TROY SCHOOL DISTRICT #287

7000 – FINANCIAL M ANAGE MENT

POLICY - *7*000 SERIES
FINANCIAL M AN A G EM E N T

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Goals **7000**

Since educational programs are dependent on adequate funding and the proper management of those funds, District goals can best be attained through efficient fiscal management. As trustee of local, state and federal funds allocated for use in public education, the Board shall fulfill its responsibility to see that funds are used to achieve the purposes intended.

Because of resource limitations, fiscal concerns often overshadow the educational program. Recognizing this, the District must take specific action to ensure that education remains primary. This concept shall be incorporated into Board operations and into all aspects of District management and operation.

In the District's fiscal management, the Board seeks to achieve the following goals:

1. Engage in advance planning, with staff and community involvement, to develop budgets that will achieve the greatest educational returns in relation to dollars expended.
2. Establish levels of funding which shall provide superior education for the District's students.
3. Provide timely and appropriate information to staff who have fiscal responsibilities.
4. Establish efficient procedures in all areas of fiscal management.

Legal Reference:
I.C. 33-506
I.C. 33-701 et seq. Fiscal Affairs of School Districts

Policy History:
Adopted on: 1/8/07
Revised on: 2/9/09

Budget and Program Planning **7100**

The annual budget is evidence of the Board's commitment to the objectives of the instruction programs. The budget supports the immediate and long-range goals and established priorities within all areas, instructional, non-instructional and administrative programs.

Prior to presentation of the proposed budget for adoption, the Superintendent shall prepare, for the Board's consideration, recommendations (with supporting documentation) which shall be designed to meet the needs of students within the limits of anticipated revenues.

Program planning and budget development shall provide for staff participation and the sharing of information with patrons prior to action by the Board.

Following preliminary planning and no later than twenty-eight (28) days prior to the Board's annual meeting, the proposed budget shall be available and a public hearing on the budget shall be held. At the public hearing, or at a special meeting held no later than fourteen (14) days after the public hearing, the Board shall adopt a budget for the ensuing year.

Not later than April 30 of each year, the budget hearing shall be scheduled. The Clerk of the Board shall notify the County Clerk of the date and location set for the budget hearing. In the event no budget hearing will be held, the County Clerk will be so notified. Proper notice of the budget hearing shall be posted as required by law, and a copy of the proposed budget shall be available for public inspection at all reasonable times at the administrative offices of the District.

A summary statement of the budget shall also be prepared and published for the ensuing year. The statement shall be in a manner consistent with standard accounting principles and in such form as required by the State Superintendent of Public Instruction. The summary statement shall show the following:

1. Amounts budgeted for all major classifications of income and expenditures, with total amounts budgeted with salary and wage expenditures in each such classification shown separately;

2. Amounts previously budgeted for the two (2) previous years for the same classification of proposed comparison.

The budgeted dollar amounts of revenue—as approved within the adopted budget—in those categories included in Idaho Code Section 33-802, which deals with school levies, will be the same as presented to the respective county commissioners for tax levying purposes.

Once the budget is approved by the Board, it will serve as a spending plan for the fiscal year. However, the Board will have the authority to amend the budget as provided by law when circumstances warrant.

Legal Reference:
I.C. 33-402(f)
I.C. 33-512(2)
I.C. 33-701
I.C. 33-801
I.C. 33-802
I.C. 33-802A

Policy History:
Adopted on: 1/8/07
Revised on: 2/9/09

Budget Implementation and Execution **7110**

Once adopted by the Board, the operating budget shall be administered by the Superintendent and his/her designees. All actions of the Superintendent/designees in executing the programs and/or activities delineated in that budget are authorized according to these provisions:

1. Expenditure of funds for the employment and assignment of staff shall meet the legal requirements of the State of Idaho and adopted Board policies.
2. Funds held for contingencies may not be expended without approval from the Board.
3. A listing of warrants describing goods and/or services for which payment has been made must be presented for Board approval each month.
4. Purchases shall be made according to the legal requirements of the State of Idaho and adopted Board policy.
5. Necessary and immediate expenditures of properly budgeted funds may be made prior to a Board meeting if recommended by the Superintendent and approved by the Board Chair or designee, and reported to the Board at the next meeting.

A monthly budget report must be prepared by the Superintendent showing the maintenance and operation budget, and documenting the cumulative expenditures and available balances in each major section of the District's accounts.

A monthly treasurer's report shall be prepared showing receipts, expenditures, and cash balances in each budget account of this District.

The monthly budget report and the monthly Treasurer's report shall be submitted to the Board at the regular meeting.

Legal Reference:

I.C. 33-509
I.C. 33-701 et seq. Fiscal Affairs of School District

Policy History:
Adopted on: 1/8/07
Revised on: 2/9/09

Budget Adjustments **7120**

This Board will review the District's budget periodically and make appropriate budget adjustments to reflect the availability of funds and the requirements of the District.

Any person(s) proposing a budget amendment must provide written notice of the same to each board member at least seven (7) days in advance of the meeting at which such budget amendment will be proposed.

Prior to the final vote on a budget amendment proposal, notice shall be posted and published once in the manner prescribed by Idaho law. The meeting to adopt a budget amendment shall be open and shall provide opportunity for any taxpayer to appear and be heard. Budget procedures shall be consistent with statutory requirements.

With timely notice of a public meeting, trustees, by sixty percent (60%) of the members of the Board of Trustees, may declare by resolution that a budget amendment is necessary to reflect the availability of funds and the requirements of the District. Budget amendments are specifically authorized by I.C. § 33-701.

Revenue derived from maintenance and operation levies made pursuant to I.C. 33-802(2) are excluded from budget adjustments.

Budget amendments shall be submitted to the State Superintendent of Public Instruction.

Legal Reference:

I.C. 33-402
I.C. 33-701 Fiscal year – Payment and accounting of funds
I.C. 33-802

Policy History:
Adopted on: 1/8/07
Revised on: 2/9/09

Accounting System Design **7200**

The District accounting system shall be established to present with full disclosure the financial position and results of the financial operations of the District funds and account groups in conformity with generally accepted accounting principles. The accounting system must be in compliance with the accounting system requirements established by legislative action. The accounting system shall be able to demonstrate compliance with finance-related legal and contractual provisions.

Policy History:
Adopted on: 2/9/09
Revised on:

GASB Statement 34 (Accounting System) 7210

Purpose

The Board recognizes the need to implement the required accounting and financial reporting standards set out in Governmental Accounting Standards Board Statement 34 ("GASB 34"). The primary objectives of implementing the GASB 34 are to assure compliance with state requirements, and to properly account for both the financial and economic resources and to provide new and additional information to users of District financial statements.

Authority

Participation of and reporting shall be in accordance with Board policy, State of Idaho Fiscal Policies manuals as prepared by the office of the State of Idaho Controller's Office and GASB 34.

Delegation of Responsibility

The responsibility to coordinate the compilation and preparations of all information necessary to implement this policy is delegated to the Superintendent in cooperation with the District Accountant. School District personnel at all levels are responsible to the Board of Trustees for the safeguarding, stewardship, efficiency and effectiveness of use, and the accountability for fixed assets under their jurisdiction and /or control.

The purchase or acquisition and use of all fixed assets shall be in accordance with all applicable federal, state, local and school District statutes, regulations, and policies. All District personnel shall share the responsibility for assuring that the District fixed assets are used efficiently and effectively in accordance with District policy to achieve the goals and objectives of the District.

The designated individual shall be responsible for implementing the necessary procedures to establish and maintain a fixed asset inventory, including depreciation schedules. Depreciation shall be computed on a straight-line basis over the useful lives of the assets, using an averaging convention. Normal maintenance and repairs shall be charged to expense as incurred; major renewals and betterments that materially extend the life or increase the value of the asset shall be capitalized. A schedule of accumulated depreciation shall be consistent from year to year. The basis for depreciation, including groups of assets and useful lives, shall be in writing and submitted for review to the Board of Trustees.

The Superintendent in Cooperation with the District's Accountant shall prepare the required Management Discussion and Analysis (MD&A). The MD&A shall be in the form required by GASB Statement 34 and shall be submitted to the board for approval, prior to publication.

Prior to submission of the MD&A for Board approval, the independent auditors shall review the MD&A, in accordance with SAS No. 52, "Required Supplementary Information."

Guidelines

Accounting records for fixed assets and fixed asset transactions shall be maintained in such a manner as to provide information to promote sound fiscal management, to assess management accountability and to assist interested parties with decision-making about the District's management of fixed assets.

Periodically, at a suitable time, the District management shall conduct a physical inventory of the fixed assets that shall be compared to the accounting records.

In order to associate debt with acquired assets, and to avoid net asset deficits, any asset that has been

GASB Statement 34 (Accounting System) (continued) 7210

acquired with debt proceeds shall be capitalized, regardless of the cost of the asset. The asset life of these assets shall be considered relative to the time of the respective debt amortizations.

For all other assets not acquired by debt proceeds, the dollar value of any single item for inclusion in the fixed assets accounts shall be not less than $5,000.

The capitalization threshold shall be set at a level that will capture at least 80% of all fixed assets valued at $5,000 or more.

The assets listed below do not normally individually meet capitalization threshold criteria:

1. Library books
2. Classroom texts and workbooks
3. Computer equipment
4. Classroom furniture

These asset category costs shall be capitalized and depreciated as groups when that group's acquisition cost exceeds the capitalization threshold in any given fiscal year.

For group asset depreciation purposes, the estimated useful life of the group may be based on the weighted average or simple average of the useful life of individual items, or on an assessment of the life of the group as a whole. Periodically, the intermediate unit shall review the estimated life of groups of assets and adjust the remaining depreciation life of the group.

Assets that fall below the capitalization threshold for GASB 34 reporting purposes may still be significant for insurance, warranty service, and obsolescence/replacement policy tracking purposes. The intermediate unit may record and maintain these non-GASB 34 asset inventories in subsidiary ledges.

Capitalization Policy for Fixed Assets

As used herein, the term "fixed assets" refers to the land, buildings, improvements, machinery, equipment, furnishings, facilities, property, and other resources purchased or otherwise acquired by the District to be utilized in accomplishing the District's goals for a period of time that extends beyond one budget period.

A fixed asset is a property that meets all of the following requirements.

1. Must be tangible in nature.
2. Must have a useful life of longer than the current fiscal year.
3. Must be of significant value.

Fixed assets may be acquired through donation, purchase or may be self-constructed. The asset value for donations will be the fair market value at the time of the donation. The asset value, when purchased, will be the initial cost plus the trade-in value of any old asset given up, plus all costs related to placing the asset into operation. The cost of self-constructed assets will include both the materials used and the cost of labor involved in the construction of the asset.

GASB Statement 34 (Accounting System) (continued) 7210

The following significant values will be used for different classes of assets:

Class of Fixed Asset	Significant Value
Equipment and machinery	$2000.00 or more
Buildings - Improvements	$5000.00 or more
Improvements other than buildings	$5000.00 or more
Land	Any amount

Disposal of Fixed Assets

The disposal of fixed assets shall be in accordance with all applicable federal, state, local and District statute, regulation and policy.

Policy History:
Adopted on: 2/9/09
Revised on:

Federal Grant Financial Management System **7218**

The District maintains a proper financial management system in order to receive both direct and state-administered grants and to expend funds associated with a grant award. Certain fiscal controls and procedures must be in place to ensure that all financial management system requirements are met.

Idaho Financial Reporting Management System (IFARMS)

IFARMS provides the basis for complete financial and cost accounting, for the development of program budgets, and for the preparation of periodic financial reports. The uniformity of the system enables the District to fulfill state requirements and provides the flexibility to obtain program and account detail to meet management needs.

Financial Management Standards

The standards for financial management systems are found at 2 C.F.R. § 200.302. The required standards include:

1. **Identification:** The District shall identify, in its accounts, all federal awards received and expended and the federal programs under which they were received. Federal program and award identification shall include the information described below under "Overview of the Financial Management/Accounting System."

2. **Financial Reporting:** Accurate, current, and complete disclosure of the financial results of each federal award or program will be made in accordance with the financial reporting requirements set forth in the Education Department General Administrative Regulations (EDGAR).

3. **Accounting Records:** The District shall maintain records that adequately identify the source and application of funds provided for federally-assisted activities. These records will contain information pertaining to grant or subgrant awards, authorizations, obligations, unobligated balances, assets, expenditures, income and interest, and be supported by source documentation.

4. **Internal Controls:** Effective control and accountability shall be maintained for all funds, real and personal property, and other assets. The District shall adequately safeguard all such property and shall assure that it is used solely for authorized purposes.

Federal Grant Financial Management System (continued) 7218

"Internal controls" are tools to help program and financial managers achieve results and safeguard the integrity of their program. Internal controls should be designed to provide reasonable assurance that the following objectives are achieved:

A. Effectiveness and efficiency of operations;
B. Adequate safeguarding of property;
C. Assurance property and money is spent in accordance with grant program and to further the selected objectives; and
D. Compliance with applicable laws and regulations.

5. **Budget Control:** Actual expenditures or outlays shall be compared with budgeted amounts for each federal award.

6. **Cash Management:** The District shall maintain written procedures to implement the cash management requirements found in EDGAR. See Policy 7450.

7. **Allowable Costs:** The District shall maintain written procedures for determining allowability of costs in accordance with EDGAR. See Policy 7320 and Procedure 7320P.

Overview of the Financial Management/Accounting System

The District accounting system is established to present, with full disclosure, the financial position and results of the financial operations of the District in conformity with generally accepted accounting principles. The accounting system currently used is Infinite Visions. The system is in compliance with IFARMS, as required by Idaho statute. IFARMS shall be used as the basis for developing program budgets and the preparation of periodic financial reports. The District Business Manager shall be responsible for managing budgets and accounts payable. As required by 34 CFR 200.302, the District shall maintain on file award letters that include Catalog of Federal Domestic Assistance (CFDA) titles and numbers, federal award identification numbers and years, names of the federal awarding agencies, and the name of the State Department of Education (the pass-through entity), for each federal award. The funds are given unique identification numbers in the IFARMS system.

The Business Manager shall be responsible for preparing financial reports, as required for local, state, and federal agencies, for review and approval by the Board of Trustees. The financial reports shall reflect the financial activity and status of the District. These reports shall include monthly and cumulative expenditures, program budgets, and balances remaining.

Budgeting

The Planning Phase: Meetings and Discussions: Before Receiving the Grant Award Notice (GAN): The Superintendent, assisted by the Business Manager, shall be responsible for initial federal grant budget development. Initial budget development shall be based upon estimates of federal program award amounts as provided by the State Department of Education, as well as input from program and administrative staff with respect to individual program staff needs,

Federal Grant Financial Management System (continued) 7218

number and assignments of paraprofessionals relative to program allocations, and need for instructional supplies and equipment. The primary considerations of initial budget development shall be the educational needs of students and the availability of existing District resources for meeting these needs.

Budgets shall be prepared and presented in a format that clearly identifies revenue sources and amounts and budgeted expenditures, in accordance with IFARMS accounting codes, and shall be open for public inspection.

The Superintendent shall present the proposed budget to the Board for final approval of the budget and the policies reflected therein, such as proposed changes or additions to instructional programs and proposed salary schedules. Consideration of the proposed budget shall take place in an open meeting with opportunity for public comment. The approved budget shall be included in the minutes of the Board as documentation of its acceptance and approval.

After Receiving the GAN: If the Superintendent determines that final program allocations necessitate revisions to program budgets, he or she, assisted by the Business Manager with input from federal programs staff, shall discuss, review, and propose budget revisions. If proposed revisions require amendment proposals, the Superintendent will follow protocols of the amendment process.

Amending the Budget: The Superintendent shall review and approve any necessary budget amendments and shall submit those amendments to the Board at least seven days in advance of the meeting at which the amendment will be considered. The Board shall have final approval of the amended budget and consideration of the proposed budget shall take place in an open meeting with opportunity for public comment. The approved amended budget shall be included in the minutes of the Board of Trustees as documentation of its acceptance and approval.

Budget Control: The Business Manager shall prepare monthly financial reports that monitor budget performance by comparing actual to budgeted revenues and expenditures. Monthly financial reports indicate budgeted amounts, monthly expenditures, year-to-date-expenditures and percentage of budget spent. The Superintendent shall review these reports for the preceding month prior to presentation to the Board.

Accounting Records

The Business Manager shall be responsible for the maintenance of accounting records. Electronic accounting records are maintained in the Infinite Visions, and paper records are maintained on file in the District office. All accounting records shall be reviewed by the District Superintendent and, where appropriate and required, the Board. The District chart of accounts and financial reports shall be established and maintained in accordance with Generally Accepted Accounting Principles (GAAP) and IFARMS, as required by Idaho Code. Accounting records shall be available for public inspection at any time.

Federal Grant Financial Management System (continued) 7218

Spending Grant Funds

In determining what items will be included in individual program budgets, the Business Manager and the Superintendent will follow the federal cost principles and individual program statutes and regulations, as the basis for determining whether individual expenditures are allowable.

While developing and reviewing the grant budget, the District will keep in mind the difference between direct costs and indirect costs.

Direct and Indirect Costs:

1. **Determining Whether a Cost is Direct or Indirect:** Direct costs are those costs that can be identified specifically with a particular final cost objective, such as a federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy.

   Indirect costs are those that have been incurred for a common or joint purpose benefiting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved.

   Costs incurred for the same purpose in like circumstances shall be treated consistently as either direct or indirect costs.

   Identification with the federal award rather than the nature of the goods and services involved is the determining factor in distinguishing direct from indirect costs of Federal awards. Typical costs charged directly to a Federal award are the compensation of employees who work on that award, their related fringe benefit costs, the costs of materials, and other items of expense incurred for the Federal award.

   The salaries of administrative and clerical staff shall normally be treated as indirect costs. Direct charging of these costs may be appropriate only if all of the following conditions are met:

   A. Administrative or clerical services are integral to a project or activity;
   B. Individuals involved can be specifically identified with the project or activity;
   C. Such costs are explicitly included in the budget or have the prior written approval of the federal awarding agency; and
   D. The costs are not also recovered as indirect costs.

2. **Indirect Cost Rate:** It is at the discretion of the Troy School District to use the indirect cost rate. It is the normal policy of the District not to take indirect costs on federal awards. If the District elects to take indirect costs, it shall follow the procedures for calculating the indirect cost rate prescribed by the State Department of Education and apply the policies and procedures outlined in the federal regulations as described below.

Federal Grant Financial Management System (continued) **7218**

3. **Applying the Indirect Cost Rate:** Once the District has an approved indirect cost rate, the percentage is multiplied against the actual direct costs (excluding distorting items such as equipment, contracts in excess of $25,000, pass-through funds, etc.) incurred under a particular grant to produce the dollar amount of indirect costs allowable to that award.

   Once the District applies the approved rate, the funds that may be claimed for indirect costs have no federal accountability and may be used as if they were non-federal funds. For direct grants, reimbursement of indirect costs is subject to the availability of funds and statutory or administrative restrictions.

   Where a federal program has a specific cap on the percentage of administrative costs that may be charged to a grant, that cap must include all direct administrative charges as well as any recovered indirect charges.

Cross Reference: 7230 Financial Reporting and Audits

Legal Reference:

2 C.F.R § 200.300 ET. Seq.	Post Federal Award Requirements
2 C.F.R. § 200.56	Indirect (Facilities & Administrative (F&A)) Costs
2 C.F.R. § 200.413	Direct Costs
34 C.F.R. § 75.564	Reimbursement of Indirect Costs
34 C.F.R. § 76.569	Using the Restricted Indirect Cost Rate

Policy History:
Adopted on: 12/10/18
Revised on: 3/11/19

Documentation and Approval of Claims **7220**

All financial obligations and disbursements must be documented in compliance with the statutory provisions and audit guidelines. The documentation will specifically describe acquired goods and/or services, the budget appropriations applicable to payment, and the required approvals. All purchases, encumbrances and obligations, and disbursements must be approved by the administrator designated with the authority, responsibility and control over the budget appropriations. The responsibility for approving these documents should not be delegated.

The District business office will be responsible for the development of the procedures and forms to be used in the requisition, purchase and payment of claims.

The bills will be reviewed by appropriate administrative personnel and a recommendation will be made to the Board regarding payment.

A final payment determination will be made by the Board. Checks or warrants for the approved bills will be drawn by the Superintendent or designee.

All bills will be accepted, certified for payment, and paid within sixty (60) calendar days of receipt of bill, unless a contract specifies another payment arrangement.

Signatures

All checks issued on a School District account must be signed by two (2) authorized individuals designated by the Board.

Disbursements

No disbursement will be approved unless sufficient funds are available in the appropriate account. Payments must be made to a specific person, company, or organization. No checks will be made payable to "cash."

District checks will not be pre-signed. All disbursements must be documented by original invoices, sales slips, or register tapes with explanations provided.

District checks may be issued to students or employees to reimburse them for personal funds disbursed for school purposes provided that prior approval of the expenditure was received from the superintendent or designee, and proper supporting documentation is submitted.

Advance Payments

Advance payments for goods and services may be authorized at the discretion of the Superintendent. A written request for an advance stating the amount needed and the purpose of the advance must be submitted. When the activity is complete, the sponsor must submit a report of all expenditures with the appropriate receipts and sales slips. Any unused funds will be returned immediately.

Cancellation of Checks

Any check issued by the District will be voided when:

Documentation and Approval of Claims (continued) **7220**

1. It has been outstanding for more than six (6) months; or

2. It has been reported as lost or stolen; or

3. It has been returned by the payee for some reason.

If the voided check is replaced with a new check, a "stop payment" order will be filed with the bank from which the check is drawn.

Activity Accounts

Each building secretary is appointed Assistant Treasurer to the District Treasurer. Each building Principal is designated as a secondary signer of activity checks for an amount not to exceed five thousand dollars ($5,000). Expenditures in excess of five thousand dollars ($5,000) must have prior Board approval.

The Board will be provided monthly reports regarding the status of all activity funds.

Electronic Signatures

The issuance of an electronic signature by this District to a public agency and the acceptance of an electronic signature from a public agency are permitted. An electronic signature will have the full force and effect of a manual signature only if the electronic signature satisfies the following requirements:

1. It is unique to the person using it;

2. It is capable of verification; and

3. It conforms to all other provisions of this policy.

Electronic Communications

Any electronic communication filed with or issued by the District will be given the full force and effect of a paper communication if the following conditions are met:

1. If the communication is an electronic filing or recording, this District agrees to accept or send such communication electronically.

2. If a signature is required on the communication by any statute, rule, or regulation, or other applicable law, the electronic signature on the communication conforms to the requirements of the "Idaho Electronic Signature and Filing Act," reiterated in this policy.

3. The electronic communication conforms to all other provisions of this policy.

Rules for Accepting, Using, and Issuing Electronic Signatures and Communications

In accord with Idaho Code 67-2356, this District adopts the following rules for accepting, using, and issuing electronic signatures and communications:

Documentation and Approval of Claims (continued) **7220**

1. The Superintendent or designee is authorized to issue an electronic signature in his or her name.

2. The Superintendent or designee is authorized to issue electronic communications.

3. This District will receive, and accept as original, electronic communications and signatures so long as the communication, on its face, appears to be authentic.

4. The Superintendent or designee may, at his or her discretion, request that an original of the electronic communication and/or electronic signature be forwarded to the District in a timely manner.

5. When necessary or practical, paper copies will be made of electronic communications and stored in a manner and time frame consistent with the nature and purpose of the communications, and with all other District policies, regulations, statutes, and rules that may apply.

6. The District will issue and accept electronic communications only when the benefit outweighs or is equal to the benefit of issuing paper communications.

7. The District will accept and issue electronic communications only if such communications conform to any formatting requirements associated with them.

8. The Superintendent or designee is authorized to establish additional rules associated with accepting, using and issuing electronic communications.

Cross-Reference: 1260 Authorization of Signatures

Legal Reference:
I.C. 33-506(1)
I.C. 33-509 A
I.C. 33-705
I. C. 67-2302
I.C. 67-2351, et seq.

Policy History:
Adopted on: 1/8/07
Revised on: 2/9/09

District Financial Fraud and Theft Prevention 7225

Disclaimer

District Financial Fraud or Theft is a criminal matter and covered by state laws. This policy is merely a guideline so that all District employees understand the possible repercussions of such actions. If you have questions regarding fraud and/or theft, please contact your District legal counsel and/or your local law enforcement agency.

All District employees, Board members, consultants, vendors, contractors and other parties maintaining a business relationship with the District shall act with integrity and due diligence in matters involving District fiscal resources.

The Superintendent shall be responsible for developing internal controls designed to prevent and detect fraud, financial impropriety or fiscal irregularities within the District. Every member of the District's administrative team shall be alert for any indication of fraud, financial impropriety or irregularity within his/her areas of responsibility.

The Superintendent shall investigate reports of fraudulent activity in a manner that protects the confidentiality of the parties and the facts. All employees involved in the investigation shall be advised to keep information about the investigation confidential.

Staff Responsibilities

Any employee who suspects that financial fraud, impropriety or irregularity has occurred shall immediately report those suspicions to their immediate supervisor and/or the Superintendent/designee who shall have the primary responsibility for initiating necessary investigations. Additionally, the Superintendent shall coordinate investigative efforts with the District's legal counsel, auditing firm and other internal or external departments and agencies, including the county prosecutor's office and law enforcement officials, as the Superintendent may deem appropriate.

In the event the concern or complaint involves the Superintendent, the concern shall be brought to the attention of the Chair of the Board of Trustees who is hereby empowered to contact the District's legal counsel, auditing firm and any other agency to investigate the concern or complaint.

Definition

As used in this policy, "fraud" refers to intentionally misrepresenting, concealing or misusing information in an attempt to commit fiscal wrongdoing. Fraudulent actions include, but are not limited to:

- Behaving in a dishonest or false manner in relation to District assets, including theft of funds, securities, supplies or other District properties.
- Forging or altering financial documents or accounts illegally or without proper authorization.
- Improper handling or reporting of financial transactions
- Personally profiting as a result of insider knowledge
- Disregarding confidentiality safeguards concerning financial information
- Violating Board conflict of interest policies
- Mishandling financial records of District assets (destroying, removing or misusing)

District Financial Fraud and Theft Prevention (continued) **7225**

Internal Controls

The following internal controls shall be a regular practice of the District in an effort to prevent the possibility of fraud:

- Budgetary Transfers. The transfer of appropriations is important for the Superintendent, purchasing agent, business official and treasurer, and all should have written confirmation of the information. The purchasing agent shall be apprised if the transfer has been approved, the treasurer shall document it and the business official shall record it.
- Treasurer's Receipts. The treasurer should have receipts and numbered duplicates for everything paid out in his/her custody.
- Checks. The treasurer shall keep personal custody of any signature stamps and maintain a log for every check written.
- Audit. An individual not connected to the business office should audit the check register regularly.
- Conduct background checks on potential business office employees. Check all possible references, not just those offered, and perform criminal background checks on key business officials and others warranted.
- Segregate functions within the business office so as to avoid the opportunity for fraud without collusion.

The District shall carry a fidelity bond on the District Treasurer, the District Clerk, the Chair of the Board, and such other personnel as may be directed by the Board.

Cross-Reference: 1210 Qualifications, Terms and Duties of Board Officers

Legal Reference: I.C. 33-508
I.C. 33-509

Policy History:
Adopted on: 1/8/07
Revised on: 2/9/09

Financial Reporting and Audits **7230**

The Board directs that financial reports of all District funds shall be prepared in compliance with statutory provisions and generally accepted accounting and financial reporting standards. In addition to the reports required for local, state, and federal agencies, financial reports will be prepared monthly and annually and presented to the Board. The financial reports shall reflect the financial activity and status of the District funds.

Within one hundred twenty (120) days from the last day of each fiscal year, this Board, through its Superintendent, shall prepare and publish an annual statement of financial condition and report of the District as of the end of such fiscal year in the form prescribed by the State Superintendent of Public Instruction.

This annual statement will include, but not be limited to:

1. The amounts of money budgeted and received and from what sources; and
2. The amounts budgeted and expended for salaries and other expenses by categories. This District shall have available upon request, at the administrator's office, a full and complete list of vendors and the amount paid to each, and the list of the number of teachers paid at each of the several stated gross salary levels in effect in the District.

This Board may authorize additional or supplementary statements and reports for the purpose of informing the public of its financial operations, either as to form, content, method, or frequency.

The annual statement of financial conditions and report shall be published within one hundred twenty (120) days from the last day of the fiscal year in one issue of the newspaper designated by this District.

The Chair, Clerk, and Treasurer of this District shall certify the annual statement of financial condition and report it to be true and correct, and the certification will be included in each published statement.

Appropriate interim financial statements and reports of financial position, operating results and other pertinent information will be prepared to facilitate management control of financial operations.

A full and complete audit of financial statements of this district will occur on an annual basis. One (1) copy of the auditor's report shall be filed with the State Department of Education after its acceptance by this Board, but not later than October 15 of each school year.

The audit shall be performed by independent auditors employed on a written contract and will be conducted in accordance with generally accepted governmental accounting standards as defined by the United States General Accounting Office.

The Board directs that District audits shall be conducted in accordance with Idaho law (I.C. 67-450B). Each audit shall be a comprehensive audit of the affairs of the District and the District funds. The audits shall comply with all statutory provisions and generally accepted governmental auditing standards, as defined by the United States Government Accountability Office. Within ten (10) days after receiving the audit from the District's independent auditor, the school District shall file two (2) copies of the completed audit report with the legislative counsel at:

Idaho Legislative Services Office
Legislative Services Audit Staff of Legislative Counsel P.O. Box 83720
Boise, Idaho 83720-0054

The report shall be filed with the State Department of Education after its acceptance by the Board of Trustees not later than November 10.

Financial Reporting and Audits (continued) 7230

Compliance With GASB 34

In compliance with GASB 34 (Governmental Accounting Standards Board, Standard 34), the District's annual audit shall be developed to make the audit easier to understand and more useful to patrons and others who use the District's financial information to make decisions. The District's audit shall be based on a full accrual accounting of all financial activities, and shall include the Management Discussion and Analysis (MD&A) as a part of Required Supplementary Information (RSI), as mandated by GASB 34.

Management Discussion and Analysis

The Superintendent or designee shall draft the MD&A, an analysis of the District's current overall financial position and operating results, intended to allow others to assess whether the District's finances have improved or deteriorated.

The MD&A shall:

1. Precede the basic financial statement and provide an objective and readable analysis of the District's overall financial activities;

2. Be based solely on facts known to the administration at the date of the auditor's report;

3. Emphasize current-year results in comparison with the prior year;

4. Include charts and grafts, as appropriate, to enhance reader understanding;

5. Report the change in the overall financial condition from the prior year to the current year;

6. Introduce and explain the difference from prior years in the format of the financial material presented;

7. Explain the newly required statement of net assets, and statement of activities, and what they are intended to report. Relative to the District-wide statements, identify all District assets and liabilities using the accrual basis of accounting;

8. Condense financial information derived from the District-wide statements with explanation of significant changes between the current and prior years;

9. Analyze balances and transactions of individual funds;

10. Budgetary comparison schedules or statements; and

11. Describe significant capital assets and long-term debt activities that occurred in the prior year.

The annual budget shall reflect all necessary expenses for carrying out the provisions of this policy.

This District shall file two (2) copies of each completed audit report with the legislative council within ten (10) days after receiving the audit from the contracting independent auditor.

Financial Reporting and Audits (continued) **7230**

Legal Reference:

I.C. 33-701 Fiscal year – Payment and accounting of funds
I.C. 60-106
I.C. 67-405B Independent Financial Audits by Government Entities

Policy History:
Adopted on: 1/8/07
Revised on: 2/9/09

Fiscal Accountability and IDEA Part B Funds **7235**

The District must ensure fiscal accountability at each phase in the use of Individuals with Disabilities Education Act (IDEA) Part B funds. The purpose of this policy is to ensure that the District complies with the State Department of Education requirements described in the *Idaho State Department of Education IDEA Funding Manual*.

Use of IDEA Part B Funds

The District shall use IDEA funds only to pay excess costs of providing special education and related services to children with disabilities. A cost is determined to be an excess cost of providing special education only if it meets each of the following criteria:

1. The cost would not exist in the absence of special education needs;
2. The cost is not also generated by students without disabilities; and
3. If the cost is specific to a particular child, it is documented if that child is on an Individual Education Plan (IEP).

The Board directs the Superintendent to establish procedures and internal controls to ensure that IDEA Part B funds are used only for allowable, excess costs of providing special education and that these costs are accounted for in the proper function/program codes described in 34 CFR 300.202-205. These procedures and controls shall also ensure the accuracy of the District's Excess Cost Calculation, as required by 34 C.F.R. 300.16 and Appendix A to 34 C.F.R.300.

The Special Education Director and the Business Manager approve all IDEA Part B expenditures (PO, invoices) following the process described in the written procedures for determining allowability of cost (cost principles).

Time and Effort Reporting

Charges to federal awards for salaries and wages must be based on records that accurately reflect the work performed. In order to determine if personnel costs are allowable under IDEA Part B, the District shall maintain auditable "time and effort" documentation that shows how each employee paid with IDEA Part B funds spent his or her compensated time. Such work shall be documented on the time and effort forms. The form shall be kept for employees paid in full or in part with federal funds or whose salary is used to meet a matching requirement in a federal program. Such documents are written reports of how the time was spent.

The Board directs the Superintendent to establish a system for time and effort reporting that complies with the requirements of OMB Circular A-87 and OMB Circular A-133 and with the 4235P Written Compensation Procedure.

Fiscal Accountability and IDEA Part B Funds (continued) 7235

Maintenance of Effort

[**ONLY REQUIRED FOR DISTRICTS THAT USE ONLY LOCAL FUNDS FOR THE CALCULATION OF MAINTENANCE OF EFFORT**]

In order to ensure that the requirement of Maintenance of Effort is met, the Board directs the Superintendent to establish a means of tracking and reporting local expenditures separate from the expenditure of State funds. This is to be done for the purpose of verifying that local funds are used for special education expenditures.

Parentally-Placed Private School Children

The District must ensure that it is providing the appropriate portion of IDEA Part B funds to children receiving special education at private schools within the boundaries of the District. To accomplish this, the Board directs the Superintendent to establish procedures to accurately track and report expenditures for services provided to parentally-placed private school children.

The Special Education Director and the Business manager keep accurate records of all expenditures charged to the parentally-placed private school children budget. The documentation should be traceable to the financial report and available for inspection if requested.

Property Procurement and Tracking

The Board directs the Superintendent to establish written procedures to ensure that the District's mechanism for procurements using IDEA Part B funds conforms to the standards outlined in 34 C.F.R. 80.36 and with Policy 7400 Procurement Management System and any related procedures. The Board also directs the Superintendent to establish a system to maintain adequate inventory management of property purchased with IDEA Part B funds.

Property records in the inventory management system should include, at a minimum:

1. Property description;
2. Identification number;
3. Source of funding;
4. Acquisition date and cost;
5. The location, use, and condition of the property; and
6. Any ultimate disposition data including the date of disposal and sale price of the property.

In addition to the above information, the inventory management system should ensure that all source documents in support of the above information are maintained throughout the life and disposition of the equipment. These records should be updated frequently so that every piece of equipment purchased with federal funds can be accounted for at any given time.

Fiscal Accountability and IDEA Part B Funds (continued) **7235**

Cross Reference	7400 Procurement Management System
Legal Reference:	2 C.F.R. §§200.430 Time and Effort 34 C.F.R. §§80.36 Procurement 34 C.F.R. §§80.42 Retention and Access Requirements for Records 34 C.F.R. §§300.132-133 Provision of Services for Parentally-Placed Private School Children with Disabilities 34 C.F.R. §§300.16 Excess Costs 34 C.F.R. §§300.202-205 Use of Amounts 34 C.F.R. §§300, Appendix A Excess Costs Calculation Fiscal Accountability Checklist: For Sub-Recipients of IDEA Part B Funds OMB Circular A-87 OMB Circular A-133
Other Reference:	Idaho SDE IDEA Part B Funding Manual.

Policy History:
Adopted On: 9/8/2013
Revised On: 3/11/19
Reviewed on:

Retention of Records Relating to Federal Grants **7237**

The Board directs the Superintendent to ensure that fiscal records related to federal grants are retained for a minimum of six years from the obligation of funds. These records shall be available for inspection if required.

Procedures

The District shall maintain records that fully show:

1. The amount of funds under the grant or subgrant;
2. How the District uses those funds;
3. The total cost of each project;
4. The share of the total cost of each project provided from other sources;
5. Other records to facilitate an effective audit; and
6. Other records to show compliance with federal program requirements.

The District shall also maintain records of significant project experiences and results. These records and accounts shall be retained and made available for programmatic or financial audits.

In accordance with State Department of Education record retention policy 4.16.02 Administration of Federal Grant Program, the District shall maintain all fiscal and programmatic records relating to federal grants for a minimum of five years and one additional audit.

The District will destroy paper records by shredding only. In the event of the disposal of computers or electronic equipment that may contain confidential student or personnel records, the District will ensure that hard drives are appropriately "wiped" clean of information prior to disposal.

The District shall retain records based on the schedule provided in Policy 8605.

Collection and Transmission of Records

The District shall maintain electronic records in the Infinite Visions system, and paper records shall be maintained in the District office under the supervision of the Business Manager or designee. The Clerk will have authorized access as directed. Electronic and/or paper records shall be provided to awarding agencies to meet reporting requirements and to auditors and monitors, as appropriate and required. Records that are kept electronically may be transmitted electronically as allowed by 2 CFR 200.335.

Access to Records

The District shall provide the awarding agency, Inspectors General, the Comptroller General of the United States, and the pass-through entity, or any of their authorized representatives, the right of access to any documents, papers, or other records of the District which are pertinent to the Federal award, in order to make audits, examinations, excerpts, and transcripts. The right also includes timely and reasonable access to the District's personnel for the purpose of interview and discussion related to such documents.

Retention of Records Relating to Federal Grants(continued) **7237**

Privacy

Access to both the Infinite Visions system, personnel files, the Student Management System, confidential student files, Special Education IEP files shall be password protected in the case of electronically maintained records and kept in locked filing cabinets in the case of paper records. These records are maintained under the supervision of the Superintendent and the Business Manager, or Federal Programs Director with exclusive access to paper files and passwords for electronic systems. The District clerk may also have access to these records. Employees shall be trained in the requirements of the Family Educational Rights and Privacy Act (FERPA). If a request for confidential information is received from a source not having clear authority under FERPA or other statute, the District shall consult appropriate legal counsel prior to providing records.

Legal Reference:	34 C.F.R. §§ 75.730-.731
	34 C.F.R. §§ 75.732
	34 C.F.R. §§ 76.730-.731
	2 C.F.R.§§ 200.333-.337
Other Reference:	Idaho SDE IDEA Part B Funding Manual.

Policy History:
Adopted on: 12/10/18
Revised on: 3/11/19

Federal Impact Funds **7240**

It is the intent of the District that all American Indian children of school age have equal access to all programs, services, and activities offered in the District.

It is also the intent of the District to fully comply with the requirements of Title VIII (Impact Aid Program) of the Elementary and Secondary Education Act and regulations relating thereto. To that end, the District shall:

1. Provide tribal officials and parents of Indian children an opportunity to comment on the participation of Indian children on an equal basis in all programs and activities offered by the District;
2. Annually assess the extent to which Indian students are participating on an equal basis in the educational programs and activities of the District;
3. If and when necessary, modify its educational programs to ensure that Indian children participate on an equal basis with
   non-Indian children served by the District;
4. Disseminate annually the following materials to tribal officials and Indian parents:
   - Title VIII application;
   - Evaluation of programs assisted with Title VIII funds;
   - Program plans and information related to the education programs of the District.

Such materials will be provided to tribal officials and parents of Indian children in sufficient time to allow tribal officials and parents of Indian children an opportunity to review the materials and make recommendations on the needs of Indian children and provide input on how the District might help those children realize the benefits of the District's educational programs and activities.

1. Solicit information from tribal officials and parents of Indian children on Indian views, including information on the frequency, location, and time of meetings;
2. Notify tribal officials and parents of Indian children of the locations and times of meetings;
3. Consult and involve tribal officials and parents of Indian children in the planning and development of the District's educational programs and activities;
4. Modify its Indian policies and procedures, if and when necessary, based upon the results of the assessments referenced below.

Assessments

Tribal officials and parents of Indian children are encouraged to assess the effectiveness of their input regarding the participation of Indian children in the District's educational programs and activities and the development and implementation of the District's Indian policies and procedures and share the results of such assessment with the District.

Legal Reference:

20 USC 7701, et seq. The Impact Aid Program Statute (Title VIII of the Elementary and Secondary Education Act of 1965)
20 USC 7704
34 CFR 222.94 What provisions must be included in a local educational agency's Indian policies and procedures?

Policy History:
Adopted on: 1/8/07
Revised on: 2/9/09

Fund Accounting System **7250**

The accounts of the District are organized on the basis of funds, each of which is considered to be a separate accounting entity. The operations of each fund are accounted for by providing a separate set of self-balancing accounts. The following funds are maintained by the District (plus school activity accounts):

100 General Maintenance and Operation
220 Federal Forest Reserve
231 Local Education Program Fund
234 Baseball Field Project
235 6th Grade Outdoor Classroom Project
240 School Maintenance Balance
241 Drivers Education Fund
243 Professional-Technical Education
244 Greenhouse Project
245 Technology Grant – State
246 Drug-Free Schools Fund – State
247 Response to Intervention Fund
249 Other State Grants
251 Title I-A, ESEA – Improving Basic Programs
257 Title VI-B, IDEA – School Age
258 Title VI-B, IDEA – Pre-school
261 Title V-A, ESEA – Innovative Programs
262 Small Rural Schools Achievement
263 Perkins III Grant
271 Title II-A, ESEA – Improving Teacher Quality
273 Title IV-A, ESEA – Safe and Drug-Free Schools - Federal
290 Food Service
310 Bond Interest Redemption – Elementary
311 Bond Interest Redemption - Secondary
420 School Plant Facilities
424 School Bus Depreciation
425 Lottery Fund
430 School Maintenance/Repair Fund
610 Internal Service Fund
710 Ramsdale Scholarship Fund
711 KellyScholarship Fund

Legal Reference:
I.C. 33-901 et seq. School Funds
I.C. 33-701 et seq. Fiscal Affairs of School District

Policy History:
Adopted on: 2/9/09
Revised on:

Student Activity Fund **7260**

The Board is responsible for the establishment and management of student activity funds. The purpose of student activity funds shall be to account for revenues and disbursements of those funds raised by students through recognized student body organizations and activities, including:

1. Admission charges for interscholastic activities;
2. The sale of yearbooks and annuals;
3. Student fee collections which are used to provide more than one activity/benefit to all of the students of a school or school building;
4. Receipt from vending machines located on school property.

The funds collected by the schools shall be maintained in accounts requiring two authorized signatures for the distribution of funds: one signature shall be by a person designated by the Board as an assistant Treasurer and the other shall be a designated signatory of the building or District.

The funds shall be deposited and expended by check in a bank account maintained by the District for each student activity fund. The use of the student extra- and co-curricular funds is limited to the benefit of the students. All funds collected or received for school programs, activities or students use are by Idaho law public monies and the care, custody, control and accounting for such monies is the duty and responsibility of the Treasurer and the Administrative Officer of the District.

The management of student activity funds shall be consistent with sound business practices. Authority is delegated to the Superintendent to require each school within the District to conform to accounting procedures for the receipt, deposit and withdrawal of funds. A report of the activity of these funds shall be submitted to the Board each month. This includes providing for the safekeeping of monies, proper accounting and administration of the funds, and compliance with the Board of Trustees policies and procedures. The Principal is responsible for the proper collection, disbursement and control of all school activity funds.

For other activity or student funds, the board may create a separate fund(s) and implement procedures for the accounting and control of the same.

Projects for the raising of funds shall generally contribute to the educational experience of students and shall not detract from the instructional program. All fundraising projects must have the approval of the Principal. Solicitation of funds outside the school must have the approval of the Superintendent.

Purposes

These funds are used for, but not limited to:

- promoting the general welfare of each school and the educational development and morale of all students,
- promoting the athletic program of the student body,
- promoting specific areas of interest of the student body,
- financing specific projects sponsored by a designated class,
- financing the publication of the yearbook and support of the student body,
- purchasing consumable materials that become the property of the student,
- hold in these accounts until all income and expenditures have been properly accounted and the accounts can be cleared.

Examples

The Student Activity Fund is ledger account for controlling, accounting for, and dispersing money received from sources including, but not limited to:

- student body fees,
- concessions,
- vending machines,
- interest income,

Student Activity Fund (continued) **7260**

- gate receipts,
- sale of athletic clothing,
- club dues,
- fund raisers,
- donations,
- sale of yearbooks,
- fees charged to cover costs of consumable materials used in class projects if the finished project becomes the property of the student.
- functional accounts necessary to operate and maintain a standard accounting system,
- monies belonging to other area schools received from sources such as hosting district or regional events. (These funds should not be counted as part of the athletic or organizational income and expense of the host school. Other accounts in this group may be a division of net income between the host school and one or more schools.)

Disbursement Authority

These funds are dispersed, based on the request of the specific class's or activity's advisor or coach, or the student body treasurer, and with the approval of the Activity Director and Principal.

Receipts

All cash and other receipts shall be handled in a manner which promotes appropriate accounting and minimizes any opportunity for theft, fraud, financial loss, or the appearance of impropriety.

The official financial records of the student activity funds for any School in this School District shall be audited annually by a qualified public accountant or other responsible person approved by the Board of Trustees. The employee responsible for maintaining student activity funds shall be under bond in an amount which protects the maximum funds on hand at any time. An annual report will be prepared for the Board of Trustees, disclosing all results of the audit.

Legal Reference:

I.C. 33-705 Activity Funds
Paulson v. Minidoka County Joint District, No. 331, 93 Idaho 469, 463 P.2d 935 (1970)

Policy History:
Adopted on: 1/8/07
Revised on: 1/14/08, 2/9/09

Property Records **7270**

Property records and inventory records shall be maintained on all land, buildings, and physical property under the control of the District. Such records shall be updated annually.

Property records of facilities and other fixed assets shall be maintained on an ongoing basis. All goods purchased using federal funds shall be delivered to the District office and received by the Business Manager. Upon receipt of goods, the Business Manager shall notify the Superintendent of fulfillment of the purchase order.

The Business Manager checks all items against the invoice to ensure accuracy of delivery. Inventory items will be recorded on the Master Inventory list. No equipment shall be removed for personal or non-school use except according to Board policy.

Property records shall show, appropriate to the item recorded, the:

1. Description and identification;
2. Manufacturer;
3. Date of purchase;
4. Initial cost;
5. Location;
6. Serial number, if available; and
7. Model number, if available

For each equipment and computing device purchased with federal funds, the following information is maintained in the Special Services office mastery inventory list. The list includes the following information:

1. Serial number or other identification number;
2. Source of funding for the property;
3. Identification of title holder
4. Acquisition date and cost of the property;
5. Percentage of federal participation in the project costs for the federal award under which the property was acquired;
6. Location, use, and condition of the property; and
7. Any ultimate disposition data including the date of disposal and sale price of the property.

In the event the property is sold, lost, or stolen, or cannot be repaired, the item will be deducted from the master inventory list. The date of the change will be listed along with the sale price if the item is sold.

Property Classifications

Equipment and supplies with a useful life of more than 1 year, including computing devices, will be engraved with “Property of the Troy School District #287” and with appropriate equipment identification.

Property Records (continued) **7270**

Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the District for financial statement purposes, or $5,000.

Supplies means all tangible personal property other than those described in § 200.33 Equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the District for financial statement purposes or $5,000, regardless of the length of its useful life.

Computing devices means machines used to acquire, store, analyze, process, and publish data and other information electronically, including accessories (or "peripherals") for printing, transmitting and receiving, or storing electronic information.

Capital assets means tangible or intangible assets used in operations having a useful life of more than one year that are capitalized in accordance with GAAP. Capital assets include:

1. Land, buildings (facilities), equipment, and intellectual property (including software) whether acquired by purchase, construction, manufacture, lease-purchase, exchange, or through capital leases; and

2. Additions, improvements, modifications, replacements, rearrangements, reinstallations, renovations or alterations to capital assets that materially increase their value or useful life (not ordinary repairs and maintenance).

Physical Inventory

A physical inventory of the property must be taken and the results reconciled with the property records at least yearly.

Each staff member will inventory property items in their room at the end of each school year. The inventory sheet is signed by the staff member taking the inventory as verification and is reviewed by the Business Manager and kept in the vault. Computer and technology equipment is inventoried through Valuations Northwest management's program, and recorded in an Excel spreadsheet maintained by the Business Manager. Electronic equipment, such as iPads, are engraved with "Property of Troy School District #287".

Any discrepancy between physical inventory and the master inventory sheet will be researched by the Business Manager and noted on the master inventory.

Maintenance

The District shall maintain adequate maintenance procedures and records to ensure that property is kept in good condition. If an item needs repair, the Business Manager will be notified and proper repair procedures will be determined, either in District or by sending the item to a qualified repair facility.

Property Records(continued) **7270**

Lost or Stolen Items

The District maintains a control system that ensures adequate safeguards are in place to prevent loss, damage, or theft of the property.

Use of Equipment Purchased with Federal Funds

Equipment purchased with federal funds must be used in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by the federal award, and the District will not encumber the property without prior approval of the federal awarding agency and the pass-through entity.

During the time equipment is used on the project or program for which it was acquired, the equipment will also be made available for use on other projects or programs currently or previously supported by the federal government, provided that such use will not interfere with the work on the projects or program for which it was originally acquired. First preference for other use must be given to other programs or projects supported by the federal awarding agency that financed the equipment. Second preference is given to programs or projects under federal awards from other federal awarding agencies. Use for non-federally funded programs or projects is also permissible.

When no longer needed for the original program or project, the equipment may be used in other activities supported by the federal awarding agency, in the following order of priority:

1. Activities under a federal award from the federal awarding agency which funded the original program or project; then
2. Activities under federal awards from other federal awarding agencies.

In the event that the District no longer needs real or personal or real property, it will follow the rules, policies, and procedures required by Idaho Code §33-601(4)(b) and by Policy 9100.

Cross Reference: 7210 GASB Statement 34 (Accounting System)

Legal Reference:	I.C. §33-601(4)(b)	Real and Personal Property—Acquisition, Use or Disposal of Same
	I.C. § 33-701	Fiscal Year – Payment and Accounting of Funds
	2 C.F.R. § 200.12	Capital Assets
	2 C.F.R. § 200.20	Computing Devices
	2 C.F.R. § 200.33	Equipment

Property Records(continued) **7270**

2 C.F.R. § 200.94	Supplies
2 C.F.R. § 200.313	Equipment

Policy History:
Adopted on: 1/8/07
Revised on: 10/17/07, 2/9/09, 3/11/19

Revenues **7300**

The District shall seek and utilize all available sources of revenue for financing its educational programs. This includes revenues from non-tax, local, state and federal sources. All revenues received for the District will be properly credited to the appropriate fund and account as specified by federal and state statute and the accounting and reporting regulations for Idaho school Districts.

The District shall collect and deposit all direct receipts of revenues as necessary but at least once monthly. The District shall make an effort to collect all revenues due from all sources, including, but not limited to, rental fees, bus fees, fines, tuition fees, other fees and charges.

Policy History:
Adopted on: 2/9/09
Revised on:

Investment of Funds **7305**

Pursuant to Idaho Code 33-701, the Board authorizes the Superintendent to invest all or part of any plant facilities reserve fund, or any fund accumulated for the payment of interest on, and the redemption of, outstanding bonds, or other obligations of the District. The Superintendent shall develop criteria and procedures for appropriate investments which shall be reviewed by the Board. A progress report of investments shall be made to the Board on a regular basis.

Policy Considerations

The investment policy shall be reviewed annually by the Superintendent or designee and recommended changes will be presented to the Board for consideration.

Investments may be made only in those instruments approved by, and in a method in conformity with, state law including any instrument permitted by law for the investment of state moneys.

Any investments of idle or surplus monies shall be invested with a designated depository wherein the investment shall be fully insured under the Federal Deposit Insurance Corporation (FDIC) provisions when possible and practicable

Legal Reference:

I.C. 33-701 Fiscal Year - - Payment & Accounting of Funds
I.C. 33-901
I.C. 57-101, *et seq.*
I.C. 67-1210 Investment of Idle Moneys

Policy History:

dopted on: 1/8/07
Revised on: 10/3/07, 2/9/09

Advertising in Schools/Revenue Enhancement **7310**

Revenue enhancement through a variety of District-wide and District approved marketing activities, including but not limited to advertising, corporate sponsorship, signage, etc., is a Board-approved venture. These opportunities are subject to certain restrictions as approved by the Board in keeping with the contemporary standards of good taste. Such advertising will seek to model and promote positive values for the students of the District through proactive educational messages and not just traditional advertising of a product. Preferred advertising includes messages that encourage student achievement and the establishment of high standards of personal conduct.

All sponsorship contracts will allow the District to terminate the contract at least on an annual basis if it is determined that it will have an adverse impact on implementation of curriculum or the educational experience of students.

The revenue derived should:

1. Enhance student achievement;
2. Assist in the maintenance of existing District athletics and activity programs; and
3. Provide scholarships for students participating in athletic, academic, and activity programs who demonstrate financial need and merit.

Appropriate opportunities for these marketing activities include but are not limited to:

1. Fixed signage;

2. Banners;

3. District-level publications;

4. Television and radio broadcasts;

5. Athletic facilities, to include stadiums, high school baseball fields, and high school gymnasiums;

6. District-level projects;

7. Expanded usage of facilities beyond traditional use (i.e., concerts, rallies, etc.);

8. Interior and exterior of a limited number of District buses only if the advertising is associated with student art selected by the District. The only advertising information will note that the student art is sponsored by the participant in the District sponsorship. Maintenance for these buses will include but not exceed normal maintenance costs; and

9. Individual school publications (when not in conflict with current contracts).

Advertising in Schools/Revenue Enhancement (continued) **7310**

Advertising will not be allowed in classrooms, and corporate-sponsored curriculum materials are subject to the requirements of Board policy.

The following restrictions will be in place when seeking revenue enhancement. Revenue enhancement activities will not:

1. Promote hostility, disorder, or violence;
2. Attack ethnic, racial, sexual orientation, gender identity or expression, or religious groups;
3. Discriminate, demean, harass, or ridicule any person or group of persons on the basis of gender;
4. Be libelous;
5. Inhibit the functioning of the school and/or District;
6. Promote, favor, or oppose the candidacy of any candidate for election, adoption of any bond or budget issues, or any public question submitted at any general, county, municipal, or school election.
7. Be obscene or pornographic as defined by prevailing community standards throughout the District;
8. Promote the use of drugs, alcohol, tobacco, firearms, or certain products that create community concerns;
9. Promote foods or beverages which do not meet the standards for foods sold at school described in Policy 8250. This restriction shall apply to all advertising, including signage, scoreboards, school stores, cups, packaging, vending machines, trash cans, coolers, menu boards, and food service equipment;
10. Promote any religious or political organization;
11. Use any District or school logo without prior approval; or
12. Use age-inappropriate material.

Exception

Nothing herein shall be construed to prevent advertising in publications which are published by student organizations, PTA/PTO, booster club, or other parent groups. Funds received for approved projects involving advertising in said publications may be retained by the school- related group that is sponsoring the activity as a fund-raising event.

Advertising in Schools/Revenue Enhancement (continued) **7310**

Solicitations

Salespersons, representatives, or agents shall not solicit or contact pupils, teachers, or other employees in the school buildings or on school grounds without prior approval.

Cross Reference:	2100	Curriculum Development and Assessment
	2500	Library Materials
	2520	Curricular Materials
	8250	Guidelines for Food and Beverages Sales
Legal References:	42 USC § 1758b, § 204	Healthy and Hunger-Free Kids Act of 2010
	42 USC § 1771 *et seq*.	Child Nutrition Act of 1966
	42 USC § 1751 *et seq*.	National School Lunch Act
	7 CFR § 210.30	Local School Wellness Policy

Policy History:
Adopted on: 2/9/09
Revised on: 8/10/09, 4/11/11, 9/23/19

Purchasing **7400**

Authorization and Control

It is the policy of this District to conduct its purchasing program in a manner to optimum use of District funds. The Board, or its designee, reserves the right to determine what is in the best interest of the District.

The Superintendent is authorized to direct expenditures and purchases within the limits of the detailed annual budget for the school year and pursuant to State purchasing and federal procurement requirements. Board approval for purchase of capital outlay items is required when the aggregate total of a requisition exceeds $25,000, except the Superintendent shall have the authority to make capital outlay purchases without advance approval when it is necessary to protect the interests of the District or the health and safety of the staff or students. The Superintendent shall establish requisition and purchase order procedures as a means of controlling and maintaining proper accounting of the expenditure of funds that align with State purchasing and federal procurement requirements. Staff members shall not obligate the District without express authority. Staff members who obligate the District without proper authorization may be held personally responsible for payment of such obligations.

Bids and Contracts

With the exception of the purchase of curricular materials, and in accordance with the requirements of Idaho Code, whenever the cost of any construction, repair, or improvement; or the acquisition, purchase, or repair of any equipment; or other personal property necessary for the effective operation of the District exceeds $50,000, bids shall be called for by issuing public notice as specified in statute as well as following federal procurement requirements. Specifications shall be prepared and be made available to all vendors interested in submitting a bid. The contract shall be awarded to the lowest responsible bidder, except that the Board may reject any bid, reject all bids, or publish notice to rebid the project. If after calling for bids a second time, no satisfactory bid is received, the Board may proceed under its own direction, subject to the approval of the State Board of Education.

When purchasing good and services pursuant to Idaho Code, and determining the most qualified bidder for award of the contract, the District, at its sole discretion, may consider not only the amount of the bids, but may also consider additional factors including but not limited to the relative experience, ability, references and integrity of the bidders to do faithful and conscientious work and promptly fulfill the contract according to contract requirements.

Except where a Request for Proposals is advertised, in the event the District awards a contract to a bidder other than the lowest responsive bidder, the Board shall declare its reason or reasons on the record and shall communicate such reason or reasons in writing to all who have submitted a competing bid. The disappointed bidders shall have the right to submit a timely written objection, at which time the District shall stop all work on the project, and shall review its decision and determine whether to affirm its prior award, modify the award, or choose to re-bid, setting forth its reason or reasons therefor. After completion of the review process, the political subdivision may proceed as it deems to be in the public interest.

Purchasing (continued) **7400**

The Superintendent shall establish bidding and contract awarding procedures that align with State purchasing and federal procurement requirements.

Cooperative Purchasing

The District may cooperatively enter into contracts with one or more districts to purchase materials necessary or desirable for the conduct of the business of the District provided that the purchasing cooperative follows State purchasing and federal procurement requirements.

(d) ***Buy American*** —

(1) ***Definitions.*** For the purpose of this paragraph (d):

(i) ***Domestic commodity or product*** means:

(A) An agricultural commodity that is produced in the United States; and

(B) A food product that is processed in the United States substantially using agricultural commodities that are produced in the United States.

(ii) ***Substantially using agriculture commodities that are produced in the United States*** means over 51 percent of a food product must consist of agricultural commodities that were grown domestically.

(2) ***In general.*** Subject to paragraph (d)(4) of this section, a school food authority must purchase, to the maximum extent practicable, domestic commodities or products.

(3) ***Required language.*** School food authorities must include language requiring the purchase of foods that meet the Buy American requirements in paragraph (d)(1) of this section in all procurement procedures, solicitations, and contracts.

(4) ***Limitations.*** Paragraphs (d)(2) and (3) of this section apply only to:

(i) A school food authority located in the contiguous United States; and

(ii) A purchase of domestic commodity or product for the school lunch program under this part.

(5) ***Exceptions.*** The purchase of foods not meeting the definition in paragraph (d)(1) of this section is only permissible when the following criteria are met:

(i) The school food authority determines that one of the following limited exceptions is met:

(A) The product is listed in the Federal Acquisitions Regulations (FAR) at 48 CFR 25.104 and/or is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality; or

(B) Competitive bids reveal the cost of a United States product is significantly higher than the non-domestic product.

(ii) Non-domestic food purchases (those that do not meet the definition of domestic commodity or product, as defined in paragraph (d)(1) of this section) must not exceed the following caps by the established deadlines:

(A) By July 1, 2025, non-domestic food purchases must not exceed 10 percent of total annual commercial food costs that a school food authority purchases per school year.

(B) By July 1, 2028, non-domestic food purchases must not exceed 8 percent of total annual commercial food costs that a school food authority purchases per school year.

(C) By July 1, 2031, non-domestic food purchases must not exceed 5 percent of total annual commercial food costs that a school food authority purchases per school year.

(iii) School food authorities must maintain documentation, except when the item purchased is found on the FAR at 48 CFR 25.104 when using an exception under paragraph (d)(5)(i) of this section.

(iv) School food authorities must maintain documentation, to demonstrate that when using an exception under paragraph (d)(5)(i) of this section their non-domestic food purchases do not exceed the annual threshold specified in paragraph (d)(5)(ii) of this section.

(6) ***Harvested fish.*** To meet the definition of a domestic commodity or product, harvested fish must meet the following requirements:

(i) Farmed fish must be harvested within the United States or any territory or possession of the United States; and

(ii) Wild caught fish must be harvested within the Exclusive Economic Zone of the United States or by a United States flagged vessel.

Personnel Conflicts of Interest

No employee will make any purchase or incur any obligations for or on behalf of the District from any private business, contractor, or vendor in which or with which the employee has a direct or indirect financial or ownership interest.

Purchasing (continued) **7400**

Purchases or contracted services from any private business or venture in which any employee of this District has a direct or indirect financial or ownership interest will be made on a competitive bid basis strictly in accordance with the following procedures:

1. The interested employee, the business, the contractor, or the vendor will fully disclose, in writing, the employee's exact relationship to the business, the contractor, or the vendor;

2. The affected business, the contractor, or the vendor may submit a bid in compliance with the specifications outlined by the District;

3. The interested employee will not be involved in any part of bidding process, including but not limited to, preparing specifications, advertising, analyzing, or accepting bids; and
4. This policy will apply to any organization, fund, agency, or other activity maintained or operated by the District.

No employee will solicit gifts, gratuities, favors, prizes, awards, merchandise, or commissions as a result of ordering any items or as a result of placing any purchase order with a business, contractor, or vendor on behalf of the District nor accept anything of monetary value from a business, contractor, or vendor except for unsolicited gifts of $50 or less in value.

Procurement Under a Federal Award

In addition to the conflicts of interest outlined above, no employee, officer, or agent of the District may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest. Such conflicts of interest include instances where any of the following has a financial or other interest in or a tangible personal benefit from a firm considered for a contract:

1. The employee, officer, or agent;

2. Any member of his or her immediate family, including spouses, children, and parents;

3. His or her partner. For the purposes of this policy, "partner" shall mean an adult of the same sex or different sex with whom the employee, officer, or agent shares a non-marital intimate relationship and a common residence and with whom they mutually affirm that they share responsibility for each other's common welfare; or

4. An organization which employs or is about to employ any of the parties listed above.

The following activities are prohibited:

1. The purchase during the school day of any food or service from a District contractor or vendor for individual use;
2. The removal of any food, supplies, equipment, or school property without proper authorization;

3. Individual sales by District personnel of any school property, including used items.

Violations

Any District officer, employee, or agent who violates this policy may be subject to disciplinary action, including but not limited to a fine, suspension, or termination. Violations of law will be referred to the local, State, or federal authority having proper jurisdiction.

Cross Reference:	7400P	Procurement Under a Federal Award
	7405	Public Works Contracting and Procurement
	7407	Public Procurement of Goods and Services

5.

Legal Reference:	I.C. § 18-1351	Bribery and Corrupt Practices – Definitions
	I.C. § 33-316	Cooperative Contracts to Employ Specialized Personnel and/or Purchase Materials
	I.C. § 33-402	Notice Requirements
	I.C. § 33-601	Real and Personal Property – Acquisition, Use or Disposal of Same
	I.C. § 67-2805	Procurement of Public Works Construction Without License - Exemptions
	I.C. § 67-2801 et seq.	Purchasing by Political Subdivisions
	F.C. § 210.21	Procurement

Policy History:
Adopted on: 7/6/09
Revised on: 2/12/18
Reviewed on 4/22/26

TROY SCHOOL DISTRICT #287

7000 - FINANCIAL MANAGEMENT

Misc. Procurement Standards-Federal Award Requirements 7400P(1)

In addition to its other policies and procedures regarding procurement, the District shall adhere to the following requirements for federal awards:

1. Ensure that all solicitations incorporate a clear and accurate description of the technical requirements for the material, product, or service to be produced, and set forth those minimum essential characteristics and standards to which the material, product, or service must conform. The District shall avoid using detailed product specifications if possible. The District will identify all requirements which bidders must fulfill and all other factors to be used in evaluating bids or proposals.

2. Prohibit the use of statutorily or administratively imposed state, local, or tribal geographical preferences in the evaluation of bids or proposals, except in cases where applicable federal statutes expressly mandate or encourage geographic preference. When contracting for architectural and engineering services, geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract

3. Provide a written method for conducting technical evaluations of the proposals received and for selecting recipients, including factors considered for the evaluation; who performs the evaluation, the number of evaluations performed, the timeframe for conducting any evaluations, and the selection of a vendor and whether another position reviews the evaluation.

4. Maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

5. Avoid acquiring unnecessary or duplicative items;

6. Consider consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives and any other appropriate analysis to determine the most economical approach.

7. Maintain a list of prequalified persons, firms, or products which are used in acquiring goods and services, and include enough qualified sources to ensure maximum open and free competition.

8. Award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of the proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources.

9. Maintain records sufficient to detail the history of procurement. These records will include:

    1. Rationale for the method of procurement;
    2. Selection of contract type;
    3. Contractor selection or rejection; and

4. The basis for the contract price.

10. The use of a time and materials type contract is prohibited unless the District determines that no other contract is suitable. Time and materials type contract means a contract whose cost to a District is the sum of:

1. The actual cost of materials; and
2. The direct labor hours charged at hourly rates that reflect wages, general and administrative expenses, and profit.

Since this formula generates an open-ended contract price, a time-and-materials contract provides no positive profit incentive to the contractor for cost control or labor efficiency. When this type of contract is used, it will include a ceiling price that the contractor exceeds at their own risk. The District will assert a high degree of oversight over such contracts in order to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls.

11. The District will adhere to any additional procurement rules as applicable to specific federal programs, such as federal child nutrition programs.

Legal References
2 CFR § 200.317
2 CFR § 200.318
2 CFR § 200.320
2 CFR § 200.334
2 CFR 200.320(b)(1)(2)
2 CFR 200.520
2 CFR Appendix II of Part 200
2 CFR Appendix Part 200
29 CFR PART 5
31 USC 1352
7 CFR 210.23(c)
7 CFR 225.15(c)
7 CFR 226.15(e)
7 CFR 250.54
Executive Order 11738
Food and Nutrition Service
IC § 18-1351
IC § 33-316
Section 306
Section 508

Policy History:
Adopted On: 08/10/26
Revised On:
Reviewed On: 07/13/26

Misc. Procurement Standards - Procurement Methods Under a Federal Award **7400P(2)**

Documented Procurement Programs

The District shall maintain and use documented procedures for procurement transactions under a federal award or subaward, including for acquisition of property or services. These document procurement procedures must be consistent with state, local, and tribal laws and regulations and the standards identified in 2 CFR 200.318 through 200.327.

Informal Procurement Methods

Micro purchases are defined as a transaction with an aggregate purchase value less than or equal to the District's chosen micro purchase threshold. The District's micro purchase threshold is $10,000, unless the District has self-certified a higher micro purchase threshold of up to $50,000 with the State Department of Education. Self-certification must be done annually to remain in effect and must be documented based on internal controls, the District's evaluation of risk, and documented procurement procedures. This documentation shall be made available to the federal agency responsible for the grant, the State Department of Education, and auditors as described in 2 CFR 200.334. The self-certification shall also include:

1. A justification;
2. The specific threshold; and
3. Supporting documentation of:

    1. A qualification as a low-risk audited according to the criteria in 2 CFR 200.520 for the District's most recent audit;
    2. An annual internal institutional risk assessment to identify, mitigate, and manage financial risks; or
    3. A higher threshold is consistent with State law.

Micro purchases may be awarded without soliciting competitive price or rate quotes if the District considers the price reasonable based on research, experience, purchase history, or other relevant information, and maintains documentation to support the choice. To the extent practicable, the District will make an effort to distribute micro purchases equitably among qualified suppliers.

Simplified acquisitions are for transactions whose aggregate value is greater than the micro purchase threshold but not more than the simplified acquisition threshold. The District's simplified acquisition threshold is $150,000 or a lower amount determined by the Board based on internal controls, an evaluation of risk, and the District's documented procurement procedures.

Simplified acquisitions require rate or price quotes from an adequate number of qualified sources. The District may exercise judgment on a case-by-case basis to determine how many quotes are considered adequate.

Formal Procurement Methods

Formal procurement methods are required when the aggregate value of a transaction exceeds the simplified acquisition threshold. Formal procurement methods include either the collection of sealed bids or the collection of proposals. Formal procurement methods are competitive and require public notice.

Sealed bidding is used when:

1. A complete, adequate, and realistic specification of the purchase description is available.
2. Two or more responsible bidders have been identified as willing and able to compete for the contract.
3. The procurement lends itself to a firm price contract, and the selection of the final bid is made principally on price.

Sealed bids are publicly solicited from vendors, and a firm fixed price contract is awarded to the responsible bidder whose proposal conforms with all material terms and conditions and is lowest in price.

The following shall be required for sealed bids:

1. Bids must be solicited from an adequate number of qualified vendors, and vendors shall be provided sufficient response time to submit bids.
2. Invitations for bids must be publicly advertised.
3. Invitations for bids must define the items or services with specific information and must include the required specifications for bidders to properly respond.
4. All bids will be opened at the same time and place prescribed in the invitation for bids.
5. Bids will be opened publicly.
6. A firm-fixed-price contract shall be awarded in writing to the lowest responsive bid from a responsible bidder.
7. When specified in the invitations for bids, factors such as discounts, transportation costs, and life cycle costs must be considered in determining which bid is lowest. Payment discounts must only be used to determine the low bid when the District determines that discounts are a valid factor based on prior experience.
8. The District will provide and document a justification for all rejected bids.

Proposals are collected when the aggregate value of the transaction is greater than the simplified acquisition threshold, but conditions are not appropriate for using sealed bids. Proposals can result in a fixed price contract or a cost reimbursement contract.

The following requirements apply to such proposals:

1. Requests for proposals require public notice.
2. All evaluation factors and their relative importance and scoring must be identified.
3. Proposals must be solicited from multiple qualified sources.
4. To the maximum extent practicable, any proposals submitted in response to the public notice must be considered.
5. The District will have written procedures for technical evaluation and selection of proposals.
6. Contracts must be awarded to the responsible offeror whose proposal is most advantageous to the District considering price and other factors.

7. Architectural/engineering professional services shall be selected based on qualifications without consideration of price. Price may only be excluded from consideration for the procurement of architectural/engineering services.

Competitive Proposals

The technique of competitive proposals is normally conducted when more than one source submits an offer, and either a fixed price or cost-reimbursement type contract is to be awarded. It is generally used when conditions are not appropriate for the use of sealed bids. If this method is used, the following requirements apply:

1. Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals must be considered to the maximum extent practical;
2. The District must have a written method for conducting technical evaluations of the proposals received and making selections;
3. Proposals must be solicited from an adequate number of qualified sources; and
4. Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered.

The District may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. This method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services even if A/E firms are a potential source to perform the proposed effort.

Contract/Price Analysis

The District performs a cost or price analysis in connection with every procurement action, (including contract modifications), in excess of the District's simplified procurement threshold or in excess of $150,000, whichever amount is lower. A cost analysis generally means evaluating the separate cost elements that make up the total price, while a price analysis means evaluating the total price, without looking at the individual cost elements.

The method and degree of analysis is dependent on the facts surrounding the particular procurement situation; however, the Superintendent must come to an independent estimate prior to receiving bids or proposals.

Documentation of all such cost and price analyses shall be kept for three years beyond the current year for review.

Noncompetitive Proposals (Sole Sourcing)

Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:

1. The item is available only from a single source;
2. The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
3. The federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the District;
4. After solicitation of a number of sources, competition is determined inadequate; or
5. The aggregate amount of the procurement transaction doesn't exceed the micro purchase threshold.

A cost or price analysis will be performed for noncompetitive proposals when the price exceeds $50,000.

Full and Open Competition

All procurement transactions must be conducted in a manner providing full and open competition consistent with 2 CFR §200.319. In order to ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements. Some of the situations considered to be restrictive of competition include but are not limited to:

1. Placing unreasonable requirements on firms in order for them to qualify to do business;
2. Requiring unnecessary experience and excessive bonding;
3. Noncompetitive pricing practices between firms or between affiliated companies;
4. Noncompetitive contracts to consultants who are on retainer contracts;
5. Organizational conflicts of interest;
6. Specifying only a “brand name” product instead of allowing “an equal” product to be offered and describing the performance or other relevant requirements of the procurement; and
7. Any arbitrary action in the procurement process.

Legal References

2 CFR § 200.317
2 CFR § 200.318
2 CFR § 200.320
2 CFR § 200.334
2 CFR 200.320(b)(1)(2)
2 CFR 200.520
2 CFR Appendix II of Part 200
2 CFR Appendix Part 200
29 CFR PART 5
31 USC 1352
Executive Order 11738
Food and Nutrition Service
IC § 18-1351
IC § 33-316
Section 306
Section 508
7 CFR 210.23(c)
7 CFR 225.15(c)
7 CFR 226.15(e)
7 CFR 250.54

Policy History:
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Revised On:
Reviewed On: 07/13/26

Misc. Procurement Standards - Requirements and Restrictions for Procurement Under a Federal Award - Competition 7400-P(3)

The following shall be required in the case of procurement under a federal grant to ensure adequate competition.

Geographical Preferences Prohibited

The District shall conduct procurements in a manner that prohibits the use of statutorily or administratively imposed state, local, or tribal geographical preferences in the evaluation of bids or proposals, except in those cases where applicable federal statutes expressly mandate or encourage geographic preference. When contracting for architectural and engineering services, geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.

Buy American and School Meals

When making purchases for the District's school lunch program, the District shall, to the maximum extent practicable, purchase domestic commodities or products.

For the purposes of this procedure, "domestic commodity or product" shall mean:

1. An agricultural commodity that is produced in the United States; and
2. A food product that is processed in the United States substantially using agricultural commodities that are produced in the United States.

Additionally, the District shall require school meal program suppliers to attest that their final food products are either 100% domestic commodities or a food product containing over 51% domestic food components, by weight or volume.

Exceptions to this Buy American requirement may be made when the District determines that:

1. The food or food product is not produced or manufactured in the United States in sufficient or reasonably available quantities of a satisfactory quality; or
2. Competitive bids reveal the cost of a United States food or food product is significantly higher than the non-domestic product.

When such an exception is made, the Superintendent or their designee shall document such exceptions. Non-domestic food purchases shall not exceed the limits set in 7 CFR 210.21(d)(5).

The District shall include language requiring the purchase of foods that meet these Buy American requirements in all procurement procedures, solicitations, and contracts.

Prequalified Lists

The District shall ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, the District shall not preclude potential bidders from qualifying during the

solicitation period.

Solicitation Language

The District shall ensure that all solicitations incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description shall not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product, or service to be procured and, when necessary, shall set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. Detailed product specifications should be avoided if at all possible.

When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a "brand name or equivalent" description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers shall be clearly stated; and identify all requirements which the offers must fulfill and all other factors to be used in evaluating bids or proposals.

Contracting with Small and Minority Businesses and Women's Business Enterprises

When soliciting goods and services on projects that will use federal funds, the District shall comply with the following requirements for the purpose of ensuring small business, minority-owned businesses and women's business enterprises are to be used whenever possible:

1. Place qualified small and minority businesses and women's business enterprises on its solicitation lists;

2. Assure that small and minority businesses, and women's business enterprises are solicited and notified whenever they are potential sources of the needed goods or services;

3. Divide the total requirements of a project, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;

4. Establish reasonable delivery schedules, where the project requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;

5. Consult the services, assistance, and information, as appropriate, of qualified organizations such as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and

6. Require a project's prime contractor, if subcontracts are to be let, to take the affirmative steps listed in the numbered list above.

Legal References
2 CFR § 200.317
2 CFR § 200.318
2 CFR § 200.320
2 CFR § 200.334
2 CFR 200.320(b)(1)(2)
2 CFR 200.520
2 CFR Appendix II of Part 200
2 CFR Appendix Part 200
29 CFR PART 5
31 USC 1352
7 CFR 210.23(c)
7 CFR 225.15(c)
7 CFR 226.15(e)
7 CFR 250.54
Executive Order 11738
Food and Nutrition Service
IC § 18-1351
IC § 33-316
Section 306
Section 508

Policy History:
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Revised On:
Reviewed On: 07/13/26

Misc. Procurement Standards - General Procurement Standards for Federal Awards 7400-P(4)

Contractor Oversight

The District shall maintain oversight to ensure that its contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

Substitutions and Deviations

Any time an accepted item is not available, the Superintendent or their designee will select an acceptable alternate. The contractor must inform the Superintendent or their designee when such an item is not available by **10 days** before delivery of the item is expected. In the event a non-domestic agricultural product is to be provided to the District, the contractor must obtain written approval of the product in advance. The Superintendent or their designee must comply with the Buy American Provision.

Conflict of Interest

The following standards of conduct define conflicts of interest and govern the performance of employees engaged in the selection, award, and administration of contracts:

1. No District employee, officer, agent or board member may participate in the selection, award, or administration of a contract supported by a federal award if they have a real or apparent conflict of interest. Such a conflict of interest is present when the employee, officer, or agent, any member of their immediate family, their partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm or person considered for a contract.

2. District officers, employees, and agents of the non-federal entity must neither solicit nor accept gratuities, favors, nor any service or item exceeding $50 in value from any contractor or subcontractor. Any District employee, who solicits any gift, or who accepts an unsolicited gift with a value exceeding $50, shall be subject to disciplinary action up to and including termination. Any District officer or agent found to have violated these standards shall be immediately terminated or separated from District service.

3. Any subrecipient of the District that is not a state, local government or Indian tribe shall also maintain written standards of conduct covering organizational conflicts of interest. For the purposes of this policy, organizational conflicts of interest are when a recipient or subrecipient is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization due to relationships with a parent company, affiliate, or subsidiary organization.

Efficient Purchases

The District shall use all resources and assets effectively and efficiently. Accordingly, prior to any purchase request, the requestor shall evaluate the need for the item, and shall ensure that the acquisition of

unnecessary or duplicative items is avoided. In addition to the previous requirements, whenever feasible, consideration should be given to consolidating or breaking out procurements to obtain a more economical purchase. Finally, where appropriate, an analysis will be made of lease versus purchase alternatives, and any similar analysis of alternatives to determine the most economical approach.

1. To foster greater economy and efficiency, and in accordance with efforts to promote cost-effective use of shared services across the federal government, the District shall endeavor to enter into state and local intergovernmental agreements or inter-entity agreements where appropriate for procurement or use of common or shared goods and services.

2. The District shall endeavor to use federal excess and surplus property in lieu of purchasing new equipment and property whenever such use is feasible and reduces project costs.

3. The District shall endeavor to use value engineering clauses in contracts for construction projects of sufficient size to offer reasonable opportunities for cost reductions. Value engineering is a systematic and creative analysis of each contract item or task to ensure that its essential function is provided at the overall lower cost.

4. The District shall award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration shall be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources.
5. The District may use time and material type contracts only after a determination that no other contract is suitable and if the contract includes a ceiling price that the contractor exceeds at its own risk. Time and material type contract means a contract whose cost to the District is the sum of:

    1. The actual cost of materials; and
    2. Direct labor hours charged at fixed hourly rates that reflect wages, general and administrative expenses, and profit.

This formula generates an open-ended contract price, a time-and-materials contract provides no positive profit incentive to the contractor for cost control or labor efficiency. Therefore, each contract shall set a ceiling price that the contractor exceeds at its own risk. Further, the District shall assert a high degree of oversight in order to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls.

7. The District alone shall be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements. These issues include, but are not limited to, source evaluation, protests, disputes, and claims. These standards do not relieve the District of any contractual responsibilities under its contracts. Violations of law shall be referred to the local, state, or federal authority that has proper jurisdiction.

<u>Recordkeeping</u>

The District shall retain all books, records and other documents related to any contract agreement for three years after final payment, and the contractor shall also be required to retain such records during that

time. During that period, such records shall be provided in full upon request to the District, the State Department of Education, or to USDA auditors. The documents to be retained by the District shall include at least the following:

1. A written rationale for the method of procurement;
2. A copy of the original solicitation;
3. The selection of contract type;
4. The bidding and negotiation history and working papers;
5. Contractor selection or rejection and the basis for contractor selection;
6. Approval from the State agency to support a lack of competition when competitive bids or offers are not obtained;
7. The basis for award cost or price;
8. The terms and conditions of the contract;
9. Any changes to the contract and negotiation history;
10. Billing and payment records;
11. A history of any contractor claims;
12. A history of any contractor breaches;
13. A record of the date, time, and location of the public opening of any bids or proposals;
14. Copies of all letters informing parties that submitted bids or proposals that the contract has or has not been awarded to them; and
15. Copies of any advertisements for solicitations of goods or services.

All invitations for bids, requests for proposals, and requests for quotations shall also be signed by the authorized purchaser and kept with appropriate documentation.

The authorized purchaser shall maintain records of all non-competitive negotiation purchases, including at least the following:

1. The name of the item purchased;
2. The dollar amount;
3. The vendor or contractor, and
4. The reason non-competitive procurement was used.

Termination for Cause or Convenience

For all contracts over $10,000 the District shall include a description of how the contract can be terminated for cause or convenience and the basis for settlement when such termination occurs.

Price Adjustment

The District shall contemplate not only the need for including an economic price adjustment clause (sometimes referred to as an escalator) in their contracts, but also to carefully enforce the terms of the clause and demand price reductions when appropriate.

If the following conditions are met, a contract with an economic price adjustment is appropriate and the District may, at its own discretion, include an economic price adjustment clause—or escalator—in their contracts:

1. Contract performance will or may cover an extended period of time;
2. There is serious doubt about the stability of market conditions during the period of the contract;
3. Adjustment standards or indices agreed to are based on contingencies outside the contractor's control; and
4. Contingencies, such as increases in labor costs, that would otherwise be included in the contract price can be identified and covered separately in the contract.

The escalator shall be tied to an appropriate standard or cost index, which shall be noted in the original solicitation of bids as well as the contract documents.

The District shall monitor any elevators included in their contracts to ensure the price is decreased if appropriate and shall respond to contractor notice of warranted price increases.

Construction Contracts ($2,000 or More)

Contractors for any construction contract of $2,000 or more shall comply with the Davis-Bacon Act and its related administrative rules set out in 29 CFR Part 5. This includes requirements related to contract language, wages, and fringe benefits.

Byrd Anti-Lobbying Certificate ($100,000 or More)

Any contractor providing a bid on a contract of $100,000 or more shall file a Byrd anti-lobbying certificate verifying to the District that they will not and have not used federal funds to pay a person or organization to influence or attempt to influence an officer or employee of any agency, a member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any federal contract, grant, or any other award covered by 31 U.S.C. 1352. The contractor shall disclose any lobbying they have engaged in in connection with obtaining any Federal award using non-federal funds. The District shall relay these disclosures to the State Department of Education.

Clean Air Act Requirements ($150,000 or More)

Contractors shall comply with all applicable standards, orders, and requirements issued under Section 306 of the Clean Air Act, Section 508 of the Clean Water Act, Executive Order 11738, and Environmental Protection Agency regulations that prohibit the use of facilities on the EPA's list of Violating Facilities, unless the applicable contract, grant, or loan is exempt from these requirements. The District shall report any known violation of this requirement to the State Department of Education and the USEPA Assistance Administrator for Enforcement.

Legal References
2 CFR § 200.317
2 CFR § 200.318
2 CFR § 200.320
2 CFR § 200.334
2 CFR 200.320(b)(1)(2)
2 CFR 200.520

2 CFR Appendix II of Part 200
2 CFR Appendix Part 200
29 CFR PART 5
31 USC 1352
7 CFR 210.23(c)
7 CFR 225.15(c)
7 CFR 226.15(e)
7 CFR 250.54
Executive Order 11738
Food and Nutrition Service
IC § 18-1351
IC § 33-316
Section 306
Section 508

Policy History:
Adopted On: 08/10/26
Revised On:
Reviewed On: 07/13/26

Procurement of Goods and Services for School Meal Programs 7403

When making purchases related to the District federally funded school breakfast and lunch programs, the District shall adhere to the following requirements in addition to any more restrictive requirements imposed by other applicable policies.

All contractors under these programs shall be in conformance with the applicable portions of the District's agreement under the Child Nutrition Programs. The contractor will conduct program operations in accordance with 7 CFR Parts 210, 7 CFR 215, 7 CFR 220, 7 CFR 225, 7 CFR 226 and 7 CFR 250. All contracts with food service management companies shall include all items required per the State Department of Education. More information on these is available from the State Department of Education's Child Nutrition Programs Department.

The Superintendent or designee shall be responsible for determining the procurement needs of the District's nutrition programs, forecasting the amounts to be purchased, ensuring the applicable procurement method is used, and for overseeing such procurement. They shall also be responsible for notifying vendors in writing that their bid, proposal, or quote has or has not been accepted.

Discounts and Rebates

All contractors shall fully disclose all discounts, rebates, allowances, and incentives received from their suppliers. The contractor shall return to the District the full amount of any such discounts, rebates, or credits received for any purchase made on behalf of the District. The contractor must individually identify the amount and nature of each of these on bills and invoices presented to the District for payment. The District shall also not make any payment from this account to a contractor that would result in the contractor receiving payment that exceeds their actual, next allowable costs.

The District shall not make any expenditure from its nonprofit food service account for any cost resulting from a cost-reimbursable contract that fails to meet this requirement and any other requirements laid out in 2 CFR 200 and 7 CFR 210.21.

Micro Purchases ($15,000 or Less)

The District shall, to the extent practicable, distribute micro purchases equitably among qualified suppliers. Micro purchases may be awarded without soliciting competitive quotes if the District considers the price to be reasonable. The District shall maintain evidence of this reasonableness with the records of any such purchase.

Small Purchase Procedures ($15,000 to $100,000)

Before making a small purchase, the District shall obtain quotes from vendors. When possible, three quotes should be obtained, and in all cases at least two quotes will be obtained. These quotes may be provided verbally and shall be documented by the District.

Informal Bidding ($100,000 to $250,000)

The District shall issue a written request for bids for any purchase subject to semi-formal bidding requirements. This request describing the goods or services desired shall be provided to at least three vendors. Unless there is an emergency, the District shall grant the vendors three days to provide a written response. In all cases, the vendors shall have one day to submit any objections.

Formal Bidding ($250,000 or More)

At least two weeks before the bid opening, the District shall publish notice of the request for bids. The District shall make bid specifications available upon request and will accept written objections. The District may, at its discretion, request a security or bond from vendors submitting bids.

All bids shall be publicly opened at the time and place prescribed in the invitation for bids.

The purchase shall be made pursuant to an open competitive sealed bid process. The procurement shall be made from the qualified bidder submitting the lowest bid price complying with bidding procedures and meeting the specifications for the goods and/or services sought to be procured.

The contract shall be:

1. A firm fixed price contract and may specify a lump sum or a per-unit price;
2. A cost-reimbursable contract; or
3. Established by line item bidding.

The District may reject any bid if there is a sound and documented reason to do so.

USDA Non-Discrimination Statement

In accordance with federal civil rights law and USDA civil rights regulations and policies, the District, as an institution participating in or administering USDA programs, is prohibited from discriminating based on race, color, national origin, religion, sex, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the District or the State Department of Education or contact USDA through the Telecommunications Relay Service at 711 (voice and TTY). Additionally, program information may be made available in languages other than English.

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at How to File a Program Discrimination Complaint and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter

to USDA by:

Mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Mail Stop 9410, Washington, D.C. 20250-9410;
Fax: (202) 690-7442; or
Email: program.intake@usda.gov.

Legal References
2 CFR § 200.319
2 CFR § 200.320(a) and (b)
2 CFR 200
2 CFR 200.214
47 CFR § 54.520(c)(1)(i)
7 CFR 210.21
7 CFR 215
7 CFR 220
7 CFR 225
7 CFR 226
7 CFR 250
Food and Nutrition Service
IC § 67-2806

Policy History:
Adopted On: 08/10/26
Revised On:
Reviewed On: 07/13/26

Public Works Contracting and Procurement 7405

No contract involving a public works project shall be let to any contractor who is not licensed as required by the laws of this State. Further, the District shall at all times adhere to the bidding requirements for public works contracting and procurement as set out in State law.

Public Works Contractor Licensure Requirements

$0 to $50,000	No licensure requirement	IC 54-1903(9)
$50,000 and above	Licensure required	IC 54-1903(9)

Exemptions from Public Works Contractor Licensure

Less than $50,000 for construction, alteration, improvement, or repair. Single project with any number of trades.	IC 54-1903(9)
Any construction, alteration, or repair due to an emergency. Pursuant to the provision of, Chapter 10, Title 46 Idaho Code	IC 54-1903(11)

Public Works Construction Bidding

$0 to $50,000	No bidding requirements	IC 67-2803(2)
$50,000 to $200,000	Semi-formal bidding: Issue written requests for bids describing the work to at least 3 licensed contractors. Allow 3 days for written response; objections 1 day prior to bid. Keep records for 6 months. Accept low bid, or reject all bids	
$200,000 and above	Formal bidding 2 **Options A & B:**	
	Category A –Open to all licensed contractors. Publication requirements. Written objections allowed. May request bid security/bond. Accept low bid, or reject all bids. See code for details.	(IC 67-2805(2)(a)
	Category B –Open to pre-qualified contractors. After pre-qualification is determined, the bidding process is in the same manner as Category A.	IC 67-2805(2)(b)

Public Works Contracting and Procurement (continued) **7405**

Legal Reference:	I.C. § 33-601	Real and Personal Property – Acquisition, Use or Disposal of Same
	I.C. § 54-1903	Unlawful to Engage in Public Works Contracting Without License – Exemptions
	I.C. § 67-2801 et seq.	Purchasing by Political Subdivisions
	I.C. § 74-401 et seq.	Ethics in Government

Other Reference: Policies and Procedures Used Template. Idaho State Department of Education, http://www.sde.idaho.gov/sped/funding/

Policy History:
Adopted on: 7/6/09
Revised on: 2/12/18, 5/31/19

Public Procurement of Goods and Services **7407**

The District shall at all times adhere to the bidding requirements for the procurement of goods and services as set out in State law.

$0 to $50,000	No bidding requirements	IC 67-2803(2)
$50,001 to $100,000	Semi-formal bidding: Issue written requests for bids describing goods or services desired to at least three vendors. Allow three days for written response, unless an emergency exists; One day for objections. Keep records for six months. Accept low bid, or reject all bids.	IC 67-2806(1)
$100,001 and above	Formal bidding: Publish bid notice at least two weeks in advance of bid opening. Make bid specifications available; written objections allowed. May request bid security/bond. Can reject all if able to purchase more economically in the open market.	IC 67-2806(2)

Exemptions to Public Procurement of Goods and Services Bidding		
Personal Property	Already competitive bid (piggy-backing)	IC 67-2803(1)
Less than $50,000	Contracts or purchases of goods or services	IC 67-2803(2)
Any Amount	Payments of Wages	IC 67-2803(3)
Any Amount	Personal or professional services performed by an independent contractor. (Refer to info on qualifications in I.C. 67-2320)	IC 67-2803(4)
Any Amount	Procurement of an interest in real property – lease or purchase	IC 67-2803(5)
Any Amount	Procurement of insurance	IC 67-2803(6)
Any Amount	Costs of Joint Powers participation	IC 67-2803(7)
Any Amount	Procurement of used personal property	IC 67-803(8)
Any Amount	Procurement from federal government general services administration (GSA) schedules or federal multiple award schedules (MAS)	IC 67-803(9)
Any Amount	Procurement of personal property or services through contracts entered into by the division of purchasing of the department of administration of the state of Idaho	IC 67-2803(10)
Any Amount	Procurement of goods for direct resale	IC 67-2803(11)
Any Amount	Procurement of travel and training;	IC 67-2803(12)

Public Procurement of Goods and Services(continued) **7407**

Any Amount	Procurement of goods and services from Idaho correctional industries	IC 67-2803(13)
Any Amount	Procurement of repair for heavy equipment	IC 67-2803(14)
Any Amount	Procurement of software maintenance, support and licenses of an existing system or platform that was bid in compliance with state law	IC 67-2803(15)
Any Amount	Procurement of public utilities	IC 67-2803(16)
Any Amount	Procurement of food for use in jails or detention facilities	IC 67-2803(17)
Any Amount	Procurement of used equipment at an auction if authorized by the governing board	IC 67-2803(18)
Any Amount	Emergency Expenditures	IC 67-2808(1)

Legal Reference: I.C. § 67-2801 et seq. Purchasing by Political Subdivisions

Policy History:
Adopted on: 7/6/09
Revised on: 2/12/18

Contracts **7409**

The Board may enter into service contracts with independent contractors as necessary for the operation of the District. The Board shall comply with the requirements of Idaho Code Section 67-2800, et seq., relative to competitive bidding for such contracts and this District's Policy 7400 entitled "Purchasing".

The Board may enter into personal service contracts, as determined to be in the best interest of the District, to carry out its responsibilities and duties in governing the district and accomplishing the District's educational goals and objectives. Such contracts are exempt from statutory bidding requirements.

The Board of Trustees of this District authorizes the Superintendent or designee to enter into agreements with private service providers when he/she determines that the necessary educational services are not available through the District or that it is in the best interest of a student and the District to enter into an agreement with a private service provider. Such agreements may be entered into for services identified on a student's IEP or 504 plan, or for other educational services as needed by the District. In no event shall such agreement exceed twelve (12) calendar months.

Any agreement signed by the Superintendent/designee with private service providers, pursuant to this policy, shall set forth the terms of the agreement, the relationship of the parties, the services to be provided, provisions for record keeping and confidentiality of records, the billing procedures, as well as other terms that are deemed to be necessary.

The Superintendent/designee shall select private service providers pursuant to this policy based on their qualifications, work experience, availability, lack of conflict of interest with the District, and financial stability. While the Superintendent/designee may also consider a parent's request for a particular service provider, such request will not be the controlling factor in selecting a private service provider.

No private service providers hired under this policy shall be considered employees of the District. Further, all private service providers, and their employees, shall be fully qualified for the services for which the agreement specifies.

Policy History:
Adopted on: 2/9/09
Revised on:

Petty Cash Funds **7410**

The use of petty cash funds shall be authorized for specific purchases only. Those purchases will include individual purchases of supplies and materials under the amount of Fifty Dollars ($50), postage, delivery charges, and freight. Individual personal reimbursements which exceed Fifty Dollars ($50) should not be made from petty cash funds. Petty cash accounts will be maintained as cash on hand, and the total dollar amount of each petty cash account will be limited to Two Hundred Dollars ($200) for secondary schools and One Hundred Dollars ($100) for elementary schools and school offices and departments.

Each administrator of a school or department with a petty cash fund account may appoint and designate a fund custodian to carry out the bookkeeping and security duties. Monies which are not specifically petty cash monies shall not be co-mingled with the petty cash fund. At the conclusion of each school year, all petty cash funds must be closed out and the petty cash vouchers and cash on hand returned to the business office for processing.

The District business office shall be responsible for establishing the procedures involving the use and management of petty cash funds.

Policy History:
Adopted on: 2/9/09
Revised on:

Petty Cash Funds **7410**

While it is recommended that all purchases of goods or services be made within established purchasing procedures, there may be an occasional need for an employee to make a purchase for the benefit of the District from personal funds. In that event, an employee will be reimbursed for a personal purchase under the following criteria:

1. It is clearly demonstrated that the purchase is of benefit to the District.
2. The purchase was made with the prior approval of an authorized administrator.
3. The item purchased was not available from resources within the District.
4. The claim for personal reimbursement is properly accounted for and documented with an invoice/receipt.

The District business office will be responsible for the development of the procedures and forms to be used in processing claims for personal reimbursements.

Legal Reference:
Idaho Code Section 33-506

Policy History:
Adopted on: 1/8/07
Revised on: 2/9/09

Payroll **7425**

This School District will issue one payroll per month.

Salary payments for certificated personnel will be prorated on a twelve-month (12-month) basis. The payroll for all other personnel is authorized on the basis of the time sheet submitted to the central office.

Supplemental pay for special assignments will be paid according to a schedule approved by the Board. Such payment will be made in accordance with the regular payroll procedure. Supplement pay will be prorated on a twelve-month (12-month) basis unless the employee requests, in writing, full payment at the completion of the activity assignment.

All payroll warrants are subject to those deductions which are required by statute of the State of Idaho and the federal government. Any other payroll deductions for school employees will be in accordance with Board policy and upon written authorization of the employee.

Compulsory payroll deductions will be made as required by Idaho and federal law.

Optional deductions will be made upon written request by the employee for such purposes as approved by the Board.

Legal Reference:
I.C. 33-506
I.C. 33-515

Policy History:
Adopted on: 1/8/07
Revised on: 2/9/09

Travel Allowances and Expenses **7430**

Every District employee and Trustee shall be reimbursed for travel expenses while traveling and engaged in official District business. All travel expenses must be reported on the established travel expense and voucher forms and, for employees, approval must be granted prior to traveling by the Superintendent or designee.

The District business office shall be responsible for the development of procedures and forms to be used in connection with travel expense claims and reimbursements.

Advance funding for travel, or use of a District credit card, is permitted for approved travel. Any unused advanced funds must be returned to the District immediately upon the employee's return. The amount of any expenses or credit card charges not subsequently approved must be returned to the District within thirty days of notification. Any such funds not returned may be deducted from the employee's paycheck.

Unless the District is directly billed for the employee's travel expenses by a third party, the following rates will apply (as modified by the Negotiated Agreement, if applicable):

- Registration Costs: The actual registration cost will be paid by the District.

- Lodging: The actual cost of lodging, with the maximum amount as set by the Idaho Board of Examiners.

- Meals: When the employee is traveling out of the District, the actual cost of meals will be reimbursed, with a maximum daily rate not higher than that allowed under the Internal Revenue Code for travel within or outside the state of Idaho. The employee must submit receipts for all meals for which reimbursement is sought. The District will not reimburse employees for the purchase of beer, wine or alcoholic beverages.

  In those instances where District employees are traveling outside the district on official business for less than twenty-four (24) hours, the partial day's subsistence rates set by the Idaho Board of Examiners will apply. If the employee is required to travel prior to 7:00 a.m., breakfast will be paid. If the employee is required to travel at noon, lunch will be paid. If the employee is required to travel after 7:00 p.m., dinner will be paid.

- Travel: The actual cost of travel (air and taxi fare, parking, etc.) will be reimbursed; receipts for such costs must be submitted to the District. When the employee drives his/her own vehicle, the cost of transportation will be based on the miles traveled. Such mileage will be reimbursed at the rate currently in place for employees of the State of Idaho. The District will not pay the costs of citations for traffic and parking violations.

Legal Reference:
I.C. 33-701 Fiscal year – Payment and accounting of funds
I.C. 67-2008

Policy History:
Adopted on: 1/8/07
Revised on: 2/9/09

District Credit Cards **7440**

The Board of Trustees permits the use of District credit cards by certain school officials to pay for actual and necessary expenses incurred in the performance of work-related duties for the District.

All credit cards shall be in the name of the School District. Credit cards may only be used for legitimate School District business expenditures. The use of credit cards is not intended to circumvent the District's policy on purchasing. Purchases that are unauthorized, illegal, represent a conflict of interest, are personal in nature or violate the intent of this policy may result in credit card revocation and discipline of the employee.

The Superintendent shall monitor monthly the use of each credit card by reviewing credit card expenditures and report any serious problems and/or discrepancies directly to the Board.

Credit Card Users

A list of those individuals that will be issued a District credit card shall be maintained in the Business Office and reported to the Board each year at its reorganizational meeting in July.

Credit card users must take proper care of the credit card(s) and take all reasonable precautions against damage, loss or theft. Any damage, loss or theft must be reported immediately to the Business Office and to the appropriate financial institution. Failure to take proper care of credit cards or failure to report damage, loss or theft may subject the employee to financial liability.

Users must submit detailed documentation, including itemized receipts for services, travel and/or other actual and necessary expenses which have been incurred in connection with school-related business for which the credit card has been used. Failure to provide a proper receipt can make the employee responsible for expenses incurred.

Credit Card Limits

The District shall establish a credit line not to exceed $5,000 for each card issued and an aggregate credit limit of $25,000 for all cards issued to the district.

Return of Credit Card

A District employee who is no longer employed by the District shall return the credit card upon termination to the Superintendent no later than five calendar days after termination.

Misuse and/or Unauthorized Use

An employee who violates a provision of this policy shall have his/her credit card revoked immediately and shall be subject to disciplinary action as determined by the Superintendent and reported to local law enforcement. If the Superintendent violates a provision of this policy, he/she shall be subject to disciplinary action as determined by the Board and reported to local law enforcement.

District Credit Cards **7440**

Additional Procedures

The Superintendent may establish additional procedures governing the issuance and use of District credit cards that do not contradict any part of this policy. Each cardholder shall be apprised of the procedures governing the use of the credit card and a copy of this policy and accompanying procedures shall be given to each cardholder.

Legal Reference:

I.C. 18-5701 Misuse of Public Money by Officers
I.C. 18-5703 Definitions
I.C. 33-512

Policy History:
Adopted on: 1/8/07
Revised on: 10/17/07, 2/9/09

Federal Cash Management Policy **7450**

The District will comply with applicable methods and procedures for payment that minimize the time elapsing between the transfer of funds and disbursement by the District, in accordance with the Cash Management Improvement Act. Generally, the District receives payment from the State Department of Education on a reimbursement basis.

According to guidance from the U.S. Department of Education (USDE), when calculating the interest earned on USDE grant funds, regardless of the date of obligation, interest is calculated from the date that the federal funds are drawn down from the G5 system until the date on which those funds are disbursed by the District.

Payment Methods

1. **Reimbursements:** The District will initially charge federal grant expenditures to nonfederal funds.

   The District Grant Accountant or Business Manager will request reimbursement for actual expenditures incurred under the federal grants monthly. All reimbursements are based on actual disbursements, not on obligations. Reimbursement requests will be submitted on a District form to the State Department of Education.

   The Superintendent or his or her designee shall promulgate a procedure specifying any further requirements.

   Consistent with State and federal requirements, the District will maintain source documentation supporting the federal expenditures; such as invoices, time sheets, and payroll stubs; and will make such documentation available for the State Department of Education to review upon request.

   Reimbursements of actual expenditures do not require interest calculations.

2. Advances: To the extent the District receives advance payments of federal grant funds; the District will strive to expend the federal funds on allowable expenditures as expeditiously as possible. Specifically, the District shall attempt to expend all drawdowns of federal funds within 72 hours of receipt.

   The District will hold federal advance payments in interest-bearing accounts, unless an allowable exception applies. The District will begin to calculate interest earned on cash balances once funds are deposited into the District's account.

   Interest will be calculated quarterly. Total federal grant cash balances will be calculated on cash balances per grant and applying the District's actual or average interest rate. Within 30 days of the end of the quarter, the District will remit interest earned. The District may retain up to $500 of interest earned per year.

   The Superintendent or his or her designee shall promulgate a procedure specifying the process for remitting interest.

Federal Cash Management Policy **7450**

Legal Reference:	2 CFR § 200.305	Payment
	31 CFR § 205	Rules and Procedures for Efficient Federal-State Funds Transfers

Policy History:
Adopted on: 8/12/19
Revised on:
Reviewed on:

Timely Obligation of Funds **7450P1**

When Obligations are Made

Obligations are orders placed for property and services, contracts, and subawards made, and similar transactions during a given period that require payment by the District during the same or a future period.

Funds received under a federal grant shall be considered to be obligated according to the standards provided in 34 C.F.R. § 75.707 or 34 C.F.R. § 76.707, as applicable. The following table illustrates when funds are determined to be obligated under federal regulations:

If the obligation is for:	**The obligation is made:**
Acquisition of property	On the date on which the District makes a binding written commitment to acquire the property
Personal services by an employee of the District	When the services are performed
Personal services by a contractor who is not an employee of the District	On the date which the District makes a binding written commitment to obtain the services
Public utility services	When the District receives the services
Travel	When the travel is taken
Rental of property	When the District uses the property
A pre-agreement cost that was properly approved by the Secretary under the cost principles in 2 CFR part 200, Subpart E- Cost Principles.	On the first day of the project period.

Period of Performance of Federal Funds

All obligations must occur on or between the beginning and ending dates of the grant project. This period of time is known as the period of performance. The period of performance is dictated

Timely Obligation of Funds (continued) **7450P1**

by statute and will be indicated in the Grant Adjustment Notice (GAN). Further, certain grants have specific requirements for carryover funds that must be adhered to.

State-Administered Grants: As a general rule, state-administered federal funds are available for obligation within the year that Congress appropriates the funds for. However, given the unique nature of educational institutions, for many federal education grants, the period of availability is 27 months. Federal education grant funds are typically awarded on July 1 of each year. While the District will always plan to spend all current grant funds within the year the grant was appropriated for, the period of obligation for any grant that is covered by the "Tydings Amendment" is 27 months, extending from July 1 of the fiscal year for which the funds were appropriated through September 30 of the second following fiscal year. This maximum period includes a 15-month period of initial availability, plus a 12-month period for carryover. For example, funds awarded on July 1, 2015 would remain available for obligation through September 30, 2017.

Direct Grants: In general, the period of availability for funds authorized under direct grants is identified in the GAN.

For both state-administered and direct grants, regardless of the period of availability, the District must liquidate all obligations incurred under the award not later than 90 days after the end of the funding period unless an extension is authorized. Any funds not obligated within the period of availability or liquidated within the appropriate timeframe are said to lapse and must be returned to the awarding agency. Consequently, the District shall closely monitor grant spending throughout the grant cycle.

Carryover

State-Administered Grants: As described above, the Tydings Amendment extends the period of availability for applicable state-administered program funds. Essentially, it permits recipients to "carry over" any funds left over at the end of the initial 15 month period into the next year. These leftover funds are typically referred to as carryover funds and continue to be available for obligation for an additional 12 months. Accordingly, the District may have multiple years of grant funds available under the same program at the same time.

Any carryover in individual federal programs is determined in an annual audit performed each year according to GAAP and State statutes. After carryover amounts are determined, they are reported and administered according to specific federal award requirements as outlined in the individual program applications.

Procedure History:
Adopted on: 8/12/19
Revised on:
Reviewed on:

Program Income **7450P2**

Definition

Program income means gross income earned by a grant recipient that is directly generated by a supported activity or earned as a result of the federal award during the grant's period of performance.

Program income includes, but is not limited to, income from fees for services performed, the use or rental of real or personal property acquired under federal awards, the sale of commodities or items fabricated under a federal award, license fees and royalties on patents and copyrights, and principle and interest on loans made with federal award funds. Interest earned on advances of federal funds is not program income. Except as otherwise provided in federal statutes, regulations, or the terms and conditions of the federal award, program income does not include rebates, credits, discounts, and interest earned on any of them. Additionally, taxes, special assessments, levies, fines, and other such revenues raised by a recipient are not program income unless the revenues are specifically identified in the federal award or federal awarding agency regulations as program income. Finally, proceeds from the sale of real property, equipment, or supplies are not program income.

Use of Program Income

The default method for the use of program income for the District is the deduction method. Under the deduction method, program income is deducted from total allowable costs to determine the net allowable costs. Program income will only be used for current costs unless the District is otherwise directed by the federal awarding agency or pass-through entity. The LEA may also request prior approval from the federal awarding agency to use the addition method. Under the addition method, program income may be added to the Federal award by the Federal agency and the non-Federal entity. The program income must then be used for the purposes and under the conditions of the Federal award.

While the deduction method is the default method, the District shall always refer to the GAN prior to determining the appropriate use of program income.

It is the policy of the District that no program income will be generated in federal programs. If program income is generated, the Business Manager will account for it in accordance with the District's normal accounting procedures, utilizing the special revenue accounting codes of IFARMS, and track as program income attributable to a specific federal program.

Procedure History:
Adopted on: 8/12/19
Revised on:
Reviewed on:

Federal Debarment and Suspension 7455

Federal Debarment and Suspension

For all District programs receiving federal funds, the District shall comply with all applicable federal regulations that restrict or prohibit transactions using federal funds with all persons or entities that are debarred, suspended, or otherwise excluded from or ineligible for participation in federal assistance programs or activities. This shall include verifying that no awards, subawards, or contracts using federal funds are awarded to parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in the Federal assistance programs or activities.

This limitation is directed by Executive Order 12549 which provides that "a person who is debarred or suspended shall be excluded from federal financial and nonfinancial assistance and benefits under federal programs and activities." Thus, the District shall refrain from entering into any transaction with a person or entity which has been suspended or debarred by the U.S. Department of Education, or other federal agency from which the District has received federal funds.

Covered Federal Non-Procurement Transactions

Federal funds received by the District that are covered by this policy include, but are not necessarily limited to funds received from the following transactions:

1. Grants;
2. Cooperative agreements;
3. Scholarships;
4. Fellowships;
5. Contracts of assistance;
6. Loans;
7. Loan guarantees;
8. Subsidies;
9. Insurances;
10. Payments for specified uses; and
11. Donation agreements.

District's Covered Transactions with Third Parties

This policy applies to circumstances where the District enters into a procurement contract with a third party for goods and/or services, and intends to use covered federal funds to partially or fully purchase such goods and/or services, as more specifically described below:

A contract for goods or services is a "covered transaction" if any of the following applies:

1. The contract is awarded to the District pursuant to a nonprocurement transaction listed above and the amount of the contract is expected to equal or exceed $30,000; or
2. The contract requires the consent of an official of a federal agency. In that case, the contract, regardless of the amount, is always considered a covered transaction, and it does not matter who

awarded it. For example, it could be a subcontract awarded by a contractor at a tier below the District's nonprocurement transaction; or
3. The contract is for federally-required audit services.

In addition, a subcontract is also a covered transaction if:

1. It is awarded by a participant in a procurement transaction under a nonprocurement transaction of a federal agency that extends the coverage of Item 1 above, under "District's Covered Transactions with Third Parties"; and
2. The value of the subcontract is expected to equal or exceed $30,000.

District Responsibilities before Entering into Covered Transactions - Prohibition

Prior to entering into a "covered transaction" with a third party, the District shall verify the person or entity with whom it intends to do business is not excluded or disqualified by performing any one of the following:

1. Checking the OMB-designated integrity and performance system accessible through the System for Award Management (SAM.gov)
2. Collecting a certification from that person; or
3. Adding a clause or condition to the covered transaction with that person.

* The General Services Administration (GSA) maintains SAM.gov exclusions and makes them available, as detailed in subpart E. When a federal agency takes action to exclude a person under the nonprocurement or procurement debarment and suspension system, the agency enters the information about the excluded person into the SAM.gov Exclusions. If the District has a question about any person or entity on the SAM.gov, it should contact the point of contact for the federal agency that placed the person's name into the Exclusion List.

In the event the third party is on the SAM.gov exclusions list, the District shall not enter into the contemplated transaction unless and until the federal agency responsible for providing the District with the federal funds grants a written exception.

Legal References
13 CFR § 400.109
2 CFR § 180
2 CFR § 200.206
2 CFR § 200.213
31 USC § 6503

Policy History:
Adopted On: 08/10/26
Revised On:
Reviewed On: 07/13/26

New Fees or Increase of Fees **7500**

The Superintendent or designee shall review annually fees assessed to determine if an increase, decrease, new fee or other change is necessary. The Superintendent or designee shall report the fee findings to the Board at least annually.

In the event a fee increase of four-percent (4%) or less from the prior fee amount is necessary, the Board can review and vote on such a fee increase. However, in the event a fee increase of five-percent (5%) or more from the prior fee amount is necessary, the Board shall hold a hearing upon such proposed fee increase at a regular or special meeting of the Board.

The Board shall provide notice of the meeting according to Idaho Code 63-1311A. Meeting notice shall include the reason for the meeting, i.e. the Board is considering a fee increase that is in excess of five percent (5%) of the amount of fees last collected prior to such decision. If the Board is assessing a new fee, the meeting notice shall indicate such.

For the purpose of this policy, the definition of "fee" will include all fees and charges of this school district for a direct public service, including fees for voluntary activities and extra costs such as extracurricular activities, driver's education, towel or locker use, adult education courses, breakfasts and lunches, parking, and similar services or activities.

Cross Reference: 3440 Student Fees, Fines & Charges
7300 Revenues

Legal reference:

I.C. 63-1311A Advertisement of and Hearing on Fee Increases
I.C. 33-603 Payment of fees or returning of property
I.C. 60-106 Qualifications of Newspapers Printing Legal Notices
Attorney General Opinion No. 94-4

Policy History:
Adopted on: 1/8/07
Revised on: 2/9/09

TROY SCHOOL DISTRICT #287

FINANCIAL MANAGEMENT **7710**

Bond Continuing Disclosure and Certification Requirements

Designation of Administrator

The District hereby designates the Business Manager (the "Administrator") to have the primary responsibility to ensure compliance with the applicable securities laws and rules relating to issued bonds. The Administrator shall review these procedures annually. The Administrator will consult with Bond Counsel and/or the District's legal counsel and advisors, as necessary, to ensure that the District complies with the Bond Disclosure Agreement. This will include, without limitation, consultation in connection with any potential changes in ratings of the bonds or changes in finances or operations of the District. In addition, prior to placing any bond question on a public ballot, the Administrator will ensure that the bond resolution ballot language fits the required description in Idaho Code.

The Administrator will actively participate in the preparation of all primary disclosure materials. The Administrator will review and prepare all post-issuance disclosure materials, including, without limitation, the materials for the District's financial statements and the information described in the Required Annual Filings, and events required to be disclosed under the rule known as the Material Event Filings, and any other voluntary or required disclosure to the market.

The Administrator will review all primary and post-issuance disclosure materials and consult with all officers, employees, directors, agents, and officials of the District as necessary to ensure that such materials do not contain materially false information or omit material information that investors would want to know in making an informed investment decision about the bonds.

The Administrator will also obtain appropriate training in the issuance of municipal bonds, securities law disclosure, proficiency in the use of Electronic Municipal Market Access (EMMA), and update such training on an annual basis or as new developments arise.

Duties of the Administrator

Prior to submitting a bond question to the county clerk, the administrator will ensure it includes required ballot disclosure language found in Title 34, Chapter 9.

Upon the issuance of any bonds, or annually in the absence of such issuance, the Administrator shall update Required Annual Filings to reflect the requirements of the Disclosure Agreements of the District and the requirements thereof.

Within the time specified under each Disclosure Agreement, the Administrator will submit, or cause to be submitted through a disclosure agent if one has been appointed, the District's Required Annual Filing to the Municipal Securities Rulemaking Board (MSRB) via EMMA.

Not more than five days after the submission of the Required Annual Filing to the MRSB, the Administrator shall provide to the Superintendent and the Board of Trustees written confirmation that the Annual Required Filing has been submitted and filed properly with the MSRB through EMMA. The Administrator shall independently verify by access to EMMA that the Required Annual Filing has been filed and properly appears on EMMA.

In the event that the Required Annual Filing is not completed in time to submit the Required Annual Filing to the MRSB through EMMA within the time specified, the Administrator will file a notice of occurrence of such event in accordance with the policy and procedures set forth below under "Reporting of Events," and in accordance with the Rule, and submit the Required Annual Filing as soon as it is available.

Reporting of Events

The Administrator will make, or cause to be made through a disclosure agent if one has been appointed, all required Material Event Filings via EMMA consistent with the requirements of the Rule.

The occurrence of certain events, including payment defaults, requires a Material Event Filing without the need for a materiality determination (*i.e.* they are deemed material under the rule). These include:

1. Principal and interest payment delinquencies;

2. Unscheduled draws on debt service reserves reflecting financial difficulties;

3. Unscheduled draws on credit enhancements reflecting financial difficulties;

4. Substitution of credit or liquidity providers, or their failure to perform;

5. Adverse tax opinions, the issuance by the Internal Revenue Service of proposed or final determinations of taxability, Notices of Proposed Issue (IRS Form 5701-TEB) or other material notices or determinations with respect to the tax status of the security, or other material events affecting the tax status of the security. [**Note: A routine IRS audit is reportable because it could lead to an adverse tax opinion.]**

6. Defeasances;

7. Rating changes;

8. Bankruptcy, insolvency, receivership, or similar event of the obligated person;

9. Default, event of acceleration, termination event, modification of terms or other similar events under the terms of a financial obligation of the obligated person, any of which reflect financial difficulties.

Other events, such as non-payment related defaults, must be analyzed to determine if the event is material and if so, a Material Event Filing is required. The Administrator will consult with Bond Counsel regarding any questions as to whether an event has occurred and what filings are required. These include:

1. The consummation of a merger, consolidation, or acquisition involving an obligated person or the sale of all or substantially all of the assets of the obligated person, other than in the ordinary course of business, the entry into a definitive agreement to undertake such an action or the termination of a definitive agreement relating to any such actions, other than pursuant to its terms, if material.

2. Nonpayment-related defaults, if material.

3. Modifications to rights of security holders, if material.

4. Bond calls, if material, and tender offers.

5. Release, substitution or sale of property securing repayment of the securities, if material.

6. Appointment of a successor or additional trustee or the change of name of a Trustee, if material.

7. Incurrence of a financial obligation or agreement, if material, or agreement to covenants, events of default, remedies, priority rights, or other similar terms of a financial obligation of the obligated person, any of which affect security holders, if material.

The Administrator shall establish appropriate procedures within the District such that officers and employees of the District who have access to material information of the kind that would be required to be disclosed under a Material Event Filing are aware of the requirements of the Disclosure Agreement, and that such officers and employees will report such events to the Administrator in a timely manner. As soon as the Administrator learns of the occurrence of an event that is either deemed material or that knowledge of such an event would be material under applicable securities law, the Administrator will prepare and file, or cause to be filed, in a timely manner not in excess of ten business days of the occurrence, a Material Event Filing via EMMA. Not more than five days after the submission of a Material Event Filing to the MRSB, the Administrator shall independently verify by access to EMMA that the Material Event Filing has been filed and properly appears on EMMA.

Nothing in a Disclosure Agreement prevents the District from making a voluntary filing with the MSRB of other material information in addition to the events that give rise to a Material Event Filing under the rule and the Disclosure Agreement.

Failure to File

In the event the Administrator fails to make any Required Annual Filing or Material Event Filing, the Administrator shall immediately notify the officer of the District to whom the

Administrator reports of such failure to file and will cooperate fully to consider whether the District should engage a Disclosure Agent if one has not already been engaged, or take other action to ensure future filings are made on a timely basis.

Correspondence from Securities and Exchange Commission (SEC)

Upon receipt of any correspondence from the SEC, the Administrator will immediately notify the District, provide the District with a copy of such correspondence, and develop a plan of action to respond to the SEC inquiry.

Record-Keeping Requirements

Unless otherwise specified in applicable District resolutions or tax certificates, the District shall maintain the following documents for the term of each issue of bonds (including refunding bonds, if any) plus at least an additional three years:

1. A copy of the bond closing transcript(s) and other relevant documentation delivered to the District at or in connection with closing of the issue of bonds;

2. A copy of all material documents relating to capital expenditures financed or refinanced by bond proceeds, including (without limitation) construction contracts, purchase orders, invoices, trustee requisitions and payment records, as well as documents relating to costs reimbursed with bond proceeds, and records identifying the assets or portion of assets that are financed or refinanced with bond proceeds;

3. A copy of all contracts and arrangements involving private use of bond-financed assets or for the private use of output or throughput of bond-financed assets; and

4. Copies of all records of investments, investment agreements, arbitrage reports, and underlying documents, including trustee statements.

Legal References:	I.C. § 34-913	Disclosures in Elections to Authorize Bonded Indebtedness
	Municipal Securities Rulemaking Board Rule Book (Updated October 1, 2016) http://www.msrb.org/msrb1/pdfs/MSRB-Rule-Book-PDF-Current-Quarter.pdf	

Policy History:
Adopted on: 4/11/2022
Revised on:
Reviewed on: 3/14/2022

Troy School District Foundation **7900**

The Troy School District Foundation is established for the purpose of administering contributions for the benefit of the School District and its students. The Foundation operates under the policies and direction of the Board of Trustees.

Revenues consist of direct donations, interest earned from investments, land sales, and other sources accepted by the Board of Trustees. All revenues become the property of the Troy School District #287 and are available for general use according to District Policies currently in effect. While the Board attempts to honor lawful requests by donors as to the use of funds, Idaho Code prohibits any absolute restrictions. It is the firm intention of the Board, however, to honor the purposes set forth with the original gifts.

All awards and expenditures from Foundation funds must be in accordance with the policies of the Troy School District and state and federal laws. Donations cannot be accepted which stipulate uses not in accordance with these regulations.

The Foundation's assets are located in two special funds: The Scholarship Fund and The Endowment Fund. (When contributions are received that are not designated for scholarships, the proceeds are deposited in the Endowment Fund.)

The Scholarship Committees act as advisors to the Board of Trustees.

The Ramsdale Scholarship Committee is comprised of at least _____but no more than ___ patrons of the District as appointed by the Board of Trustees, plus the _____.

The Kelly Scholarship Committee is comprised of at least _____but no more than _ _____patrons of the District as appointed by the Board of Trustees, plus the _____.

The Board shall endeavor to select committee members from all Trustee zones if feasible. Each member shall be appointed for a _____-year term on a staggered basis with one or two new appointees each year. When a vacancy occurs during the member's term, a newly- appointed member shall fill the vacancy for the unexpired portion of the term.

The Troy Education Association Scholarship Committee is comprised of at least _but no more than _____as appointed by the _____, plus the ____.

The Committees will promote community ownership and participation, and make recommendations to the Board of Trustees for award recipients.

From time to time, the Scholarship Committees will consult with District personnel such as the Superintendent of Schools, District Clerk, and High School Counselor, to coordinate financial records, collect criteria for awards, promote community ownership, assist with fund-raising, etc.

Troy School District Foundation (continued) **7900**

Legal Reference: I. C. 33-506

Policy History:
Adopted on: 1/8/07
Revised on: 2/9/09

Endowment Fund **7910**

The Endowment Fund consists of funds derived from unspecified general donations to the Troy School District or to its departments or activities.

Policy History:
Adopted on: 2/9/09
Revised on:

Scholarship Funds **7920**

The Scholarship Funds consist of a General Account and three Dedicated Accounts: the Ramsdale Scholarship, Kelly Scholarship, and Troy Education Association Scholarship.

The General Account is funded by private contributions, special fund raising efforts, or returns of unused funds to the Principal.

Dedicated Accounts are established by donors, and often include special criteria for funding and selection.

Policy History:
Adopted on: 2/9/09
Revised on: