# **311. PURCHASING PROCEDURES** (Revised 3-3-08)

## **DISTRICT GENERAL FUND**

- A. Requisition is originated by teacher, staff, or administrator.
- B. Requisition is approved or rejected by principal.
- C. If approved, requisition is sent to Business Manager.
- D. After review of requisition, Business Manager authorizes a purchase order.

No purchases are to be made without a purchase order unless approved by the Business Manager or the Superintendent. Note: Certain purchases require bids to be taken and may require Board of Education approval and a purchase order will not be authorized until that occurs.

**312. PROCUREMENT PLAN – CHILD NUTRITION DEPARTMENT** (Approved 3-3-08)(Revised 6-13-11, Updated 2-13-17, 1-17-19)

# Sapulpa Pubic Schools, Child Nutrition Services SECTION I—PROCUREMENT PLAN GENERAL REQUIREMENTS

The Sapulpa Public Schools, Child Nutrition Services plan for procuring items for use in the Child Nutrition Programs (CNP) is as follows:

- 1. The procurement plan provides for free and open competition, transparency in transactions, comparability, and documentation of all procurement activities.
- 2. The following **Code of Conduct** will be expected of all persons who are engaged in the awarding and administration of contracts supported by CNP reimbursement funds. These written standards of conduct include:
- a. No employee, officer, or agent shall purchase or establish a contract if a conflict of interest, real or apparent, would be involved. Conflicts of interest arise when one of the following has a financial or other interest in the firm selected for the award:
- (1) The employee, officer, or agent
- (2) Any member of the immediate family
- (3) His or her partner
- (4) An organization that employs or is about to employ one of the above
- b. Employees, officers, or agents shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to sub agreements.
- c. The purchase during the school day of any food or service from a contractor for individual use is prohibited.
- d. No item, food, or beverage purchased with nonprofit school food service funds will be removed from the school premises by school personnel.
- e. Penalties for violation of the standards of code of conduct of the **School Food Authority** (**SFA**) **CNP** should be:
- (1) Reprimand by Board of Education
- (2) Dismissal by Board of Education
- (3) Any legal action necessary
- 3. Regardless of procurement method, the following factors will be determined regarding the allowability of costs:

- a. Be necessary and reasonable for proper and efficient administration of the program(s)
- b. Be allocable to federal awards applicable to the administration of the program(s)
- c. Be authorized and not prohibited under state and local law

4. Purchasing will be conducted at the most restrictive procurement threshold:

	Federal Procurement Thresholds	SFA/Sponsor Procurement Thresholds (Input)
Micro Purchasing	Less than \$10,000	\$7,500
Equipment	Over \$5,000	
Small/Informal	Less than \$250,000	\$7,500 to \$50,000
Formal	Greater than \$250,000 or any Food Service Management Contract.	Over \$50,000

- 5. All staff conducting purchasing will be trained on the procurement procedures.
- 6. All purchasing records must be maintained no less than the current year plus three additional years.

## 7. Buy American Provision

Section 104(d) amended Section 12(n) of the National School Lunch Act (NSLA) (42 U.S. 1760) requires SFAs participating in the NSLP and SBP in the United States *to purchase for those programs, to the maximum extent practicable, domestic USDA Foods or products.* For purposes of this provision, the term *domestic food commodity or product* means agricultural USDA Foods produced in the United States, including Guam, American Samoa, the Virgin Islands, Puerto Rico, and the Northern Mariana Islands, and food products processed in the United States *SUBSTANTIALLY* using agricultural USDA Foods that are produced in the United States. *SUBSTANTIALLY* means that over 51 percent of the processed food comes from American produced products.

#### 8. Geographic Preference

The use of statutorily or administratively imposed in-state or local geographic preferences for procurements under USDA entitlement programs is prohibited, except for unprocessed locally grown or locally raised agricultural products. The Food, Conservation, and Energy Act of 2008 (Public Law 110-246, Section 4302) amended Section 9(j) of the NSLA to allow institutions receiving funds through CNP to apply a geographic preference when procuring unprocessed locally grown or locally raised agricultural products. When geographic preference is used, the SFA must still get quotes from several farmers when procuring unprocessed locally grown or locally raised agricultural products so that competitors have an opportunity to compete for the bid.

#### 9. Protest Procedure

Suppliers who wishes to file a protest pertaining to a bid, quote or competitive proposal must file as follows:

- a. A protest shall be in writing and shall include the company name, address and other contact information of the Supplier, the name of the bid, quote or competitive proposal under dispute, a detailed description of the specific reason(s) for the protest, copies of any supporting documentation, and the specific ruling or relief requested.
- b. Written protests shall be addressed and delivered to: The Superintendent of Schools, Sapulpa Public Schools, 511 E. Lee Street, Sapulpa, OK, 74066
- c. Protests based on the terms of a bid, quote or competitive proposal must be received at least seven (7) working days prior to the submittal deadline for the bid, quote or competitive proposal.
- d. Protests based on the award of the bid, quote or competitive proposal must be received no more than three (3) working days after the award.
- e. Upon receipt of a timely written protest, the Superintendent or designee shall promptly consider the protest. If the protest is not resolved by mutual agreement of the aggrieved person and the District, the Superintendent or designee will promptly issue a decision in writing, stating the reason(s) for the action taken. The Superintendent or designee will provide a copy of the decision to the protesting Supplier.
- f. The Superintendent's decision or designee may be appealed by a written request for review received no more than two (2) workings days after the protesting Supplier's receipt of the decision. The request for review shall be addressed and delivered to: The Clerk of the Board of Education, Sapulpa Public Schools, 511 E. Lee Street, Sapulpa, OK 74066. The request for review must be in writing and shall include a detailed description of the specific reason(s) the Supplier disagrees with the decision of the Superintendent or designee and a copy of any supporting documentation. The decision of the school board will be final.
- g. The Superintendent/designee and the school board will consider only timely protests and requests for review.

Oklahoma statute 62 O.S. §310.9 requires a signed and notarized non kickback affidavit on every purchase order of \$25,000 or more. The affidavit is to be signed by the person or persons authorized to accept payment on behalf of the architect, contractor, engineer, or supplier.

# 11. Lobbying Certification

Lobbying certification must be obtained for procurement contracts of more than \$100,000. Any vendor whose contract award is for more than \$100,000 must complete a Certification Regarding Lobbying form. The SFA must keep this signed certification statement on file with a copy of the vendor's contract.

12. The SFA or any of its vendors who participate in lobbying activities must complete a Disclosure of Lobbying Activities form. SFAs must submit this completed form to the State Agency. A vendor would submit its completed form to the SFA.

# 13. Debarment or Suspension

The SFA is prohibited from contracting with an individual or company that has been debarred or suspended in accordance with 2 CFR §180, as adopted and modified by USDA regulations at 2 CFR §417

# 14. Beverage and Snack Agreement

Any exclusive beverage and snack agreement will exclude Child Nutrition ServicesThe sale of milk cannot be limited at any time during the school day or at any place on the school premises.

15. Contract Work Hours and Safety Standards Act (40 U.S.C. 3701-3708). Where applicable, *all contracts* awarded by the nonfederal entity in excess of \$100,000 that involve the employment of mechanics or laborers must include a provision for compliance with 70 U.S.C. 3702 and 3704, as supplemented by Department of Labor regulations (29 CFR Part 5). Under 40 U.S.C. 3702 of the Act, each contractor must be required to compute the wages of every mechanic and laborer on the basis of a standard work week of 40 hours. Work in excess of the standard work week is permissible provided that the worker is compensated at a rate of not less than one and a half times the basic rate of pay for all hours worked in excess of 40 hours in the work week. The requirements of 40 U.S.C. 3704 are applicable to construction work and provide that no laborer or mechanic must be required to work in surroundings or under working conditions which are unsanitary, hazardous, or dangerous. These requirements do not apply to the purchases of supplies or materials or articles ordinarily available on the open market or contracts for transportation or transmission of intelligence.

16. Equal Opportunity and Discrimination.

Vendors of Formal Contracts of \$10,000 or more must certifies that it is an Equal Opportunity Employer, a provider of services and/or assistance, and is in compliance with the 1964 Civil Rights Act, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, as amended, and Executive Orders 11246 and 11375. The vendor assures compliance with the Americans With Disabilities Act of 1990 (Public Law 101-336), all amendments to, and all requirements imposed by the regulations issued pursuant to this Act

- 17. Contracts in excess of \$150,000 shall contain provision that require compliance with all applicable standards, orders, or requirements issued under Section 306 of the Clean Air Act (42 U.S.C. 1857[h]), Section 508 of the Clean Water Act (33 U.S. C. 1368), Executive Order 11738, and Environmental Protection Agency (EPA) Regulation (40 CFR §15), which prohibit the use of nonexempt federal contracts, grants, or loans of facilities included on the EPA list of violating facilities. The provision shall require reporting of violations to the grantor agency and to the EPA Assistant Administrator for Enforcement (EN-329). The contract must recognize mandatory standards and policies relating to energy efficiency that are contained in the State Agency conservation plan issued in compliance with the Energy Policy and Conservation Act (Public Law 94-163).
- 18. The SFA will take all necessary affirmative steps to assure that *minority firms, women's business enterprises*, and *labor surplus area firms* are used when possible. Affirmative steps shall include:
- a. Placing qualified small and minority businesses and women's business enterprises on solicitation lists.
- b. Assuring that small and minority businesses and women's business enterprises are solicited whenever they are potential sources.
- c. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses and women's business enterprises.
- d. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses and women's business enterprises.
- e. Using the services and assistance of the Small Business Administration (SBA) and the Minority Busi- ness Development Agency of the Department of Commerce.
- f. Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed above.

## SECTION II—MICRO PURCHASING

If the amount of purchases for items is less than \$7,500, for all items except equipment where the cap will be \$5,000, the following procedures will be used:

- 1. Purchases will not be separated into two or more purchases to meet or be below the \$7,500 threshold.
- 2. The price quotes will not be required. Competition is not required.
- 3. When practicable, micro purchases will be distributed equitably among qualified suppliers.
- 4. Documentation of purchases will be kept and maintained for three years plus the current year.
- 5. The Child Nutrition Director will be responsible for documentation of purchase. NOTE: Federal threshold of \$2,000 is applicable in the case of acquisitions for construction subject to the Davis-Bacon Act.

#### SECTION III—PURCHASING EQUIPMENT

If the amount of purchases for *equipment* is greater than \$5,000, use the following procedure:

- 1. Written specifications will be prepared and provided to vendors.
- 2. Each vendor will be contacted and given an opportunity to provide a price quote on the same specifications. A minimum of two vendors shall be contacted.
- 3. The price quotes will receive appropriate confidentiality before award.
- 4. If using USDA funding for the purchase, the SFA/sponsor will seek prior approval from Oklahoma CNP unless the equipment is placed on the Equipment Preapproval List located in the Child Nutrition Manual.
- 5. Quotes will be awarded by the Child Nutrition Director. Quotes awarded will be to the lowest and best quote based upon quality, service availability, price, and/or other determining factors at the time of bid.
- 6. The Child Nutrition Director will be responsible for documentation of records to show selection of vendor, reasons for selection, names of all vendors, price quotes from each vendor, and *written specifications*.
- 7. The Child Nutrition Director will be responsible for documentation that the actual product specified is received.

**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 nonfederal entity for financial statement purposes or \$5,000. See also §\$200.12 capital assets, computing devices, 200.48 general purpose equipment, 200.58 information technology systems, 200.89 special purpose equipment, and 200.94 supplies.

# SECTION IV—SMALL PURCHASE PROCUREMENT

If the amount of purchases for items is greater than \$7,500 and less than \$250,000, Small Purchase Procedures must be followed. There are two methods of Small Purchasing allowed, either Quotes and/or a Market Basket Study. Quotes documented from an adequate number of qualified sources will be required.

# **Method 1: Quotes**

- 1. Written specifications will be prepared and provided to the vendor.
- 2. Each vendor will be contacted and given an opportunity to provide a price quote on the same specifications. A minimum of two vendors shall be contacted.
- 3. The Child Nutrition Director will be responsible for contacting potential vendors when price quotes are needed.
- 4. The price quotes will receive appropriate confidentiality before award.
- 5. Quotes will be awarded by Child Nutrition Director. Quotes awarded will be to the lowest and best quote based upon quality, service availability, price, and/or or terms at the time of the bid.
- 6. The Child Nutrition Director will be responsible for documentation of records to show selection of vendor, reasons for selection, names of all vendors contacted, price quotes from each vendor, and written specifications.
- 7. The Child Nutrition Director will be responsible for documentation that the actual product specified is received.
- 8. Anytime an accepted item is not available, the Child Nutrition Director will select the acceptable alternate. Full documentation will be made available as to the selection of the acceptable item. Substituted items will not be made at the vendor's discretion.

- 9. Purchasing will be based on the following criteria:
  - a. Price (provided all items meet required specifications and required quality)
  - b. Availability of product in required time line
  - c. Service

## SECTION V—FORMAL PROCUREMENT

If the amount of purchases is more than \$250,000 or for a Food Service Management Contract, formal procurement procedures will be used as required by 2 CFR Part 200.318-326, formerly 7 CFR §3016.36.

Formal bid procedures will be applied on *the basis of a* combination of centralized and individual site deliveries.

Because of the potential for purchasing more than \$250,000, it will be the responsibility of Child Nutrition Director to document the amounts to be purchased so the correct method of procurement will be followed.

When a formal procurement method is required, the following **COMPETITIVE SEALED BID or COMPETITIVE PROPOSAL in the form of a Request for Proposal (RFP)** procedures will apply:

- An announcement of an Invitation for Bid or a RFP will be placed on the district web site to publicize the intent to purchase needed items. The advertisement for bids/proposals or legal notice will be posted for a minimum of two weeks.
- For all purchases over \$250,000, a newspaper advertisement is required. The announcement will contain a:
  - General description of items to be purchased
  - Deadline for submission of questions and the date written responses will be provided, including addenda to bid specifications, terms, and conditions as needed
  - Date of pre-bid meeting, if provided, and if attendance is a requirement for bid award
  - Deadline for submission of sealed bids or proposals
  - Address of location where complete specifications and bid forms may be obtained

- If an IFB or RFP, each vendor will be given an opportunity to bid on the same specifications.
- The developer of written specifications or descriptions for procurements will be **PROHIBITED** from submitting bids or proposals for such products or services.
- The IFB or RFP will clearly define the purchase conditions. The following list includes requirements, not exclusive, to be addressed in the procurement document:
  - Contract period
  - SFA/sponsor is responsible for all contracts awarded (statement)
  - Date, time, and location of bid opening
  - How vendor is to be informed of bid acceptance or rejection
  - Delivery schedule
  - Set forth requirements (terms and conditions) which bidder must fulfill in order for bid to be evaluated
  - Benefits to be entitled if the contractor cannot or will not perform as required
  - Statement assuring positive efforts will be made to involve minority and small business
  - Statement regarding the return of purchase incentives, discounts, rebates, and credits to the nonprofit CN account
  - Contract provisions as required in 7 CFR Part 210.21(f) for all cost reimbursable contracts
  - Contract provisions as required in 7 CFR Part 210.16(a)(1-10) for food service management company (FSMC) contracts
  - Procuring instrument to be used are purchase orders from firm fixed prices after formal bidding
  - Price adjustment clause (escalation/de-escalation) based on appropriate standard or cost index (Consumer Price Index [CPI] or other as stated in terms and conditions for pricing and price adjustments)
  - Method of evaluation and type of contract to be awarded
  - Method of award announcement of effective date (if intent to award is required by state or local procurement requirements)
  - Specific bid protest procedures, including contact information of person and address and the date by which a written protest must be received
  - Provision requiring access by duly authorized representatives of the SFA/sponsor, State Agency, USDA, or Comptroller General to any books, documents, papers, and records of the contractor, which are directly pertinent to all negotiated contracts
  - Method of shipment or delivery upon contract award

- Provision requiring contractor to maintain all required records for THREE years after final payment and all other pending matters (audits) are closed for all negotiated contracts
- Description of process for enabling vendors to receive or pick up orders upon contract award
- Provision requiring the contractor to recognize mandatory standards/policies related to energy efficiency contained in the State Energy Plan issued in compliance with the Energy Policy and Conservation Act (PL 94-165)
- Signed statement of noncollusion
- Signed Debarment/Suspension Certificate or statement included in contract or copy of Excluded Parties List System (EPLS)
- Specifications and estimated quantities of products and services prepared by SFA/sponsor and provided to potential contractors desiring to submit bids/proposals for the products or services requested
- If any potential vendor is in doubt as the true meaning of specifications or purchase conditions, interpretation will be provided in writing to all potential bidders by Child Nutrition Director and date specified
- The Child Nutrition Director will be responsible for securing all bids or proposals.
- The Child Nutrition Director will be responsible to ensure all SFA/sponsor procurements are conducted in compliance with applicable federal, state, and local procurement regulations
- The following criteria will be used in awarding contracts as a result of bids/proposals:
  - Price (provided all items meet required specifications and required quality)
  - Availability of product in required time line
  - Service

In awarding a competitive negotiation (RFP), a set of award criteria in the form of a weighted evaluation sheet will be provided to each bidder in the initial bid document materials. Price alone is not the sole basis for award but remains the primary consideration when awarding a contract. Following revaluation and negotiations, a firm fixed price or cost reimbursable contract is awarded.

- The contracts will be awarded to the responsible bidder/proposer whose bid or proposal is responsive to the invitation and is most advantageous to the SFA/sponsor, price and other factors considered. Any and all bids or proposals may be rejected in accordance with law.
- Child Nutrition Director is required to sign on the bid tabulation of competitive sealed bids or the evaluation criterion score sheet of competitive proposals signifying a review and approval of the selections.
- Child Nutrition Director reviewing the procurement system to ensure compliance with applicable laws.

- Child Nutrition Director responsible for documentation the actual product specified is received.
- Anytime an accepted item is not available, the Child Nutrition Director will select the acceptable alternate. The contractor must inform Child Nutrition Director when a product is not available. In the event a nondomestic agricultural product is to be provided to the SFA/sponsor, the contractor must obtain, in advance, the written approval of the product. The Child Nutrition Director must comply with the **Buy American** provision.
- Full documentation as to the reason an accepted item was unavailable and to the procedure used in determining acceptable alternates will be available for audit and review. The person responsible for this documentation is Child Nutrition Director.
- The Child Nutrition Director responsible for maintaining all procurement documentation.

#### SECTION VI—NONCOMPETITIVE NEGOTIATION

If items are available **ONLY** from a single source **when the award of a contract is not feasible under small purchase, sealed bid, or competitive negotiation, NONCOMPETITIVE NEGOTIATION** procedures will be used:

- 1. Written specifications will be prepared and provided to the vendor.
- The Child Nutrition Director will be responsible for the documentation of records to fully explain the decision to use the noncompetitive negotiation. The records will be available for audit and review.
- 3. The Child Nutrition Director will be responsible for documentation that the actual product or service specified was received.
- 4. The Child Nutrition Director will be responsible for reviewing the procedures to be certain that all requirements for using single source or noncompetitive negotiation are met.
- 5. Noncompetitive negotiations shall be used for one-time purchases of a new food item in order to determine food acceptance by students and for samples for testing purposes. A record of noncompetitive negotiation purchase shall be maintained by the SFA. The record of noncompetitive purchases shall include, at a minimum, the following:
  - Item name
  - Dollar amount
  - Vendor
  - Reason for noncompetitive procurement

## SECTION VII—EMERGENCY PURCHASING

- 1. If it is necessary to make a one-time emergency procurement to continue service to obtain goods, the purchase shall be made and a log of all such purchases shall be maintained by the SFA . the following emergency procedures shall be followed. All emergency procurements shall be approved by the SFA. At a minimum, the following emergency procurement procedures shall be documented:
- Item name
- Dollar amount
- Vendor
- Reason for emergency
- 2. If the emergency purchasing need requires a contract, all books, records, and other documents relative to the award of the contract must be retained for three years after final payment. Specifically, the SFA/sponsor shall maintain, at a minimum, the following documents:
- Written rationale for the method of procurement
- A copy of the original solicitation
- The selection of contract type
- The bidding and negotiation history and working papers
- The basis for contractor selection
- Approval from the State Agency to support a lack of competition when competitive bids or offers are not obtained
- The basis for award cost or price
- · The terms and conditions of the contract
- Any changes to the contract and negotiation history
- Billing and payment records
- A history of any contractor claims
- · A history of any contractor breaches

# Section VII – Group Buying and Co-op Buying

When in the best interest of the district, purchases may be made using a group buying service (GBS). A GBS, an organization that buys in larger quantities on behalf of other entities may call itself many different names and may be referred to as a purchasing cooperative, purchasing consortium, group-buying/purchasing organization, etc. A GBS can be for-profit or not-for-profit. It is vital that all procurement transactions be conducted in a manner providing free and open competition. This principle fully applies to purchases made through any GBS.

Oklahoma State Prime Vendor Contract (State Contracting). When the SFA chooses, the SFA may purchase food and foodservice supplies using a statewide contract established by the Department of Central Services, Central Purchasing Division for the State of Oklahoma. Likewise, if the SFA chooses, fresh produce may be purchased using the Department of Defense selected vendor for any school year.

When the SFA chooses, purchases may be made through a cooperative agreement with other school districts. Sealed Bid (Formal Advertising) procedures will be followed as required.

# **CHART OF PROCEDURES**

Sapulpa Public Schools, Child Nutrition Services will purchase the following products or group of products and services as per the stated purchase period using the identified procurement method. *Price quote time frame* period is defined as the time frame for which bids or quotes are obtained and awarded.

PRODUCT	HOW OFTEN ARE PRICE	PROCUREMENT METHOD
		USED
Milk	Annual with option for 2 (1 year) extensions.	Small
Bread	Annual with option for 2 (1 year) extensions	Small
Prime Vendor to include all of the following: Canned fruits and Vegetables Frozen Fruits Vegetables Pre-prepared Fruits & Vegetables Meats Paper Products Chemicals This includes Net Off Invoice USDA Food items.	Annual with option for 2 (1 year) extensions	Formal
Fresh fruits and vegetables	Annual with option for 2 (1 year) extensions	Small or Formal (if purchased with Tulsa Area Directors Co-op)
Chemicals	If not included with Prime Vendor, will use State Bid	Small
Small equipment	One consolidated quote each Spring for all sites or as needed throughout the year as small equipment needs arise	Small for consolidated quote Micro for fill in
Large equipment	As Needed	Small
Office Supplies	As Needed	Micro
Copy Services	As Needed	Micro
USDA Further Processing	Annual	Formal, with Tulsa Area Directors through Union Schools

# **330.1 ACTIVITY ACCOUNT PROCEDURES** (Revised 8-93)

#### A. PREPARING FOR THE YEAR

Preparation for the year begins in the spring when all requests for fund-raising activities must be submitted for approval for the following year. No fund-raising activity can take place without board approval, and this is normally done once each year.

Activities which require approval are ALL activities in which money will be collected by school personnel to be deposited in an activity sub-account, whether or not the event results in a profit. This includes vending machines, all concessions, sale of any item such as pencils or tee-shirts, and all events where tickets are sold or donations solicited. If you collect money, it requires board approval in advance.

Approval can be obtained after the school year begins in rare instances when a sponsor could not have foreseen the event. The request must be submitted through the principal to the Director of Financial Services before the board agenda is set for the following month. The board must have the opportunity to approve or disapprove the event.

#### B. SETTING UP RECORDS

As a sponsor of an activity sub-account, you are required to keep the following records:

- 1. Ledger
- 2. Receipts or lists of all money collected
- 3. Deposit slips for all receipts
- 4. Expenditure authorizations

At the beginning of the year, obtain a ledger, receipt book, deposit slips, and expenditure authorization forms from the Activity Account Custodian. If you already have a ledger, the pages you used last year should have been removed and filed with last years records. The first ledger entry for this year should be your beginning balance, reconciled with the Activity Account Custodian's balance for you. If you keep more than one account, the same ledger book may be used if you start a separate page for each sub-account. You may prefer to use a separate ledger book. The ledger is a running account of all deposits and expenditures which should be updated every time you submit a deposit or expenditure authorization. The balance should always be brought down, just like the figures in a checkbook that show checks, deposits, and a running balance.

An electronic ledger kept on the computer is also acceptable. It should be printed periodically for backup, as well as backed-up to diskette on a regular basis and kept in a safe place.

#### C. SETTING UP THE FILING SYSTEM

The year's records may be organized in one of two ways, or a combination of the two. Major fund-raising projects should be organized in a project folder, containing complete documentation on the project. This includes receipts showing all money collected, deposits, and expenditures. On-going events may have documentation filed chronologically, such as having a folder for each month of the year.

#### D. COLLECTING AND DEPOSITING MONEY

All funds collected must be documented as to date, amount, and source of funds. This can be done by issuing a pre-numbered receipt, by documenting the amount on a counting slip (concessions), by using a ticket reconciliation slip, or by keeping a list of students who turn in money by date and amount.

Money collected must be deposited daily with the Activity Account Custodian. All funds collected by school-sponsored groups become school activity funds. This means that groups are not allowed to have their own checking account, cannot keep a treasury with their treasurer, or operate their own fund in any way except through the Activity Account Custodian. This includes all groups that are school sanctioned, and who have a regular staff member as their sponsor.

Fill out the deposit slip by itemizing the source of the funds. If you deposit funds from more than one source (i.e. Candy Sales and Club Dues) be sure to list them on two different lines of the deposit slip. Individuals in the secondary complex should follow the procedure outlined at the end of this document. The Activity Account Custodian will count the money again before making the bank deposit and will issue you a receipt. Be sure to enter each deposit in your account ledger and file the receipt with your other documents.

If you sell tickets for an event, it is important that they be pre-numbered. If tickets are handed out to group members to be pre-sold, treat them as assets just as you would candy or other items. That is, create a list with the student's name and range of tickets they take, and list any tickets returned with the amount each student turns in.

If you sell tickets at the door for an event, the seller should be someone other than the one who takes them up. The seller should complete a reconciliation sheet showing starting and ending numbers for children and adults, and the money received.

When pre-numbered receipts or tickets cannot be sold (such as concessions), at least two people should be assigned to collect and count receipts. Both individuals then should sign a count slip before the money is deposited.

State department guidelines state that money collected should be deposited IN THE BANK in its original form, and should not be used to cash personal checks for staff, kept on hand to make change, or used for other unauthorized purposes.

#### E. EXPENDITURES

All activity account expenditures must be approved in advance by the building principal, have the original invoice submitted with the authorization, and paid for by check to the original vendor. Only travel expenses are authorized for reimbursement to an individual, and receipts are required for all travel expenses except mileage.

The sequence is as follows:

- 1. Obtain authorization from the principal
- 2. Order or purchase goods from the vendor
- 3. Obtain and SIGN the vendor's invoice, making sure all goods are delivered and satisfactory
- 4. Sign the bottom of the authorization and send it with the invoice to the Activity Account Custodian for payment

Please note that there is no provision for paying for goods with cash or in advance. The law requires schools to pay by check and to pay only for goods and services received. Vendors who do business with public schools understand this.

Invoices are required before payment can be made. A statement from a vendor is not sufficient, since statements do not itemize goods received or provide an opportunity for the recipient to sign. It is imperative that you sign and turn in invoices in order to avoid late payments.

If you pay an individual to help you with a project, you must first obtain authorization from the principal just as in making a purchase. If an exact amount hasn't been agreed upon, estimate the amount and have the principal approve a MAXIMUM not to exceed on the appropriate line. In place of an invoice, fill out a time sheet and have the individual sign it, along with you, and submit this for payment. Remember, a Sapulpa Schools employee cannot be paid any amount for labor or services rendered, no matter how small, from activity accounts. This is a federal tax code (law).

All payments for labor to school employees must be submitted on time sheets and paid through payroll in order to be properly documented.

#### F. CLOSING THE YEAR

Reconcile your activity sub-account with the Activity Account Custodian each month. If you have done this, closing the year will be easy.

Each sponsor at the secondary level (Jr. and Sr. High) will check out with the Activity Account Custodian. Accounts for Middle School and Elementaries will be checked out by the principal or his designee.

- 1. Verify that your ending balance in your ledger agrees with the balance on the district's records.
- 2. Record your balance on a ledger sheet for starting the new year.
- 3. Turn in all records for the year, including your ledger (or just the pages used), all receipt books, and deposit slips. If you sponsor a fund-raiser that uses student lists, include these in the records you turn in. Secondary sponsors turn records in to the Activity Account Custodian. Middle School and Elementary sponsors turn records in to the sponsor's school office.

If you have any questions regarding an activity account procedure check with the Activity Account Custodian or the Assistant Superintendent.