# Internal Audit Unit MONTGOMERY COUNTY BOARD OF EDUCATION Rockville, Maryland

March 31, 2023

## **MEMORANDUM**

Subject:

To: Dr. Robert W. Dodd, Principal

Walt Whitman High School

From: Mary J. Bergstresser, Supervisor, Internal Audit Unit

Report on Audit of Independent Activity Funds for the Period

September 1, 2021, through December 31, 2022

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. They are responsible for ensuring that the IAFs are administered in accordance with Board of Education policies and MCPS regulations and procedures.

The IAF audits are conducted regularly to evaluate compliance with policies, regulations, and procedures, and to review processes for continuous improvement. Generally accepted audit procedures guide the work of the auditors who examine samples of the IAF records and financial accounts selected from documentation of various activities to verify their accuracy, as well as to assess the effectiveness of financial control procedures. An IAF audit does not review every transaction or school activity but seeks to provide reasonable assurance that any significant errors or omissions in the financial records are detected.

At our March 15, 2023, meeting with you; Miss Danielle Fus, school business administrator; Mrs. Joy L. Garnett, school financial specialist; Mr. Gregory (Greg) Miller, assistant principal; and Ms. Ajeenah D. Chavez, school administrative secretary, we reviewed the prior audit report dated November 12, 2021, and the status of the present conditions. It should be noted that Miss Fus's assignment as school business administrator was effective November 28, 2022. This audit report presents the findings and recommendations resulting from our examination of the IAF records and financial accounts for your school for the period designated above.

## **Findings and Recommendations**

School Financial Training (SFT) Part I, is required for principals within their first year of assignment. Refresher training is recommended every three years because policies, regulations, procedures, and technology applications are continuously updated (refer to the MCPS Financial

*Manual*, chapter 1, page 9). In your action plan dated January 2022, you indicated that you would sign up for the next SFT Part I available. We noted that you have not taken the SFT Part I since 2011. We recommended that you immediately sign up to take SFT Part I.

The purpose of Appendix A, Chart of Accounts (COA) within the MCPS Financial Manual, Chapter 20, and Independent Activity Fund (IAF) is to provide uniformity for accounting and reporting of IAF transactions. The COA provides guidance on IAF account structure and account descriptions that pertain to the setup of accounts in School Funds Online (SFO). We found numerous instances of nonconformity and recommend that the school's accounts be brought into compliance with the latest chart of accounts.

Sponsors of school activities, which involve the collection, or disbursement of IAF must be provided an account history report for each month in which transactions have been recorded in their accounts and are required to verify that transactions have been correctly recorded. We noted that the school financial specialist did not consistently provide account history reports to the athletic specialist and did not print the June 2022 reports. We also found that the monthly sponsor reports are not consistently distributed nor collected with the sponsor's signature/confirmation to acknowledge review and to verify activities to or from their accounts. The school financial specialist must prepare and deliver the monthly account history reports to the sponsors, and sponsors must review and resolve any discrepancies in their accounts and return the signed statements to the school financial specialist who will file them for review by the Internal Audit Unit (refer to MCPS Financial Manual, chapter 20, page 9).

Documents supporting the IAF reports are part of the financial records and must be maintained in the school office and filed logically to be readily available for audit or other purposes. IAF records shall be retained for five years after the close of the year to which they apply and until all audit requirements have been met, whichever is longer, and then destroyed (refer to the *MCPS Financial Manual*, chapter 20, page 16). Our review disclosed that some financial records were misfiled and not available for review, such as voided checks, bank deposit slips, deposit analysis, remittance slips, MCPS Form 280-46, *Independent Activity Funds Request for Payment to MCPS Employees for Services (Work) Performed*, and MCPS Form 280-49A, *Authorization for Consultant/Independent Contractor (Vendor) Services Paid with Independent Activity Funds (IAF)*. We recommend that IAF records be properly filed and retained in order to be available for audit.

Schools are encouraged to contact payees who have not cashed or deposited checks within 60 days and replace checks if lost or damaged to minimize the required escheat filing (refer to the *MCPS Financial Manual*, chapter 18, page 2). Checks that are not cashed by their payees within 180 days of issuance are considered abandoned property and, by law, belong to the State of Maryland. It is recommended that only if the payee provides a signed document or an email stating that the check was lost/destroyed and asks for a replacement check should the reissuance of a check be done. We found that you did not do the escheat process in 2021 and when you did escheat outstanding checks in 2022 you left several stale checks that should have also been escheated in December 2022. In

order to comply with the State of Maryland law and to eliminate additional work, if payee authorization is not received, we recommend checks be escheated annually using the process outlined on the Division of Controller website (refer to the *MCPS Financial Manual*, chapter 20, page 12).

MCPS Form 280-54, Independent Activity Funds Request for a Purchase, is used to obtain principal approval to proceed with an intended purchase (refer to the MCPS Financial Manual, chapter 20, page 4). The purpose of each disbursement must be fully explained on this form in order to properly record expenditures in appropriate accounts and to ensure that expenditures comply with IAF requirements. Invoices for goods or services must be signed by the purchaser to indicate satisfactory receipt. The secretary will then mark the documentation as "paid" prior to disbursing the funds. In your action plan, you included that the school business administrator and school financial specialist had begun denying any purchases received without pre-approval to remain in compliance with the MCPS Financial Manual. In our sample of disbursements, we found instances in which controls over purchases were weakened including incidents where documentation was missing or not adequate to assure the school benefited from the purchase, instances in which purchases were not pre-approved, MCPS documentation supporting purchases not always stamped or marked "paid," and invoices and online purchase confirmations were not always signed by the receiver to indicate goods or services were received, and that payment could be processed.. We recommend that MCPS Form 280-54 be prepared by staff with an estimate of expected expenditure and signed by the principal at the time verbal approval is sought. Certain sponsors would benefit from preparing an annual budget detailing expected income and expenses and obtaining your approval at the beginning of the school year. These budgets should be monitored by your school financial specialist and revised if necessary. We also recommend that all support documents be marked "paid", the purchase be verified as complete by the recipient, and that the invoice/packing slip be marked "received" and signed/dated by the recipient when goods are received at the school. Requiring invoices to be marked "received" ensures that goods or services have been satisfactorily received prior to payment.

The use of personal credit cards for large purchases is discouraged (refer to the *MCPS Financial Manual*, chapter 20, page 8). In our sample of disbursements, we found that several staff and non-staff members spent their own personal funds, usually using debit/credit cards, and were reimbursed large amounts instead of making purchases through the Business Hub or with an MCPS purchasing card. We recommend issuing MCPS purchasing cards to MCPS staff members for small purchases and all large purchases be placed in the Business Hub.

MCPS Form 280-49A, specifies that this form is required (in lieu of MCPS Form 280-54) to document authorization/approval for all consultant/independent contractor services paid with IAF, regardless of the amount due for services. If payment due for the vendor's services is \$1,500 or more, a purchase order is required, EXCEPT when contracting with Montgomery County Police Officers for high school event security. (refer to the *MCPS Financial Manual*, chapter 15, page 2). We found that contractor services did not always have a MCPS Form 280-49A completed, submitted and approved for disbursement. We recommend that the school complete and submit

MCPS Form 280-49A two weeks prior to commencement of services for all contractor/consultants, and when services are over \$1,500 be entered into the Hub as a purchase order. We also recommend that the approved MCPS Form 280-49A be kept on file to document the authorization and approval to pay a consultant/independent contractor with IAF.

Except for specific excluded items, any procurement requiring the disbursement of \$7,500 or more, or any contract with an anticipated aggregate expenditure of \$7,500 or more requires the prior written authorization of the associate superintendent of finance. In addition, expenditures with total estimated cost between \$7,500 - \$24,999 require requisition for quotes through procurement (refer to the *MCPS Financial Manual*, chapter 3, page 3). During our review of disbursements, we found that the school had expended sums in excess of \$7,500 without the required approval or quotes. We recommend use of MCPS Form 281-55, *Restricted Independent Activity Fund (IAF) Purchases Request for the Associate Superintendent of Finance's Approval*, when appropriate to ensure compliance with MCPS procurement requirements. We also recommend you to obtain three quotes from different vendors when needed.

Aggregate school expenditures of general funds for the procurement of refreshments in connection with meetings and staff appreciation items may not exceed \$60 per individual staff member, per fiscal year, without the prior written authorization of the Associate Superintendent of Finance (OOF) (refer to the *MCPS Financial Manual*, chapter 20, page 5). These expenditures must be appropriately recorded in accordance with the IAF chart of accounts. In your action plan, you indicated that you would monitor your approved budget to avoid overspending. We found that you exceeded the total amount allowed in FY 2022, without approval of the OOF. We recommend that you adhere to the MCPS requirements, as well as correctly classify and record these transactions for more accurate accountability.

The MCPS Purchasing Card Program streamlines the process for making low-dollar purchases that are necessary for MCPS operations. Use of the purchasing card does not relieve the cardholder from complying with all MCPS regulations, the procedures in the *MCPS Procurement Manual*, or the *MCPS Financial Manual*. In you action plan, you indicated that there would be follow up with cardholders and the principal if there were questions or concerns regarding allowable transactions. In the review of your purchase card transactions, we found that non-instructional items were purchased using the 03 Instructional Materials card. It is recommended that you follow the guidelines outlined in the procurement manual on allowable purchases (refer to the *Purchasing Card User's Guide*, page 2).

Cash and checks collected for IAF activities by sponsors and other authorized individuals must be remitted with MCPS Form 280-34, *Remittance Slip*, to the financial agent on the day the funds are received. In your action plan, you indicated that all staff would be reminded that funds had to be remitted by 2:00 p.m. or secured in the school night safe. You also indicated that the financial agents would review daily deposits for completion and make deposits timely. We found instances in which staff collecting funds were holding funds rather than remitting them timely to the financial agent. In addition, the financial agent was not always making timely deposits and was holding

money in excess of permitted amounts. The financial agent did not notate if the deposits were placed in the safe or receipted after hours. We also noted that MCPS Form 280-34, was not always filled out completely by the sponsor nor financial agent, and at times was missing the date collected, description of funds, signature, total amount collected, date received by the financial agent and receipt number. We recommend that all sponsors and the financial agent complete the remittance slip in full. To minimize the risk of loss and provide assurance that available funds will be fully utilized to meet school needs, all funds collected must be remitted to the financial specialist daily (refer to the *MCPS Financial Manual*, chapter 7, page 4). In addition, all remittances on hand must be deposited promptly, and always before each weekend, end of the month, or holiday.

Fund raising at the school must conform to the *Guidelines for Sponsoring an Independent Activity Fund Fund Raiser*. We found that there was a lack of adherence to these guidelines. Following these internal control procedures provides for accountability of funds raised as well as the opportunity to evaluate the results at the conclusion of the event. We found that not all sponsors were preparing fundraiser request forms to obtain your approval prior to the start of an activity. Each fund raiser must be approved by the principal in writing and the approval retained in the school office. Financial activities for each fund-raising activity should be recorded in a separate account in the 7000 series and a completion report prepared that analyzes the results (refer to the *MCPS Financial Manual*, chapter 20, page 13).

Retail sales tax must be collected by the school and remitted to the State of Maryland on the sales of all taxable merchandise. Taxable merchandise includes yearbook, school store, fundraiser items, athletic student purchases, and other items that become the personal property of the individual making the purchase (refer to the *MCPS Financial Manual*, chapter 18, page 2). We noted you had sales for which sales tax had not been collected and accurately remitted to the State of Maryland. We recommend that the school work toward full compliance by working with sponsors to determine activities for which sales tax must be collected.

Sponsors of field trips must have a complete class or club roster of student names and annotate how much each student paid by cash, check or online, date paid, students who did not participate in the trip, and students who received waivers, scholarships, or reduced fees. This data must be remitted to the financial agent at the completion of each trip, and compared to remittances recorded in the trip account history report. We found not all sponsors are turning in completed data at the conclusion of each trip, and that data is not being compared to the final account history report. We also found that an athletic coach did not follow the field trip guidelines for athletic tournaments. We recommend trip sponsors use MCPS Form 280-41, *Field Trip Accounting*, or its equivalent, and provide complete data at the conclusion of each trip. This data must be reconciled by the financial agent with remittances recorded in activity accounts (refer to the *MCPS Financial Manual*, chapter 20, page 10). We also recommend that all athletic tournaments to be run through the IAF chart of accounts field trip 5000 series.

A memorandum is issued annually with guidelines for management and accounting of external exam fees paid for students who are eligible for waivers and fee reductions. We found a lack of

adherence to these guidelines. We found errors in recording transactions so that account information needed for reconciliation of activities was unreliable. The monitoring spreadsheet used by the testing coordinator did not meet MCPS requirements. We also found that the Advance Placement (AP) coordinator performed both coordination and clerical services, and was not paid as outlined in the above-mentioned memo. We recommend that you work with staff to ensure that procedures are in place to effectively manage external exam activities, and to ensure that waivers reported are accurate and well documented.

# **Notice of Findings and Recommendations**

- The principal must attend School Finance Training Part I (repeat).
- Accounting transactions must conform to the IAF standard districtwide chart of accounts.
- Monthly account history reports must be provided to sponsors for affirmation of transaction correctness and returned to the financial agent.
- The IAF must be managed in accordance with sound accounting practices and effective internal controls that include safeguarding financial records until required audits are completed.
- Uncashed checks must be remitted to the state, in accordance with the MCPS escheatment process.
- Purchase requests must be preapproved by the principal prior to procurement (repeat).
- Personal funds or credit cards used to make school purchases must be discouraged.
- Purchase documentation must be adequate to support disbursements, stamped Paid, and marked as received.
- Disbursements to contractors that perform a service must have a MCPS Form 280-49A approved prior to service being provided.
- Purchases over \$7,500, with certain exceptions, must have OOF approval.
- Total combined expenditures for staff appreciation and meeting refreshments may not exceed \$60 per individual staff member, per fiscal year, without prior approval of the OOF.
- Purchasing card activity must comply with the MCPS *Purchasing Card User's Guide* (repeat).
- Cash and checks (funds) collected by sponsors must be promptly remitted, along with a complete MCPS Form 280-34, to the school financial specialist and in turn deposited timely (repeat).
- Fund-raisers must be approved by the principal prior to advertising or conducting the activity.
- Tax must be collected on taxable sales and remitted to the Comptroller of Maryland.
- Field trip records prepared by sponsors must provide comprehensive data to account for all students eligible to participate and financial specialist must reconcile funds collected with account history report.
- The exam coordinator must maintain accurate student fee collection records and submit them to financial staff for reconciliation to the general ledger

Other matters were discussed and satisfactorily resolved. We appreciate the cooperation and assistance of your staff. In accordance with MCPS Regulation DIA-RA, *Accounting for Financial Operations/Independent Activity Funds*, using the attached action plan, please provide a written response to the Internal Audit Unit within 30 calendar days of this report. In your response, please share a detailed plan for addressing these issues, including appropriate staff training and support.

Prior to returning your completed audit action plan, please contact Dr. Donna Redmond Jones, director of school support and well-being, Office of Student Support and Well-Being, for written approval of your plan. Based on the audit recommendations, Dr. Redmond Jones will indicate whether she will conduct an electronic review of your action plan or schedule a time to meet in person with you and your school business administrator and school financial specialist to support you with developing a well-defined plan to address the findings.

MJB:YSG:rg

#### Attachment

# Copy to:

Members of the Board of Education

Dr. McKnight

Mr. Hull

Dr. Murphy

Ms. Reuben

Mr. Stockton

Mrs. Williams

Dr. Floyd-Cooper

Mr. Reilly

Mrs. Chen

Ms. Eader

Mr. Klausing

Dr. Redmond Jones

Mrs. Ripoli

Ms. Webb

## FINANCIAL MANAGEMENT ACTION PLAN

Report Date: March 31, 2023	Fiscal Year: FY23
School: Walt Whitman HS - 427	Principal: Dr. Robert W. Dodd
OTLS Associate Superintendent: Dr. Donna Redmond Jones	OTLS Director: Dr. Donna Redmond Jones

# **Strategic Improvement Focus:**

As noted in the financial audit for the period <u>09/01/2021-12/31/2022</u>, strategic improvements are required in the following business processes: Adhering to MCPS Financial Manual policies and procedures remain the priority and focus of Walt Whitman High School's Principal, School Business Administrator, and School Financial Specialist. Financial reports, internal controls, disbursements, purchase cards, and cash receipts.

Findings/Action Steps	Person(s) Responsible	Resources Needed	Monitoring Tools/Data Points	Monitoring: Who & When	Results/Evidence
The principal must attend School Finance Training Part I (repeat).  Dr. Dodd will attend Finance Training in August. Mr. Greg Miller, Principal Intern, will attend as well	Robert Dodd; Gregory Miller - Admin Secretary as support and insurance that class registration is complete	MCPS PDO Course #64336	Register on the MCPS PDO site. Transcript will be automatically updated upon completion.	Administrative Secretary Dr. Jones, associate superintendent	Miller/Dodd will complete the course by end of summer 2023
Accounting transactions must conform to the IAF standard districtwide chart of accounts.	FS	List of accounts set by MCPS	Start new accounts in the correct number/category;	SBA will monitor as accounts are being	Correct account numbers will be

Must use countywide accounts for fundraisers and SGA	SBA		Move existing accounts after the end of the school year, but before the close of books on July 1	closed at the end of the FY	used consistently in the future
Monthly account history reports must be provided to sponsors for affirmation of transaction correctness and returned to the financial agent.  Monthly Staff Reconciliation Reports Reviewed and Documented	School Secretary II	Large binders, white and colored paper, reports from SFS	Visual cues with colored paper versus white in binder will indicate who hasn't completed their review	If not done by the 20th of the month, SBA, will email staff who are delinquent	Increased compliance with IAF accounts
The IAF must be managed in accordance with sound accounting practices and effective internal controls that include safeguarding financial records until required audits are completed.  The school will develop an internal financial handbook that will be aligned with MCPS guidance; elements of the handbook will be explained to the full staff at a meeting during	SBA Principal Administrative Secretary	Versions of Financial Handbook from other MCPS high schools; MCPS Business Hub	Complete creation/revision done by pre-service Financial handbook will be updated regularly during the school year.	FS SBA Principal Administrative secretary	Staff will consistently abide by MCPS financial guidelines including various approvals like request for purchase, fundraisers, field trips.

pre-service week, 2023					
Uncashed checks must be remitted to the state, in accordance with the MCPS escheatment process.  Escheatment will be completed in May of 2023 (June 2022 and prior)	FS SBA Principal	Escheatment memo to controller's office (Stefan Austin)	Outstanding check list, complete escheatment process, send to controller's office	SBA Principal	Verify on the May bank reconciliation that checks have been escheated and are no longer listed as uncleared
Purchase requests must be preapproved by the principal prior to procurement (repeat).	Approval is required by SBA, FS, and Principal prior to purchasing	MCPS Form 280-54, sample completed documents	SBA and FS will monitor budget line items for final review and ensure signature is included to confirm receipt of items	Pre-service week training	SBA, FS will deny any purchases received without pre-approval to remain in compliance
Personal funds or credit cards used to make school purchases must be discouraged.  Staff with high personal spending for school needs will be issued P-cards	SBA will monitor the Viking Cafe and Black & White Viking Cafe and Black & White sponsors will receive P-cards	JP Morgan online course for appropriate use of P-cards	Confirmation of course completion	SBA will make sure paperwork is filled out and submitted for August training courses and Pcard retrieval	Minimal personal spending for reimbursement on necessary program items
Purchase documentation must be adequate to support disbursements, stamped Paid,	SFS SBA	Proper collection and organization of all invoices and	Sources documents stamped paid when received.	SBA	All receipts/invoices will be able to be reviewed and seen

and marked as received.  The FS must stamp the invoice/receipt for all expenditures (source document stamped paid).		receipts.			as stamped paid
Disbursements to contractors that perform a service must have a MCPS Form 280-49A approved prior to service being provided.  School staff will ensure that 280-49A will be completed and submitted to MCPS Procurement for approval prior to service.	SBA Principal FS Operations Team	Operations Team will review upcoming events weekly and determine the need for vendor approval	Weekly Operations Team meetings  Regular SBA-Principal meetings to process documentation	Weekly/monthly	All vendors paid through the IAF will receive approval from MCPS Procurement with necessary documents saved/filed for auditing purposes
Purchases over \$7,500, with certain exceptions, must have OOF approval.  SBA will collaborate with MCPS Procurement to ensure that appropriate quotes and approvals are sought prior to large purchases.	FS SBA Principal	Consistent guidance from Procurement on processes for large purchases.  Guidance from MCPS Audit on the use of funds/grants from external organizations	Grant approvals and reimbursements  Record of vendor quotes and submission for approval to Procurement  Record of ordering	FS SBA Principal	Record of OOF approval will be documented prior to large purchases
Total combined expenditures for staff appreciation and meeting refreshments may not exceed \$60 per individual staff member, per fiscal year, without prior approval of the OOF.	SBA FS Principal Administrative team	The administrative team will develop an annual budget on staff appreciation expenditures	Water cooler in Health Room can be charged to General Funds Retirement gifts will	Principal SBA Administrative team FS	Staff appreciation allocation will not be overspent

Staff appreciation cannot be overspent - moved funds into account to visualize how much money we have left.		(summer 2023)  Staff appreciation budget will be modified as needed during the school year	now be purchased through staff-generated funds raised each school year		
Purchasing card activity must comply with the MCPS Purchasing Card User's Guide (repeat).  Staff with high personal spending for school needs will be issued purchasing cards.	SBA	JP Morgan online course	SBA will make sure paperwork is filled out and submitted for August training courses and p-card retrieval	SBA Principal	Minimal personal spending for reimbursement
Cash and checks (funds) collected by sponsors must be promptly remitted, along with a complete MCPS Form 280-34, to the school financial specialist and in turn deposited timely (repeat).	Sponsors, SBA, SFS	Deposits, Deposit Slips, SFS will have access to the drop safe and check daily	Staff will be reminded of procedures via email to ensure deposits are brought to SFS prior to 2pm. Any deposits after 2pm must be secured in the safe until retrieved the next day. SFS will write when deposit is collected from the safe	Daily; Sponsors, SBA, SFS	Club sponsors will bring deposits to SFS daily and are securely deposited to the bank every school day
Fund-raisers must be approved by the principal prior to advertising or conducting the	SBA FS Principal	MCPS Fundraiser form	Prior to annual Clubs Night, the administrator	Continuous monitoring by SBA, SFS, and Principal	Pre-approval of fundraisers will be signed by SBA, SF,

activity.  All fundraisers with required approvals and documentation will be consistently reviewed by the principal and the SBA.			responsible for supervising clubs will share sponsor responsibilities along with the SBA at a staff meeting  Sponsors will be held accountable for monitoring the financial activities of their clubs  Fundraiser planning forms will be shared with staff during pre-service.  MCPS approval form will be included in Financial Handbook		and Principal before flyers, SCO, or announcements are shared with the community.
Tax must be collected on taxable sales and remitted to the Comptroller of Maryland.	FS SBA Principal	Spreadsheet for record of taxable sales	FS will track all taxable sales on the spreadsheet  SBA will monitor that FS completes taxable sales on the spreadsheet	SBA Principal	Spreadsheet will be kept up to date with an accurate record of taxes for review.
Field trip records prepared by sponsors must provide comprehensive data to account for all students eligible to	SFS	Field Trip close-out form, Attachment reports	SFS will send Outlook Calendar invites to remind staff to properly	SFS, SBA will monitor monthly.	

participate and financial specialist must reconcile funds collected with account history report.		close out Field Trips once the trip is complete and bills have been paid.		
The exam coordinator must maintain accurate student fee collection records and submit them to financial staff for reconciliation to the general ledger.	SBA, Test Coordinator, SFS	Exam coordinator will keep up to date, accurate records of payments and required refunds	Quarterly check-ins with SBA and Exam coordinator	

Office of School Support and Well-Being (OSSWB)						
X Approved	Please re	revise and resubmit plan by				
Comments:						
Director:	Amna Redmend Jenes	Date:5/7/23	_			