

August 9, 2022

MEMORANDUM

To: Ed Ryans, Ed. D., Instructional Director
Cluster 11

Albert Lewis, Acting Principal
Largo High School

From: Michele Winston, CPA, Director
Internal Audit

Re: Financial Audit for October 1, 2018 through January 31, 2022

An audit was completed on the financial records of **Largo High School** for the period October 1, 2018 through January 31, 2022. The audit indicates that the school's financial records and procedures require improvement to be in accordance with the Accounting Procedures Manual for School Activity Funds (APM) and Board of Education (BOE) policies and procedures. The exceptions noted in the audit are documented in the attached audit report.

As principal of the school, you will be responsible for preparing an action plan by **September 12, 2022**, indicating steps that will be taken to ensure compliance with the APM. Please note that you are required to provide your action plan using the attached Microsoft Word template and any other correspondence to the Internal Audit Office, email address internal.audit@pgcps.org. **Please forward this template as a Microsoft Word document.** A copy of your action plan should also be forwarded to Danyelle Washington, Business Analyst, and email address: dany.washington@pgcps.org and Katrina Greene, Student Activity Fund Support Specialist, email address: katrina.greene@pgcps.org.

Enclosure

cc Juanita Miller, Ed. D., Board Chair
Monica Goldson, Ed.D. Chief Executive Officer
Members, Board of Education
Mychael Dickerson, Chief of Staff
Helen Coley, Ed. D., Chief of School Support and Leadership
Carletta Marrow, Ed. D., Associate Superintendent
Michael Herbstman, Chief Financial Officer
James Dougherty, Director, Financial Services
Joeday Newsom, Esq., Staff Director, Board of Education
Katrina Greene, School Activity Funds Support Specialist
Janice Walters-Semple, CPA, Internal Audit Supervisor
Kelvin Campbell, Internal Auditor II

Internal Audit Report

Largo High School

School Activity Funds

For the Period Ended January 31, 2022

Largo High School
School Activity Funds
Internal Audit Report
For the Period Ended January 31, 2022

Table of Contents

INTERNAL AUDITOR’S REPORT 2
SUMMARY 3
OBJECTIVES 3
SCOPE 3
FINDINGS AND RECOMMENDATIONS..... 4
STATUS OF PRIOR AUDIT FINDINGS 10
ACKNOWLEDGEMENT 11

Largo High School
School Activity Funds
Internal Audit Report
For the Period Ended January 31, 2022

Internal Auditor's Report

We have examined the School Activity Funds (SAF) of the Largo High School for the period October 1, 2018 through January 31, 2022. The school's Principal is responsible for the administration of SAF. Our responsibility is to express an opinion based on our examination.

Our examination was conducted by attestation standards established by the American Institute of Certified Public Accountants and Generally Accepted Government Auditing Standards and accordingly, included examining on a test basis, evidence supporting SAF and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion.

Our examination disclosed the following findings:

- *Mismanagement of Disbursements,*
- *Record Retention,*
- *Vending Machines Contract,*
- *Excessive Spending in Restricted Fund Accounts,*
- *Unremitted Restricted Account Balances,*
- *Inappropriate Use of Reimbursement Vendor Option,*
- *Fundraiser Forms Not Completed, and*
- *Delinquent Monthly Bank Reconciliations*

The findings resulted in a material deviation from Board of Education (BOE) policies, procedures, and the Accounting Procedures Manual for School Activity Funds (APM) requirements.

In our opinion, the SAF referred to above, requires improvement to achieve compliance with BOE policies and procedures and the APM, in all material respects, for the period ended January 31, 2022.



Michele Winston, CPA, Director
Internal Audit

Largo High School
School Activity Funds
Internal Audit Report
For the Period Ended January 31, 2022

SUMMARY

Internal Audit completed an audit of the school activity funds (SAF) for the Largo High School for the period October 1, 2018 through January 31, 2022. The audit was conducted as part of the department's annual audit plan.

The audit indicated the office's financial records and procedures require improvement to be by the Accounting Procedures Manual for School Activity Funds (APM) and Board of Education (BOE) policies and procedures.

This audit report includes **8** findings that occurred under the leadership of the previous principals. A listing of the findings and the personnel responsible are included in the appendix at the end of the audit report. Detailed findings from the current audit are cited on the following pages with accompanying recommendations for corrective action.

OBJECTIVES

The objectives of the audit were to determine the effectiveness of the system of internal controls and whether the school complies with the policies and procedures of the APM and the BOE. It is important to recognize while the audit focused on deficiencies, it was intended to be constructive. The audit was not designed and conducted to evaluate the effectiveness of the educational programs in the school. Therefore, the absence of comments related to the educational programs should not be construed to imply that these programs are either adequate or deficient.

SCOPE

The audit was based on our review of bank statements, financial reports, selected and available canceled checks and all voided checks and MTF envelopes submitted by staff for the period October 1, 2018 through January 31, 2022. In addition, selected receipts, disbursements, and supporting documentation were reviewed for the said period. Audit results were based on available documentation. Several documents were not on file for review. (*See **2023.02 Record Retention***)

This is an audit of funds related to students' activities at the school and does not include SOR funds or any funds not derived from students' activities for the audit period.

Largo High School
School Activity Funds
Internal Audit Report
For the Period Ended January 31, 2022

FINDINGS AND RECOMMENDATIONS

The audit resulted in the following findings and recommendations.

2023.01: Mismanagement of Disbursements

The following exceptions in the management of disbursements were noted:

- A. ***Inadequate Approval*** – There were **11** instances where expenditures were not adequately approved. The Principal did not pre-approve the School Fund Expenditure Form (SFEF) before purchases in **7** instances. SFEFs were not approved in **4** instances.
- B. ***Delinquent Vendor Payments*** – There were **7** instances where expenditures were not remitted to the vendor promptly. The range of delinquency was between **5** and **77** days.
- C. ***Inadequate Supporting Documentation*** – There were **7** instances where expenditures did not contain adequate supporting documentation or incomplete SFEF. Expenditures were supported by emails or were not supported in some instances.
- D. ***Use of Board Approved Vendors*** – There were **4** instances where staff members were reimbursed for purchases made from unapproved vendors. The recordkeeping staff indicated the status of each vendor had been verified. However, IA has determined that **3** of the vendors have never been BOE-approved vendors and the **4th** vendor has been inactive since September 30, 2012.

The APM provides the following guidelines regarding the administration of cash disbursements:

- A. Before ordering or purchasing goods or services, an SFEF must be completed and signed (approved) by the principal.
- B. Invoices are required to be paid within 30 days of receipt or by the invoice due date. Principals should review invoices and statements for past due amounts and ensure that payments are made promptly.
- C. All checks must have itemized documentation attached to the SFEF to substantiate the amount of the checks.
- D. All checks must be written to an Approved/Active vendor in School Funds Online.

Largo High School
School Activity Funds
Internal Audit Report
For the Period Ended January 31, 2022

The principal did not establish internal controls relative to the management of disbursements. The staff did not always seek preapproval before incurring expenditures. The principal and recordkeeping staff did not review open invoices and statements for past due amounts to ensure that all payments were made promptly. A review of supporting documentation was not always complete before the issuance of the check to ensure that itemized documentation was attached. Staff members were not instructed that vendors must be BOE approved and the recordkeeping staff did not verify the status of the vendor prior.

Mismanagement of disbursements constitutes non-compliance with BOE policies and procedures and increases the financial risk to the school and staff. Approving purchases without adequate documentation and failure to adequately approve expenditures may result in payment for goods and services that were not received and increases the school's vulnerability to potential misuse or waste of resources. Delinquent payment of invoices could result in the vendor placing the BOE's account with a collection agency where significant collection fees could be assessed. The school risks unsatisfactory service from vendors who have not been properly approved.

Recommendation: The principal and recordkeeping staff must perform the following to improve the administration of disbursements:

- A. The principal must ensure staff members are aware that the appropriate pre-approval is required before purchasing products or services. In addition, the principal should ensure all pre-approval details are provided on SFEFs before approving expenditures. Staff should be held accountable for compliance.
- B. The principal and recordkeeping staff must ensure vendor payments are issued timely, within 30 days of receipt, or by the invoice due date. The requirement for reviewing open invoices and statements must be consistently followed.
- C. Internal controls must be established to ensure that all SFEFs are complete and have adequate supporting documentation before the issuance of payments.
- D. The principal must ensure staff members are aware that goods and services should only be purchased from BOE-approved vendors. Internal controls should be established to ensure the recordkeeping staff is verifying the status of all vendors before issuing payments.

Largo High School
School Activity Funds
Internal Audit Report
For the Period Ended January 31, 2022

2023.02 Record Retention

Supporting documentation to substantiate financial transactions was not available for review in the following instances:

- 42 Cash Disbursements,
- 19 Cash Receipts,
- 46 Voided Checks,
- 40 Fund Transfer Journal Entry Proof Sheets, and
- 33 Monetary Transmittal Forms

According to Section 6.12 of the APM, *Record Retention*, all SAF records are required to be retained for 7 years and or until audited, including the current fiscal year. This includes, but is not limited to, financial reports, bank statements, receipts, disbursement authorities, Monetary Transmittal Forms, SFEFs, canceled checks, and contracts.

The former recordkeeping staff did not maintain an adequate filing system. The principal did not provide adequate oversight for the record retention process.

Failure to make financial records available for audit constitutes noncompliance with BOE policies and procedures and compromises the audit trail necessary for determining compliance with applicable requirements.

Recommendation: The principal must ensure proper custody of all records relating to SAF until they are audited. An adequate filing system must be implemented to ensure that financial documents are properly filed and accessible for future review in the absence of the recordkeeping staff or principal. The principal should hold recordkeeping staff accountable for compliance.

2023.03 Vending Machines Contract

The school currently has a total of 7 vending machines (4 sodas and 3 snacks) to facilitate the needs of its students and faculty. A current signed contract stipulating commissions due to the school and frequency of commissions was not on file.

The APM, Section 9.8, *Vending Machine Sales*, states that all schools with vending machines must have a signed contract stipulating commissions due to the school and the frequency of these commissions being remitted. The contract term cannot exceed one year.

The principal did not enter into a contractual agreement for the school's vending machines during the current audit period. Nonexistence of a contractual agreement for vending impacts the BOE's ability to determine whether the school is deriving maximum benefits from the operation of the vending machines.

Largo High School
School Activity Funds
Internal Audit Report
For the Period Ended January 31, 2022

Possible missing vending proceeds from the faculty vending machines funds could be used for student activities and also offset the deficit in the PSA fund account.

Recommendation: The principal must obtain a current signed vending contract for all machines stipulating commissions due to the school and the frequency these commissions are remitted. The principal should provide oversight to ensure that current vending contracts are consistently established, adhered to, and maintained on file in compliance with BOE policies and procedures. The principal should seek assistance for the Purchasing and Supply Services Office if necessary.

2023.04 Excessive Spending in Restricted Fund Accounts

The school's SAF has 4 restricted fund accounts with deficits totaling **(\$12,824.64)** as of January 31, 2022. The following is a table of fund account deficits:

Account	Description	Amount
450.2	PSA-Food	(\$214.33)
450.3	PSA-Staff Appreciation	(\$282.78)
480	Yearbook	(\$12,223.78)
594.1	Acad. of Finance	(\$103.75)
		(\$12,824.64)

According to the APM, expenditures for all restricted accounts are limited to the amount of funds collected for those activities. However, if restricted accounts exceed the available cash, the account is insolvent. As the fiduciary agent for SAF, the principal should ensure all accounts are solvent at all times.

The yearbook account deficit can be traced as far back as June 30, 2006. Without financial records, IA could not determine the cause of the deficit. Several former principals and recordkeeping staff did not monitor accounts to ensure that restricted accounts maintained a positive balance before expenditures were authorized. As such, BOE policies and procedures as established in the APM regarding the use of restricted funds were not followed.

Students are not receiving the maximum possible benefit of the resources that should have been available to them when restricted funds are overspent.

Recommendation: The principal and recordkeeping staff must ensure that all potential expenditures are evaluated relative to the availability of resources and that care is exercised to ensure that resources are used for the maximum benefit of the students. Spending in these accounts must cease until the account deficits are resolved. Accounting and Financial Reporting should be contacted to determine the resolution for the deficit in the Yearbook fund account.

Largo High School
School Activity Funds
Internal Audit Report
For the Period Ended January 31, 2022

2023.05 Unremitted Restricted Account Balances

As of January 31, 2022, the following restricted balances were observed in the school’s records and have not been remitted to the BOE:

Item#	Account	Description	Amount
1	214.5	Boys Football Gate Rec-Varsity	\$505.00
2	521	Credit Recovery	\$9,673.50
			\$10,178.50

The PGCPS Athletics Handbook states that gate receipts from varsity football ticket sales are to be remitted to the PGCPS Office of Treasury Operations. Beginning in 2019, the Office of Athletics and Treasury Operations established an electronic process to transfer the balance in the schools’ checking accounts to the Office of Treasury Operations.

Annually, the Accounting and Financial Reporting Office provides instructions to recordkeeping staff for the remittance of Credit Recovery Funds. Applicable instructions were provided on February 20, 2020, with a deadline of February 28, 2020.

The Office of Athletics has not ensured that all balances were correct and did not initiate the automatic debit from the school’s football gate receipts account. The recordkeeping staff did not remit credit recovery funds to the Treasury Office during FY 2020 and FY 2021.

Ineffective remittance of specific restricted funds balances to specified offices represents non-compliance with Board policies and procedures and decreases the potential benefit of these funds. The credit recovery funds are used by the BOE to fund the payment of teachers who assist with the program.

Recommendation: The financial recordkeeping staff should ensure that all restricted balances that require remittance to the BOE are properly managed each year. The principal should provide oversight by reviewing the school’s Year to Date Report each month for outstanding balances in these accounts. The Office of Athletics should be contacted to ensure that the Boys Football Gates Receipts transfers are initiated as required. The instructions from the Office of Financial Accounting and Reporting must be followed to ensure prompt transfer of Credit Recovery funds.

Largo High School
School Activity Funds
Internal Audit Report
For the Period Ended January 31, 2022

2023.06 Inappropriate Use of Reimbursement Vendor Option

The recordkeeping staff inappropriately processed **119** cash disbursement transactions during the audit period. Refunds to students and parents totaling **\$16,079.63** were processed using the “Reimbursement Vendor” option instead of the “Refund Vendor” option.

As outlined in the APM, the “*Reimbursement Vendor*” option was created to post reimbursable expenses to the staff and the “*Refund Vendor*” option was created to post refundable expenses to parents.

BOE policies and procedures as established in SFO regarding the use of the “*Reimbursement Vendor*” and “*Refund Vendor*” options were not followed. The recordkeeping staff indicated that she was not familiar with the guidelines for using the “*Refund Vendor*” option for processing refunds.

The school’s financial records may not have been accurately stated. Failure to follow instructions for processing refunds places the school in a position of non-compliance with BOE policies and procedures.

Recommendation: The principal must establish procedures to ensure that all future refunds are accurately processed in SFO.

2023.07 Fundraiser Forms Not Completed

The school conducted 9 sponsored fundraisers during the audit period. Fundraiser Initiation and Authorization Forms, Fundraiser Completion Reports, and Annual Fund Raising Summary Reports were not prepared for all fundraising events.

According to the APM Fundraiser Initiation and Authorization Forms and Completion, reports must be prepared by the sponsor and be reviewed, and acknowledged by the principal. Additionally, the principal should prepare or delegate the preparation of an annual report summarizing all fundraising activities concluded during the school year. Fundraiser reports should be available for review by parents, and other interested members of the community.

BOE policies and procedures as established in the APM were not followed. The requirement for completion of fundraiser forms was not communicated to fundraising sponsors.

Failure to complete fundraising forms removes audit evidence sufficient to provide administrators and interested personnel with information about fundraising results.

Recommendation: The principal must establish internal controls to ensure that fundraising sponsors are held accountable for preparing fundraising forms (Fundraiser Initiation and Authorization Forms and Fundraiser Completion Reports) for fundraising events held. The responsibility for preparing a summary of fundraising activities should be delegated to ensure

Largo High School
School Activity Funds
Internal Audit Report
For the Period Ended January 31, 2022

compliance with the requirements of the APM. These documents must be maintained on file for public and auditor review upon request.

2023.08 Delinquent Monthly Bank Reconciliations

There were **5** instances where the recordkeeping staff did not complete Monthly bank reconciliations timely and the principal failed to review and approve completed bank reconciliations as required. The range of delinquency was **7** to **48** days.

According to the APM, the principal is responsible for receiving the bank statement unopened. After reviewing the statement and canceled checks, the principal is required to forward the documents to the bookkeeper for preparation of the bank reconciliation. The bookkeeper is required to complete the bank reconciliation within 7 days after receiving the statement from the bank. This process is required to be completed by the 15th of the subsequent month. The completed reconciliation should be returned to the principal every month for review and approval.

The principal did not implement adequate internal controls to ensure that monthly bank reconciliations were completed and consistently reviewed by the 15th of each month as required.

Failure to complete, review and approve monthly bank reconciliations promptly increases the financial risk to the school.

Recommendation: The principal must establish procedures to ensure the completion, review and, approval of monthly bank reconciliations occur by the 15th of each month as required.

STATUS OF PRIOR AUDIT FINDINGS

The previous audit report for Largo High School was issued for the period ending September 30, 2018. During that period, neither the acting principal nor the recordkeeping staff was in their current positions. The previous audit report included **5** reportable conditions, of which **2** are repeated. The following findings were noted as a result of the prior audit, and the status is indicated below:

- **Mismanagement of Funds Received** - Controls appear to be working.
- **Mismanagement of Disbursements** – The condition still exists. See Finding 2022.01 regarding *Mismanagement of Disbursements*.
- **Fundraiser Forms** - Condition still exists. See Finding 2022.09 regarding *Fundraiser Forms Not Completed*.
- **Year-end Monetary Transmittal Form Envelopes** - Controls appear to be working.
- **Stale Dated Checks** - Controls appear to be working.

Largo High School
School Activity Funds
Internal Audit Report
For the Period Ended January 31, 2022

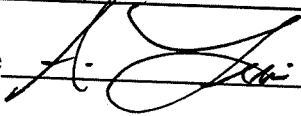
ACKNOWLEDGEMENT

We would like to thank the principal and staff of Largo High School for their cooperation and assistance extended during the audit.

Prince George's County Public Schools
Internal Audit Department
School/Office: Largo HS
Response Date: September 12, 2022

	Findings	Recommendations	Concur Non-Conc ur Partially Concur	Action Plan	Corrective Action Date	<u>Status</u> Implemented Partially Implemented Not Implemented
1.	<u>2023.01:</u> <u>Mismanagement</u> <u>of Disbursements</u>	<p>The principal and recordkeeping staff must perform the following to improve the administration of disbursements:</p> <p>A. The principal must ensure staff members are aware that the appropriate pre-approval is required before purchasing products or services. In addition, the principal should ensure all pre-approval details are provided on SFEFs before approving expenditures. Staff should be held accountable for compliance.</p> <p>B. The principal and recordkeeping staff must ensure vendor payments are issued timely, within 30 days of receipt, or by the invoice due date. The requirement for reviewing open invoices and statements must be consistently followed.</p>	Concur	<p>The principal and recordkeeping staff must perform the following to improve the administration of disbursements:</p> <p>A. The principal must ensure staff members are aware that the appropriate pre-approval is required before purchasing products or services. In addition, the principal should ensure all pre-approval details are provided on SFEFs before approving expenditures. Staff should be held accountable for compliance.</p> <p>B. The principal and recordkeeping staff must ensure vendor payments are issued timely, within 30 days of receipt, or by the invoice due date. The requirement for reviewing open invoices and statements must be consistently followed.</p>	August 10, 2022	Implemented

Principal Signature



Date

9/12/2022

		<p>C. Internal controls must be established to ensure that all SFEFs are complete and have adequate supporting documentation before the issuance of payments.</p> <p>D. The principal must ensure staff members are aware that goods and services should only be purchased from BOE-approved vendors. Internal controls should be established to ensure the recordkeeping staff is verifying the status of all vendors before issuing payments.</p>		<p>C. Internal controls must be established to ensure that all SFEFs are complete and have adequate supporting documentation before the issuance of payments.</p> <p>D. The principal must ensure staff members are aware that goods and services should only be purchased from BOE-approved vendors. Internal controls should be established to ensure the recordkeeping staff is verifying the status of all vendors before issuing payments.</p>		
2.	<u>2023.02 Record Retention</u>	The principal must ensure proper custody of all records relating to SAF until they are audited. An adequate filing system must be implemented to ensure that financial documents are properly filed and accessible for future review in the absence of the recordkeeping staff or principal. The principal should hold recordkeeping staff accountable for compliance.	Concur	The principal must ensure proper custody of all records relating to SAF until they are audited. An adequate filing system must be implemented to ensure that financial documents are properly filed and accessible for future review in the absence of the recordkeeping staff or principal. The principal should hold recordkeeping staff accountable for compliance.	August 10, 2022	Implemented

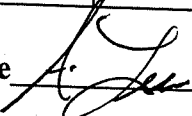
Principal Signature

Date

9/12/2022

3.	<u>2023.03 Vending Machines Contract</u>	The principal must obtain a current signed vending contract for all machines stipulating commissions due to the school and the frequency these commissions are remitted. The principal should provide oversight to ensure that current vending contracts are consistently established, adhered to, and maintained on file in compliance with BOE policies and procedures. The principal should seek assistance for the Purchasing and Supply Services Office if necessary.	Concur.	The principal must obtain a current signed vending contract for all machines stipulating commissions due to the school and the frequency these commissions are remitted. The principal should provide oversight to ensure that current vending contracts are consistently established, adhered to, and maintained on file in compliance with BOE policies and procedures. The principal should seek assistance for the Purchasing and Supply Services Office if necessary.	August 10, 2022	Implemented. New Contract signed on September 12, 2022.
4.	<u>2023.04 Excessive Spending in Restricted Fund Accounts</u>	The principal and recordkeeping staff must ensure that all potential expenditures are evaluated relative to the availability of resources and that care is exercised to ensure that resources are used for the maximum benefit of the students. Spending in these accounts must cease until the account deficits are resolved. Accounting and Financial Reporting should be contacted to determine the resolution for the deficit in the Yearbook fund account.	Concur	The principal and recordkeeping staff must ensure that all potential expenditures are evaluated relative to the availability of resources and that care is exercised to ensure that resources are used for the maximum benefit of the students. Spending in these accounts must cease until the account deficits are resolved. Accounting and Financial Reporting should be contacted to determine the resolution for the deficit in the Yearbook fund account.	August 10, 2022	Partially Implemented. We working with Ms. Green to rectify the yearbook account.
5.	<u>2023.05 Unremitted</u>	The financial recordkeeping staff should ensure that all restricted balances that	Concur	The financial recordkeeping staff should ensure that all restricted	August 10, 2022	Implemented

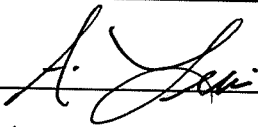
Principal Signature



Date 9/12/2022

	<u>Restricted Account Balances</u>	require remittance to the BOE are properly managed each year. The principal should provide oversight by reviewing the school's Year to Date Report each month for outstanding balances in these accounts. The Office of Athletics should be contacted to ensure that the Boys Football Gates Receipts transfers are initiated as required. The instructions from the Office of Financial Accounting and Reporting must be followed to ensure prompt transfer of Credit Recovery funds.		balances that require remittance to the BOE are properly managed each year. The principal should provide oversight by reviewing the school's Year to Date Report each month for outstanding balances in these accounts. The Office of Athletics should be contacted to ensure that the Boys' Football Gates Receipts transfers are initiated as required. The instructions from the Office of Financial Accounting and Reporting must be followed to ensure prompt transfer of Credit Recovery funds.		
6.	<u>2023.06 Inappropriate Use of Reimbursement Vendor Option</u>	The principal must establish procedures to ensure that all future refunds are accurately processed in SFO.	Concur	The principal must establish procedures to ensure that all future refunds are accurately processed in SFO.	August 10, 2022	Implemented
7.	<u>2023.07 Fundraiser Forms Not Completed</u>	The principal must establish internal controls to ensure that fundraising sponsors are held accountable for preparing fundraising forms (Fundraiser Initiation and Authorization Forms and Fundraiser Completion Reports) for fundraising events held. The responsibility for preparing a summary of fundraising activities should be	Concur	The principal must establish internal controls to ensure that fundraising sponsors are held accountable for preparing fundraising forms (Fundraiser Initiation and Authorization Forms and Fundraiser Completion Reports) for fundraising events held. The responsibility for	Aug 22, 2...	Implemented

Principal Signature

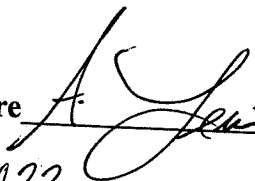


Date

9/12/2022

		delegated to ensure compliance with the requirements of the APM. These documents must be maintained on file for public and auditor review upon request.		preparing a summary of fundraising activities should be delegated to ensure compliance with the requirements of the APM. These documents must be maintained on file for public and auditor review upon request.		
8.	<u>2023.08</u> <u>Delinquent</u> <u>Monthly Bank</u> <u>Reconciliations</u>	The principal must establish procedures to ensure the completion, review and, approval of monthly bank reconciliations occur by the 15 th of each month as required.	Concur	The principal must establish procedures to ensure the completion, review and approval of monthly bank reconciliations occur by the 15 th of each month as required.	August 10, 2022	Implemented

Principal Signature



Date 9/12/2022