Internal Audit Unit
MONTGOMERY COUNTY BOARD OF EDUCATION
Rockville, Maryland

June 16, 2026

MEMORANDUM

To: Mr. Timothy D. Britton, Principal
Sherwood High School

From: Melvin A. Phillips, Supervisor, Internal Audit Unit

Subject: Report on Audit of Independent Activity Funds for the Period May 1, 2023, through January 31, 2026

Background

Independent Activity Funds (IAFs) of Montgomery County Public Schools (MCPS) are established to promote the general welfare, education, and morale of students, as well as to finance the recognized extracurricular activities of the student body. School principals are the fiduciary agents for the IAFs charged with determining the manner in which funds are raised and expended for activities such as field trips, admission events, and fundraisers. Principals are responsible for ensuring that the IAFs are administered in accordance with:

- MCPS Regulation DIA-RA
- MCPS Financial Manual
- MCPS Business Center Memoranda and Tools

Sherwood High School (SHS) was built in 1950 and renovated in 1991. For the 2025-2026 school year they served over 1,600 students ranging from grades 9-12. Their feeder middle schools are Rosa M. Parks and William H. Farquhar. The school hosts a variety of school programs such as College and Career Research & Development (CCRD), Maryland State Certified Project Lead the Way (PLTW) Engineering and Academy of Health Professions to name a few. At the time of the audit, SHS reported total IAF assets of $954,101.12. Of this balance $801,654 were in the four Centralized Investment Fund (CIF) accounts, which pays a 2.77 percent annual interest rate. The school receives commissions from Cell Tower Revenue, the Interagency Coordinating Board (ICB), yearbook sales, student pictures and vending machines. The school is also widely known for its signature Rock and Roll Revival (RRR) production, an annual student-driven performance that generates significant ticket, sponsorship, and concession revenue, and operates an active athletic department, a school store, and an Agricultural Education program.

In FY25, the school received over $86,000 in athletic donations through fundraising efforts. The Sherwood Warrior Club, which is the school’s booster club, supports the athletic program monetarily. The school is also supported by the Parent Teacher Student Association (PTSA) which assists with senior class events, teacher appreciation and supporting families where needed.

Audit Objective

The Internal Audit Unit (IAU) uses generally accepted auditing principles to provide an audit opinion on the school's financial activity by evaluating the adequacy of internal controls and compliance with Board of Education (Board) policies and MCPS regulations and procedures. Specifically, the audit seeks to obtain reasonable assurance that:

- Evidence of fraud was not identified within the IAF.
- Funds are safeguarded against loss, misappropriation, or misuse.
- Transactions are accurately recorded and fairly reported in the school's financial records.
- Receipts and disbursements are appropriate, properly documented, and consistent with the intended purpose of the funds.
- Instances of misappropriation, misreporting, or waste, if they exist, are identified and evaluated for materiality.

The IAU is free from organizational impairments to independence. The IAU administratively reports directly to the chief of staff of the Office of the Board of Education and functionally reports to the Montgomery County Board of Education's Fiscal Management Committee.

Methodology

The audit is not designed to examine every transaction but instead relies on risk-based sampling and other generally accepted audit procedures to provide reasonable assurance. Audit procedures include interviews with key staff, a review of prior audit findings and the status of related action plans, testing of transaction samples, and an on-site assessment of internal controls and procedures.

Audit Opinion:

Unsatisfactory- High Risk

Significant deficiencies in internal controls and financial management practices were identified within IAF. These deficiencies create a high risk of fraud, material misappropriation, misreporting, or waste. The issues observed were pervasive and indicate that the school is not in compliance with MCPS regulations and procedures.

In accordance with MCPS Regulation DIA-RA, *Accounting for Financial Operations/Independent Activity Funds*, using the attached action plan template to provide a written response, approved by the school's director of school leadership and improvement to the IAU within 30 calendar days of this report.

Prior Audit:

Prior audit report dated July 7, 2023 was conducted for audit period February 1, 2022 through April 30, 2023; and no findings were noted.

New Findings and Recommendations:

Finding 1 [High Risk]: School has excess funds in the checking and cell tower accounts.

According to the *MCPS Financial Manual, Chapter 20, Independent Activity Funds,* school independent activity funds, in excess of needs within the next 30 days, should be invested in the Centralized Investment Fund to earn higher interest available through collective participation of all schools in this larger fund. With a monthly disbursement of approximately $60,000, the school should maintain a checking account balance just sufficient to cover these expenses plus the bank's minimum requirement to avoid monthly service fees. This strategy ensures all operational costs are met while maximizing the efficiency of the school's liquid assets. We recommend transferring excess funds into the CIF account.

It was also noted that revenues exceeded disbursements in Fiscal Year(FY) 2024 by $76,932 and FY25 by $54,2334. This could be due to fundraisers and cell tower revenue.

The school receives cell tower revenue annually. These funds are considered non-student-generated and may be used to support staff development and general accounts when needed. During the audit period, the school received $56,042 in cell tower revenue, bringing the IAF cell tower account balance to $179,702. The school transferred $25,000 into the General account and $13,950 into the Staff Appreciation account. The funds transferred into the General account were used for dumpster rentals to clean up the greenhouse, to Comcast for ten adapters, refinishing the gym floors, and clean-up of school grounds, among other expenditures. We recommend that a portion of these funds be directed to support student initiatives consistent with the purpose of the IAF.

Finding 2 [High Risk]: Internal controls for account management were inadequate

According to the *MCPS Financial Manual, chapter 7, Cash Control of School Funds*, the most important internal control over the handling of funds is the separation of duties so that no one person controls all aspects of a process from start to finish. The involvement of two or more persons in each process enhances integrity and accuracy because each person acts as a check on the work of the other. We noted that the school business administrator (SBA) performs the bank reconciliation while also serving as the account manager for accounts that should be assigned to and reviewed monthly by the principal. We recommend that the principal be assigned as the responsible owner of the General, Staff Development, Staff Appreciation, and Staff Food accounts, along with the CIF and checking accounts, and that the principal review them monthly.

Per chapter 20 of the *MCPS Financial Manual*, the monthly bank statement, if mailed to the school, shall be delivered directly to the principal, unopened. If the school uses online banking, the principal must independently access and review the bank statement. The review is documented by a copy of the bank statement, signed and dated by the principal, signifying that the statement has been reviewed. We noted that the bank and CIF statements were signed by the principal but were not always dated (January, May, and September of 2025, and January 2026); the May 2025 CIF statement was neither signed nor dated. We also noted that the MCPS customer statement and journal entry reports were not always included with the monthly bank reconciliation documents, and that two of the CIF scholarship account balances did not match the IAF scholarship account balances. We recommend that the principal date the statements at the time of review, that the reconciler include the customer statement and journal entry reports with the monthly bank reconciliation packet, and that all four CIF account balances be reviewed monthly to ensure that the IAF balance matches the CIF bank statement balance.

The principal is the individual who has the overall fiduciary responsibility for the IAF. Unless prohibited, a principal may delegate, in writing, the authority to transact financial business in their name to a designee; however, the principal remains ultimately responsible for that individual's actions (*MCPS Financial Manual*, chapter 20, page3). In addition, all checks issued must bear two signatures, one of which must be the principal's, except in the principal's absence or when the check is made payable to the principal. We noted that there was no delegation memo on file naming a person or persons authorized to sign financial documents (excluding contracts) in the principal's absence, and that several checks were not signed by the principal.

We recommend creating a delegation memo annually naming who may sign checks and other financial documents in the principal's absence.

Finding 3 [Moderate Risk]: Senior class officers did not identify what excess funds should be used for and senior class dues were charged years in advance.

The sponsor of a senior class should get documented approval from the senior class prior to graduation for what purpose any remaining balance at the end of the school year should be expended (*MCPS Financial Manual*, chapter 20, page 12). It was noted that, excess senior class funds were transferred to underclass accounts without proper documentation from the senior class officers notating what those funds should be used for. We recommend that before the senior class officers graduate that they create a document stating where they would like any remaining funds to go towards.

Budget prepared by the sponsor of a school activity approved by the principal that indicates projected revenue by source and projected expenditure by type of item for a period of time not to exceed a fiscal year (*MCPS Financial Manual*, chapter 20, page 4). It was noted that there was no budget on file for the senior class account determining each year how much to charge students for senior dues. This led to students being charged a set amount the year prior to their graduation year.

We recommend that the financial agent and senior class sponsor meet during the summer before senior year to set dues based on projected expenses.

Finding 4 [High Risk]: Receipts and check stock were not recorded in SFO, and deposits and disbursements lacked sufficient supporting documentation.

All receipts and checks should be processed in School Funds Online (SCO) and any stock that it not properly recorded should be voided, defaced and kept in a file for audit's review. It was noted that four checks were not found, six checks were not processed in SFO and three blank checks were voided but not properly defaced. There were six receipts that were not processed in SFO and two of those receipts were not on file. Of the four voided receipts, one of them was not defaced. We recommend processing all checks and receipts through SFO to ensure that all are being accounted for. When processing a void, it is crucial that all documents pertaining to the void be on file and that the voided check or receipt stock be properly defaced by writing "void" across the document.

Prior to the disbursement of any IAF, the financial agent will ensure that they have received the appropriate authorization documentation to support the procurement of the goods and services for which the disbursement is to be made. The financial agent also will ensure that the staff member who made the purchase provides adequate documentation to support payment such as original itemized receipt or invoice and written indication that goods and services were received in the quantity and quality required. (*MCPS Financial Manual*, chapter 20, page 6) It was noted that eight checks did not have proper documentation in the file with the disbursement. We recommend that before disbursing any funds that the financial agent have either an itemized receipt, invoice or verified contract on file with the disbursement documents.

After processing in SFO, receipts shall be attached to the remittance slip and any other source documentation and be filed in sequential order together with a copy of the deposit slip validated by the bank. (*MCPS Financial Manual*, chapter 7, page4) It was noted that deposits did not always include supporting documentation such as a check stub, copy of check, or transaction/commission information.

We recommend that when the school receives checks from vendors or organizations that they include the supports that accompanied the check.

Finding 5 [High Risk]: The principal did not approve purchase requests in writing prior to the procurement of goods or services.

Schools must follow the *MCPS Financial Manual, chapter 20, Independent Activity Funds,* to procure goods and services using IAF. In our sample of 27 disbursements, we found that eleven MCPS Form 280-55, *Independent Activity Funds (IAF) Request for Purchase*, had not been approved by the principal before procurement of goods or services. In addition, we found another eleven requests that were not preapproved, several of which were instead approved by the assistant principal. We recommend that staff obtain the principal's approval using MCPS Form 280-55 before purchasing goods or services. If the sponsor is seeking immediate approval, the staff member should have the MCPS Form 280-55 prepared and obtain the principal's signature at that time.

Finding 6 [High Risk]: The school did ot adhere to MCPS procurement procedures when contracting with independent contractors using IAF.

Schools must follow the *MCPS Financial Manual, chapter 20, Independent Activity Funds*, to procure goods and services using IAF. In our sample, we noted eleven payments to independent contractors who provided services to the school. The services include track timing, landscaping, refinishing floors, and a guest speaker to name a few. In addition, there was a sound engineer and assistant music director that did not undergo the fingerprinting process since the school checked the "no" box on MCPS Form 280-49A,(now MCPS Form 280-55) when it was submitted to procurement. The school did not go through the ethics board for the sound engineer who was a family member of someone who worked at the school.

Payments to independent contractors/consultants via IAF shall be made only after receiving approval using MCPS Form 280-55, and obtaining IRS Form W-9 from the vendor. The financial agent should verify in SFO if the independent contractor has been established as a districtwide vendor, in which case, the IRS Form W-9 may already be on file. (*MCPS Financial Manual*, chapter 20, page7)

Consultants/independent contractors performing work in schools must comply with applicable laws including prohibitions of hiring of registered sex offenders by contractors performing work on MCPS property. Additionally, a criminal background check including fingerprinting, must be done for any consultant/independent contractor or member of their workforce who will have direct, unsupervised, and uncontrolled access to students. (*MCPS Financial Manual*, chapter 15, page 1) We recommend anytime an independent contractor will be working directly with students that the school check the appropriate box on MCPS Form 280-55 to ensure that the contractor goes through the background check process.

Prior written authorization from the Board Ethics Panel must be obtained to procure any goods or services from an enterprise organized as a for-profit or nonprofit entity where an MCPS employee or a member of an MCPS employee's immediate family has any amount of ownership in or influence over decision making of the business entity. (*MCPS Financial Manual*, chapter 20, page 6)

We recommend going through the Board Ethics Panel to get this vendor approved before working any future events.

Finding 7 [Moderate Risk]: Payments to staff for school related activities did not follow MCPS guidelines

IAF payments to MCPS employees for work that is done outside the employee's duty day must be made according to MCPS pay rate guidelines and payroll processes. IAF payments for services performed by MCPS employees must be processed through the MCPS payroll system using MCPS Form 280-46, *Independent Activity Funds Request for Payment to MCPS Employees for Services (Work) Performed*. Payroll procedures are published by the Employee and Retiree Service Center.

(MCPS Regulation DIA-RB, *Payments for Services and Reimbursements for Expenses from School Independent Activity Funds .)* Payments to staff for services provided should follow the hourly rate per the Extracurricular Activity (ECA) handbook. It was noted that staff were paid without proper documentation indicating the hours and days worked and were not paid the hourly rate based off of MCPS pay rate guidelines. In addition, staff members determined a set amount to be paid based off of prior years' payments and hourly rates were backed into in order to achieve the set amount. We recommend that the school refer to the ECA handbook to obtain the hourly rate each fiscal year and when processing MCPS Form 280-46, include on a separate sheet for each staff member the hours and days worked. We also recommend reviewing with the Rock and Roll Revival sponsor the payment amounts to staff each year for this production.

Each High School is allocated 840 ECA 1 stipend hours. A school may purchase additional stipend hours using the school's IAF. (MCPS ECA Handbook 2025-2026) It was noted that MCPS Form 430-59, *Extracurricular Activity (ECA) Stipend Agreement and Assignment*, for staff members that worked ECA hours were not available for audit review. It also was noted that the school overpaid for FY25 ECA hours by $5,634, because an updated ECA plan was not submitted.

We recommend updating the ECA plan before the deadline in May to ensure the school is not charged more than the hours they use and to keep copies of MCPS Form 430-59 on file for audit review.

Finding 8 [High Risk]: Funds were misappropriated and overspent.

The two basic purposes for raising and disbursing of IAFs are to promote the general welfare, education, and morale of students and to finance the recognized extracurricular activities of the student body. The principal is responsible for ensuring that the IAF is managed in accordance with Board policies, MCPS regulations, and procedures. (*MCPS Financial Manual*, chapter 20, page 1)

We noted that the school overspent its Staff Appreciation and Staff Food accounts for all three audit years sampled. In addition, the FY 2024 custodial supplies account and the FY 2024 and FY 2025 ECA Class 1 hour allocations were each overspent by significant amounts. Building service workers were paid overtime from the IAF to clean the building before the start of school; these costs are properly funded through district resources, not the IAF. Payments to Crystal Springs exceeding $2,300 (water cooler service in areas accessible primarily to staff) were charged to the General account.

We recommend monitoring these accounts to ensure that school funds are being spent appropriately, and that the IAF cease funding building service overtime, custodial supplies, and staff-area refreshment services that are properly funded through district resources.

Finding 9 [Low Risk]: Vendor payments were not processed in compliance with MCPS established policies and procedures.

MCPS Form 280-55 must be completed for all vendors performing a service. Any vendor whose service is $1,500 or more must be processed through HUB+. Once the form is returned with approval from the Department of Procurement in Part D, services can be obtained from the vendor in alignment with the statement of work/agreement. The appropriate staff member at the school must submit a requisition for a non-catalog request (NCR) before the start of services against the school's IAF/Cash account to ensure proper accounting to charge the IAF (Ex. 01-XXXXX-00000-XXX-00-121005-000000-0000-00; Segments with "X" refer to the school organization and school location. (*MCPS Financial Manual*, chapter 15, page 5) It was noted that several vendor payments over $1,500 were processed using a school check, this includes athletic payments over $2,500. It also was noted that a transportation vendor was used that was not on the approved vendor carrier list and that weed and bee killer were used on school grounds without following MCPS guidelines on application.

We recommend using HUB+ when entering in athletic vendor payments of $2,500 or more and $1,500 or more for other school vendor payments. We also recommend when ordering buses referring to the bus carrier list, and for guidance on weed and pest application reaching out to Integrated Pest Management.

Finding 10 [Moderate Risk]: Purchasing card guidelines were not followed.

All cardholders are required to reconcile each transaction using the online reconciliation program (PaymentNet), print the required reports, attach receipts to the report, and send the report and receipts within five working days from the end of the reporting period to their approving official. Approving officials are required to approve each transaction by the 10th of each month following the purchase. (*MCPS Purchasing Card User's Guide*). It was noted that not all cardholders turned in their statement of account landscape report every month and that many transactions had not been either reviewed by the cardholder or approved by the approving official. Some transactions were as old as 490 days. We recommend creating a checklist to ensure all cardholders have turned in their statement of account landscape report along with the receipts to match the transactions. The approver can then go in at that time and approve the transactions based off of the information that is on the statement of account landscape.

Finding 11 [Low Risk]: Fundraising forms were not completed.

All fund-raising activities shall be in accordance with Board Policy CND, *School-Related Fund-Raising*. Detailed guidance for sponsoring IAF fund-raisers is contained in the MCPS publication Guidelines for Sponsoring an IAF Fundraiser. All fund-raisers require principal approval on the Request for Fundraiser Form and analysis of the activity on the Fund-Raiser Completion Report. The forms are available in the Business Tools & Calculators, Fundraisers section of the MCPS Business Center (*MCPS Financial Manual*, chapter 20 page14). We noted that fund-raiser request forms and completion reports were not completed for the fund-raisers sampled.

We recommend that the sponsor complete a Request for Fundraiser form and obtain written approval from the principal before conducting the fund-raiser. Upon completion of the fund-raiser, the sponsor should complete the Fund-Raiser Completion Report. This report will show all revenue and expenses and provides an analytical tool to determine whether the fund-raiser was successful.

Finding 12 [Low Risk]: Field trip documents were not completed or on file

All field trips must be approved in writing by the principal prior to communicating information to parents and collecting funds. Field trips outside of the 50-mile radius must be approved by the Division of School Leadership and Improvement (DSLI) via MCPS Form 210-4, *Approval for Extended Day, Out-of-Area, and Overnight Field Trips*. The approval documentation should be kept on file for audit review. It was noted that approvals were not on file.

We recommend that the financial agent keep all relevant documentation on file for field trips for five years or until audit review.

Finding 13 [Moderate Risk]: Substitute payments to MCPS for field trips and AP testing were not made.

If substitute teachers are used, the school's IAF must reimburse MCPS for the cost from field trip funds collected, using MCPS Form 203-2A, *iPayment Worksheet — School Reimbursement for MCPS Substitute Teacher Coverage*. Payment for substitute teachers is now processed in iPayment in the HUB+ (*MCPS Financial Manual*, chapter 20, page 11). We noted that substitutes were used for both field trips and AP exam proctoring; however, MCPS was not reimbursed for those charges. In addition, FY 2025 funds collected for AP exam fees and late charges were not forwarded to MCPS.

We recommend that, after the activity is completed, the school follow the MCPS payment guide to reimburse MCPS for the cost of the substitutes and for collected exam fees.

Finding 14 [High Risk]: Athletic fundraisers lacked proper approval and reconciliation, and collected funds were not deposited in accordance with policy.

Fund-raiser request forms should be completed for every fund-raiser and should include the intended use of funds. Any funds collected should be turned in daily to the athletic director, who will then remit them to the financial agent. A reconciliation of fund-raising accounts should take place upon completion of the fund-raiser; documentation from the vendor should be used in reconciling the account where possible. This ensures that all funds were received and deposited into the fund-raising account. All funds received for school fund-raisers should be deposited in the school's IAF account in a timely manner.

We noted that the Gold Card fund-raiser was not approved by the principal. The FY 2024 contract was signed by the sponsor (head football coach), and there was no contract in place for FY 2025. Funds deposited did not match the account reconciliation reports provided to the school from the vendor, the FY 2024 difference was $11,125 and the FY 2025 difference was $3,375. Some funds received were deposited with the Booster Club rather than into the IAF account.

The SchoolFR fund-raiser was not approved by the principal, and funds in excess of what was collected were transferred into the athletic account. We also noted that funds were transferred out of the fund-raiser account for a field trip without any documentation indicating the intended use of the collected funds.

We recommend that all athletic fund-raisers be approved by the principal, including the intended use of funds, and that all funds received be deposited into the IAF account. All contractual agreements require the principal's exclusive signature. Sponsors are required to submit a Fund-Raiser Completion Report immediately following the conclusion of any fund-raising activity.

Finding 15 [High Risk]: Athletic budget line items were overspent.

A budget should be prepared by the sponsor of a school activity and approved by the principal that indicates projected revenue by source and projected expenditure by type of item for a period of time not to exceed a fiscal year. The sponsor cannot exceed the total amount of expenditures in the approved budget without receiving prior written approval of the principal to amend the budget. The sponsor and financial agent are responsible for monitoring of any budget to ensure revenues and expenditures conform to what the principal has approved. Should revenues not reach budgeted levels, sponsors are expected to adjust expenditures to stay within budget. (*MCPS Financial Manual*, chapter 20, page p.4). It was noted that line items in the budget were overspent without obtaining prior written approval.

We recommend that the financial agent and the athletic director review the budget frequently. When needed the athletic director should update the budget and obtain principal approval before spending.

Finding 16 [High Risk]: The Booster Club Purchased Items Directly for the School.

Parent Teacher Associations (PTAs), Parent Teacher Student Associations (PTSAs), Parent Booster Clubs, and foundations established by parents may not be used to bypass Board policies, MCPS regulations, and procedures. (*MCPS Financial Manual*, chapter 19, page 1) These organizations may not make direct payment for supplies, equipment, maintenance, uniforms, or services. The school makes the purchase and the organization providing the donation reimburses the school. This does not apply to services related to staff recognition or appreciation events. (*MCPS Financial Manual*, chapter 20, page 18). It was noted that the Boosters paid for softball field sprinklers, landscaping and a mural.

We recommend that the school make the initial payment and subsequently seek reimbursement from the booster club.

Finding 17 [Low Risk]: Students were overcharged for course fees.

Course fees are approved for a specific amount, and schools may only charge students that approved amount. We noted that the school was approved to charge students $20.00 per semester but instead charged $21.00 (Photography; Ceramics and Sculpture) and $26.25 (Studio Art 3) to cover the cost of SCO processing fees.

We recommend charging students only the approved amount and absorbing SCO processing fees through the school's SCO Processing Fees account.

Exit Conference:

At our May 5, 2026, exit conference with Mr. Timothy D. Britton, principal, and Mrs. Rebecca V. Williams, school business administrator, Mrs. Christina Kontoyianis, school financial specialist, and Mr. Jason D. Woodward, athletic director, we reviewed the prior audit report dated July 7, 2023, and the status of the present conditions. You received a detailed report outlining each finding, best practices, and other areas for improvement. This audit report presents the findings and recommendations resulting from our examination of the IAF records and financial accounts for the school for the period designated.

We thank you for your cooperation. Based on the **Unsatisfactory** status of your IAF audit, an action plan must be completed. Prior to returning your completed audit action plan, please contact Dr. Eugenia S. Dawson, director of school leadership and improvement, Division of School Leadership and Improvement, for written approval of your plan. Based on the audit recommendations.

MAP:ABB:rg

Attachment

Copy to:

Members of the Board of Education
Dr. Taylor
Mrs. Alfonso-Windsor
Ms. McGuire
Dr. Moran
Ms. Seabrook
Mr. Francois
Dr. Jones
Mrs. Chen
Dr. Dawson
Mrs. Ripoli
Mr. Santos Rodriguez
Ms. Webb

FINANCIAL MANAGEMENT ACTION PLAN

Report Date: 7/1/2026	**Fiscal Year:** 2026
School or Office Name: Sherwood High School	**Principal:** Micah Wiggins
DSLI Associate Superintendent: Donna Redmond Jones	**DSLI Director:** Dr. Rubens

Strategic Improvement Focus:

As noted in the financial audit for the period 5/23 - 1/26, strategic improvements are required in the following business processes :

Action Steps	Person(s) Responsible	Resources Needed	Monitoring Tools / Data Points	Monitoring: Who & When	Results/Evidence
Funds will be moved from the checking account into the CIF savings account as needed	Rebecca Williams, SBA, Christina Kontoyianis, SFS	CIF Account statements	Monthly Bank Statement.	Micah Wiggins, Principal	The balance of the checking account will not exceed the suggested amount for two consecutive bank statements
The monthly bank statements and CIF statements will be signed and dated by the principal when reviewed	Christina Kontoyianis, SFS	MCPS Financial Manual	Monthly Bank Statement and CIF statements	Micah Wiggins, Principal, Rebecca Williams, SBA	The principal's signature and date reviewed present on monthly statements
Annual memo on file delegating checking signing and financial documents in principal's absence	Rebecca Williams, SBA, Christina Kontoyianis, SFS	MCPS Financial Manual	Memo delegating approval of financial documentions in principal's absence	Micah Wiggins, Principal, Rebecca Williams, SBA,	Signed annual memo on file
Senior class will have directives for usage of excess funds in class account at the end of the school year.	Christina Kontoyianis, SFS, Senior Class Sponsor	MCPS Business Center	The SBA will meet with the class sponsor establish expectations and necessary documentation. Regular meetings w/ sponsor	Micah Wiggins, Principal, Rebecca Williams, SBA, Christina Kontoyianis, SFS	Annual Memo and senior events budget on file.

Action Steps	Person(s) Responsible	Resources Needed	Monitoring Tools / Data Points	Monitoring: Who & When	Results/Evidence
All receipts and checks will include the supporting documentation. Voided checked will be defaced and kept on file.	Christina Kontoyianis, SFS	SFO reciepts and check stock	All voided checks will be defaced.	Micah Wiggins, Principal, Rebecca Williams, SBA	The princial and SBA will regualrly verify voided checks are defaced and all receipts and checks are accounted for.
All purchases will be pre-approved by the principal.	Rebecca Williams, SBA, Christina Kontoyianis, SFS	MCPS form 280-55	All requested will be dated before the purchase date.	Rebecca Williams, SBA, Christina Kontoyianis, SFS	Documentation of pre-approval will be included with all purchase requests
Contractors will complete the necessary background checks and ethics board approvals.	Rebecca Williams, SBA, Christina Kontoyianis, SFS	MCPS form 280-55 and 235-40	Completion of forms 235-40 and 280-55	Rebecca Williams, SBA, Christina Kontoyianis, SFS	The approval documentation will be included with the 280-55 and 235-40
The ECA plan will be updated throughout the year to stay within the alloted stipend hours. Staff will be paid the standard rate of pay.	Frida Keres, Admin Secretary and Rebecca Williams, SBA	MCPS ECA Planning sheet on the Business Center	The SBA will meet with the administrative secretary to verify the ECA hours are within the school's allocation.	Micah Wiggins, Principal, Rebecca Williams, SBA	The ECA hours will be within the school's allocation for the year.
All vendor payments over $1500 and athletic payments over $2500 will be submitted through the Hub.	Christina Kontoyianis, SFS	MCPS financial Manual, Form #280-55 and MCPS Hub	Requests over the prescribed amount will not be approved and a requisition will be created in the Hub	Micah Wiggins, Principal, Rebecca Williams, SBA	The principal and SBA will not approve check requests over the set limits
A checklist of all p-card holders will be used every month to monitor all landscape reports have been received.	Rebecca Williams, SBA	MCPS JP Morgan Cardholder/ Approver Memo	Checklist of P-card holders to ensure all card holders have submitted their monthly reports.	Micah Wiggins, Principal,	A monthly report of outstanding purchases will be made to ensure all purchases have been identified.
Fundraising and field trip procedures have been updated to include all required paperwork including the principal’s approval. Paperwork will be kept on file.	Christina Kontoyianis, SFS	MCPS fundraiser & field trip guidelines on Bus Center	Sponsors will have a meeting with the Bus Office to ensure paperwork is correct & complete for every field trip and fundriser.	Micah Wiggins, Principal, Rebecca Williams, SBA	The necessary documentation will be on file for fundraisers and field trips during the fiscal year.

Action Steps	Person(s) Responsible	Resources Needed	Monitoring Tools / Data Points	Monitoring: Who & When	Results/Evidence
Substitute payment procedures have been updated to ensure MCPS is reimbursed for substitute use.	Christina Kontoyianis, SFS	iPayment	The IAF accounts will have records of payments to MCPS for substitute usage	Micah Wiggins, Principal, Rebecca Williams, SBA	The IAF accounts will have records of payments to MCPS for substitute usage
Athletic fundraisers, like the Gold Card event, have been discontinued. Athletic fundraisers will follow the required MCPS documentation procedures and approval guidelines	Jason Woodward, AD, Christina Kontoyianis, SFS	MCPS Fundraiser Guidelines on Business Center	Sponsor will meet with the business office to ensure all paperwork is complete and correct prior to principal approval.	Micah Wiggins, Principal, Rebecca Williams, SBA	Fundraiser paperwork will be submitted to the business office for prior approval.
PTSA and Booster club will not make direct purchases for the school. Items must be purchased by the school through established MCPS procedures and reimbursed by the PTSA or Booster club.	Jason Woodward, AD and Christina Kontoyianis, SFS	MCPS Financial Manual and Procurement Manual	Purchase request will be submitted to the business office. W/ principal approval, purchase will be made through the Bus. Off	Micah Wiggins, Principal, Rebecca Williams, SBA	Purchases will be made by the school with the proper documentation and include reimbursement paperwork from the school club.
Course fees in School Cash Online will not exceed the approved amount and the SCO fees will be absorbed by the school	Christina Kontoyianis, SFS	MCPS Course Fee Memo	Course fees will be reviewed & approved by the principal prior to attaching to student SCO accounts	Micah Wiggins, Principal, Rebecca Williams, SBA	Course fees will end in an whole dollar amount and not include additional SCO fees

DIVISION OF SCHOOL LEADERSHIP AND IMPROVEMENT (DSLI)

☑ **Approved** ☐ **Please revise and resubmit plan by _______________**

Comments:

Director: Joe L. Rubens Date: 07/22/2026