MEMORANDUM

To: Mr. Jeffrey T. Brown, Principal
    Roberto W. Clemente Middle School

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

Subject: Report on Audit of Independent Activity Funds for the Period
         February 1, 2018, through May 31, 2019

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, 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 July 22, 2019, meeting with you and Ms. Elizabeth A. Shull, school financial specialist, we reviewed the status of the conditions described in our prior audit report dated April 23, 2018, and the status of present conditions. 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

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 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. In our sample of disbursements, we found prior approval was not consistently
obtained. By requiring prior approval, the principal retains control over the expenditure of IAF funds. 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 having 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 business office and revised if necessary.

Summary of Recommendations

- Purchase requests must be approved by the principal prior to procurement (repeat).

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 form, 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. Adrienne L. Morrow, director of learning, achievement, and administration, Office of School Support and Improvement. Based on the audit recommendations, Dr. Morrow 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 administrative secretary to support you with developing a well-defined plan to address the findings.

MJB:HT:ls

Attachment

Copy to:
Members of the Board of Education
Dr. Smith
Dr. Navarro
Dr. Statham
Dr. Zuckerman
Mr. Civin
Dr. Johnson
Mr. Wilson
Mrs. Camp
Mrs. Chen
Ms. Diamond
Dr. Morrow
Mr. Tallur
Ms. Webb
### Financial Management Action Plan

**Report Date:** July 25, 2019  
**Fiscal Year:** July 25, 2019

**School:** Roberto W. Clemente MS - 157  
**Principal:** Jeffrey T Brown

**OSSI**  
**Associate Superintendent:** Dr. Eric Wilson  
**OSSI Director:** Dr. Adrienne Morrow

### Strategic Improvement Focus:

As noted in the financial audit for the period 2/1/18-5/31/19, strategic improvements are required in the following business processes:

- Purchase requests must be approved by the principal prior to procurement.

### Action Steps

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<tr>
<th>Action Steps</th>
<th>Person(s) Responsible</th>
<th>Resources Needed</th>
<th>Monitoring Tools / Data Points</th>
<th>Monitoring: Who &amp; When</th>
<th>Results/Evidence</th>
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<tr>
<td>Financial Specialist &amp; Principal will present financial procedures to all staff in staff meetings, team meetings, and meeting with IAF sponsors during pre-service to review financial procedures, but especially 280-54 procedures and expectations. Refreshers and personalized trainings will be provided to sponsors before planned events.</td>
<td>Financial Specialist</td>
<td>Time with staff</td>
<td>Weekly Meetings with Financial Specialist &amp; Principal</td>
<td>Financial Specialist, Principal</td>
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**OFFICE OF SCHOOL SUPPORT AND IMPROVEMENT (OSSI) REVIEW & APPROVAL**

☑/Approved ☐ Please revise and resubmit plan by ____________

Comments:

Director: **Adrienne L. Morrow** Date: **8/19/19**