

## Financial Operations

### Financial Operations

Financial Management (Policy 3100)

### Financial Management

Preparation of Budget (Policy 3110)

Banking Services (Policy 3140)

Investment of District Funds (Policy 3160)

Procurement Standards – Federal Contracts (Policy 3165)

Federal Awards – Allowable Cost (Policy 3166)

### Payroll

Expenditures for Certificated Staff (Policy 3230)

### Revenue

Taxing Authority/Tax Rate Hearing (Policy 3320)

Bonded Indebtedness (Policy 3330)

Sale/Lease of Real Property (Policy 3380)

### Accounting and Reporting

Travel and Reimbursement (Policy 3440)

Sales Tax (Policy 3450)

Bond Proceeds Reporting (Policy 3480)

## **FINANCIAL OPERATION**

## **Regulation 3100**

### **Financial Management**

The following procedures or actions shall be taken:

1. The Missouri Financial Accounting Manual, published by the Missouri Department of Elementary and Secondary Education, shall be adopted for financial accounting.
2. All receipts, including student activity funds, shall be deposited in the School District account as provided by law. There shall be no separate accounts of any organization, individual, or department for funds collected or received in connection with any school activity or program.
3. All expenditures shall be paid by check except that a petty cash fund of \$250.00 shall be kept by the Secretary of the Board for purposes of payment of obligations for which no charge account can be arranged. A descending ascending register shall be maintained showing all petty cash transactions. Also, consecutively numbered receipts shall be maintained whereby all expenditures shall be described relative to amount, date, and purpose, with all receipts being attached to the voucher to be approved by the Board. All receipts shall be signed by the person disbursing and receiving petty cash from the fund.
4. The Superintendent shall formulate administrative procedures to facilitate the orderly expenditure and receipt of funds. The Superintendent is empowered to purchase for the District within limits as set forth by the budget approved by the Board of Education; however, purchases of single items with a unit cost of \$1,000.00 or more shall be approved by the Board, except for emergency items which are necessary to prevent interruption of school operations.
5. The District accountant shall maintain student activity accounts for various classes and organizations. Upon graduation any funds which remain in the account of the graduating class shall be transferred to the Student Council Account.

Board Adopted December 18, 2008  
Board Reviewed November 21, 2013  
Board Reviewed August 16, 2018

## **FINANCIAL OPERATION**

## **Regulation 3110**

### **Financial Management**

#### **Preparation of Budget**

On or before the first Thursday in March of each year, the Superintendent shall prepare and submit to the Board for its consideration a preliminary draft of the annual budget covering salaries of the teachers, principals, and other employees, and an estimate of other current expenses for the next fiscal year together with an estimate of the income or revenue available and necessary for the purpose of fixing the annual levy to be submitted to the voters according to the law.

After the beginning of the fiscal year in July, the Superintendent shall prepare and present to the Board for its consideration a detailed annual budget covering all estimated expenditures for the ensuing fiscal year in accordance with the levy authorized by the voters. The aggregate estimated expenditures shall not exceed ninety-eight percent (98%) of the estimated income plus any fund balances carried forward from the previous fiscal year. This annual budget, with such changes or additions as the Board may desire to make, shall be adopted by the Board on or before the first Thursday of September of each year.

#### **Income**

Estimates of income are based on previous receipts, information such as new legislation, new programs and phasing out of present programs; interest rates; tax rate (less 3% uncollectible). Unencumbered balance is defined as the end-of-fiscal year balance minus anticipated expenditures between July 1st and November 1st.

#### **Expenditures**

Budget expenditures are to reflect the needs and priorities of the District's programs. By law, the expenditures cannot exceed the estimated revenue to be received plus any unencumbered balance.

Board Adopted December 18, 2008  
Board Reviewed November 21, 2013  
Board Reviewed August 16, 2018

## **FINANCIAL OPERATION**

**Regulation 3140**  
**(Form 3140)**

### **Financial Management**

#### **Banking Services**

For purposes of letting bids, the Board will divide District funds into no less than two nor more than ten equal parts. Each eligible bidder may bid for any number of the parts. However, the bid for each part must be separate. Notice that bids for depositary of District funds will be received will be published in a newspaper within the county which publishes at least five times per week or, if no such publication exists, then notice will be published in a newspaper of general circulation within the county. Notice that bids will be received will be published at least twenty days prior to the date designated for acceptance of bids.

Each eligible bidder is required to deliver to the secretary of the Board a sealed bid stating the rate of interest or the method by which the interest will be determined for the term of up to five years as specified in the notice to bidders. Each bid must be accompanied by a certified check drawn upon a county bank or a bank in an adjoining county made out to the District in an amount of no less than two thousand five hundred dollars. The bidder's certified check is required as a guaranty of good faith that if selected as depositary, it will deposit the required security. Bids will not be disclosed prior to opening at a public meeting.

On the date designated for acceptance of bids, the Board/designee will publicly open each bid and will verbally read and document each such bid. After discussion and after any clarification of bids, the board will select the successful bidder(s) for each fund part let for bid. Upon award of the depositary bid(s), the security checks will be returned to all bidders. The Board reserves the right to reject any and all bids. Depositary contracts may be terminated at any time by the mutual agreement of the Board and the depositary.

Interest on funds deposited will be computed on the daily balance and will be payable on the first day of each month to the treasurer of the District for credit of the District. No later than the fifth day of each month, the District's depositary(s) will provide to the secretary of the Board a written accounting of the interest paid by the depositary on District funds.

District funds will be deposited in the name of the District. No funds may be withdrawn except by a legally drawn check bearing the signatures of the president and the treasurer of the Board or by wire transfers executed by a person designated by the Board to execute such transfers.

Board Adopted July 11, 2005

Board Reviewed December 19, 2013

Board Reviewed September 20, 2018

**Financial Management****Payments from Federal Awards/Cash Management****Cash Management Procedure**

In order to ensure compliance with Cash Management Improvement Act (CMIA), the following procedures have been implemented:

1. The individual District Manager for each Federal grant will review and prepare each payment request to ensure compliance with CMIA and related regulations.
2. The District's financial officer will, as an additional check, review the payment requests prepared by the Federal grant manager to ensure compliance with federal and state regulations.
3. Payment requests will be made for each Federal program on a monthly basis. If the amount to be requested in any month is \$500.00 or less, the District's financial manager may elect to carry over the sum until the succeeding month.
4. All Federal funds will be documented by an individual program and tracked by the District's financial officer.
5. The District's financial officer will monthly track Federal funds as individual expenditures in the District's general ledger.
6. The District's financial officer will have initial responsibility to ensure overall compliance of cash management requirements. The District's external auditor will monitor utilization of Federal funds to ensure compliance with federal and state cash management requirements.

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Board Reviewed October 18, 2018

## **FINANCIAL OPERATION**

## **Regulation 3160**

### **Financial Management**

#### **Investment of District Funds**

In achieving the District's investment objectives, District officials will be guided by the following criteria:

1.     Legality – District funds will be invested only as permitted by the Constitution and Statutes of the State of Missouri as well as federal law and applicable federal regulations. Investments outside the legal requirements will not be permitted.
2.     Safety – Safety of the District funds is the foremost objective of the District's investment program. Investments will be made in a manner that seeks to ensure the preservation of capital.
3.     Liquidity – The District's investments will remain sufficiently liquid to meet all operating requirements that may be reasonably anticipated. Of necessity, District investments will consist largely of securities with active secondary or resale markets.
4.     Yield – District investments will be designed with the objective of obtaining a market rate of return throughout budgetary and economic cycles. However, rate of return is less important than realizing the safety and liquidity objectives.

#### **Permissible Investments**

The following categories of investments are authorized for investment of District funds:

1.     United States Treasury Securities – The District may invest in obligations of the United States government for which the full faith and credit of the United States are pledged for the payment of principal and interest.
2.     United States Agency Securities – The District may invest in obligations issued or guaranteed by any agency/instrumentalities or any wholly owned corporation of the United States Government.
  - a.     U.S. Government Agency Coupons and Zero Coupon Securities – Bullet coupon bonds with no embedded options and with final maturities of five (5) years or less.
  - b.     U. S. Government Agency Discount Notes – Purchased at a discount with maximum maturities of one (1) year.

- c. U. S. Government Agency Step-Up Securities – The coupon rate is fixed for an initial term. At a coupon date, the coupon rate rises to a new, higher fixed term. This provision is restricted to securities with final maturities of five (5) years or less.
  - d. U. S. Government Agency Collateral Securities – Restricted to securities callable at par only with final maturities of five (5) years or less.
  - e. U. S. Government Agency Floating Rate Securities – The coupon rate floats off one index and resets at least quarterly with final maturities of three (3) years or less.
  - f. U. S. Government Mortgage Backed Securities – Restricted to securities with stated final maturities of five (5) years or less.
- 3. Repurchase Agreements – Such agreements must be purchased through approved broker/dealers and may not be entered into for periods in excess of ninety (90) days. Approved broker/dealers must have a signed Public Securities Association Master Repurchase Agreement on file with the State Treasurer's Office. The purchaser in a repurchase agreement (repo) enters into a contractual agreement to purchase Treasury and government agency securities while simultaneously agreeing to resell the securities at predetermined dates and prices. Overnight and open repurchase agreements must be collateralized at 100% with approved securities. Term repurchase agreements must be collateralized at 100%. The market value of all repurchase agreement collateral will be reviewed at least weekly to determine collateral adequacy.
  - 4. Collateralized Public Deposits (Certificates of Deposit) – Instruments issued by financial institutions which state that specified sums have been deposited for specified periods of time and at specified rates of interest. The certificates of deposit are required to be backed by acceptable collateral securities as described in §§ 110.010 - .020, RSMo.
  - 5. Commercial Paper – Investments are limited to paper which has received the highest letter and numerical ranking (A-1/P-1) as provided by Standard & Poor's and Moody's. Issues are limited to corporations that are organized and operating in the United States and have a total commercial paper program in excess of \$500,000,000 and have long term debt ratings, if any, of "A" or better from Standard & Poor's and Moody's. Such purchases may not exceed 180 days to maturity.
  - 6. Banker's Acceptances - Issuing banks for such bills of exchange or time drafts must have the highest letter and numerical rating by Standard and Poor's and Moody's. Such banks must be organized and operating in the United States. Banker's acceptance agreements may not have maturity dates exceeding 180 days.

**Prohibited Transactions**

- 1. Leveraged Borrowing for Investment Purposes – Leveraging is prohibited whether through a reverse repurchase agreement or otherwise.

2. Use of “Structured Note” – (e.g. inverse floaters, leveraged floaters, and equity-linked securities) is not permitted. Investment in any instrument, which is commonly considered a “derivative” instrument (e.g. options, futures, swaps, caps, floors, and collars), is prohibited.
3. Contracting to sell securities not yet acquired in order to purchase other securities for purposes of speculation on developments or trends in the market is prohibited.

**Collateralization**

Collateralization will be required on two (2) types of investment: certificates of deposit and repurchase agreements. In order to anticipate market changes and provide a level of security for all funds, the market value (including accrued interest) of the collateral should be at least 100%. For certificates of deposit, the market value of collateral must be at least 100% or greater of the amount of certificates of deposit plus demand deposits with the depository, less the amount, if any, which is insured by the Federal Deposit Corporation.

All securities, which serve as collateral against the deposits of a depository institution, must be safekept at a non-affiliated custodial facility. Depository institutions pledging collateral against deposits must, in conjunction with the custodial agent, furnish the necessary custodial receipts within five (5) business days from the settlement date.

**Repurchase Agreements**

The securities for which repurchase agreements will be transacted will be limited to Treasury and government agency securities that are eligible to be delivered via the Federal Reserve’s Fedwire book entry system. Securities will be delivered to the District’s designated Custodial Agent. Funds and securities will be transferred on a delivery vs. payment basis.

All deposits placed in financial institutions must be at least 100% collateralized with approved securities. All securities, which serve as collateral against the deposits of a depository institution must be safekept at a nonaffiliated custodial facility. Depository institutions pledging collateral against deposits must, in conjunction with the custodial agent, furnish the necessary custodial receipts.

**Asset Allocation**

District investment will be diversified to minimize the risk of loss resulting from over concentration of assets in specific maturity, specific issuer, or specific classes of securities. At a minimum District investments will fall within the following minimum and maximum allocations.



<b><u>INVESTMENT TYPE</u></b>	<b><u>MINIMUM ALLOCATION</u></b>	<b><u>MAXIMUM ALLOCATION</u></b>
U.S. Treasuries/Securities having principal and interest guaranteed with the U.S. Government	0%	100%
U.S. Government Agencies and Government-sponsored Enterprises	0%	100%
U.S. Government Agency Callable Securities	0%	30%
Repurchase Agreements	0%	50%
Collateralized CDs/Time and Demand Deposits	0%	100%
Commercial Paper and Banker's Acceptances	0%	50%

**Maximum Maturity**

To the extent possible, the District will attempt to match its investments with anticipated cash flow requirements. Investment in bankers' acceptances and commercial paper will mature and become payable not more than 180 days from the date of purchases. All other investments will mature and become payable not more than five (5) years from the date of purchase.

**Internal Controls**

In keeping with the emphasis the Board has placed in ensuring the safety of public funds, the District will maintain and enhance its internal controls of funds. Every reasonable effort will be made to minimize the potential for loss of funds from fraud, employee error, misrepresentations by third parties, unanticipated changes in financial markets or imprudent actions by employees. Investments that are downgraded below the minimum acceptable rating levels will be reviewed for possible sale within a reasonable time period. At least quarterly, the District's investments will be revalued to reflect prevailing market prices.

Internal controls to achieve investment safety include, but are not limited to:

1. Separation of duties;
2. Separation of transaction authority from accounting and record keeping;

3. 3<sup>rd</sup> Party Custodial safekeeping;
4. Clear delegation of authority;
5. Written confirmation of telephone transactions;
6. Documentation of transaction strategies;
7. Monitoring of ethics and conflict of interest provisions provided in this policy/regulation.

### **Reporting**

The Superintendent/designee will direct preparation of a report at least quarterly to the Board concerning the current status and performance of the District's investments. The quarterly investment report will include but not be limited to:

1. Investment type, issuer, maturity, par value, and dollar amount invested in all securities and monies held by the District.
2. Funds or investments managed by contracted parties.
3. Market value as of the date of the report and the source of valuation.
4. Citation of compliance with the District's investment policy/regulation or an explanation for noncompliance.
5. Statement of the ability or inability to meet expenditure requirements for six (6) months, as well as an explanation of why funds will not be available if that is the case.
6. Statement of the percentage of the District total investments which comprise each category of the investment set out herein.
7. Rating levels for commercial paper and bankers acceptances.

The quarterly investment report will be delivered at an open session of a regular meeting of the Board. A copy of the District investment policy/regulation will be provided to each outside manager of District investment funds. Commitment to compliance with this policy/regulation will be a precondition for initial placement of District funds. Adherence to District policies/regulations will be condition for continued retention as a manager of District funds.

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Board Updated November 19, 2015

Board Reviewed October 18, 2018

**Procurement Standards – Federal Contracts****Procurement Standards – Federal Contracts****Conflict of Interest**

The District maintains a written code of standards of conduct which governs the performance of District employees who may be engaged in the award and administration of contracts. These standards will include a prohibition against employees who are involved in the selection, award or administration of a contract supported by Federal funds, if a conflict of interest, real or apparent, would be involved.

A conflict of interest would arise if a District board member or employee, any member of their family, their partner, or an organization which employs or is about to employ any of the parties named in this paragraph, has a financial or other interest in the firm selected for the award.

Neither District board members, nor employees will accept gratuities, favors, or anything of monetary value from contractors, potential contractors or parties to sub-agreements. This rule will not apply to gifts of less than ten dollars (\$10.00), or is an unsolicited item of nominal intrinsic value. Violations of these conflict of interest provisions will result in disciplinary action up to and including termination for employees, and up to and including public sanction of a violating Board member.

**Avoidance of Unnecessary/Duplicate Purchase**

The District will review proposed procurements to avoid purchases of unnecessary or duplicative items. Consideration will be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach. Where appropriate to foster great economy and efficiency, the District will consider entering into state and local intergovernmental agreements for procurement, or lease of common goods and services. Moreover where appropriate, the District will use Federal excess and surplus property in lieu of purchasing new equipment and property.

The District will, when appropriate, consider and utilize value engineering clauses in contracts for construction projects for cost reductions. In making awards, the District will select contractors to successfully perform under the terms of the procurement. In analyzing the suitability of contractors, consideration will be given to contractor integrity, compliance with public policy, past performances, as well as, financial and technical services.

**Recordkeeping**

The District will maintain records sufficient to detail the significant history of a procurement. These records will include, but not be limited to, the following:

- rationale for the method of procurement;
- selection of contract type;
- contractor selection/rejection; and
- basis for the contract price.

**Time and Material Type Contracts**

The District will use time and material contracts only after a determination has been made that no other contract is suitable and, if the contract includes a ceiling price, which the contractor may exceed only at its own risk.

**Contractor Compliance Resolution**

The District is responsible for resolution and settlement of all contractual and administrative issues arising out of Federal related procurements including, but not limited to, source evaluation, protests, disputes and claims. Violations of law will be referred to the local, state or federal authority having jurisdiction.

The District will maintain procedures to handle and resolve procurement disputes, including provisions to share information regarding the protest to the awarding agency.

**Competition for Contract Awards**

The District will conduct all procurement transactions in a manner providing full and open competition. In doing so, the District will avoid:

- placing unreasonable requirements on firms seeking to qualify to do business;
- requiring unnecessary experience or excessive bonding;
- noncompetitive pricing practices among bidders;
- noncompetitive awards to consultants that are retainer contracts;
- organizational conflicts of interest;
- specifying only a brand name product instead of allowing an equal product to be offered; and
- any arbitrary actions in the procurement process.

The District will avoid in such Federal procurements administratively imposed in – state or local geographical preferences in the evaluation of bids or proposals, except where federal law expressly mandates or encourages such preferences. However, when contracting for architectural and engineering services, geographic locations may be a selection criteria provided that the use of such criteria leaves a sufficient number of qualified firms to compete for the contract.

**Procedures for Procurement Transactions**

The District will ensure a clear and accurate description of the technical requirements for the material, product or service to be provided under federally related procurements. The description may include a statement of the qualitative nature of the material, product or service to be procured and when appropriate will set forth those minimum essential characteristics and standards to which it need conform in order to satisfy the intended use. Where appropriate, a “brand name or equal” description may be used to define the performance or other requirements of a procurement.

The District will ensure that all prequalified lists of persons, firms, or products are current and include enough qualified sources to ensure maximum open and free competition. Potential bidders will not be precluded from qualifying during the solicitations process.

**Methods of Procurement Affecting****Micro Purchases**

Where small purchases under Ten Thousand Dollars (\$10,000.00) price quotations will be obtained from an adequate number of qualified sources. Micro Purchases will be distributed equally among qualified vendors.

**Small Purchases**

The District will utilize the following procurement procedures for purchases of \$250,000 or less. The District where feasible will obtain at least three (3) bids or quotes for each such purchase. The District will maintain documentation for all “small purchases” including the small purchase item; identity of quotes/bids; amount of such bid/quotes; and the date of purchase.

**Sealed Bids**

When procurement is by sealed bid (formal advertising), bids are publically solicited and a firm-fixed price contract is awarded, the award will be made to the responsible bidder whose bid, conforming with all material terms and conditions of the invitation to bid, is the lowest in price. The sealed bid procurement method will be utilized for all purchases in excess of \$250,000. The sealed bid method is preferred for construction if the following conditions apply:

- a complete adequate and realistic specification is available;
- two or more responsible bidders are willing and able to compete for the project;
- the procurement lends itself to a firm price contract; and
- selection of the successful bidder can be made principally on the basis of lowest price.

If sealed bids are used, the following requirements apply:

- invitation to bid will be publically advertised and bids will be solicited from an adequate number of known suppliers providing them sufficient time to bid;
- invitation to bid will define the items or services to be bid;
- all bids will be publically opened at a time and place described on the invitation to bid;
- firm fixed-price contract award is made to the lowest responsive and responsible bidder; and
- any and all bids may be rejected when there is a sound documented reason.

### Competitive Proposal

The District will utilize a competitive proposal method when conditions are not appropriate for the use of sealed bids. This method will be utilized where either a firm-fixed price is capped or cost reimbursement contract is available. When this method is used, the following requirements will apply:

- requests for proposals will be publicized along with evaluation factors and their relative importance;
- proposals will be solicited from any adequate number of qualified sources;
- a clear method of technical evaluations of the proposals and selective of any awardee will be utilized;
- awards will be made to the firm whose proposal is most advantageous to the program with price and other factors considered; and
- this method may be used for selection of architectural and engineering firms where qualifications are evaluated and the most qualified firm is selected subject to negotiations; and
- more than one contractor/vendor is submitted an offer.

### Noncompetitive Sole Source

Where appropriate, procurement may be made by a proposal from any one source or after solicitation, competition is deemed inadequate. This method will be used when small purchase procedures, sealed bid, or competitive proposals are not feasible and one of the following applies:

- item is available from only one source, or there is an emergency situation;
- using the services of the Small Business Administration and the Minority Business Development Agency;
- requiring the prime contractor, where subcontracts are to be left to utilize the steps set out above sole source purchases will be well documented concerning the necessity for all sole source purchases.

**Contract Cost and Price**

The District will perform a cost or price analysis in connection with every procurement action. At a minimum, the District will make independent estimates before receiving bids or proposals. A cost analysis will be required when adequate price competition is lacking and for sole source procurements, unless price reasonableness can be established on the basis of catalog or mailed price. The District will negotiate profit as a separate element of the process for each contract.

- public emergency will not permit a delay in competitive solicitation; and
- the awarding Federal agency authorizes this method.

**Contracting with Small and Minority Firms, Women's Business Enterprise and Labor Surplus Area Firms**

The District will take all necessary steps to assure participation of such firms. Affirmative steps will include:

- placing such firm on a solicitation list;
- assuring that such firms are solicited whenever possible;
- when economically feasible dividing total requirements into smaller contracts or quantities; and
- when economically feasible establishing delivery requests which encourage participation for such firms in which there is no price competition and small cases where cost analysis is performed. Consideration will be given to the complexity of the work, the risk to be borne, contractor's investment, the amount of subcontracting, quality of contractors' work on similar work.

Costs or prices on estimated costs will be allowable only to the extent that costs incurred or cost estimates are consistent with Federal cost principals. The District will not use a cost plus a percentage of cost and a percentage of construction cost method.

**Agency Review**

The District will make available, upon request of the Federal agency, all documents, including but not limited to, procurement specifications; invitations to bid; procurement procedures; pre-award documents.

**Biding Requirements**

The District will require bonding for all construction or facility improvements ensuring that the awarding Federal agency's interests are adequately protected as provided in federal regulations.



**Contract Provisions**

The District's contracts under the Regulation will include:

- administrative, contractual or legal remedies for contractor breaches and provide appropriate remedies for such breaches;
- compliance with Executive Order (EO 11246);
- compliance with Copeland Anti-Kickback Act;
- compliance with Davis Bacon Act;
- compliance with § 103 and 107 of the Contract Work Hours and Safety Standards Act;
- notice of awarding agency's requirements and regulations pertaining to reporting;
- notice of awarding agency's requirements and regulations pertaining to patent rights;
- notice of awarding agency's requirements and regulations relating to copyrights and rights in data;
- access to contractor's book documents, papers and records which are pertinent to the contract;
- compliance with all applicable standards, order or requirements under §306 of the Clean Air Act, §508 of the Clean Water Act (EO 11738) and Environmental Protection Act Regulations; and
- mandatory standards and policies relating to emergency efficiency contained in the state emergency conversation plan.

**Background Checks**

All District vendors shall conduct criminal record and sexual offender background checks on each of its employees who, under a procurement contract, may provide services on District property or at District events. Copies of such record requests will be provided to the District upon request.

**Faith Based Organizations**

Faith based organizations are eligible to contract with those Districts on federally related contracts on the same basis as any other private organization. In such contracting, the District will not discriminate for or against an organization based on the organization's religious character or affiliation. However, private organizations that engage in inherently religious activities, such as religious workshops, instruction or proselytization must offer these services separately in a time or location separate from any programs or services supported by a federally related District contract.

A faith based organization that contracts with the District on a federally related contract may retain its independence, autonomy, right of expression, religious character and authority over its governance.

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Board Adopted April 19, 2019

**Financial Management****Federal Awards – Allowable Costs****Allowable, Reasonable, Allocable Cost Principles****Allowable**

To be allowable under a Federal award, costs will meet the following criteria:

1. Be necessary and reasonable for the performance of the Federal Award and be allocable to the Award.
2. Conform to limitations or exclusions in these principles or in the Federal award as to types or amounts of cost items.
3. Be consistent with policies and procedures that apply uniformly to both federally–financed and other District activities that are non-Federal.
4. Be given consistent treatment. A cost may not be assigned as a direct cost if any other cost for a like purpose is assigned as an indirect cost.
5. Be in accordance with generally accepted accounting principles.
6. Not be included as a cost or used to meet cost sharing or matching request of any other federally financed project in either the current or a prior project.
7. Be adequately documented.
8. Be net of all applicable credits.

**Reasonable**

A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a reasonable person under the prevailing circumstances. In determining reasonableness of a specific cost, consideration must be given to:

1. Whether the cost is generally recognized as ordinary and necessary for the operations of the District, or the proper and efficient performance of the Federal award.
2. The restraints or requirements imposed by sound business practice, and terms of the Federal grant.
3. Market prices for comparable goods or services for the District's geographic area.
4. Whether District individuals involved in the Federal grant acted with prudence.
5. Whether the District has significantly deviated from its established practices and policies regarding the incurrence of costs.

**Allocable**

A cost is allocable to a particular Federal award if the goods or services involved are chargeable or assignable to the Federal award in accordance with the benefits received. This standard is met if the cost:

1. Is incurred specifically for the Federal award.
2. Benefits both the Federal award and other work of the District and can be allocated on proportions using reasonable methods.
3. Is necessary to the overall operation of the District and is assignable in part to the Federal award.

**Allowability Procedures**

At the time of budgeting for a Federal award, all costs, direct and indirect, will be reviewed by the District's Federal Grant administrator to assure compliance with Federal allowability principles.

1. All purchase orders/invoices will be screened by the District's finance officer to ensure consistency of the budgeted items with Federal allowability principles.
2. An annual risk assessment will be conducted consistent with 2 CFR Part 200.331(b).
3. The District's outside auditor will review compliance with Federal allowability standards as part of the annual audit.

**Documentation of Personnel Costs**

Semi-Annual Certification – Where employees are expected to work solely on a single Federal award or cost objection, charges for their salaries and wages will be supported by periodic certifications that the employees worked solely on that program for the certification period.

**Monthly Personnel Reports**

Where District employees work on multiple activities or cost objectives, a distribution of their salary and wages will be supported by personnel activity reports. Similar procedure will be used for District employees working on cost sharing or matching activities.

If the District elects to work under a substitute system for time and effort, the District will seek approval by DESE.

**Stipends and Extra Duty Pay**

Where the District pays for extra work beyond an employee's regular contract, the District will have developed written documentation that demonstrates the extra work to be performed; the dates of performance; and the amount or rate to be paid to such employee. A contract will also be signed by the District and the employee to show acceptance of the terms. In addition, the employee must complete time and effort documentation that supports the extra work beyond the employee's regular contract. This documentation may be a semi-annual time certification or monthly personnel activity report.

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Board Adopted July 24, 2017

Boar Reviewed October 18, 2018

## **FINANCIAL OPERATION**

**Regulation 3230**  
**(Form 3230)**

### **Payroll**

#### **Expenditures for Certificated Staff**

The District will expend for tuition, teacher retirement and compensation of certificated staff a percentage of current operating costs that is no less than two (2) percentage points less than the base school year certificated salary percentage.

#### **Or**

Have an unrestricted fund balance in the combined incidental and teachers' fund on June 30, which is equal to or less than ten percent (10%) of the combined expenditures for the year from those funds.

#### **Or**

Maintain or increase its fiscal instructional ratio of efficiency (FIRE) compared to the District's FIRE for the 1997-98 base year.

The District's FIRE is the quotient of the sum of the District's current operating costs plus the cost of improvement of instruction and the cost of purchased services and supplies for operation of the facilities housing those programs, and excluding student activities divided by the sum of the District's current operating cost for kindergarten through grade twelve, plus all tuition revenue received from other districts minus all noncapital transportation and school safety and security costs.

#### **Exceptions**

The above provisions do not apply to qualifying districts when the state distributes ninety-six percent (96%) or less for the formula than it did in fiscal year 2002. A qualifying district:

1. Must have had on June 30th of the preceding fiscal year a combined incidental and teacher fund balance which was seventeen percent (17%) or less of the combined incidental and teacher fund expenditures for that fiscal year.

#### **Or**

2. Must have had one person or a corporation with ten percent (10%) or more of the District's assessed valuation be delinquent in a property tax payment.

#### **Or**

3. Must have had a combined incidental and teacher fund balance on June 30th of the preceding fiscal year that was fifty percent (50%) or less than the local property tax revenue for that fiscal year.

#### **Or**

4. Will receive in the current fiscal year ninety-six percent (96%) or less of their fiscal year 2002 formula distribution.

Board Adopted August 2005  
Board Reviewed January 16, 2014  
Board Reviewed November 15, 2018

## **FINANCIAL OPERATION**

## **Regulation 3320**

### **Revenue**

### **Tax Rate Hearing**

The Board of Education will annually conduct tax rate hearing(s) prior to September 1. The purpose of the tax rate hearing process is to provide administrative recommendations, obtain community input and adoption of a tax rate. Notice of all tax rate hearings will be provided by posting in at least three District sites or publication in a local newspaper at least seven (7) days prior to the hearing. Written notice will include the District's assessed valuation, proposed tax rate, date, time and place of hearing and will advise where copies of the proposed tax rate may be obtained.

Board Adopted February 20, 2014

Board Reviewed November 15, 2018



## **FINANCIAL OPERATION**

## **Regulation 3330**

### **Revenue**

### **Bonded Indebtedness**

The Missouri state law guidelines shall serve to direct the Board's bond issues. Guidelines currently include the following provisions:

1. A two-thirds vote is required to approve the issuance of bonds if the issue is not submitted at a general, primary or municipal election.
2. A four-sevenths vote is required before bonds may be issued if the proposal is submitted at a general, primary or municipal election.
3. Revenues from taxes levied for the purpose of satisfying bonded indebtedness, including principal and interest, will be recorded in the debt service fund.
4. Twenty years is the maximum number of years for which bonded indebtedness may be obligated.
5. Bonds shall be issued in denominations of one thousand dollars or multiples thereof.
6. The limit for District bonded indebtedness is 15% of the value of taxable tangible property as documented by the last completed assessment for state and county purposes.

Board Adopted February 20, 2014

Board Reviewed December 20, 2018

## **FINANCIAL OPERATION**

## **Regulation 3380**

### **Revenue**

### **Sale/Lease of Real Property**

If the Board of Education affirmatively votes to sell or lease unneeded real property, the sale will be conducted as follows:

#### **Listing with Real Estate Broker**

At its option, the Board may list the property with one or more real estate brokers licensed by the State of Missouri. In such cases, the Board is authorized to pay a commission upon successful completion of such sale or lease.

#### **Sales/Lease to Highest Bidder**

If the Board chooses not to list the unneeded real property with a real estate broker, the notice of the sale or lease will be published in a newspaper of general circulation in the community in which the District is located in whole or in part. Notice of the sale or lease will be published at least once a week for two consecutive weeks with the last publication to be at least seven (7) days prior to the sale or lease. Property will then be sold/leased to the highest bidder. The Board reserves the right, in its sole discretion, to set a minimum bid.

#### **Sale/Lease to City, State, or Governmental Subdivision**

The Board may also elect to sell or lease such real property to a city, state agency, municipal corporation, or other governmental subdivision located within the District for public use or purpose. In such case, the notice will be given by publication in a newspaper of general circulation as set out in the preceding section. The price for sale or lease of the property will be as agreed upon by the District and the governmental entity.

Regardless of how sold/leased, the lease or deed of conveyance will be signed by the Board President and attested to by the Board Secretary. The proceeds from such sale/lease, except for districts identified as financially distressed, will be placed in the capital projects fund.

#### **Disposal of Previously Donated Property**

If after ten years following the donation of real property, the District may sell the donated property after first offering to return the property to the previous owner. If the previous owner declines, the District may sell the property as surplus.

Board Adopted March 24, 2014  
Board Reviewed January 17, 2019

## **FINANCIAL OPERATION**

## **Regulation 3440**

### **Accounting and Reporting**

### **Travel and Reimbursement**

#### **Travel Expense Allowance**

Upon approval of the Superintendent, employees may be authorized to attend conferences, meetings, conventions, etc. When full expenses are allowed, they shall be deemed to include registration, transportation fees, lodging and meals.

Each employee allowed travel expenses shall file with the Superintendent/designee an itemized account of expenses; he/she may request an advance of estimated expenses subject to adjustment upon filing of the itemized account. Each employee shall submit to the Superintendent/designee such other reports as may be required.

The Superintendent may authorize attendance at professional meetings by staff members, Board members and others working on District matters, and may approve reasonable expenditures that include an amount set annually by the Board for lodging, travel expenses and applicable registration fees.

The Superintendent shall notify the Board of the date and purpose of the event for which such approval is granted, name(s) of person(s) attending, and cost to the District.

The Superintendent shall have the power to excuse any employee from duty for the above purposes for a period not to exceed one (1) day without allowance for expenses

#### **Reimbursement Policies**

1. Mileage reimbursement is not authorized between home and office/base school.
2. Employees who travel directly from home to other than office/base school on official business are entitled to a mileage allowance of the distance in excess of that from home to office/base school. The same policy is applicable to return trips. In this case a reimbursement request must show that all mileage excludes round trip mileage from home to office/base school.
3. Employees who travel from school to school on official duty are authorized mileage from the first to the last school visited subject to the restrictions outlined in the paragraph above.
4. When transportation is performed by privately owned vehicle, mileage is authorized at an annually determined rate, subject to provisions of the following paragraph.

5. When private transportation can be pooled, the driver of the vehicle is authorized reimbursement at the annually determined rate. When transportation pooling is not desired by the individuals concerned, each traveler will be limited to an equal share of the annually determined rate per mile.
6. In performing necessary local travel, personnel will use the most direct well-traveled route between any two points. Claims for mileage reimbursement will be for actual miles driven based on odometer readings.

### **Federal Award Programs**

If lodging and subsistence costs are charged directly to the Federal award, documentation must justify that:

1. Participation of the individual is necessary to the Federal award; and
2. The costs are reasonable and are consistent with the District's travel policy.

Such documentation may include any or all of the following:

1. Agenda
2. List of attendees
3. Prior written approval
4. Written qualification statement

Grant funds will not be used for temporary dependent care costs unless specifically permitted by the awards' authorizing statute, regulation or department.

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Board Adopted July 24, 2017

Board Reviewed January 17, 2019

## **FINANCIAL OPERATION**

## **Regulation 3450**

### **Accounting and Reporting**

#### **Sales Tax**

Suppliers or retailers selling rings, pictures, sweaters, jackets, school annuals, musical instruments, shoes and similar items, or renting of gowns, caps and other items which are for personal, individual benefit and use of a student, should include and collect the sales or use tax on such sales or rentals.

Purchase orders will designate if purchases are for school purposes and not for students' individual and personal ownership. If the purchases are for the school's purposes as part of its regular educational activities, no tax should be collected by the sellers. (Examples of nontaxable purchases: books, desks, school supplies and equipment; diplomas, medals, awards or cups; athletic, musical or other equipment and supplies purchased for the athletic and other departments; and items for the general use by or benefit of all students entered or engaged in regularly sponsored school athletic or other educational programs, classes, events or activities.)

Operators of vending machines or commissaries located in schools, but not operated by the schools or any school group, are required to report the tax on the gross receipts from these vending machines or commissaries operated by them (retailers).

Tax will not be collected on admissions charged to school plays or entertainment sponsored as a part of the regular school program, as such activities are considered occasional in nature. However, when entertainment or programs are put on by individuals, entertainers or groups who make this a business and receive as compensation a portion of the net receipts, then the sales tax must be collected on the admission charge even though sponsored by the school, and the profits, if any, are intended to be used for school purposes.

Board Adopted March 24, 2014

Board Reviewed February 21, 2019

**Financial Disclosure****Bond Proceeds Reporting**

In order to ensure compliance with the Security Exchange Act of 1954, the District hereby adopts the following policies and procedures:

(a) *Disclosure Officer.* The Superintendent of the District is hereby designated as the officer responsible for the *Disclosure Procedures*.

(b) *Official Statements.* Whenever an Official Statement will be disseminated in connection with the issuance of obligations by the District, the Disclosure Officer will oversee the process of preparing the Official Statement pursuant to the following procedures:

1. The Disclosure Officer shall review and make comments on the first draft of the Official Statement. Such review shall be done in order to determine that the Official Statement does not include any untrue statement of a material fact or omit to state a material fact necessary in order to make the statements made in the Official Statement not misleading. The Disclosure Officer shall also be responsible for ensuring that the financial data presented with regard to the District is accurate and corresponds with the financial information in the District's possession, including but not limited to information regarding bonded indebtedness, notes, certificates, outstanding leases, tax rates or any other financial information of the District presented in the Official Statement.

2. After completion of the review, the Disclosure Officer shall (a) discuss the first draft of the Official Statement with the members of the Working Group and such officials of the District as the Disclosure Officer deems necessary and appropriate and (b) provide comments, as appropriate, to the members of the Working Group. The Disclosure Officer shall also consider comments from members of the Working Group and whether any additional changes to the Official Statement are necessary or desirable to make the document compliant.

3. The Disclosure Officer shall continue to review subsequent drafts of the Official Statement.

4. If, in the Disclosure Officer's reasonable judgment, the Official Statement is compliant, the Official Statement may be released for dissemination to the public.

(c) *Annual Financial Information.* The Disclosure Officer will oversee the process of preparing the Annual Financial Information pursuant to these procedures:

1. By November 27 of each year, the Disclosure Officer shall prepare (or hire an agent to prepare) the Annual Financial Information. The Disclosure Officer shall also review the audited or unaudited financial statements, as applicable, to be filed as part of the Annual Financial Information. In addition to the required updating of the Annual Financial Information, the Disclosure Officer should consider whether additional information needs to be added to the Annual Financial Information in order to make the Annual Financial Information, including the Financial Statements, taken as a whole, correct and complete in all material respects.

2. If, in the Disclosure Officer's reasonable judgment, the Annual Financial Information, including the Financial Statements, is correct and complete, the Disclosure Officer or retained agent shall file the Annual Financial Information with EMMA within the requisite timeframe.

(d) *EMMA Notices.* Whenever the District is required to file an EMMA Notice, or whenever the District decides to make a voluntary filing to EMMA, the Disclosure Officer will oversee the process of preparing the EMMA Notice.

1. The Disclosure Officer or retained agent shall prepare the EMMA Notice. The EMMA Notice shall be prepared in the form required by the MSRB.

2. If, in the Disclosure Officer's reasonable judgment, the EMMA Notice complies with the Undertaking and is correct and complete, the Disclosure Officer, or retained agent, shall file the EMMA Notice with EMMA within the timeframe allowed for such filing.

(e) *Additional Responsibilities of the Disclosure Officer.* The Disclosure Officer, in addition to the specific responsibilities outlined above, shall have general oversight of the entire disclosure process, which shall include:

1. Maintaining appropriate records of compliance with this Disclosure Policy and decisions made with respect to issues that have been raised;

2. Evaluating the effectiveness of the procedures contained in this Disclosure Policy; and

3. Making recommendations to the Board of Education as to whether revisions or modifications to this Disclosure Policy are appropriate.

(f) *General Principles.*

1. All participants in the disclosure process should be encouraged to raise potential disclosure items at all times in the process.

2. The Disclosure Officer should consider whether changes in form and content of Disclosures are necessary or desirable in order to ensure the Disclosures are accurate and complete.

3. When speaking to the market of potential investors, District officials ensure that the released information does not make any untrue statement of a material fact or omit to state a material fact necessary or desirable in light of the circumstances in which they were made.

4. The review and maintenance of the Disclosures is a fluid process and recommendations for improvement of the Disclosure Procedures should be solicited and regularly considered.

Board Adopted February 18, 2015

Board Reviewed February 21, 2019