replenishment) account to be administered by the School Principal.

Maximum checking account fund levels are established and annually voted on by the School Committee.

All deposits for fund raising and other student activities must be deposited in the agency account with the City/Town/District Treasurer. Disbursements may be made from either account.

FOR THE YEAR ENDED JUNE 30, 2021

Agreed Upon Procedures

- 1. Determine if the School Committee has accepted the provisions of Section 47 of Chapter 71 of MGL; evidence should be included in School Committee minutes through a School Committee vote or obtain certification of vote.
- 2. Determine that all student activity deposits are made to an agency account maintained by City/Town/District Treasurer.

Result

The procedures were performed without exception.

Bond for Faithful Performance

DESE Guideline

The Principal or their designee who are designated to operate and control the student activity checking account shall give bond for faithful performance to the municipality or district in such amount as the City/Town/District Treasurer shall determine to secure the Principal's faithful performance of their duties in connection with such account. Annually, the School Committee should authorize any such designees and ensure bond coverage.

Agreed Upon Procedures

Determine if the School Principal and/or their designee (if applicable) have given bond to the City/Town/District Treasurer for faithful performance, and that all designees have been properly authorized by the School Committee.

Result

The procedures were performed without exception.

Annual Audit of Student Activities

DESE Guideline

There shall be an annual audit of the student activity funds which shall be conducted in accordance with procedures as agreed upon between the School Committee and the auditor based upon guidelines issued by ESE. In addition, ESE recommends the audit be performed by an outside independent audit firm once every three years for those with activities greater than \$25,000. In the intervening years, the audit may be conducted by a responsible individual independent of the student activities, with the approval of the School Committee. Such an individual could be the Town Accountant, who already has audit powers under MGL Chapter 41 the Treasurer, or the School Business Manager if the School Business Manager is not involved in the administration or transactional processing of the student activities.

FOR THE YEAR ENDED JUNE 30, 2021

Agreed Upon Procedures

Determine if the annual audits have been performed, either by an outside independent audit firm or as is permissible, internally. Evidence of this may be obtained from reports developed as a result of the process.

Result

The procedures were performed without exception.

SECTION III - GENERAL OPERATING PROCEDURES

Bank Reconciliations

DESE Guideline

A. Bank reconciliations must be done at least quarterly (preferably monthly). A copy of the bank reconciliation should be sent to the School Business Administrator, School Committee, student officers, and City/Town/District Treasurer. Sign-offs must be performed by preparers and reviewers.

Agreed Upon Procedures

Through inquiry, observations, and review of sample bank reconciliations, determine if bank reconciliations are prepared at least quarterly and sent to the appropriate parties for review; and that sign-offs by both preparer and reviewer are included in the process.

Result

The procedures were performed with the following exception:

Although the student activity checking account is reconciled monthly, we noted an unreconciled variance between the student activity account balances in MUNIS and the reconciled bank balance in the amount of \$13,513 at the beginning of the year and \$13,502 at the end of the year. The District has been unable to specifically identify the cause of the variance.

Corrective Action

Reconciliations to the bank statement are performed by the City Treasurer. The District does not have access to these accounts.

FOR THE YEAR ENDED JUNE 30, 2021

Standardized Forms for Deposits and Disbursements

DESE Guideline

Standardized forms should be used for deposits and disbursements whenever possible. Agreed Upon Procedures

While gaining an understanding of the internal control processes in place, determine if standard forms for deposits and disbursements are used.

Result

The procedures were performed without exception.

Periodic Reporting Timeline

DESE Guideline:

The School Committee and School Business Administrator should establish periodic reporting timelines. Financial reports should be created and submitted in accordance with those guidelines to the School Committee, School Business Office, Town Accountant, Treasurer and the individual student activity class/club advisors.

Agreed Upon Procedures

Through inquiry and analysis, determine if a requirement for the preparation and periodic submission to the School Committee, School Business Office, Town Accountant, Treasurer and the student activity class/club officers of financial reports exists; and if such policy is adhered with.

Result

The procedures were performed without exception:

Maintain Individual Subsidiary Accounts

DESE Guidelines

The School Principal shall maintain individual subsidiary accounts by program within the student activity control account. This will allow proper matching of program expenditures against revenues that are collected for that purpose as well as allow for the efficient determination of the program balance.

Aggregate subsidiary account balances should be reconciled no less than quarterly to the total control account.

Total control account balances should be reconciled no less than quarterly to the aggregate total of the School Principal's reconciled checking account and the agency account maintained by the Treasurer.

FOR THE YEAR ENDED JUNE 30, 2021

Agreed Upon Procedure:

Through inquiry and analysis, determine if subsidiary student activity account detail is maintained and if the aggregate of the subsidiary accounts are reconciled to the control account on a monthly basis. Result:

The procedures were performed without exception.

SECTION IV - REVENUE, RECEIPTS AND DEPOSITS

Develop Revenue, Receipts and Deposit Policies and Procedures

DESE Guidelines

The receipts process is most susceptible to theft and abuse since cash collections for student activities are normally decentralized, and individuals collecting cash are often young students inexperienced with cash handling.

DESE recommends strict procedures for control of all receipts and should include at a minimum, the following controls:

- Receipts generated from the sale of a high volume product such as the yearbook or admission to a highly attended event like the prom or other dance or ball, should be controlled through the use of pre-numbered receipts.
- A reconciliation process should be in place whereby pre-numbered receipts, tickets, attendance logs or other revenue source documents are reconciled to cash collected for particular activities prior to making a deposit in the bank. In the situation where it is impractical to use source documents, two people should count the cash and sign off on the process.
- The cash collection and deposit function should be segregated from the accounting and recording function.
- All student organizations receiving monies from any source should turn over such money to the School Principal or the Principal's designee within twenty-four hours from receipt of such funds. (If received on the weekend, then on the first business day after receipt of the funds.)
- Any money not deposited on the same day must be kept overnight in a locked vault, safe, or
 other secured locked area under no circumstance, should student activity monies be taken
 home overnight.
- All money turned over to the school by a student organization shall be accompanied by a school deposit slip stating the source of the monies, the amount being deposited, and signed by the person turning over the money to the office. If turned in by a student, this should be

FOR THE YEAR ENDED JUNE 30, 2021

co-signed by the group advisor or a teacher, who should also keep a duplicate of the deposit slip.

- The School Principal or the Principal's designee should deposit into the agency account all monies received from student activity organizations at a minimum on a weekly basis. Written evidence of receipt should be obtained from the City/Town/District Treasurer.
- An ongoing philosophy of the importance of handling money with care, honesty, and accuracy should be conveyed to the students, advisors and teachers through roundtable meetings and educational trainings.
- Money collected for purposes other than student activities shall not be deposited into the student activity account and must be handled by the MGL that governs its administration.
- Any monies paid to the school or to a student activity as commissions or revenue sharing belong to the students and shall be deposited into the student activity agency account. Such funds shall be expended for the benefit of the students in accordance with School Committee policies and may not be spent to benefit the staff or to supplement the school budget.
- A policy must be adopted by the School Committee that specifies how any other
 undesignated receipts will be distributed and such receipts must be deposited into the student
 activity agency account. No student activity revenues will be deposited into the School
 Principal's checking account.

Agreed Upon Procedures

Through inquiry of the School Principal or their designee, document the process by which receipts are administered in order to gain an understanding of the internal control process in place.

Result

Our detailed testing of the Student Activity Accounts for the year ended June 30, 2021 included the following accounts:

- 1. Central Cap & Gown
- 2. Conservatory of Arts Band
- 3. Conservatory of Arts Class of 2021
- 4. Renaissance Class of 2021
- 5. Sci-Tech-Band
- 6. Sci-Tech- Cap & Gown

The procedures were performed with the following exceptions:

- For Central High School Cap & Gown, we noted the following:
 - o It did not appear that pre numbered receipts were being used for all 29 transactions tested.

FOR THE YEAR ENDED JUNE 30, 2021

- o Of the 29 transactions tested, all transactions were turned over to the Student Activity Treasurer (Principal's designee) after 24 hours from the collection dates.
- o Four transactions out of 29 tested, totaling \$200, did not have receipts issued to students.
- o 12 receipts (issued to students) out of 29 tested did not agree to the receipts log. The difference totaled \$830.
- o For the School Year 2021, total deposits per the bank deposit slips, which agreed to the student activity ledger in MUNIS, did not agree to the total receipts that were recorded in the receipts log. The total deposit slips were \$435 less than the receipts that were recorded in the receipts log.
- For Conservatory of Arts High School Band, we noted the following:
 - Of the \$3,500 in total receipts, we tested one transaction for \$2,500. We noted that a receipt was not issued for that transaction and that the fund was turned over to the Student Activity Treasurer after 24 hours from the collection date.
- For Conservatory of Arts High School Class of 2021, we noted the following:
 - Of the three receipts tested, all receipts, totaling \$1,759, did not have receipts (issued to students) or source documents to support the transactions and were turned over to the Student Activity Treasurer after 24 hours from the collection dates.
- For Renaissance High School Class of 2021, we noted the following:
 - Of the eight receipts tested, all receipts, totaling \$2,724, did not have receipts issued to student and were turned over to the Student Activity Treasurer after 24 hours from the collection dates.
- For the High School of Science and Technology Band we noted the following:
 - Of the eleven receipts tested, all receipts, totaling \$11,658, did not have receipts issued to donors and were turned over to the Student Activity Treasurer after 24 hours from the collection dates.
- For the High School of Science and Technology Cap & Gown, we tested 20 receipts and noted the following:
 - o Seven receipts, totaling \$120, did not have receipts issued to students.
 - o All 20 receipts were turned over to the Student Activity Treasurer after 24 hours from the collection dates.
 - One receipt (issued to a student) did not agree to the receipts log. The difference amounted to \$20.

Corrective Action

The District will continue to communicate reconciliation and turnover procedures to student activity personnel and that all supporting documentation, including receipts for deposits, should be kept on file.

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SECTION V - PURCHASING AND DISBURSEMENTS

Develop Purchasing and Disbursement Policies and Procedures

DESE Guidelines

MGL 71, Section 47 gives the responsibility for the establishment of student activity accounts to the School Committee and the enforcement of School Committee policies to the School Principals; such is the case with purchasing and disbursements. It is important that disbursement policies are sound, controlled, and designed to benefit only the students.

In order to accomplish this goal, ESE recommends the following at a minimum are in place:

- Advance of funds should be avoided whenever possible. If it is anticipated that an advance is necessary, prior written approval must be obtained from the School Principal.
- Equipment and supplies purchased with student activity funds are the property of the student activity groups and not any individual student or other organization. Equipment and supplies purchased with student activity funds should be used exclusively for co-curricular student activities and not for the general use of School operations.
- Student advisors, or others involved in purchasing, may not benefit personally from any purchasing either directly or indirectly.
- Student activity funds may not be used for any purpose unrelated to student activities or for the benefit of any staff person.
- All disbursements shall be made by check.
- The policy adopted by the School Committee should specify the method or methods to be used to pay for expenses, including how to handle the reimbursement of funds when personal credit cards are used. (This is important because of the potential "reward" benefits the credit card holder may accrue).
- Disbursements exceeding \$600 in aggregate to any one individual or entity must be reviewed
 to determine if a Form 1099-MISC. is required. Process should be coordinated with the Town
 Accountant or Treasurer to ensure compliance.
- Checks may not be written to cash.
- Checks shall be signed only after they are completely prepared.
- Check signature authority shall be in accordance with School Committee policy.
 Consideration should be given to require two signatures for individual disbursements made over a certain dollar amount.

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- Individuals responsible for writing checks should be segregated from the record keeping and reconciliation process; or assurances should be made that other mitigating controls are in place such as a monthly review of all activity by an independent responsible individual.
- All disbursements are required to have adequate external supporting documentation such as a vendor invoice, bill contract or receipt.
- A record of all checks will be maintained, including void checks. Numerical order of checks should be retained.
- Checkbook reconciliations should be performed monthly.
- A standardized form should accompany all requests for check issuance.
- The standardized form shall be accompanied by the supporting documentation and must state to whom the check shall be payable, the reason for the payment, the amount of the check, the student activity account to be charged, and the approval signature of the advisor or student officer.
- All requests for replenishment to the School Principal impress checking account must be
 adequately supported and processed through the City/Town/District accounts payable warrant
 process.

Agreed Upon Procedures

Through inquiry of the School Principal or their designee, document the process by which disbursements are administered in order to gain an understanding of the internal control process in place.

Result

The procedures were performed without exception.

SECTION VI - CLASS, INACTIVE ACCOUNTS AND DEFICITS

School Committee Policies for Disposition of Class Accounts

DESE Guidelines

It is DESE's opinion that, because graduates are no longer students, monies for student class grades that have graduated cannot be legally maintained in student activity accounts. DESE recommends that the School Committee approve a policy that specifies how these funds shall be disposed of upon a class' graduation. Notification of the manner of disposition should be given to the class officers and all students who contribute to the class accounts. Such policy should specify how long the class account should remain active after graduation (i.e. 90 to 180 days after graduation to permit the school to pay all class obligations). After the waiting period, the policy should specify if and how the remaining funds will be

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transferred to the graduates, if the funds will revert to other student activity groups (such as the incoming senior class), or other specific disposition instructions.

Agreed Upon Procedures

- 1. Through review of School Committee policies, determine the policy for disposition of class accounts.
- 2. Obtain listing of all individual student activity accounts and scan the listing for class accounts for students who have already graduated.
- 3. Determine if disposition is in accordance with School Committee policies.

Result

The District's student activity Manual has a documented policy for Class Accounts at Graduation. The policy states that each class account shall remain open for a ninety-day waiting period after graduation to allow ample time for outstanding bills to be received and paid. After this waiting period, the class president and treasurer are notified in writing of the final balance in the class account. A Graduating Class Student Activity Disbursement form is used to distribute graduating class balances to other class accounts. The form is approved by a graduating class representative and the school principal.

Per our review of the class accounts, we noted one class account with a balance that was after the 90 day waiting period. As of June 30, 2021, the Commerce Class of 2018 had a balance of \$10.18.

Corrective Action

The District has closed out the account and will review its internal process to ensure that graduating class accounts are closed out as specified in the District's Student Activity Account Procedures.

School Committee Policies for Disposition of Inactive Accounts

DESE Guidelines

Any student activity inactive for a period of three (3) years or more, and for which there has been no receipts or disbursements recorded on their behalf, shall require the following actions in order to be closed:

- Written notification by the advisor or student officer to the School Principal or other authorized administrator that the activity will cease to be a viable account. If an advisor or student officer is not available, such discontinuance shall be by vote of the School Committee.
- All assets of the recognized student activity shall be identified and stated in writing.

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- Any disposition of assets of an inactive recognized student activity shall be determined by the School Committee, but in no case shall the disposition benefit specific individuals.
- Such policy will be communicated to the students who contribute to the accounts, when possible.

Agreed Upon Procedures

- 1. Through review of School Committee policies, determine the policy for disposition of inactive accounts and its reasonableness.
- 2. Obtain listing of all individually listed student activity accounts. Scan listing for accounts that do not have any activity and review prior years' activity for those accounts to determine if they are inactive.
- 3. Determine if disposition is in accordance with School Committee policies.

Result

The District's policy is that any student activity organization inactive for a period of three or more years, and for which there has been no receipts or disbursements recorded on their behalf, shall be closed following the proper closing out steps.

We reviewed the student activity balances for the years ending June 30, 2019, 2020 and 2021, and noted that there were 39 student activity accounts which had zero balances and no activity within the three years and were not closed out.

Corrective Action

The District has inactivated the appropriate accounts and will review its internal process to ensure that accounts with no activity are closed out after the specified timeframe.

School Committee Policies for Deficit Balances

DESE Guidelines

Individual activity accounts should not be permitted to be in a deficit position because such a position becomes a liability to other individual activities or possibly to future classes. ESE recommends that the School Committee develop a policy for remedial action whenever a deficit not resulting from timing exists.

Possible remedial action could include funding from the following sources:

- School Committee appropriation;
- Accumulated investment earnings;

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- Surpluses of inactive accounts;
- Gift from an activity with a surplus balance through approval of the advisor; or
- Any other legal means.

Agreed Upon Procedures

- 1. Through review of School Committee policies, determine the policy for the remediation of individual student activity deficit balances and its reasonableness.
- 2. Obtain listing of all individually listed student activity accounts. Scan listing for accounts and determine if any have deficit balances.
- 3. Determine if disposition of deficit balances is in accordance with School Committee policies.

Result

We have performed the procedures without exceptions:

SECTION VII - STUDENT TRAVEL

Enhance Student Travel Policy and Authorization Forms

DESE Guidelines

The School Committee should adopt policies and procedures for student travel related to student activities (i.e. field trips, overnight, and abroad). The policy should address how travel is to be authorized, the method or methods of paying travel expenditures, and final accountability for all travel costs associated with a trip. The following should be included in the travel policy:

- A request for travel authorization and funding must be prepared well in advance of the time the funds are needed.
- The request should be submitted by the advisor or other person responsible for the activity trip; furthermore, the request should be approved by the School Principal in accordance with policy established by the School Committee.
- Travel Authorization Forms should contain at least the following: date of request, date funds needed, destination and purpose of trip, estimated departure and return times, number of persons traveling, estimate of cash required for tips and other various sundry items, estimate of expenses, signature of person requesting authorization, signature of person authorizing the request, check number and date of payment, and signature of the School Principal.

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- The approved travel authorizations are to be submitted to the School Principal or their designee to ascertain that sufficient funds are available.
- Approved Travel Authorization Forms should remain in a pending file until final accountability for the trip has been completed.
- The policy adopted by the School Committee should specify the method or methods to be used to pay travel expenses, including how to handle the reimbursement of funds when personal credit cards are used. (This is important because of the potential "reward" benefits the credit card holder may accrue).
- A statement of final accountability must be submitted by the authorized trip sponsor promptly after the completion of the trip. Final accountability statements should include at least the following: date; notation of advance funds received (if applicable amount, date, and check number); complete listing of itemized expenditures paid together with documentary evidence of payment; totals of cash or checks expended; notation and totals of credit card or open account expenses (if applicable); the amount returned to the student activities if advances received exceed documented expenditures; the amount of additional reimbursement requested if travel expenses incurred exceed travel advances received; signature of person completing final accountability statement and signature of School Principal or their designee to indicate that there has been an acceptable final accountability.

Agreed Upon Procedures

Through a review of the School Committee policies, determine if the policy for student travel is adequate.

Result

The procedures were performed without exception.