EAST TALLAHATCHIE SCHOOL DISTRICT

Business Department Procedures Manual

2026–2027 Board-Ready Revision

BOARD ACTION REQUIRED • NOT EFFECTIVE UNTIL ADOPTED
Prepared from the August 2026 baseline and authorities reviewed through August 27, 2026

Document owner	Business Manager
Proposed version	3.0 comprehensive revision
Effective term	Upon Board adoption; intended for the 2026–2027 school year
Supersedes	Version 2.0 only upon formal Board action
Annual review	Before July 1 and whenever controlling authority changes
Required verification	Board Secretary to confirm the live local policy code/title/adoption history before adoption

Controlling rule: law, regulation, grant terms, and Board policy control over conflicting procedure text.

Document Control and Adoption

ADOPTION STATUS

This version is a board-ready proposed revision. It does not replace the August 2026 board-approved baseline until the Board adopts it in open session and the Board Secretary records the minute reference and effective date.

Proposed version	3.0 — comprehensive board-aligned revision
Baseline	ETSD Business Department Procedures Manual v2.0, published August 2026
Approval date	____________________
Minute reference	____________________
Effective date	____________________
Next review	Before July 1, 2027, or sooner if law/policy changes

Purpose and Operating Rule

This manual establishes one auditable workflow for every ETSD fund, school, department, activity, grant, bank account, payroll, asset, contract, and financial report. A transaction is complete only when authority, procurement, receipt or performance, recording, reconciliation, review, reporting, and retention are all evidenced.

STOP-AND-ESCALATE RULE

When this manual conflicts with controlling law, an award term, a legal hold, MDE/OSA/DFA direction, or a Board policy, stop the transaction. The Business Manager documents the conflict; the Superintendent and, when needed, Board counsel determine the lawful path. No employee may cure a problem by backdating, splitting, recreating, or silently replacing records.

Policy-Code Reliability Notice

ETSD source documents assign different titles to the same codes. In particular, DJAA appears as both Authorized Signatures and Federal Procurement, and DK/DKD appear as both Payroll and Student Activity Funds. This manual uses the numbering schedule recommended in the companion Board Policy Change and Crosswalk Report: DJAA for Authorized Signatures, DJEC for Federal Purchasing, DK for Student Activity Fund Management, and proposed DIC for Payroll Procedures, subject to final verification that DIC is vacant in the live policy portal.

Defined Control Roles

Control role	Minimum responsibility	Independence requirement
Board of Trustees	Adopt policy/budget; approve claims, contracts, debt, depository, dispositions, and other matters reserved by law.	Receives complete, accurate, timely reports and records actions in minutes.
Superintendent	Chief executive; approves escalations, emergencies, travel advances, certifications, and corrective action.	May not be the only preparer and reviewer of a transaction.
Business Manager	Accounting integrity, budget, cash, claims, payroll oversight, procurement review, reporting, and audit coordination.	Assigns preparer/reviewer roles and reports unresolved exceptions.
Board Secretary / Clerk	Controls official minutes, policies, signer/designation records, contracts, and Board-adoption evidence.	Verifies code/title/adoption/rescission history.
Principal / Department Head	Establishes need, budget priority, receipt/performance, activity-fund custody, and school records.	Does not approve own reimbursement or vendor payment.
Program Director	Determines allowability, award alignment, performance, prior approval, and restricted-fund documentation.	Business Office independently verifies financial treatment.
Property Manager	Tags, records, inventories, transfers, missing items, and dispositions.	Physical verification is witnessed or independently reviewed.
Payroll Processor	Processes only authorized pay, deductions, retirement, direct deposit, and tax records.	A different employee reviews master-file changes and release totals.

Contents

1. Authority, Scope, Internal Control, and Delegation

Policy anchor	DIB Financial Reports; DIAB Internal Control of Cash Receipts; DJAA Authorized Signatures (code normalization required)
Primary authority	Miss. Code §§ 37-9-18 and 37-37-1; MDE Accounting Manual; OSA School District State Legal Compliance Audit Program
Process owner	Board, Superintendent, Business Manager, Board Secretary
Required evidence	Policy index; annual delegations; signer and bank-user rosters; bond roster; access review; exception log

HARD STOP

No person may authorize, receive/custody, record, reconcile, and release the same transaction. If staffing makes full separation impracticable, the Business Manager must document and operate a specific compensating review before release.

Procedure

Step	Required action	Owner / reviewer	Evidence and timing
1	Before July 1, compile every Board delegation affecting purchasing, signing, banking, travel, cards, payroll, property, and activity funds.	Board Secretary / Business Manager	Annual authority register; minute citation; effective dates.
2	Map each process to requester, approver, custodian, recorder, reconciler, releaser, and reviewer. Identify incompatible duties.	Business Manager	Segregation-of-duties matrix before system access is granted.
3	Grant system and bank access by named user and least privilege. Shared credentials and generic payment users are prohibited.	System owner / reviewer	Access approval; MFA evidence; quarterly user listing.
4	Maintain delegated limits by role, fund, transaction type, and time period. Delegation does not override law or Board-reserved action.	Superintendent / Board	Written delegation and Board minutes when required.
5	Log every override, emergency, late approval, missing record, control breakdown, suspected loss, and policy conflict.	Discovering employee / Business Manager	COMP-01 exception record on discovery; status until closure.
6	Report material or unresolved exceptions to the Superintendent immediately and to the Board in the next packet unless counsel directs a lawful confidential process.	Business Manager / Superintendent	Exception summary, corrective owner, due date, and Board evidence.

Required control checks

- Quarterly review of banking, accounting, payroll, card, purchasing, and file-sharing users; terminate access immediately upon separation or duty change.
- Annual conflict-of-interest disclosure for Board members and employees involved in purchasing, contracting, payroll, grants, or vendor administration.
- Quarterly spot test of at least one receipt, purchase, payroll change, travel claim, card transaction, activity-fund event, and asset change from initiation through reporting.
- All approvals must identify the approver and date; a routed system approval is acceptable when access is individual and auditable.

Exception and escalation

- Missing or conflicting authority: place transaction on hold and obtain written resolution before commitment or payment.
- Suspected falsification, theft, bribery, or diversion: preserve evidence, restrict access as appropriate, and follow Chapter 22 without alerting a suspected actor prematurely.

Records

Retain policy and procedure evidence under MDAH GSL 01-07; retain authority, access, and exception records for the applicable transaction period and any longer audit, grant, investigation, litigation, or legal-hold period.

2. Budget Development, Adoption, Monitoring, and Amendments

Policy anchor	DIB Financial Reports and Statements (amend); related fund-balance and budget policies
Primary authority	Miss. Code §§ 37-61-9, 37-61-19, and 37-61-21; MDE Accounting Manual; OSA audit program
Process owner	Business Manager; Superintendent; Board
Required evidence	Budget calendar; assumptions; staffing reconciliation; hearing/publication evidence; adopted and final amended budgets; monthly variance reports

HARD STOP

Do not obligate funds that are unavailable, use an amendment to conceal an unauthorized expenditure, or leave a fund with a projected negative resource balance without immediate written escalation.

Annual budget workflow

Step	Required action	Owner / reviewer	Evidence and timing
1	Issue a calendar covering department requests, payroll projections, debt, restricted funds, tax request, notice/hearing, Board action, and MDE filing.	Business Manager	Calendar issued early enough to meet current statutory/MDE dates.
2	Require each request to state operational need, recurring cost, implementation date, staffing, funding source, procurement lead time, and sustainability after grant expiration.	Principal / program owner	FIN-01 signed request with support.
3	Project revenue by fund using enrollment, assessed values, tax collections, award notices, cash flow, historical collection rates, and documented assumptions.	Business Manager / reviewer	Assumption workbook and independent reasonableness review.
4	Reconcile every funded position and supplement to Board-approved contracts, salary schedules, calendars, benefits, vacancies, and funding sources.	HR / payroll / Business Manager	Position-control-to-budget reconciliation.
5	Publish notice, conduct the required hearing, present the proposed budget, and preserve proof of publication, exhibits, comments, and minutes.	Superintendent / Board Secretary	Complete public-process file.
6	Load the adopted budget to the accounting system and have a different employee compare fund/function/object totals to the signed Board version.	Accounting / reviewer	System-load control totals before July transactions.

Amendment and monitoring

- FIN-02 must identify source account, destination account, reason, effect on restricted purpose, procurement already initiated, and required Board/pass-through approval.
- Review budget-to-actual plus encumbrances monthly by fund, function, and object. Explain material unfavorable variances and all negative budget lines.
- Maintain a 13-week cash-flow forecast whenever projected available cash is below 60 days of routine operating disbursements or leadership identifies liquidity risk.

- Prepare and adopt the final amended budget on or before October 15 under the current OSA/MDE calendar. Preserve original, amended, and final versions without overwriting prior evidence.

Required control checks

- Tie the budget to the tax request, staffing plan, grant budgets, debt schedule, and adopted Board minutes.
- Review interfund transfers and indirect costs for legal, award, and Board authority.
- Report projected deficit, missed covenant, inability to meet payroll/claims, or material revenue shortfall immediately.

Exception and escalation

- Late amendment: document cause, amount, authorization status, and prevention plan; do not backdate.
- Restricted-fund shortfall: suspend new commitments and obtain written program/finance resolution.

Records

Retain final budgets, Board evidence, filings, and supporting financial records for the MDAH period; adopted budgets and annual reports should remain readily available as permanent governance/financial records when the schedule requires.

3. Cash Receipts and Deposits

Policy anchor	DIAB Internal Control of Cash Receipts (replace with detailed procedure)
Primary authority	Miss. Code §§ 37-7-301(s) and 37-37-1; OSA audit program; MDE Accounting Manual
Process owner	Principal/cashier; Business Office cashier; independent reviewer
Required evidence	Pre-numbered receipt; cash count; deposit slip; bank validation; ledger posting; over/short and void log

HARD STOP

Collections may not be used for purchases, cashed for employees, held off-book, substituted with personal checks, netted against shortages, or altered after receipt. Missing money or a missing receipt sequence is reported immediately.

Collection-to-ledger procedure

Step	Required action	Owner / reviewer	Evidence and timing
1	Issue a pre-numbered three-part or approved system receipt at collection. Record date, payer, amount, purpose, payment type, account, and collector.	Collector	Receipt issued immediately; voids retain all copies and explanation.
2	Restrictively endorse checks on receipt. Secure cash/checks in locked custody with access limited to designated staff.	Collector / custodian	Endorsement and custody log.
3	Count and agree money to receipts by two people when practicable. Both sign the count; document over/short before deposit.	Custodian / witness	CASH-01 control total.
4	Prepare the deposit intact and list receipt-number range. Central-office collections should be deposited the same or next business day; school activity funds follow Chapter 11's weekly/$100 minimum.	Cashier / principal	Deposit slip and transmittal; no undeposited collections overnight when avoidable.
5	Compare bank validation to the transmittal and post to the correct fund/account without netting bank fees or returned items.	Business Office	Validated deposit and ledger batch.
6	An employee independent of custody verifies receipt sequence, totals, timeliness, bank credit, account coding, and resolution of differences.	Reviewer	Dated review; exceptions logged.

Required control checks

- Maintain sequential control over blank receipt books and record issuance/return by book and range.
- Reconcile online payment processor gross receipts, fees, refunds, chargebacks, and bank settlement; post gross revenue and fees separately.
- Returned checks/chargebacks are recorded as receivables or reversals under approved collection rules; do not erase the original receipt.
- Cash refunds require original transaction support, approval independent of collection, payee acknowledgment, and entry in the refund log.

Exception and escalation

- Counterfeit, missing funds, unexplained variance, repeated late deposit, altered evidence, or suspected theft: secure the record, notify the Business Manager and Superintendent immediately, and follow Chapter 22.
- Unidentified deposit: post to a suspense account only temporarily, assign an owner, and resolve by month-end.

Records

Retain receipts, deposit support, receivable/refund records, and reconciliations as financial records under MDAH GSS 04-02 and any longer award, tax, investigation, or legal-hold requirement.

4. Bank Accounts, Cash Management, and Reconciliations

Policy anchor	DG Depository of Funds (verify title/code); DJAA Authorized Signatures
Primary authority	Miss. Code §§ 37-7-333, 27-105-5, 27-105-305, and 27-105-315; MDE Rule 71.3; OSA audit program
Process owner	Business Manager; reconciler; independent reviewer; Superintendent
Required evidence	Board depository selection; account register; signer/user roster; statements; reconciliation; stale-item log; Board packet evidence

HARD STOP

No account may be opened, closed, renamed, or moved without required Board/depository authority. Personal, school-club, or off-book accounts using district funds are prohibited.

Monthly reconciliation

Step	Required action	Owner / reviewer	Evidence and timing
1	Receive the statement directly from the bank or secure portal and preserve the original electronic file and check/ACH images.	Reconciler	Statement for every account.
2	Reconcile bank balance to ledger cash, including outstanding checks, deposits in transit, transfers, ACH/wires, interest, fees, returned items, and voids.	Reconciler	Completed within 30 days of statement receipt.
3	Trace deposits in transit to subsequent bank credit and outstanding checks to the check register; investigate items older than 60 days and apply the district stale-check process.	Reconciler	Aging and resolution notes.
4	Compare electronic activity to approved payment files, signer authority, and bank alerts. Investigate duplicate, out-of-sequence, dormant, or after-hours transactions.	Reviewer	BANK-01 review.
5	A reviewer who did not prepare the reconciliation signs/date-reviews the bank, ledger, reconciling items, and supporting schedules.	Business Manager / designee	Independent review before Board packet.
6	Present reconciled bank statements to the Board at the next regular meeting after reconciliation, consistent with current MDE/OSA requirements.	Business Manager / Board Secretary	Board packet and minute reference.

Required control checks

- Require MFA, dual release where supported, daily balance/transaction alerts, positive pay or equivalent check control, and ACH debit filters/blocks.
- Review all bank users and signers quarterly; remove access immediately when duties change.
- Maintain separate reconciliations for payroll, activity, child nutrition, debt, and restricted accounts; reconcile transfers between funds/accounts on both sides.
- Prepare a monthly cash-position summary and identify legally restricted balances.

Exception and escalation

- Unknown ACH/wire/check: contact the bank immediately through a trusted number, preserve evidence, restrict compromised access, and follow Chapter 22.
- Unreconciled difference: do not create a plug entry; quantify, investigate, document, and escalate any amount unresolved at close.

Records

Statements, reconciliations, account authority, and related support are financial records under MDAH GSS 04-02; Board minute evidence follows GSL 01-01 and 01-02.

5. Accounts Payable, Claims Docket, and Disbursements

Policy anchor	DJEJ Payment Procedures; DJEG Purchase Orders and Contracts; DJAA Authorized Signatures
Primary authority	Miss. Code § 37-9-18; OSA audit program; MDE Accounting Manual
Process owner	Accounts Payable; receiving employee; Business Manager; Superintendent; Board
Required evidence	Requisition/PO; procurement file; contract; invoice; receiving/performance evidence; claims docket; payment and cleared-item evidence

HARD STOP

No payment may be released from a statement, quote, packing slip, unsupported email, unexecuted contract, or altered remittance instruction. The person approving receipt/performance may not approve their own reimbursement or vendor interest.

Three-way match and claims workflow

Step	Required action	Owner / reviewer	Evidence and timing
1	Receive invoices through the designated Business Office channel; date stamp/log and screen invoice number, amount, remit-to, and bank information for duplicates or alteration.	Accounts Payable	Invoice intake log.
2	Match the approved PO/contract, lawful procurement evidence, invoice, and independent receipt or performance acceptance.	Accounts Payable / receiver	AP-01 complete packet.
3	Verify vendor status, mathematics, account/fund, sales-tax treatment, grant approval, payment terms, retainage, and available budget.	Accounts Payable / program owner	Coded and approved invoice.
4	Add only valid claims to the claims docket. Show vendor/payee, amount, purpose, fund/account, and any exception requiring Board attention.	Business Manager	Claims docket tied to batch total.
5	After required Board/authorized approval, release check/ACH using dual control. The preparer may not be the sole releaser.	Payment preparer / releaser	Release log and bank confirmation.
6	Post the payment, send remittance, cancel paid support electronically, and reconcile payment batch to bank and ledger.	Accounts Payable / reconciler	Cleared item and monthly reconciliation.

Required control checks

- Use automated or manual duplicate tests on vendor, invoice number, amount, date, and PO.
- Heightened review for round-dollar professional services, multiple sequential invoices, weekend activity, unusual address/bank, dormant vendor, expedited request, and split invoices.
- Require receiving within three business days of delivery/performance; unresolved quantity/quality disputes remain on hold.
- Payments to employees require payroll or reimbursement analysis; do not use vendor payments to avoid payroll tax, retirement, or contract controls.

Exception and escalation

- Emergency payment: the emergency must meet the legal definition, include written certification/approval, and appear in required Board records; return to the normal PO/claims path as soon as possible.
- Missing documentation: hold payment. An affidavit does not replace procurement, receipt/performance, or statutory approval.

Records

Claims, purchase orders, invoices, receiving, payment, and receivable/payable records are retained under MDAH GSS 04-02 and any longer contract, grant, tax, or legal-hold period.

6. Purchasing Authority, Requisitions, and Purchase Orders

Policy anchor	DJEA Purchasing Authority (amend); DJEG Purchase Orders and Contracts; DJAA Authorized Signatures
Primary authority	Miss. Code §§ 31-7-1, 31-7-13, and 37-39-21; OSA Purchase Law Summary dated July 1, 2026
Process owner	Board-designated purchasing agent; Business Manager; requester; program owner
Required evidence	Annual purchasing-agent minute; bond; requisition; quotes/bid; conflict/SAM checks; PO; receiving; contract register

HARD STOP

A purchase order or fully executed contract must precede the order, commitment, delivery, or start of work. An employee who makes an unauthorized commitment must immediately disclose it; the district does not promise ratification.

Requisition-to-purchase-order procedure

Step	Required action	Owner / reviewer	Evidence and timing
1	Describe the need, intended use, quantity/specifications, required date, estimated total value over the full term, suggested sources, funding, and receiving employee.	Requester	PUR-01 before vendor commitment.
2	Confirm necessity, budget priority, and absence of duplicative stock/equipment; aggregate reasonably foreseeable related purchases.	Principal / department head	Approval with total-value estimate.
3	Confirm award allowability, period of performance, prior approval, cost allocation, and sustainability for restricted funds.	Program owner	Grant allowability record.
4	Select the lawful method using Chapter 7; verify vendor/TIN, conflicts, SAM for federal awards, state/cooperative contract authority, and required insurance/licensing.	Business Office	Procurement checklist and evidence.
5	Issue a uniquely numbered PO only after required approval. PO states vendor, scope/items, ceiling, account, ship-to, terms, and applicable contract/clauses.	Purchasing agent	PO release log.
6	Place the order after PO issuance and document delivery, quantity, condition, serial/tag data, or service acceptance.	Requester / receiver	Receiving/performance record within three business days.

Required control checks

- Board designates purchasing agents by title/name and scope in minutes before the fiscal year; each required agent is bonded at least $50,000 under § 37-39-21.
- System approval limits must match the written delegation. The purchasing agent may not self-approve a personal reimbursement or related-party transaction.
- Blanket POs identify scope, term, maximum, account, authorized users, and invoice detail; review open balances monthly.
- Renewals, options, freight, installation, maintenance, and extensions are included in total potential value when selecting the method.

Exception and escalation

- After-the-fact request: stop further work, document facts and benefit received, obtain legal/Board review, and record corrective action. Do not backdate a PO.
- Conflict disclosure: affected individual recuses; Business Manager obtains legal/ethics review because recusal alone may not cure a prohibited transaction.

Records

Retain requisition, procurement, PO, receiving, invoice, contract, and payment as one linked file under MDAH GSS 04-02/GSL 04-01 and any longer award or contract period.

7. Quotes, Bids, Procurement Thresholds, and Exceptions

Policy anchor	DJED Bids and Quotations (replace); DJEC Federal Purchasing and Procurement (replace)
Primary authority	Miss. Code § 31-7-13; OSA Purchase Law Summary dated July 1, 2026; 2 CFR §§ 200.317–200.327; FAR 2.101
Process owner	Purchasing agent; Business Manager; bid committee; Board
Required evidence	Independent cost estimate; quote/bid/RFP; advertisement; bidder list; tabulation; responsibility review; award minutes; contract; exception certification

HARD STOP

Use the most restrictive applicable state, federal, award, and local rule. Do not split requirements, contract terms, projects, invoices, or purchase orders to avoid competition or approval.

Current threshold table — reviewed August 27, 2026

Category	Threshold	Minimum procedure
Mississippi commodities / public construction	$0–$5,000	No bid required by § 31-7-13(a), but use an approved PO, price-reasonableness evidence, and any stricter grant/local rule.
Mississippi commodities / public construction	>$5,000–$75,000	At least two independent competitive written bids; select lowest and best; break construction components over $5,000 into description and price.
Mississippi commodities / public construction	>$75,000	Advertise once weekly for two consecutive weeks; normal opening at least 7 working days after last notice; construction at least 15 working days; Board award and full file.
Federal micro-purchase	≤$15,000 effective Oct. 1, 2025	Price reasonable; distribute equitably among qualified suppliers to practicable extent. Mississippi's >$5,000 quote rule still controls applicable commodities/construction.
Federal simplified acquisition	>$15,000–$350,000	Obtain an adequate number of qualified-source quotes; ETSD minimum is two written quotes. Apply stricter state rule and document selection.
Federal formal procurement	>$350,000	Sealed bids or competitive proposals with publicized solicitation, written evaluation, cost/price analysis as required, Board award, and Appendix II clauses.

Formal and exception procedures

- For commodities above $75,000, reverse auction is the primary receipt method unless a lawful exception applies or PPRB approves an alternative. Reverse auction is not used for public construction.
- Solicitations state scope/specifications, evaluation, opening/deadline, funding clauses, insurance/licensing, protest/contact rules, and all required state/federal terms. Maintain the known bidder list and issue addenda to all recipients.
- No addendum within two working days of receipt deadline unless the opening is moved at least five working days after the addendum, consistent with § 31-7-13.
- Lowest and best: document price, responsiveness, responsibility, specification compliance, delivery, past performance, and other announced factors. Awarding other than lowest requires written findings and Board minutes.
- Sole source: vendor certification and facts supporting uniqueness, price analysis, Board written authorization/minutes, and any required notice/publication. Convenience, brand preference, or prior use is not sole source.
- Emergency: written certification describes unforeseen condition and harm from delay, limits purchase to immediate need, identifies competition obtained if practicable, and is entered in the next Board meeting record as required.
- Federal noncompetitive procurement is allowed only under 2 CFR 200.320(c): single source, public exigency/emergency, written federal/pass-through authorization, or inadequate competition after solicitation. State law may still be stricter.

Required control checks

- Verify live OSA Purchase Law Summary and acquisition.gov thresholds before each formal procurement and at least annually.
- No federal micro-purchase threshold above the FAR amount may be used unless ETSD annually documents and approves a lawful self-certification under 2 CFR 200.320(a)(1)(iv).
- SAM exclusion evidence before federal award; conflict certification; domestic preference/recovered materials where applicable; cost or price analysis above the SAT and for noncompetitive awards as required.
- Appendix II clauses are selected by contract type/value and incorporated before execution.

Exception and escalation

- One/no quote in the two-quote range: document solicitation to qualified sources and do not award unless a lawful exception is established and approved.
- Bid protest or suspected collusion: preserve all communications, suspend award when lawful, and refer to Superintendent/counsel.

Records

Bids and associated solicitation/award materials: MDAH GSL 04-01, five years or three years after audit release, whichever is later; retain longer when award/contract/claim terms require.

8. Payroll, Pay Changes, Supplements, and Withholdings

Policy anchor	Proposed DIC Payroll Procedures (confirm DIC is vacant); remove conflicting 'DK Payroll' references
Primary authority	Miss. Code §§ 37-9-17, 37-9-21, 25-11-127; IRS and PERS requirements; MDE Accounting Manual
Process owner	HR/administration; payroll processor; Business Manager; Superintendent; Board
Required evidence	Board employment/minutes; contract/salary schedule; PAY-01; time/leave; payroll register; change report; liabilities; tax/PERS reports; reconciliation

HARD STOP

No pay, supplement, retroactive change, direct-deposit change, or deduction change may be processed from an unsupported email or verbal request. Licensed employee pay must agree with an executed contract, salary schedule, or specific Board authority.

Payroll-cycle procedure

Step	Required action	Owner / reviewer	Evidence and timing
1	HR/administration provides approved employment status, position, calendar, FTE, rate/schedule, supplements, funding, start/end date, and Board minute/contract evidence.	HR / Superintendent	PAY-01 and source documents before master-file change.
2	Payroll verifies identity, tax forms, PERS status, direct deposit through a trusted process, benefits, garnishments, and funding distribution.	Payroll processor	Complete personnel/payroll setup file.
3	A different employee reviews every master-file change report, focusing on rate, bank, status, leave, withholding, and funding.	Business Manager / reviewer	Signed change report before payroll calculation.
4	Reconcile active employees, contracts, rate, days/hours, leave, substitutes, overtime, supplements, split funding, new hires, and terminations to the preliminary register.	Payroll / HR / program owner	Pre-payroll checklist and exception resolution.
5	Compare final control totals to the approved preliminary totals; dual-authorize ACH/check release.	Payroll / releaser	Final register, control totals, release evidence.
6	After release, reconcile net pay, taxes, benefits, garnishments, PERS, payroll clearing, cash, and general ledger; resolve rejects promptly.	Payroll / independent reviewer	Cycle reconciliation before next payroll.

Required control checks

- Position-control roster reconciled to payroll monthly; terminated/inactive employees and duplicate bank accounts reviewed.
- Time and effort for federally funded staff follows award/MDE documentation and reflects actual work; budget estimates are adjusted to actuals.
- Direct-deposit change is verified with the employee using a previously trusted number or in-person method; never rely on reply email alone.
- Payroll correction preserves the original audit trail and identifies cause, authorization, tax/PERS impact, recovery or payment, and review.

Exception and escalation

- Insufficient authority or conflicting contract: hold affected change and escalate before release.
- Suspected ghost employee, bank diversion, falsified time, or duplicate payment: restrict access as appropriate, preserve logs, contact the bank if relevant, and follow Chapter 22.

Records

Retain payroll, tax, PERS, garnishment, benefits, contract, time, and reconciliation records under the applicable MDAH payroll schedules and longer federal/tax/PERS/legal-hold requirements.

9. Travel Authorization, Advances, and Reimbursements

Policy anchor	DJD Travel and Expense Reimbursements (replace rate language with live-rate control)
Primary authority	Miss. Code §§ 25-3-41, 25-1-79, and 37-7-301; DFA travel rules; OSA audit program
Process owner	Traveler; supervisor; Superintendent/Board as required; Accounts Payable
Required evidence	TRV-01 authorization; agenda/business purpose; vehicle availability; fare comparisons; receipts; TRV-02 advance; TRV-03 voucher and settlement

HARD STOP

Travel must be authorized before departure. A traveler may not approve their own claim, claim a meal included in registration, receive duplicate reimbursement, or claim travel while on leave.

Current rates and live-source rule

Item	Rate in effect on review date	Operating rule
Personal automobile — authorized/no district vehicle available	$0.76 per mile effective July 1, 2026	Use route support and vehicle-availability certification.
Personal automobile — district/government vehicle available but declined	$0.235 per mile effective July 1, 2026	Lower rate applies; document availability.
Meals	$68 maximum daily state rate, Oct. 1, 2025–Sept. 30, 2026	Apply DFA destination/meal eligibility, departure/return, and provided-meal rules.
Lodging/air/rental	Actual allowable cost subject to current limits and approval	Obtain required comparisons and itemized receipts; explain exceptions.

Procedure

Step	Required action	Owner / reviewer	Evidence and timing
1	Before booking, state purpose, dates, destination, participants, funding, estimated cost, agenda, and expected benefit. Obtain required supervisor/program approval.	Traveler / supervisor	TRV-01 before commitment.
2	Document vehicle availability and compare personal vehicle, district vehicle, airfare, and rental where relevant. Obtain two fare comparisons for air and rental car when required.	Traveler / travel coordinator	Comparison attached to TRV-01.
3	For an advance, show need and estimate; obtain required Board approval and track as a receivable until settled.	Traveler / Superintendent / Board	TRV-02 and Board evidence before payment.
4	Retain agenda, itemized hotel/transport/parking receipts, route/mileage, dates/times, and proof of payment. Exclude personal costs and meals provided.	Traveler	Contemporaneous trip file.
5	Submit signed TRV-03 promptly. An advance must be settled within five working days after the end of the month in which travel occurred under the current OSA checklist.	Traveler / supervisor	Voucher, advance offset, and refund if due.

Step	Required action	Owner / reviewer	Evidence and timing
6	Accounts Payable checks authorization, rates for actual travel date, leave status, receipts, comparisons, calculations, funding, and independent approval before claims processing.	Accounts Payable / reviewer	Approved claim packet and payment evidence.

Required control checks

- Rates are effective-date controlled: verify DFA/GSA mileage and DFA meal information before processing; retain the source/memo used.
- Conference lodging above normal limits requires documented conference rate/availability and approval; upgrades and personal extensions are not district costs.
- Combine travelers and use district vehicle when economical and operationally reasonable.
- Outstanding advance aging is reviewed monthly; payroll withholding or collection follows law, policy, and due process.

Exception and escalation

- Missing itemized receipt: obtain duplicate from vendor. Any affidavit is exceptional, identifies why unavailable, and requires independent approval; it cannot prove an unallowable expense.
- Rate changed during trip: apply the rate legally effective for each travel date.

Records

Retain authorization, comparison, advance, voucher, agenda, receipts, approval, and payment under MDAH financial records and any longer grant/tax period.

10. Petty Cash, Change Funds, and Procurement Cards

Policy anchor	DJB Petty Cash Accounts (expand to card/change-fund program) or adopt separate Board-assigned card policy
Primary authority	Miss. Code §§ 31-7-1, 31-7-12, 31-7-13(o), and 31-7-305; OSA audit program
Process owner	Fund custodian/cardholder; approver; Business Manager; independent reviewer
Required evidence	Board authorization; fund/card roster; agreement; receipts; monthly reconciliation; exception log; bank statement; access return

HARD STOP

No cash advances from cards; no single card transaction over $5,000; no splitting; no personal purchase; no sales tax when exemption applies; no shared card or credential.

Petty cash and change funds

- Board/management authorization states custodian, location, purpose, amount, funding, and reconciliation frequency. Funds remain at the fixed authorized amount.
- Every disbursement uses a pre-numbered voucher, original itemized receipt, purpose, account, payee acknowledgment, and approval independent of the custodian.
- Custodian counts cash plus vouchers to the authorized amount at least monthly; an independent employee performs periodic surprise counts.
- Replenishment reimburses supported vouchers and never increases the authorized fund without formal approval.

Procurement-card procedure

Step	Required action	Owner / reviewer	Evidence and timing
1	Issue only to an employee with approved business need, training, signed CARD-01, dollar/category limits, and named approver.	Business Manager	All-card and cardholder/approver rosters.
2	Obtain authorization and procurement support before purchase; card use does not bypass PO, quote/bid, contract, grant, travel, or asset rules.	Cardholder / approver	Purchase file tied to statement item.
3	At purchase, secure itemized receipt, proof of district business, and receiving. Resolve sales tax and credits with vendor.	Cardholder	Receipt and receiving evidence.
4	Reconcile each statement transaction; code, explain, and sign. Approver independently reviews business purpose, split indicators, tax, receipt, and limits.	Cardholder / approver	Monthly statement package.
5	Business Office reviews the complete program independently and pays the card bill within 45 days under the current OSA checklist.	Business Manager / reviewer	Program review, aging, and payment evidence.
6	Suspend lost, compromised, unsupported, separated-user, or misused cards immediately; recover card and document disposition.	Business Manager	Incident/termination log.

Required control checks

- Monthly analytics for weekend/holiday, restaurant, gift card, fuel, duplicate, round-dollar, near-limit, sequential, and split transactions.
- Cardholder may not be sole approver; approver may not approve own charges.
- Credits are tracked until they appear; refunds may not be taken in cash.
- Fuel cards include vehicle/asset number, odometer, driver, date, gallons, and reasonableness review.

Exception and escalation

- Missing support or prohibited use: place amount in exception/receivable status, suspend privileges, obtain reimbursement when required, and consider discipline/reporting.
- Compromise: call issuer through trusted contact, block card, preserve transaction detail, and follow Chapter 22.

Records

Retain rosters, agreements, statements, receipts, reviews, incidents, and repayment under MDAH financial records and any longer investigation/legal-hold period.

11. Student Activity Funds and School-Level Controls

Policy anchor	DK Student Activity Fund Management (retain this title; repeal conflicting 'DK Payroll' reference); DKD conflict must be normalized
Primary authority	Miss. Code § 37-7-301(s); OSA audit program; MDE Accounting Manual
Process owner	Principal; activity-fund bookkeeper/cashier; sponsor; Business Manager; Board
Required evidence	Fundraiser approval; price/fee approval; tickets/inventory; three-part receipts; deposits; monthly transmittal; PO/claims; account review; closeout

HARD STOP

Activity funds are public funds. No off-book account, personal cash app, undocumented club account, payment from collections, or exclusive cashless gate that denies a cash option is permitted.

Fundraiser and event lifecycle

Step	Required action	Owner / reviewer	Evidence and timing
1	Before activity, submit ACT-01 with purpose, student group, dates, items/tickets, selling price/admission fee, custody, expected revenue/cost, vendor, and disposition of unsold goods.	Sponsor / principal	Principal and required Board approval before activity.
2	Issue pre-numbered tickets/items to named sellers; record beginning count. Board approves admission fees; gate provides a cash option without shifting mandatory processing fees to the public.	Principal / sponsor	Ticket/inventory issue log and approved price.
3	Count collections with two people when practicable; reconcile receipts to tickets/items sold and document voids, comps, spoilage, shortage, or overage.	Sponsor / cashier / witness	ACT-01 event reconciliation.
4	Issue three-part receipts and deposit at least weekly and whenever collections reach $100; use night depository when regular bank hours are unavailable.	Principal / cashier	Receipt, deposit, and sequence evidence.
5	Deliver monthly activity-fund transmittal and support to Central Office within five working days after month-end.	Principal	Signed transmittal, bank support, and ledger detail.
6	Close fundraiser by reconciling units/tickets, gross revenue, deposits, costs, net proceeds, inventory, and approved use. Principal and Business Office review.	Sponsor / principal / Business Office	Fundraiser closeout and exceptions.

Disbursement and account rules

- Apply Chapter 6–7 purchasing, PO, conflict, receiving, and claims rules to activity-fund spending. Student benefit and donor/fundraiser restriction must be documented.
- Use Board-approved signers and central depository accounts. Salaries, personal gifts/loans, and payments that avoid payroll rules are prohibited.

- Classify booster/PTA funds as public or private based on custody, control, use of district accounts, and administration. Written determination precedes handling; district employees may not create a nominal private fund to avoid public controls.
- At year-end or closure, identify dormant balances and obtain Board/authorized direction consistent with original purpose and law.

Required control checks

- Central Office reconciles school transmittals, bank, ledger, and account balances monthly and reports late deposits, negative accounts, unexplained transfers, and dormant funds.
- Ticket books and receipt books are controlled by range; missing numbers are investigated.
- Online processors are reconciled gross-to-net, including platform fees, refunds, chargebacks, and settlement timing.

Exception and escalation

- Shortage/lost tickets/delayed deposit: secure remaining funds/records, recount, notify principal and Business Manager immediately, and follow Chapter 17/22 as indicated.
- Unapproved fundraiser or external account: stop activity, preserve records/funds, disclose to Superintendent, and obtain legal/Board direction.

Records

Retain activity receipts, deposits, transmittals, event controls, purchase/payment records, and account reports under MDAH financial schedules and any longer audit/investigation period.

12. Federal Grants and Restricted Funds

Policy anchor	DJEC Federal Purchasing and Procurement (replace); DFC Federal Aid; DFCAA Federal Loans and Grants
Primary authority	2 CFR Part 200, including §§ 200.302–.303, .317–.327, .328–.329, .334, .344, Subpart E, and Subpart F; award/pass-through terms
Process owner	Federal Programs Director/program owner; Business Manager; Superintendent; Board
Required evidence	Award/approved budget; allowability/prior approval; procurement; SAM; contract clauses; time/effort; inventory; reports; subrecipient/contractor determination; closeout

HARD STOP

No federal cost may be charged unless it is necessary, reasonable, allocable, allowable, within period of performance, supported, consistently treated, and not used as cost share for another award without authority.

Award setup and expenditure procedure

Step	Required action	Owner / reviewer	Evidence and timing
1	Create an award profile for Assistance Listing, agency/pass-through, award number, period, budget, match, indirect rate, reporting, prior approvals, property, program income, and closeout.	Program owner / Business Manager	GRANT-01 before first obligation.
2	Map approved budget to accounting codes and responsible staff; load budget/control totals and separate federal share, local match, and program income.	Accounting / reviewer	System setup reconciliation.
3	For each cost, document program benefit and allowability; obtain prior approval where required; allocate shared costs using a reasonable supported method.	Requester / program owner	Allowability checklist attached to transaction.
4	Procure using Chapters 6–7 and the more restrictive rule. Verify SAM exclusions, conflicts, contractor/subrecipient status, and required contract clauses before award.	Business Office / program owner	Complete federal procurement file.
5	Monitor budget, obligations, cash draws, performance, time/effort, property, vendors/subrecipients, match, program income, and findings at least monthly/quarterly as applicable.	Program owner / Business Manager	Grant-to-ledger and performance reconciliation.
6	Submit financial/performance reports by award due date; reconcile report to ledger and have a second employee review. Track closeout and residual property/records.	Program owner / Business Manager	Report, reconciliation, submission confirmation.

Federal controls updated for 2026

- FAR micro-purchase threshold is $15,000 and simplified acquisition threshold is $350,000 effective October 1, 2025. The 2025 ETSD modernization draft using $10,000/$250,000 is obsolete.

- Current 2 CFR 200.328: annual reports generally due no later than 90 days after period; quarterly/semiannual generally 30 days; final recipient report 120 days, subrecipient final 90 days, unless award/pass-through sets a lawful different/extended date.
- Federal award records generally remain three years from submission of the final financial report under 2 CFR 200.334, longer for litigation, claims, audit, property, or award-specific conditions.
- Federal equipment with current per-unit fair market value at disposition of $10,000 or less may generally be disposed with no further federal responsibility under current 2 CFR 200.313, subject to state/Board rules; above $10,000 obtain disposition instructions and calculate federal share.
- Special-purpose equipment costing $10,000 or more generally requires prior written federal/pass-through approval as a direct cost under current 2 CFR 200.439 unless award terms are stricter.

Required control checks

- Monthly draw-to-expenditure reconciliation; minimize time between draw and disbursement; return excess/interest as required.
- Quarterly review of obligated but unliquidated balances, budget revisions, reporting calendar, property, and sustainability.
- Subrecipient risk assessment, written agreement, monitoring, findings follow-up, and closeout when ETSD passes through funds.
- Contractor invoices are tied to deliverables; cost reimbursement contracts receive cost review and supporting records.

Exception and escalation

- Potential unallowable cost: move to nonfederal suspense/local source pending resolution; do not leave known questioned cost on the award.
- Late report or missed prior approval: notify pass-through/federal contact, document corrective action, and report material impact.

Records

Retain at least the 2 CFR 200.334 period measured from the relevant final/annual report and longer MDAH, audit, property, tax, claim, award, or legal-hold period.

13. Child Nutrition Financial Procedures

Policy anchor	Applicable Child Nutrition and cash/procurement policies; DJEC for federal procurement
Primary authority	7 CFR Parts 210 and 220; 2 CFR Part 200; MDE Office of Child Nutrition requirements; MDAH GSS 06-01
Process owner	Child Nutrition Director; cafeteria manager/cashier; Business Manager; Superintendent
Required evidence	Daily meal counts; point-of-sale close; deposits; eligibility/access controls; claims; inventory; procurement; production/purchase records; reconciliation

HARD STOP

Meal counts, eligibility status, free/reduced information, cash, food inventory, and reimbursement claims may not be altered to force agreement or increase reimbursement.

Monthly control cycle

Step	Required action	Owner / reviewer	Evidence and timing
1	Restrict eligibility access by role; reconcile enrollment/eligibility imports, direct certification, changes, and verification under current program rules.	CN Director / reviewer	Eligibility change report and access review.
2	At each service, record reimbursable meals at the point of service by category without overt identification; control voids and manual entries.	Cashier / manager	Daily POS close and exception log.
3	Reconcile cash and online receipts to POS and deposit using Chapter 3 controls; record gross collections and processor fees separately.	Manager / Business Office	Daily count, deposit, and bank evidence.
4	Reconcile food purchases, deliveries, production records, inventory, waste, transfers, and meal counts; investigate abnormal usage.	CN Director / managers	Monthly inventory/usage analysis.
5	Prepare reimbursement claim from approved meal-count records; compare to attendance/operating days and have a second employee review before submission.	CN Director / Business Manager	Claim reconciliation and submission confirmation.
6	Reconcile claim payment to receivable, bank, and ledger; monitor nonprofit food-service account balance and allowable use.	Business Office	Monthly claim-to-ledger reconciliation.

Required control checks

- Use competitive procurement and contract monitoring for food, supplies, equipment, and services; apply Buy American and other program-specific requirements.
- Separate inventory custody/order/receipt/invoice approval as practicable; document substitutions, shortages, and credits.
- Review unpaid meal charges and bad debt under current Board/program rules; unallowable bad debt is not charged to the nonprofit food-service account.
- Complete required civil rights, food safety, procurement, and program training and retain rosters.

Exception and escalation

- Claim error: correct the source record transparently, quantify affected claim periods, notify MDE when required, and document repayment/adjustment.
- Cash/inventory discrepancy: secure records and stock, recount, notify CN Director/Business Manager, and escalate suspected loss.

Records

MDAH GSS 06-01 requires Child Nutrition program records for five years, provided audit has been released one year; retain longer when USDA/MDE, claim, investigation, or legal hold requires.

14. Fixed Assets, Inventory, Surplus Property, and Donations

Policy anchor	DPA Fixed Assets (replace/expand); DPB Donations
Primary authority	OSA Public School Asset Management Manual; Miss. Code §§ 7-7-211, 25-1-87, and 37-37-1; 2 CFR §§ 200.313 and 200.439
Process owner	Property Manager; department custodian; Business Manager; Board
Required evidence	Asset add/tag record; assignment/hand receipt; transfer; annual inventory; missing/lost/stolen affidavit; law-enforcement report; Board disposition; federal source and proceeds

HARD STOP

Property may not be removed, transferred, traded, cannibalized, donated, discarded, sold, or deleted from inventory without the required property record and Board/legal authorization.

Inventory thresholds and required items

Category	OSA rule	ETSD procedure
General property	Inventory each item costing or donated fair-market value of $1,000 or more.	Tag/record before deployment; include acquisition and assignment data.
Regardless of cost	Weapons; two-way radios; lawn equipment; chainsaws; air compressors; welding machines; generators; motorized vehicles; cellular phones.	Inventory/tag regardless of price.
$250 or more	Cameras/camera equipment; televisions; computers/computer equipment.	Inventory/tag at $250 threshold.
Federal equipment	Current 2 CFR definitions/award terms; disposition threshold is current fair value, not ETSD inventory threshold.	Track federal share, award, use, condition, location, and disposition separately.

Asset lifecycle

Step	Required action	Owner / reviewer	Evidence and timing
1	Receiving sends invoice/PO, serial/model, funding, location, custodian, condition, and federal/grant data to Property Manager before use.	Receiver / Property Manager	FA-01 within five business days of receipt.
2	Assign unique tag or approved permanent marking, record all required data, and obtain custodian acknowledgment/hand receipt.	Property Manager / custodian	Asset ledger and signed assignment.
3	Document permanent transfer before movement; temporary checkout records borrower, purpose, dates, condition, and return.	Custodian / Property Manager	FA-02 or hand receipt.
4	At fiscal year-end, each custodian verifies items. Property Manager reconciles to ledger, investigates exceptions, and prepares subsidiary ledger.	Property Manager / custodians	Annual physical inventory and reconciliation.
5	Report additions/deletions and items unaccounted for to the Board in a separate report as required by OSA guidance.	Property Manager / Business Manager	Board packet/minutes.

Step	Required action	Owner / reviewer	Evidence and timing
6	For disposition, determine condition/value, federal/contract restrictions, lawful method, Board authorization, proceeds, tag removal, and ledger deletion.	Property Manager / Board	FA-04 and complete disposition evidence.

Required control checks

- Lost property: notarized affidavit by responsible party; stolen property: law-enforcement report and NCIC entry where applicable; both reported in Board minutes.
- Donations recorded at fair market value on receipt and reviewed for restrictions, safety, maintenance, and acceptance authority.
- Acquisition cost includes purchase price less trade-in, transportation, installation, and other costs to place asset in intended operation.
- Annual analytics compare additions to capital outlay, disposals to proceeds, federal property to awards, and locations/custodians to HR/facility records.

Exception and escalation

- Missing asset: search and document within five business days; if not located, complete affidavit, assess reporting/recovery, and present to Board.
- Unauthorized disposal or personal use: stop action, preserve evidence, notify Superintendent, and follow fraud/property reporting rules.

Records

MDAH GSL 02-26: fixed asset inventory retained five years after disposal; change orders five years or three years after audit release, whichever is later; annual reports until superseded; keep facility construction files for life of facility.

15. Financial Reporting, Monthly Close, and Board Packets

Policy anchor	DIB Financial Reports and Statements (replace with report/deadline schedule)
Primary authority	Miss. Code §§ 37-9-18 and 37-61-21; MDE Rule 71.3 and Accounting Manual; OSA audit program
Process owner	Business Manager; preparers/reconcilers; Superintendent; Board
Required evidence	Close calendar; reconciliations; journal entries; financial statements; claims docket; cash flow; grant/CN/activity/debt reports; exception certification; Board packet/minutes

HARD STOP

Do not issue a final monthly or year-end report while a material unreconciled difference, unsupported journal entry, omitted account, negative fund issue, or known misstatement remains undisclosed.

Monthly close and report package

Step	Required action	Owner / reviewer	Evidence and timing
1	Close feeder systems and record all known receipts, payments, payroll, inventory, transfers, accruals, and approved journal entries for the period.	Accounting staff	Close checklist and source batch totals.
2	Reconcile bank, payroll, receivables, payables, grants, activity, CN, debt, fixed assets, cash, interfund, and subsidiary ledgers.	Assigned preparers/reviewers	Reconciliations completed and reviewed.
3	Review budget-to-actual/encumbrances, unusual balances, negative funds, stale items, cutoff, restricted balances, and prior exceptions.	Business Manager	Variance and exception analysis.
4	Prepare Board reports: combined balance/cash or fund equity; revenue/expenditure budget status; claims docket; reconciled bank statements; payroll; restricted programs; cash flow; compliance.	Business Manager	Packet tied to ledger and control totals.
5	Superintendent reviews completeness and material matters; distribute under Board calendar and preserve the exact packet presented.	Superintendent / Board Secretary	Review signoff and final PDF/native reports.
6	After meeting, record action, attach reports/minute references, post authorized corrections transparently, and carry forward unresolved items.	Board Secretary / Business Manager	Final packet and action log.

Required control checks

- Monthly reports should be completed no later than the last working day of the following month; reconciled bank statements go to the next regular Board meeting after reconciliation.
- Journal entries identify purpose, source, accounts, preparer, approver, and date; no self-approval and no unsupported plug entries.
- Year-end final financial statements and final budget information are completed by October 15 under the current OSA statutory checklist, subject to any newer MDE directive.

- Report open audit findings, deficits, unauthorized obligations, losses/fraud, debt/covenant risk, property exceptions, and corrective action status.

Exception and escalation

- Late close: document reasons, affected reports, interim controls, revised date, and corrective action; inform Superintendent/Board of material delay.
- Post-close correction: preserve original report, approve the entry, quantify impact, reissue clearly labeled corrected report when material, and notify recipients.

Records

Year-end general ledger is permanent under MDAH GSL 02-28; audit reports permanent under GSL 02-04; monthly/annual and supporting records follow GSS 04-02/GSL 01 schedules and legal holds.

16. Records Retention, Legal Holds, and Audit Readiness

Policy anchor	Adopt new districtwide Records Retention and Legal Hold policy under an unoccupied code; cross-reference all Section D policies
Primary authority	Miss. Code §§ 39-5-9 and 37-15-8; MDAH Records Retention Schedules for School Districts (July 19, 2022); 2 CFR §§ 200.334–.338
Process owner	Board Secretary/Records Officer; Business Manager; system owners; counsel
Required evidence	Records inventory; schedule citation; destruction list/approval; legal hold; audit request log; preservation and access evidence

HARD STOP

No record may be destroyed because storage is inconvenient, a staff member leaves, an audit is expected, or the record is embarrassing. Unscheduled records are not eligible for disposal until an approved schedule exists.

Retention and destruction procedure

Step	Required action	Owner / reviewer	Evidence and timing
1	Inventory paper and electronic record series by owner, system, location, confidentiality, format, and MDAH/federal/contract schedule.	Records Officer / owners	Controlled records inventory updated annually.
2	For each series, apply the longest applicable MDAH, federal, tax, PERS, bond, contract, claim, litigation, investigation, or award period.	Records Officer / counsel as needed	Retention rule with source and trigger event.
3	Issue legal/audit hold promptly when litigation, claim, investigation, subpoena, public-record request, audit, or credible dispute is known or reasonably anticipated.	Counsel / Superintendent / Records Officer	Hold notice, recipients, systems, acknowledgment.
4	Before destruction, confirm period expired, no hold/open audit/claim applies, list records and date range, and obtain required approval/Board action.	Record owner / Records Officer	Disposition list and approval.
5	Destroy securely according to confidentiality and record media; document method, vendor/certificate, date, witnesses, and schedule authority.	Records Officer	Permanent disposal documentation or Board minute citation.
6	Test backup/export and retrieval annually; preserve native audit trails, metadata, and readable copies when systems change.	IT / system owner	Retrieval test and migration plan.

Required control checks

- Records involved in investigation/litigation remain at least through counsel's written release and applicable schedule; MDAH cover instructions impose at least 12 months after settlement and appeals for involved records.
- Records dated before 1920 require special schedule direction; records 1920–1939 require written MDAH Director approval before destruction.
- Confidential destruction uses shredding, secure deletion, or certified vendor process; disposal log is permanent unless fully recorded in Board minutes, in which case retain at least five years under GSL 01-15.
- Audit responses use AUD request log; retain exactly what was provided and the source location/version.

Exception and escalation

- Unscheduled record: preserve and contact MDAH Local Government Records Office for schedule authority.
- Accidental deletion/alteration: stop normal cleanup, preserve backups/logs, notify Records Officer/IT/counsel, and document recovery and reporting.

Records

See Appendix D. The schedule citations are minimums; no disposition occurs while a longer requirement or hold applies.

17. Compliance Flags and Required Escalation

Policy anchor	DIB Financial Reports; all process-specific policies; adopt exception-reporting requirement in each amended policy
Primary authority	OSA/MDE reporting and internal-control requirements; applicable statutes/awards; Board governance authority
Process owner	Every employee; Business Manager; Superintendent; Board/counsel as required
Required evidence	COMP-01; supporting evidence; containment; decision; notification; corrective action; closure validation

HARD STOP

The discovering employee must preserve facts and report promptly. Do not investigate beyond assigned authority, confront a suspected actor, conceal, destroy, alter, or delay reporting to make a transaction appear compliant.

Flag-response matrix

Flag	Immediate response	Required escalation/evidence
Missing prior approval/PO	Stop commitment/payment; preserve request and dates.	Business Manager; after-the-fact record; legal/Board review if needed.
Negative budget/fund or liquidity risk	Suspend nonessential obligations; quantify cash/fund exposure.	Superintendent immediately; Board with written recovery options.
Vendor/bank/contact change	Hold payment; verify through previously trusted channel.	VEN-01, verification log, approver independent of vendor maintenance.
Cash/inventory variance	Secure assets/records; recount; restrict access if needed.	Principal/Business Manager/Superintendent; loss/fraud response.
Conflict/related party	Disclose and recuse; stop selection/award/payment.	Legal/ethics review and Board action where lawful/required.
Fraud/cyber diversion	Contact bank immediately; preserve email/log/device; contain access.	Superintendent; insurer; counsel; law enforcement/OSA as required.
Audit/legal/public-record hold	Suspend destruction/rotation and preserve responsive systems/devices.	Records Officer/counsel; hold acknowledgment and release.
Late required report	Quantify effect; notify recipient/oversight contact; correct.	Superintendent/Board; cause, revised deadline, prevention plan.

Required control checks

- COMP-01 assigns severity, owner, containment, decision authority, due date, reporting, financial/program effect, and independent closure evidence.
- Open material exceptions appear in monthly Board compliance reporting unless counsel identifies a lawful confidential treatment.
- Repeat exceptions require root-cause analysis and a control redesign, not repeated one-time waivers.

Exception and escalation

- If the normal supervisor may be involved, report directly to Superintendent, Board President, counsel, or OSA/law enforcement channel as appropriate.
- When legal reporting is uncertain, preserve and contain first, then obtain counsel/oversight direction without unnecessary delay.

Records

Exception and incident records follow the longest related transaction, audit, investigation, insurance, litigation, public-record, grant, and MDAH requirement.

18. Contracts, Professional Services, Construction, and Conflicts

Policy anchor	DJE Professional Services (verify); DJEG Purchase Orders and Contracts; DJED Bids; conflict-of-interest policies
Primary authority	Miss. Code §§ 31-7-13, 31-5-51, 31-3-21, 73-13-45, 25-4-103(q), and 25-4-105; 2 CFR Part 200 when federally funded
Process owner	Program owner; purchasing agent; Business Manager; Superintendent; Board; counsel/technical professional
Required evidence	Scope; estimate; procurement; evaluation; conflict disclosure; licensing/bonds/insurance; executed contract; change orders; acceptance; closeout

HARD STOP

No work begins before lawful procurement, budget, required professional/licensing review, Board action, and full execution. A vendor's form or click-through terms are a contract and require authorization.

Contract lifecycle

Step	Required action	Owner / reviewer	Evidence and timing
1	Develop measurable scope, deliverables, schedule, total potential value, funding, acceptance, data/security, insurance, ownership, records, and termination requirements.	Program owner / Business Office	Contract intake and independent estimate.
2	Select lawful procurement; disclose/evaluate conflicts; verify vendor responsibility, SAM when federal, licenses, insurance, and bonds.	Purchasing agent / counsel	Procurement and responsibility file.
3	Review legal terms including indemnity, governing law, confidentiality, student/employee data, audit access, federal clauses, renewal, and non-appropriation.	Counsel / technical reviewer	Redline/approval before signature.
4	Obtain required Board approval and authorized signatures; enter the executed contract in the central register with owner, value, term, renewals, and notice dates.	Board / Superintendent / Board Secretary	Executed contract and minute citation.
5	Monitor deliverables, invoice milestones, change orders, retainage, disputes, security, insurance, and performance; document acceptance before payment.	Contract manager	Performance file and payment approval.
6	Close out final deliverables, property/data return, warranties, claims, retainage, final payment, federal reports, and record retention.	Contract manager / Business Office	Closeout checklist and final status.

Construction threshold gates

Gate	Current minimum	Required action
Competition	>$5,000 / >$75,000	Two written bids above $5,000 through $75,000; formal advertised procedure above $75,000.

Gate	Current minimum	Required action
Payment/performance bonds and liability	Construction over $25,000	Require statutory performance/payment bonds and at least $1 million general liability as applicable under § 31-5-51; legal review.
Contractor licensing/certificate	Commercial work over $50,000	Verify appropriate MSBOC commercial license/certificate before award; specialty/residential rules may differ.
Architect/engineer	Public work over $100,000	Retain qualified architect/engineer under § 73-13-45 unless a stricter or specialized rule applies.
Federal construction	Award-specific	Apply 2 CFR 200.326 bonding and Appendix II clauses, Davis-Bacon only when required by program/statute, and state rules.

Required control checks

- Change orders include scope, cause, cost/time, funding, cumulative contract value, procurement impact, architect/engineer recommendation, contractor bond/insurance effect, and required Board approval before work.
- Potential related-party/employee vendor: full written disclosure and independent legal/ethics review; recusal alone may not make the contract lawful.
- Track renewals/termination notice dates at least 120/90/60 days in advance; no automatic renewal without budget/performance/authority review.
- Construction pay applications include schedule of values, inspection/architect certification, retainage, lien/bond documentation, and change-order reconciliation.

Exception and escalation

- Work begun without contract: issue stop-work direction if lawful, preserve facts, obtain counsel/Board review, and do not backdate.
- License/bond/insurance lapse: stop affected work/payment and obtain legal/risk direction before resumption.

Records

Contracts, procurement, construction facility files, payments, change orders, and closeout follow MDAH GSL/GSS schedules; facility construction files are retained for life of facility under GSS 01-10.

19. Ad Valorem Requests, Debt, TANs, COPs, and Financing

Policy anchor	Existing debt/tax/fund policies must be verified; adopt a consolidated Debt and Short-Term Borrowing policy if absent
Primary authority	Miss. Code §§ 37-57-1, 37-57-104–108, 27-39-333, 37-59-37, and 75-17-105; bond/financing authority and covenants
Process owner	Board; Superintendent; Business Manager; Board counsel/bond counsel/financial advisor
Required evidence	Tax request; assessed value and budget tie-out; debt register; cash-flow/borrowing analysis; notices; Board resolutions; financing documents; proceeds and covenant reports

HARD STOP

No employee or advisor may initiate, commit, sign, draw, or repurpose financing without specific lawful Board authority, independent legal/financial review, and a documented repayment source.

Tax request and financing procedure

Step	Required action	Owner / reviewer	Evidence and timing
1	Maintain a statutory calendar for budget, assessed values, tax request/millage, debt service, notices, hearings, filings, and levying authority submission.	Business Manager	Calendar and proof of each submission.
2	Reconcile tax request to adopted budget, fund balance, debt service, assessed value, collection assumptions, statutory limits, and prior collections.	Business Manager / independent reviewer	Signed tax-request tie-out.
3	Before borrowing, prepare cash-flow need, alternatives, legal authority, amount/term, interest and total cost, fees, repayment, covenants, risks, and effect on future budgets.	Business Manager / advisors	Board decision memorandum.
4	Obtain Board resolutions, public process, legal opinions, and lender/underwriter/trustee documents required for the specific instrument.	Board / counsel	Certified minutes and closing transcript.
5	Deposit and restrict proceeds; approve draws only for lawful project/purpose with procurement, invoice, inspection, and funding-source evidence.	Business Manager / project owner	Project ledger and draw file.
6	Monitor payments, covenants, continuing disclosures, arbitrage/tax requirements, reserves, project completion, and unspent proceeds.	Business Manager / advisors	Debt register and quarterly status.

Tax anticipation notes (TANs)

- Only the Board borrows; the amount may not exceed lawful anticipated current/prior revenues under § 37-59-37.
- Use only for current-year expenses or lawful maturities; document cash-flow necessity and alternatives.
- Repay within 14 months and do not exceed the current statutory interest ceiling; the OSA FY2025 checklist cites 11% under § 75-17-105.
- Update 13-week cash flow and report actual-to-plan monthly until repaid; borrowing does not replace a deficit recovery plan.

Required control checks

- Debt register shows legal authority, original amount, outstanding balance, rate, payment dates, fund/source, covenants, advisor, trustee, disclosure dates, and document location.
- Bank and ledger restricted-proceeds balances reconcile monthly to project draws and debt statements.
- No financing recommendation is accepted solely from a compensated seller; document independent advice and conflicts/fees.

Exception and escalation

- Projected covenant or payment problem: notify Superintendent, Board President, counsel/advisors immediately; suspend discretionary commitments and prepare options.
- Proceeds used for wrong purpose: stop further draws, quantify, notify counsel/Board, and correct/report under financing and grant requirements.

Records

Retain closing transcript, resolutions, tax filings, covenants, project/proceeds records, disclosures, and payment evidence for life of obligation plus required schedule/tax period; permanent records when required.

20. Surety Bonds, Depositories, and Public Funds Protection

Policy anchor	DG Depository of Funds (amend); bonded-employee policy/code must be verified and cross-referenced
Primary authority	Miss. Code §§ 37-6-15, 37-9-27, 37-9-31, 37-39-21, 25-1-12, 37-7-333, 27-105-305, and 27-105-315
Process owner	Board Secretary; Business Manager; Superintendent; Board
Required evidence	Bond roster and policies; purchasing-agent designations; depository bid/selection; collateral and security records; annual official/account report; signer/account register

HARD STOP

A required official/employee may not assume custody, purchasing, signing, or other covered authority without an effective bond. District funds may be held only in Board-selected qualified depositories and authorized accounts.

Minimum bond schedule from the current OSA checklist

Position	Statutory minimum	Authority
Board member	$50,000	§ 37-6-15
Superintendent	$100,000	§ 37-9-27
Principal	$50,000	§ 37-9-31
Purchasing agent	$50,000	§ 37-39-21
Other employee handling public funds	$25,000 minimum	§ 25-1-12; increase based on exposure/risk

Procedure

Step	Required action	Owner / reviewer	Evidence and timing
1	Before fiscal year/start date, list covered persons, position, exposure, required amount, carrier, number, term, and evidence. Resolve gaps before authority begins.	Board Secretary / Business Manager	Annual bond roster and policy copies.
2	At least every three years or current legal cycle, solicit depository proposals and evaluate qualifications, services, earnings, fees, controls, collateral, and coverage.	Business Manager / Board	Bid/evaluation and Board selection under § 37-7-333.
3	Open accounts in district legal name/TIN only; record purpose, fund, bank, account mask, authorized signers/users, Board minute, and status.	Business Manager	Central account register.
4	Review collateral/public-depositor protection and account coverage against balances; escalate uncovered or mismatched account/title/TIN.	Business Manager / reviewer	Quarterly collateral/coverage review.
5	Within 30 days after June 30, submit required officials, TIN, account list, and June 30 balances to the State Treasurer under current law.	Business Manager / Superintendent	Submission confirmation and reconciliation.

Step	Required action	Owner / reviewer	Evidence and timing
6	Report bond/depository/account changes and exceptions to Board; retain replacements and closure evidence.	Business Manager / Board Secretary	Board packet/minutes and archive.

Required control checks

- Calendar bond renewals at 90/60/30 days; verify coverage after job/title changes.
- Quarterly compare bank account register to general ledger, bank portal, confirmations, Board minutes, signer roster, and State Treasurer reporting.
- No dormant account remains open without documented purpose; close lawfully and transfer residual balance with full reconciliation.

Exception and escalation

- Lapsed/insufficient bond: remove covered authority/custody immediately and obtain replacement before resumption.
- Undercollateralized or unauthorized account: notify bank/leadership immediately, restrict exposure, and obtain legal/State Treasurer direction.

Records

Bond, account, depository, collateral, Board, and State Treasurer records remain for applicable financial/governance periods and life of related claims; permanent minute evidence under GSL 01-01.

21. PERS Retirees and Personnel-Payment Gates

Policy anchor	Proposed DIC Payroll Procedures; personnel/retiree policy cross-reference
Primary authority	Miss. Code § 25-11-127; current PERS regulations/forms; OSA audit program
Process owner	HR/administration; payroll; Business Manager; Superintendent; Board
Required evidence	Retiree status; employee/contractor analysis; Board authority; contract; Form 4B/current form; earnings/work limits; cycle monitoring; PERS correspondence

HARD STOP

Do not classify a retiree as an independent contractor merely to avoid PERS limits. No work or pay begins until status, authority, limits, reporting, and monitoring responsibility are documented.

Retiree gate procedure

Step	Required action	Owner / reviewer	Evidence and timing
1	Before offer, verify retiree status, retirement date, proposed duties, control, hours, term, compensation, and funding.	HR / hiring manager	Retiree intake and status evidence.
2	Complete employee-versus-independent-contractor analysis using actual facts; obtain PERS determination/current questionnaire when required.	HR / Business Manager	Signed classification file; no verbal conclusion.
3	For employment, calculate applicable work/earnings limits and secure Board authority/contract. For contracting, complete procurement/conflict/contract controls.	HR / Board / Business Office	Approved arrangement before start.
4	Submit current Form 4B or required PERS report within five days of employment under the current OSA checklist and keep confirmation.	Payroll / HR	Submission confirmation.
5	Each payroll cycle, compare cumulative hours/days/earnings to limits and forecast through term; include all district compensation.	Payroll / reviewer	Retiree monitoring worksheet.
6	Report separation, change, or projected excess promptly and follow PERS direction before additional work/pay.	HR / Payroll	PERS correspondence and adjustment.

Required control checks

- Maintain one districtwide retiree roster across payroll, accounts payable, substitutes, stipends, and vendors.
- Review repeated contractor invoices, individual payees, and vendor/employee identity matches for misclassification.
- Payroll and HR reconcile retiree status quarterly; report exceptions to Superintendent.

Exception and escalation

- Limit forecast breach: stop scheduling/additional duty and contact PERS before additional payment.
- Misclassification discovered: preserve facts, quantify pay/tax/PERS impact, obtain counsel/PERS direction, and correct transparently.

Records

Retain status, classification, Board/contract, forms, monitoring, pay, and PERS correspondence under payroll/personnel schedules and any longer claim/audit period.

22. Vendor Master, Electronic Payments, Cybersecurity, and Fraud Response

Policy anchor	Adopt new Vendor and Electronic Payment Controls policy under an unoccupied code; cross-reference DJAA, DJEJ, DJEC
Primary authority	2 CFR § 200.214 and Appendix II(H) when federally funded; banking agreements; OSA internal-control requirements; incident/reporting law as applicable
Process owner	Vendor master custodian; Accounts Payable; payment releaser; Business Manager; Superintendent; IT
Required evidence	W-9/TIN; conflict and SAM evidence; VEN-01; call-back log; vendor/change report; payment batch/control totals; bank confirmation; incident evidence

HARD STOP

No vendor, remittance, banking, email, or contact change is effective based only on an email, invoice, text, or caller-provided number. Payment remains on hold until independent verification succeeds.

Vendor and payment procedure

Step	Required action	Owner / reviewer	Evidence and timing
1	Obtain signed W-9 through approved channel; verify legal name/TIN, entity type, physical/remit address, contact, conflict status, and 1099 treatment.	Vendor custodian	Vendor intake file; TIN validation.
2	For federal awards, document SAM exclusion check before award; screen prohibited telecom/security products and award-specific eligibility.	Purchasing / program owner	Time-stamped federal eligibility evidence.
3	Separate vendor create/change from invoice approval and payment release; review new/change report before use.	Vendor custodian / reviewer	VEN-01 and independent approval.
4	Verify bank/remit/contact change by calling a previously trusted number or using a separately validated source; record who, when, number source, and confirmation.	Independent verifier	Call-back log; never use request email's number.
5	Prepare payment file with batch control count/amount; second user compares to claims approval and releases. Use MFA, positive pay/ACH controls, and alerts.	Preparer / releaser	Dual release and bank confirmation.
6	Review duplicates, dormant vendors, employee/board/address/bank matches, round-dollar, weekend, expedited, split, and unusual geographic patterns.	Business Manager / reviewer	Monthly analytics and resolved exceptions.

Suspected fraud or cyber diversion

1. Contact the bank/payment provider immediately using a trusted number; request recall, hold, account protection, and trace information.

2. Preserve original messages, headers, logs, call recordings/notes, devices, payment file, approvals, bank records, and access records; do not forward in a way that destroys metadata.
3. Contain compromised accounts and credentials with IT/bank; preserve evidence before wiping or rebuilding unless immediate safety requires otherwise.
4. Notify the Superintendent, Business Manager, insurer/cyber carrier, counsel, Board leadership, law enforcement, OSA, federal/pass-through agency, and affected parties as required by facts and law.
5. Maintain incident chronology, financial exposure/recovery, reporting decisions, communications, root cause, control correction, and independent closure evidence.

Required control checks

- Quarterly vendor master cleanup; deactivate duplicates/dormant vendors after review without deleting history.
- Daily bank alerts reviewed by someone independent of payment preparation; unmatched alert escalated immediately.
- Annual social-engineering/tabletop exercise covering superintendent/vendor impersonation, payroll redirect, invoice change, and fraudulent wire urgency.
- Payment tokens, check stock, signature images, and credentials remain in restricted custody with access logging.

Exception and escalation

- Failed call-back or conflicting information: keep vendor/payment on hold and escalate; urgency is not an override.
- Loss suspected: preserve and report promptly; do not net recovery against loss or delay reporting until bank outcome is known.

Records

Vendor, payment, verification, security, and fraud records follow the longest financial, bank, tax, award, insurance, investigation, litigation, public-record, and legal-hold period.

23. Audit Response and Corrective Action

Policy anchor	DIB Financial Reports; audit policy (often DHD—verify local code); 2 CFR audit policy for federal awards
Primary authority	Miss. Code § 37-9-18; OSA/MDE audit requirements; 2 CFR §§ 200.500–.521
Process owner	Business Manager (single audit liaison); Superintendent; action owners; Board
Required evidence	Audit request log; exact files produced; finding/root-cause analysis; corrective action plan; evidence; status reports; closure validation

HARD STOP
Never recreate, backdate, alter, or silently replace a requested record. If evidence is missing, say so, quantify effect, and address the cause.

Audit and finding procedure

Step	Required action	Owner / reviewer	Evidence and timing
1	Log each request, auditor/source, description, owner, due date, record location, reviewer, furnished date, and follow-up.	Audit liaison	AUD request log.
2	Collect from source system, label period/version, review completeness/confidentiality, and retain an exact copy of what was furnished.	Owner / audit liaison	Production set and transmittal.
3	For potential finding, confirm facts, criteria, condition, cause, effect, and affected population/amount; do not minimize or speculate.	Business Manager / owner	Finding analysis and supporting evidence.
4	Create AUD-01 with root cause, corrective action, owner, due date, resources, evidence standard, accounting/program correction, and validation method.	Action owner / Superintendent	Approved CAP; Board acknowledgment as required.
5	Report open findings at least quarterly; test completed control over a sufficient period and sample before closure.	Business Manager / independent validator	Status report and test evidence.
6	Close only when objective evidence shows the action is implemented, transaction impact corrected, staff trained, and control sustainable.	Superintendent / Board as appropriate	Closure approval and retained evidence.

Required control checks

- One controlled response channel avoids contradictory files and tracks due dates.
- Repeat finding receives heightened root-cause analysis, leadership accountability, and interim monitoring.
- Federal findings/ questioned costs include management decision, corrective action, and reporting under Subpart F and pass-through terms.
- Annual audit-readiness folders cover budget/Board, cash/banks, claims, payroll, procurement, travel/cards, activity, grants/CN, property, debt, contracts, and prior findings.

Exception and escalation

- Missed audit deadline or unavailable evidence: notify auditor/oversight and Superintendent promptly, document recovery plan, and report Board impact.

- Disagreement with finding: respond with evidence and criteria professionally; do not delay corrective action for undisputed control weaknesses.

Records

Audit reports are permanent under MDAH GSL 02-04. Retain working requests, responses, CAPs, and validation for the applicable audit/grant/MDAH/legal-hold period.

24. Annual Compliance Calendar and Management Certification

Policy anchor	DIB Financial Reports; all amended policies must incorporate recurring certification/deadlines
Primary authority	All authorities cited in this manual; current MDE/OSA/DFA/MDAH/federal calendars
Process owner	Business Manager and Superintendent; Board oversight
Required evidence	Master calendar; completion evidence; exception certification; policy/source check; annual management certification; Board minutes

HARD STOP
A checklist is not evidence of completion by itself. Each certified item must link to the actual reconciliation, report, filing, roster, minute, or corrective record.

Minimum calendar

Frequency/date	Required control
Each payroll/payment cycle	Master-file change review; payroll/payment control totals; dual release; post-release bank/ledger reconciliation.
Monthly	Bank/subledger reconciliations; financial statements; claims; cards; activity funds; grants/CN; cash flow; contracts; debt; exceptions.
Quarterly	Grant-to-ledger/performance; vendor analytics; access review; collateral; debt/restricted funds; inventory changes; corrective action; fraud-risk indicators.
Before July 1	Bond and purchasing-agent designations; account/signer/card rosters; delegations; access; forms; training; annual rate/threshold/policy-source verification.
By Aug. 15 or current deadline	Budget/tax-request filings and proof, after confirming the current statutory/MDE calendar.
Within 30 days after June 30	State Treasurer official/TIN/account/June 30 balance report.
By Oct. 15 or current deadline	Final amended budget and year-end financial information under the current OSA/MDE calendar.
Annually	Physical inventory; records disposition/holds; risk assessment; policy/manual crosswalk; audit findings; management certification.

Annual certification

The Superintendent and Business Manager certify to the Board that required reconciliations and reports were completed; purchasing agents, signers, cardholders, bank users, and bonded positions were verified; contracts and debt are registered; required filings were made; restricted funds and property were reconciled; records were retained or destroyed lawfully; known exceptions were disclosed; and unresolved items have written owners, due dates, and corrective plans.

Superintendent	______________________________ Date: _________
Business Manager	______________________________ Date: _________
Board acknowledgment	Minute reference: ______________________________

Required control checks

- Business Manager reviews authoritative source pages at least annually and documents thresholds/rates/deadlines in the revision log.
- Board Secretary reconciles the policy index, exact titles, adoption dates, and rescissions to this manual before each proposed adoption.

- Material procedure changes that alter authority, limits, duties, or Board-reserved action return to the Board; clerical form updates may be controlled administratively when policy permits.

Exception and escalation

- Certification exception: list the exact control not completed, risk, interim control, owner, due date, and reporting status. Never sign a blanket certification known to be false.

Records

Annual certifications, policy crosswalks, source checks, and Board minutes are retained as governance/financial records under applicable permanent or superseded-policy schedules.

Appendix A. Local Policy and Legal Authority Crosswalk

LOCAL CODE VERIFICATION REQUIRED

The following numbers are the recommended normalized schedule based on the August 2026 manual, ETSD internal policy materials, the public ETSD RFP page, and common Mississippi policy structure. The Board Secretary must verify the live Simbli title, adoption date, and rescission history before the Board acts.

Area	Manual policy anchor	Legal/administrative authority	Board action status
Financial reporting/close	DIB	§§ 37-9-18, 37-61-21; MDE/OSA	Replace/expand
Cash receipts	DIAB	§ 37-7-301(s); OSA/MDE	Replace/expand
Authorized signatures	DJAA	Board signer minutes; banking controls	Normalize DJAA title; repeal conflicting federal label
Purchasing authority	DJEA	§§ 31-7-1, 37-39-21	Amend designation, delegation, and bond rules
State bids/quotes	DJED	§ 31-7-13; OSA July 1, 2026 summary	Replace
Federal purchasing	DJEC	2 CFR 200.317–.327; FAR 2.101	Replace obsolete thresholds
PO/contracts/payment	DJEG / DJEJ	§ 31-7-13; claims/internal control	Amend
Travel	DJD	§§ 25-3-41, 25-1-79; DFA/OSA	Replace rate/deadline procedure
Petty cash/cards	DJB	§§ 31-7-12, 31-7-305; OSA	Expand or add separate card policy
Activity funds	DK	§ 37-7-301(s); OSA/MDE	Retain title; resolve DK/DKD conflict
Payroll	Proposed DIC	Contracts, tax, PERS, MDE	Adopt if DIC vacant; remove conflicting DK payroll label
Federal grants	DFC / DFCAA	2 CFR Part 200; award terms	Expand/cross-reference DJEC
Fixed assets/donations	DPA / DPB	OSA Asset Manual; 2 CFR 200.313	Replace/expand
Depository/bonds	DG + bonded employee code	§§ 37-7-333, 27-105, 25-1-12, 37-39-21	Verify codes; expand
Records/legal hold	New unoccupied code	§ 39-5-9; MDAH schedules	Adopt
Vendor/e-payment/fraud	New unoccupied code	Banking/OSA/2 CFR controls	Adopt
Debt/TAN/COP	Verify existing code or new Section D code	§§ 37-57, 37-59-37, 75-17-105	Consolidate/adopt

Appendix B. Controlled Forms and Registers

ID	Controlled record	Minimum fields / evidence
FIN-01	Budget Request	Need, recurring/nonrecurring, amount, start, staffing, funding, sustainability, owner/approval.
FIN-02	Budget Amendment	From/to accounts, amount, reason, restriction, procurement status, approvals.
FIN-03	Monthly Close Certification	All reconciliations, reports, exceptions, preparer/reviewer, Board date.
CASH-01	Receipt/Deposit Transmittal	Receipt range, payment type, count, over/short, deposit, bank validation, coding, review.
BANK-01	Bank Reconciliation Review	Statement/ledger, reconciling items, aging, subsequent clearance, preparer/reviewer.
AP-01	Claims Packet Checklist	PO/procurement, contract, invoice, receiving, coding, tax, grant, docket, payment.
PUR-01	Requisition	Need, specifications, total term value, funding, quotes/bid, receiver, approvals.
PUR-02	Quote/Bid Tabulation	Sources, independent bids, responsive/responsible, lowest/best, rationale, conflicts.
PUR-03	Sole Source	Unique basis, vendor certification, alternatives, price analysis, notice, Board authority.
PUR-04	Emergency Purchase	Condition, harm from delay, scope limited to need, competition, certification, next Board record.
TRV-01	Travel Authorization	Purpose, agenda, dates, estimate, funding, vehicle availability, comparisons, approval.
TRV-02/03	Travel Advance/Voucher	Advance need/Board action; actual trip, rates, receipts, leave check, settlement.
CARD-01	Cardholder Agreement/Review	Limits, training, prohibited use, statement reconciliation, approver, exceptions.
ACT-01	Fundraiser/Event Control	Approval, price, tickets/inventory, counts, receipts, deposits, costs, closeout.
GRANT-01	Award/Allowability Checklist	Award, period, budget, cost criteria, prior approval, procurement, reporting/property.
FA-01–04	Asset Add/Transfer/Missing/Disposition	All OSA data, assignment, search/affidavit, law enforcement, Board/federal disposition.
PAY-01	Employment/Pay Change	Board/contract, position, FTE, rate, calendar, supplement, funding, bank verification.
VEN-01	Vendor Add/Change Verification	W-9/TIN, conflict/SAM, trusted-source callback, bank/remit, creator/reviewer.
COMP-01	Exception/Incident	Facts, severity, containment, reporting, decision, owner, due date, impact, closure evidence.
AUD-01	Corrective Action Plan	Criteria/condition/cause/effect, action, owner, date, evidence standard, validation.

Appendix C. Month-End and Year-End Checklists

Month-end — evidence required

- All cash receipts/deposits posted and reconciled; receipt sequence, returned items, online fees, refunds, and variances resolved.
- Every bank account reconciled within 30 days of statement receipt and independently reviewed; stale/unknown items tracked.
- AP, claims docket, PO/encumbrances, contracts, credit balances, duplicate checks, and cutoff reviewed.
- Payroll, taxes, benefits, garnishments, PERS, clearing, funding, and bank reconciled; master-file changes reviewed.
- Activity, Child Nutrition, federal/restricted funds, debt, property additions/transfers/disposals, and interfund balances reconciled.
- Financial statements, cash flow, budget exceptions, cards, vendor analytics, compliance flags, and corrective actions reported.

Year-end — evidence required

- Close or carry forward POs lawfully; document cutoff, subsequent payments, receivables/payables, accruals, and commitments.
- Complete revenue, expenditure, payroll, grant, inventory, debt, capital asset, and interfund reconciliations; resolve unsupported balances.
- Adopt and preserve final amended budget and submit year-end financial information by current October 15 requirements.
- Complete physical inventory; report additions/deletions/unaccounted items to Board; resolve federal property and disposition.
- Submit State Treasurer account/June 30 balance report within 30 days; verify bonds, depositories, accounts, signers, and users for next year.
- Confirm MDAH retention/disposal, legal holds, audit readiness, open findings, policy crosswalk, source updates, and management certification.

Appendix D. Records Retention Quick Reference

MINIMUMS ONLY

Apply the longest MDAH, federal, tax, PERS, contract, bond, claim, investigation, litigation, public-record, award, and legal-hold requirement. Confirm the current MDAH schedule before destruction.

Record series	Minimum from current MDAH schedule	Schedule
Board minutes	Bound/official copy permanent; originals after verified copying follow schedule.	GSL 01-01
Board agendas/support	Four years.	GSL 01-02
Policies/procedure manuals	Permanent; if recorded in minutes, superseded version at least seven years after superseded.	GSL 01-07
Audit reports	Permanent.	GSL 02-04
Financial records	Five years following submission of final financial statements, subject to schedule/audit-release conditions.	GSS 04-02
Year-end general ledger	Permanent.	GSL 02-28
Bids/solicitation files	Five years or three years after audit release, whichever is later.	GSL 04-01
Fixed asset inventory	Five years after disposal.	GSL 02-26
Equipment change orders	Five years or three years after audit release, whichever is later.	GSL 02-25
Facility construction file	Life of facility.	GSS 01-10
Child Nutrition program records	Five years, provided audit has been released one year.	GSS 06-01
Litigation files	Ten years after final disposition, including settlement; review landmark matters for permanent retention.	GSL 01-13
Disposition documentation	Permanent; if complete listing in minutes, retain five years.	GSL 01-15
Federal award records	Generally three years from submission of final financial report; exceptions apply.	2 CFR 200.334

Appendix E. Authoritative Sources and Revision Log

ETSD website: https://www.etsd.k12.ms.us/

ETSD RFP page — references DJED, DJEC, § 31-7-13, and 2 CFR Part 200: https://www.etsd.k12.ms.us/rfp

OSA Resources: https://www.osa.ms.gov/resources

OSA Purchase Law Summary — July 1, 2026: https://www.osa.ms.gov/sites/default/files/Resources/Purchasing/Purchase_Law_Update.pdf

OSA School District State Legal Compliance Audit Program FY2025: https://www.osa.ms.gov/sites/default/files/Resources/Schools/statelegalcomplianceauditprogramfy2025.pdf

OSA Public School Asset Management Manual: https://www.osa.ms.gov/sites/default/files/Resources/Fixed%20Assets-Property/PublicSchMan.pdf

MDE Accounting Manual page: https://mdek12.org/financialservices/accountingmanual/

MDAH School District Retention Schedule: https://www.mdah.ms.gov/sites/default/files/2022-07/SchoolDistricts_2022-07-19_w-cover.pdf

Mississippi DFA Travel: https://www.dfa.ms.gov/travel

Mississippi DFA Meal Reimbursement: https://www.dfa.ms.gov/meal-reimbursement

GSA POV mileage rates: https://www.gsa.gov/travel/plan-a-trip/transportation-airfare-rates-pov-rates/pov-mileage-reimbursement

Acquisition.gov threshold changes effective October 1, 2025: https://www.acquisition.gov/threshold-changes

2 CFR Part 200: https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200

2 CFR 200.320 procurement methods: https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR45ddd4419ad436d/section-200.320

Revision log

Version/date	Status	Material change
2.0 / Aug. 2026	Board-approved baseline as represented in source PDF	Consolidated 24 business procedure topics; used federal $10,000/$250,000 thresholds.
3.0 / Aug. 27, 2026	Board-ready proposed revision	Added current $15,000/$350,000 federal thresholds, detailed owners/evidence/deadlines, code-conflict controls, construction/card/records/vendor procedures, and adoption safeguards.
Board adoption	Pending	Board Secretary to enter date, minute reference, exact local code/title confirmations, and effective date.

Board Adoption Certificate

The East Tallahatchie School District Board of Trustees adopts this Business Department Procedures Manual, version 3.0, subject to controlling law and the Board Policy Manual. The Board Secretary shall attach the approving minute reference and completed policy-code verification sheet.

Board approval date	______________________________________
Minute reference	______________________________________
Effective date	______________________________________
Board President	____________________________ Date: _______
Board Secretary	____________________________ Date: _______
Superintendent	____________________________ Date: _______

ATTACHMENT REQUIRED

Attach the Board Policy Change and Crosswalk Report's completed live-policy verification table and each adopted/repealed policy to the official minute packet.