

**WAUNAKEE COMMUNITY SCHOOL DISTRICT
BOARD OF EDUCATION POLICY COMMITTEE MEETING**

Thursday, June 6, 2024

7:30 AM

Waunakee Community School District
905 Bethel Circle
Waunakee, WI 53597

Members of the public may attend Board of Education meetings in-person, and will be asked to check in with District personnel when you arrive.

Public comments will be limited to 3 minutes. The Board will allow 30 Minutes for public comments.

Public comments may be sent to Rebecca McDonough at district_administrator@waunakee.k12.wi.us up to one hour before the start of the Board meeting. All comments will be reviewed by the Board members. Emailed comments will be reviewed by the board but not read out loud. Emailed comments sent during any part of the board meeting (Board Development, Closed session, Open session) will be forwarded to the board but may or may not be reviewed by the board until after the board adjourns. Comments must include the commentator's name, address, and must identify their connection to the District (if any) and any group they are representing in order to be considered by the Board.

If you would like to address the Board in-person during the public comments section of the meeting, you will be greeted in the lobby of the building, asked to check in with District personnel when you arrive so that you can be recognized and address the Board when your name is called.

A recording of the meeting will be posted on the District webpage within 24 hours of the meeting time.

AGENDA

I. CALL TO ORDER

II. ROLL CALL

III. APPROVE AGENDA

IV. PUBLIC COMMENTS

V. POLICIES FOR DISCUSSION, REVIEW, AND CONSIDERATION **3**

Attached please find the summary spreadsheet for the policies that will be reviewed at the meeting. These policies have been reviewed by the administration and the policy committee chair prior to movement to the committee for consideration.

- A. 620 Annual Operating Budget 11
- B. 621 Annual Budget Development Schedule 14
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Advantage Obligations	
F. 657 Grant Applications and Acceptance of Grants	25
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Y. 672.4 Sales/Vendor Relations	57
Z. 673 Disbursement of Funds	58
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CC. 683 Inventories	67
DD. 684 Audits	68
EE. 690 Disposition of District Property	69
VI. <u>FUTURE MEETINGS</u>	
VII. <u>ADJOURN</u>	

“Any person who has a qualifying disability as defined by the Americans with Disabilities Act who requires assistance with access or materials should contact the Waunakee Community School District Office at 849-2000, 905 Bethel Circle Drive Waunakee, WI 53597, at least twenty-four hours prior to the commencement of the meeting so that necessary arrangements can be made to accommodate the request.”

Proposed Code #	Proposed Title	Current policy code	WASB recommendation	WASB Comment (if any)	Administration Recommendation:
620	Annual Operating Budget	621	Renumber and replace with PRG 620 sample policy 1	I incorporated language from your current [olicy 621 that I thought you would want to keep in the policy. Those are local policy decisions and you can keep or delete the added language on page 1 of the policy.	Agree with WASB and making edits
621	Annual Budget development Schedule	621	Keep current rule	The PRG does not offer a sample rule for this topic. Your rule is acceptable as written. You may choose to renumber this policy to 620 to keep it connected to the Annual Operating Budget policy.	Agree with WASB
622	Budget Implementation	622	Keep current policy	The PRG does not offer a sample policy for this topic and your policy is acceptable as written.	agree with WASB
622.1	Line Item Transfer Authority	622.1	Keep current policy	The PRG does not offer a sample policy for this topic and your policy is acceptable as written.	Agree with WASB

630	Post-issuance Compliance Policy for Tax-Exempt and Tax-Advantaged Obligations	630	Review policy with bond counsel	Your current policy appears to be drafted by bond counsel. The PRG offers a two page version of this policy (631.1) that does not go to the level of detail in tax law compliance and instead directs administration to work closely with bond counsel to assure compliance with the tax law. Knowing that you wanted to keep the level of detail you currently have in your 600 policies, I left this one alone.	This policy was written by bond counsel, keep as is
657	Grant Applications and Acceptance of Grants	653	Renumber and replace with PRG 657 Sample Policy 1	This sample aligned pretty well with your current 653. I think the 3 criteria after the first paragraph of your current 653 are covered by the policy, but you might also insert those at an appropriate spot in the policy sample.	Agree with WASB Including edits
654	Gate Receipts and Admissions	654	Keep current policy	The PRG does not offer a sample policy for this topic and your policy is acceptable as written.	Agree with WASB
654.1	Free Admission/Passes to Events	654.1	Keep current policy	The PRG does not offer a sample policy for this topic and your policy is acceptable as written.	Agree with WASB

655	Income from School Shop Sales and Services	655	Keep current policy	The PRG does not offer a sample policy for this topic and your policy is acceptable as written.	Agree with WASB
655 R	Product Liability	655 R	Keep current policy	The PRG does not offer a sample policy for this topic and your policy is acceptable as written.	Agree with WASB
660	Financial Management and Internal Controls			WCSD will send me non-policy procedures adopted to provide internal controls, I will compare to PRG 660.	Not considered at this time Still under review
661	Designation of Depositories	661	Replace with PRG 661 Sample Policy 1	I included the 5 year invite to banks to serve as depository. I did not include the annual approval, which seems unnecessary unless the district is considering other options. You can insert the annual approval if you wish.	Agree with WASB
	Authorized Signatures	661.1	Delete current policy	Content of this policy is covered in 673 Disbursement of Funds. I added local requirement for purchase of forgery bond insurance to 673.	Agree with WASB

661.2	Check-writing services	661.2	Review policy regarding whether you still use the check-writing services	I have not seen a policy like this before. I suspect you have replaced this with direct deposit and direct bill payments. I think the policy is acceptable as written but again I have not seen a policy like this before. Delete the policy if it is not longer applicable.	Keep policy
662.3	Fund Balance	661.3	Recode to 662.3 and replace with PRG 662.3 sample policy 3	I chose sample 3 because it provided a target fund balance and required a 2/3 vote to use fund balance and otherwise aligned with your current policy.	Keep policy
661.3	Returned checks and other denied payents	661.4	Renumber to 661.3 and adopt sample PRG 661.3 sample policy 1. Convert current local 661.4 policy to rule 661.4	Your current policy will work as a rule under the PRG policy.	Adopt PRG 661.3 No Rule
661.5	2014 Operational Referendum Funds	661.5	Review current policy and delete if no longer needed	I imagine that this policy is no longer needed because the recurrent revenue limit increase has been incorporated into the revenue limit for many years. You may want to continue the reference to funding maintenance and technology in a policy, though that seems more appropriate as an annual budget decision.	Delete Policy

665	Fraud Prevention and Reporting	662	Renumber and replace with PRG 665 sample policy 1		Agree with WASB
664	Handling Money in District Buildings/Activities	664	Replace with PRG 664 sample policy 1		Agree with WASB
	Petty Cash Account	665	Delete current policy	I incorporated content of policy into proposed 673.	Delete Policy
671.1	Payday Schedules	671.1	Keep current policy	The PRG does not offer a sample on this topic. Your policy is acceptable as written.	Agree with WASB
671.2	Expense Reimbursement	671.2	Keep current policy	The PRG has sample policies, but your policy has very specific procedures and is legally acceptable.	agree with WASB
671.3	Salary Deductions	671.3	Delete current policy	The policy relates to teacher union dues deduction and fair share which is prohibited by Act 10. If you want a policy that allows salary deductions unrelated to union dues and fair share, this policy will need to be rewritten to first delete references to union dues and second to prohibit any salary deductions not authorized by law.	Delete Policy
672	Purchasing	672	Not complete	Review with other policies relating to internal controls.	Under Review

				<p>consulted with legal counsel regarding this policy and I am aware of your business office desire not to change procurement procedures where possible.</p> <p>The list of exceptions on the purchasing approval requirements may not be consistent with the federal procurement guideline for procurements using federal funds. See the December 2021 The Focus at page 5 and section 200.320(c) (linked on page 5 of The Focus) for information on what exceptions are allowed to the federal procurement guidelines.</p> <p>Being aware of your business office desire to not change its procurement process where possible, I suggest you review the policy with legal counsel to determine if the list of exceptions</p>	
672.1	Purchasing approval	672.1	Consult legal counsel		Keep with added Language.
672.3	Cooperative Purchasing	672.3	Replace with PRG 672.3 Sample Policy 1		Agree with WASB include edits

672.4	Sales/Vendor Relations	672.4	Keep current policy, but see comment	This policy is acceptable as written. Note that the federal procurement guidelines include vendor disbarment or suspension under certain circumstances. The PRG addresses that in 672.51 sample policy 1. You may have addressed that in the internal procurement procedures.	Keep policy
673	Disbursement of funds	673	Replace with PRG 673 sample policy 1	I included language from your current 661.1, 665 and 673 as noted in the footnotes.	Agree with WASB include edits.
673.1	Credit card program	673.1	Keep current policy	The PRG has a sample policy and rule 673.1, but that policy and rule require substantial customization	agree with WASB
680	Fiscal Accounting and Reporting	680	Keep current policy	The PRG does not have a sample for this policy and your current policy is acceptable as written.	agree with WASB

683	Inventories	683	Keep current policy	The PRG does not have a sample for this policy. The PRG uses 683 for "Management of Capital Assests" which includes some federal procurement guideline requirements. If you have not addressed the federal procurement guidelines on management of capital assests in internal procedures, you may consider renumbering this policy and adopting PRG 683 sample policy 1.	agree with WASB
684	Audits	684	Keep current policy	The PRG does not have a sample for this policy and your current policy is acceptable as written.	Keep policy with edits
690	Disposition of District Property	690	Keep current policy	You have adopted PRG 690 sample policy 1 and it appears to be the most recent version of the policy.	Keep Policy

ANNUAL OPERATING BUDGET

Policy 620

Waukegan Community School District

Page 1 of 3

~~(This sample policy addresses the development, approval, administration and monitoring of the annual operating budget in school districts that hold an annual meeting of the electorate (i.e., all districts except for unified school districts and the Milwaukee Public Schools)).~~

The School Board shall consider and adopt an annual operating budget for the District in accordance with state law. The budget serves as the financial plan for the operation of the District. It provides the framework for both expenditures and revenues for the year and translates into financial terms the approved educational programs, goals and priorities for the District.

The Board delegates to the ~~identify the appropriate position(s) – e.g., District Administrator, Director of Business Services~~ the authority to establish procedures and processes necessary to prepare the annual operating budget. In addition, the Board places responsibility for administering the annual operating budget, once adopted, with the ~~identify the appropriate position(s) – e.g., District Administrator, Director of Business Services~~. The budget shall be administered in accordance with state law and applicable District policies.

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The Board shall do all of the following in the development, approval, and implementation of the annual operating budget:

1. Set goals and parameters that advise budget preparation. ~~The Board will annually establish general budget guidelines for the development of the first draft of the budget. The Board may allow the utilization of a formula based budget that incorporates the cost of living increases and enrollment fluctuations among other factors in determining funds/resources available for staff and materials.~~¹
2. Confirm the Board's agreement with a tentative timeline for key process steps that is proposed to the Board by ~~identify the appropriate position(s) – e.g., District Administrator and Director of Business Services~~. The administration's proposal for the tentative timeline shall coordinate with the dates that important input data (such as the state budget and reasonable estimates of revenue and aid) are expected to be available. ~~{Editor's Note: If this step is not consistent with the district's preferred practice or if the board does not wish to commit to this step in policy, consider deleting the item. Such planning can still be conducted even if the step is not defined in policy.}~~²
3. ~~Approve the proposed budget that will be forwarded for public review in connection with a budget hearing. The Board encourages community input in the budget process and will hold at least one public hearing on the budget prior to the budget being adopted. This is in addition to the statutorily required budget hearing and annual meeting.~~³
4. Issue appropriate notice of, hold, and attend the annual public budget hearing in conjunction with the District's annual meeting of electors. The proposed budget, the Board's annual budget report, and the treasurer's statement of annual receipts and expenditures shall be presented to the District's electors.

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¹ The added language is from your current policy 621.

² I think you might want to delete this section as noted in the editor's note, will leave it for you to decide. You cover the budget timeline in your 621 Rule, so you don't additionally need to address the timeline in the policy.

³ The added language is from your current policy 621.

ANNUAL OPERATING BUDGET

Policy 620

Waukegan Community School District

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5. After the annual meeting and budget hearing, and no later than the date designated in state law for determining the District's tax levy, adopt the final annual operating budget in light of the Board's goals, any feedback received from the public, and applicable financial constraints.
6. Determine the District's final tax levy in light of the final budget, with the Board Clerk timely certifying the tax levy to the appropriate municipalities.
7. Monitor and evaluate the implementation of the budget periodically throughout the year, using reports prepared by the administration and considering such questions as the following:
 - a. Have expected revenues been received by the District?
 - b. Are expenditures for various purposes in line with the corresponding budget appropriations?
 - c. Have funds been disbursed as authorized?
 - d. Is the budget facilitating or hindering progress on Board and District goals?
 - e. Is the budget as a whole staying within the parameters set by the Board?
 - f. Are any modifications to the budget necessary or desirable?

During the period between July 1st and the Board's adoption of a final annual budget, the District may spend funds as needed to meet the immediate expenses of operating and maintaining the District's educational programs. As to such expenditures made prior to final adoption of the annual budget, the District's standard procedures for obtaining approval of purchasing decisions and payments shall apply ~~insert if desired: ", with added consideration given to temporarily deferring significant discretionary expenditures, purchasing decisions, and payments when reasonably practical and when the District will not be disadvantaged by doing so."~~

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Solely to the extent required by state law, changes to (1) the amount of tax to be levied or certified, (2) the amounts of the appropriations, or (3) the purposes for such appropriations, as stated within a formally-proposed or Board-adopted annual budget may require a two-thirds vote of the members-elect of the Board for approval. In addition, when required by state law, the District shall issue a legally-sufficient notice (i.e., a Class I legal notice or a notice posted on the District website) of any such budget amendments that have been approved by a two-thirds vote. ~~insert this reference to the statutory notice deadline, if desired, as a reminder of the requirement: "Any such notice shall be published or posted within 15 days after the change is approved."~~ ~~Editor's Note: The 15-day notice deadline is not discretionary. The statutory deadline does not need to be repeated in local policy, but also cannot be modified.~~ ~~insert the following additional clarifying language if desired: "The following changes to a Board-approved school district budget require neither a two-thirds approval vote nor the issuance of a notice to the public: (1) alterations made to a draft budget prior to the version of the budget that is approved and noticed as the proposed budget for the public budget hearing; (2) budget alternations made pursuant to a public budget hearing; and (3) changes in subordinate line items from which the Board-adopted budget evolved, but which were not expressly detailed in the Board-approved budget, provided that such changes do not affect the major, non-subordinate line item(s) that were expressly presented within the Board-adopted budget."~~

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~~insert if desired and consistent with local practices: "In managing budgets and allocations established for individual schools or specific programs/departments, the building principal or~~

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ANNUAL OPERATING BUDGET

Policy 620

Wauwaukee Community School District

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~~program/department manager shall not modify the applicable area's budget unless he/she obtains (1) authorization from the District Administrator or his/her administrative level designee; and (2) where any such modification of the area budget would also constitute an amendment of the District's annual budget for which state law requires a two-thirds vote of the Board, the approval of the Board."~~

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Legal References:

Wisconsin Statutes

- [Section 65.90](#) [municipal budgets]
- [Section 120.10](#) [powers of the annual meeting; including power to vote various taxes]
- [Section 120.11\(3\)](#) [school board review of district finances before annual meeting; annual report to the electorate]
- [Section 120.12\(3\)](#) [school board duty; adoption of tax levy]
- [Section 120.13\(33\)](#) [school board power; spending authority until final adoption of annual budget]
- [Section 120.16\(4\)](#) [school district treasurer's statement to the annual meeting]
- [Section 120.17\(8\)](#) [clerk duty; delivery of tax statements to local municipalities]

Cross References:

- WASB PRG 620 Sample Policy 1
- [111, District Goal Development](#)
- [622, Budget Implementation](#)
- [622.1, Line Item Transfer](#)
- [661.3, General Fund Balance](#)
- [672, Purchasing](#)

Adoption Date: ~~March 1994~~

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Revised: ~~April 2002~~

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~~November 2005~~

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Policies of the Board of Education

Series 600: Fiscal Management

ANNUAL BUDGET DEVELOPMENT SCHEDULE

(All dates are approximate completion dates and are revised annually.)

621-Rule

November	Administrators begin to develop an outline of major staff, and program or equipment needs for the next fiscal year.
December	Outline of major needs for the next year is reviewed with the administrators by the superintendent and Director or Business Services business manager . Budget timeline also reviewed.
January	Board Budget Committee establishes the guidelines to be utilized by administration in developing the first draft of the budget. This may include a formula for establishing resource limits in specific areas. Business manager Director of Business Services begins process to develop facilities and maintenance budget.
January	Budget timelines, priorities, formula, and Board guidelines reviewed with administration and department chairpersons. Budget process begins at building and district level.
February	Board acts on any possible staff reductions.
March	<ul style="list-style-type: none">• Staff members return budget requests to designated administrators.• Business manager Director of Business Services completes proposed maintenance and facility budget with the Director of Buildings and Grounds and building principals.• Staff requests finalized with the superintendent.
March	<ul style="list-style-type: none">• Administrators present building/area budget requests to superintendent and Director of Business Services business manager.• Salaries and benefits budget completed by superintendent and Director of Business Services Business Manager.
April	Administrative team and budget committee reviews and revises first budget draft for presentation to the Board.
May	Board budget committee reviews third draft of the budget. Second draft presented to Board
June	Public hearing held on the third draft of the budget.

- June Third draft of budget revised by the superintendent and **Director of Business Services** ~~business manager~~ with the Budget committee.
- June Board adopts proposed budget for the next fiscal year.
- July - Oct Annual Meeting and Budget Hearing. Levy approved. Budget revisions made by Board if necessary. Final budget adopted at board meeting held after annual meeting.
- November 1
- Board makes final adjustments in the levy and certifies the levy.
 - New budget process begins.

Adopted: March 1994

Revised: April 2002
November 2005

Waunakee Community School District

BUDGET IMPLEMENTATION

The Board of Education places the responsibility for administering the operating budget, once adopted with the superintendent and **Director of Business Services** ~~business manager~~. In order to allow the superintendent and business manager to administer and control the budget in an effective and efficient manner, the following principles shall be followed:

- 1) The superintendent and duly delegated employees of the District are authorized to execute the programs and/or activities as set forth in the adopted operating budget subject to continuous review by the Board, and limited to the following express provisions:
 - a. All expenditures so authorized are contained and are fully funded within the line item of the operating unit as adopted by the Board.
 - b. Appropriate financial reports are given to the Board monthly for Board control purposes.
- 2) The Board, recognizing that prompt payment of bills improves efficiency and lowers cost of operation, and to take advantage of time discounts, at the time it authorizes or ratifies a purchase, authorizes the superintendent, or his/her designated representative, to make payment provided the expenditure is made in accordance with principles set forth above.

Legal Ref.: Section 65.90 Wisconsin Statutes

Cross Ref.: 622.1 Line Item Transfer Authority
673, Payment Procedures

Adopted: 10/11/82

Revised: March 1994
November 2005

Waunakee Community School District

Policies of the Board of Education

Series 600: Fiscal Management

LINE ITEM TRANSFER AUTHORITY

622.1

In keeping with the need for periodic reconciliation of the District's budget, the Board of Education will authorize as it sees fit the transfer of budget line items upon the request of the business manager and recommendation of the Board Budget Committee.

At the end of the fiscal year, budget categories shall be examined and the year-end status of each shall be determined. The Board shall appropriate amounts to be transferred from the categories in which a surplus exists to those in which there is a deficit. Such budget transfers shall be made consistent with legal requirements.

Legal Ref.: Section 65.90 Wisconsin Statutes

Cross Ref.: 621, Budget Development
661.3, General Fund Balance

Adopted: 10/11/82

Revised: March 1994
April 2002
November 2005

Waunakee Community School District

POST-ISSUANCE COMPLIANCE POLICY FOR TAX-EMEMPT AND TAX-ADVANTAGED OBLIGATIONS

630

Statement of Purpose

This Post-Issuance Compliance Policy (the “Policy”) sets forth specific policies of the Waunakee Community School District, Waunakee, Wisconsin (the “Issuer”) designed to monitor post-issuance compliance of tax-exempt obligations or tax-advantaged obligations (“Obligations”) issued by the Issuer with applicable provisions of the Internal Revenue Code of 1986, as amended (the “Code”), and regulations promulgated thereunder (“Treasury Regulations”).

The Policy documents practices and describes various procedures and systems designed to identify on a timely basis facts relevant to demonstrating compliance with the requirements that must be satisfied subsequent to the issuance of Obligations in order that the interest on such Obligations continue to be eligible to be excluded from gross income for federal income tax purposes or that the Obligations continue to receive tax-advantaged treatment. The federal tax law requirements applicable to each particular issue of Obligations will be detailed in the arbitrage or tax certificate prepared by bond counsel and signed by officials of the Issuer and the post-closing compliance checklist provided by bond counsel with respect to that issue. This Policy establishes a permanent, ongoing structure of practices and procedures that will facilitate compliance with the requirements for individual borrowings.

The Issuer recognizes that compliance with applicable provisions of the Code and Treasury Regulations is an on-going process, necessary during the entire term of the Obligations, and is an integral component of the Issuer’s debt management. Accordingly, the analysis of those facts and implementation of the Policy will require on-going monitoring and consultation with bond counsel and the Issuer’s accountants.

General Policies and Procedures

The following policies relate to procedures and systems for monitoring post-issuance compliance generally.

- A. The Business Officer (the “Compliance Officer”) shall be responsible for monitoring post-issuance compliance issues. [For utility issues, the Compliance Officer will coordinate with the Utility’s Business Manager with respect to monitoring post-issuance compliance.]
- B. The Compliance Officer will coordinate procedures for record retention and review of such records.
- C. All documents and other records relating to Obligations issued by the Issuer shall be maintained by or at the direction of the Compliance Officer. In maintaining

such documents and records, the Compliance Officer will comply with applicable Internal Revenue Service (“IRS”) requirements, such as those contained in Revenue Procedure 97-22.

- D. The Compliance Officer shall be aware of options for voluntary corrections for failure to comply with post-issuance compliance requirements (such as remedial actions under Section 1.141-12 of the Regulations and the Treasury’s Tax-Exempt Bonds Voluntary Closing Agreement Program) and take such corrective action when necessary and appropriate.
- E. The Compliance Officer will review post-issuance compliance procedures and systems on a periodic basis, but not less than annually.

Issuance of Obligations - Documents and Records

With respect to each issue of Obligations, the Compliance Officer will:

- A. Obtain and store a closing binder and/or CD or other electronic copy of the relevant and customary transaction documents (the “Transcript”).
- B. Confirm that bond counsel has filed the applicable information report (e.g., Form 8038, Form 8038-G, Form 8038-CP) for such issue with the IRS on a timely basis.
- C. Coordinate receipt and retention of relevant books and records with respect to the investment and expenditure of the proceeds of such Obligations with other applicable staff members of the Issuer.

Arbitrage

The following policies relate to the monitoring and calculating of arbitrage and compliance with specific arbitrage rules and regulations.

The Compliance Officer will:

- A. Confirm that a certification of the initial offering prices of the Obligations with such supporting data, if any, required by bond counsel, is included in the Transcript.
- B. Confirm that a computation of the yield on such issue from the Issuer’s financial advisor or bond counsel (or an outside arbitrage rebate specialist) is contained in the Transcript.
- C. Maintain a system for tracking investment earnings on the proceeds of the Obligations.
- D. Coordinate the tracking of expenditures, including the expenditure of any investment earnings. If the project(s) to be financed with the proceeds of the

Obligations will be funded with multiple sources of funds, confirm that the Issuer has adopted an accounting methodology that maintains each source of financing separately and monitors the actual expenditure of proceeds of the Obligations.

- E. Maintain a procedure for the allocation of proceeds of the issue and investment earnings to expenditures, including the reimbursement of pre-issuance expenditures. This procedure shall include an examination of the expenditures made with proceeds of the Obligations within 18 months after each project financed by the Obligations is placed in service and, if necessary, a reallocation of expenditures in accordance with Section 1.148-6(d) of the Treasury Regulations.
- F. Monitor compliance with the applicable “temporary period” (as defined in the Code and Treasury Regulations) exceptions for the expenditure of proceeds of the issue, and provide for yield restriction on the investment of such proceeds if such exceptions are not satisfied.
- G. Ensure that investments acquired with proceeds of such issue are purchased at fair market value. In determining whether an investment is purchased at fair market value, any applicable Treasury Regulation safe harbor may be used.
- H. Avoid formal or informal creation of funds reasonably expected to be used to pay debt service on such issue without determining in advance whether such funds must be invested at a restricted yield.
- I. Consult with bond counsel prior to engaging in any post-issuance credit enhancement transactions or investments in guaranteed investment contracts.
- J. Identify situations in which compliance with applicable yield restrictions depends upon later investments and monitor implementation of any such restrictions.
- K. Monitor compliance with six-month, 18-month or 2-year spending exceptions to the rebate requirement, as applicable.
- L. Procure a timely computation of any rebate liability and, if rebate is due, to file a Form 8038-T and to arrange for payment of such rebate liability.
- M. Arrange for timely computation and payment of “yield reduction payments” (as such term is defined in the Code and Treasury Regulations), if applicable.

Private Activity Concerns

The following polices relate to the monitoring and tracking of private uses and private payments with respect to facilities financed with the Obligations.

The Compliance Officer will:

- A. Maintain records determining and tracking facilities financed with specific Obligations and the amount of proceeds spent on each facility.

- B. Maintain records, which should be consistent with those used for arbitrage purposes, to allocate the proceeds of an issue and investment earnings to expenditures, including the reimbursement of pre-issuance expenditures.
- C. Maintain records allocating to a project financed with Obligations any funds from other sources that will be used for otherwise non-qualifying costs.
- D. Monitor the expenditure of proceeds of an issue and investment earnings for qualifying costs.
- E. Monitor private use of financed facilities to ensure compliance with applicable limitations on such use. Examples of potential private use include:
 - 1. Sale of the facilities, including sale of capacity rights;
 - 2. Lease or sub-lease of the facilities (including leases, easements or use arrangements for areas outside the four walls, e.g., hosting of cell phone towers) or leasehold improvement contracts;
 - 3. Management contracts (in which the Issuer authorizes a third party to operate a facility, e.g., cafeteria) and research contracts;
 - 4. Preference arrangements (in which the Issuer permits a third party preference, such as parking in a public parking lot);
 - 5. Joint-ventures, limited liability companies or partnership arrangements;
 - 6. Output contracts or other contracts for use of utility facilities (including contracts with large utility users);
 - 7. Development agreements which provide for guaranteed payments or property values from a developer;
 - 8. Grants or loans made to private entities, including special assessment agreements; and
 - 9. Naming rights arrangements.

Monitoring of private use should include the following:

- 1. Procedures to review the amount of existing private use on a periodic basis; and
- 2. Procedures for identifying in advance any new sale, lease or license, management contract, sponsored research arrangement, output or utility contract, development agreement or other arrangement involving private use of financed facilities and for obtaining copies of any sale agreement,

lease, license, management contract, research arrangement or other arrangement for review by bond counsel.

If the Compliance Officer identifies private use of facilities financed with tax-exempt or tax-advantaged debt, the Compliance Officer will consult with the Issuer's bond counsel to determine whether private use will adversely affect the tax status of the issue and if so, what remedial action is appropriate. The Compliance Officer should retain all documents related to any of the above potential private uses.

Qualified Tax-Exempt Obligations

If the Issuer issues "qualified tax-exempt obligations" in any year, the Compliance Officer shall monitor all tax-exempt financings (including lease purchase arrangements and other similar financing arrangements and conduit financings on behalf of 501(c)(3) organizations) to assure that the \$10,000,000 "small issuer" limit is not exceeded.

Federal Subsidy Payments

The Compliance Officer shall be responsible for the calculation of the amount of any federal subsidy payments and the timely preparation and submission of the applicable tax form and application for federal subsidy payments for tax-advantaged obligations such as Build America Bonds, New Clean Renewable Energy Bonds and Qualified School Construction Bonds.

Reissuance

The following policies relate to compliance with rules and regulations regarding the reissuance of Obligations for federal law purposes.

The Compliance Officer will identify and consult with bond counsel regarding any post-issuance change to any terms of an issue of Obligations which could potentially be treated as a reissuance for federal tax purposes.

Record Retention

The following policies relate to retention of records relating to the Obligations issued.

The Compliance Officer will:

- A. Coordinate with staff regarding the records to be maintained by the Issuer to establish and ensure that an issue remains in compliance with applicable federal tax requirements for the life of such issue.
- B. Coordinate with staff to comply with provisions imposing specific recordkeeping requirements and cause compliance with such provisions, where applicable.

- C. Coordinate with staff to generally maintain the following:
1. The Transcript relating to the transaction (including any arbitrage or other tax certificate and the bond counsel opinion);
 2. Documentation evidencing expenditure of proceeds of the issue;
 3. Documentation regarding the types of facilities financed with the proceeds of an issue, including, but not limited to, whether such facilities are land, buildings or equipment, economic life calculations and information regarding depreciation.
 4. Documentation evidencing use of financed property by public and private entities (e.g., copies of leases, management contracts, utility user agreements, developer agreements and research agreements);
 5. Documentation evidencing all sources of payment or security for the issue; and
 6. Documentation pertaining to any investment of proceeds of the issue (including the purchase and sale of securities, SLGs subscriptions, yield calculations for each class of investments, actual investment income received by the investment of proceeds, guaranteed investment contracts, and rebate calculations).
- D. Coordinate the retention of all records in a manner that ensures their complete access to the IRS.
- E. Keep all material records for so long as the issue is outstanding (including any refunding), plus seven years.

Continuing Disclosure

Under the provisions of SEC Rule 15c2-12 (the “Rule”), underwriters are required to obtain an agreement for ongoing disclosure in connection with the public offering of securities in a principal amount in excess of \$1,000,000. Unless the Issuer is exempt from compliance with the Rule as a result of certain permitted exemptions, the Transcript for each issue of Obligations will include an undertaking by the Issuer to comply with the Rule. The Compliance Officer of the Issuer will monitor compliance by the Issuer with its undertakings, which may include the requirement for an annual filing of operating and financial information and will include a requirement to file notices of listed “material events.”

Conduit Bond Financings

In conduit bond financings, such as industrial revenue bonds or Midwestern Disaster Area Bonds, the Issuer is not in a position to directly monitor compliance with arbitrage requirements and qualified use requirements because information concerning and control of those activities lies with the private borrower. The Issuer’s policy in connection with conduit financings is to

require that the bond documents in such financings impose on the borrower (and trustee or other applicable party) responsibility to monitor compliance with qualified use rules and arbitrage and other federal tax requirements and to take necessary action if remediation of nonqualified bonds is required.

Adopted: July 2012

Waunakee Community School District

GRANT APPLICATIONS AND ACCEPTANCE OF GRANTS

Waukegan Community School District

Policy 657

Page 1 of 3

~~*(This sample policy establishes general expectations for the pursuit and acceptance of grants from federal, state, local, and private entities. This policy, and particularly the degree of authority (if any) that the school board may grant to the administration to directly accept grants on behalf of the board/district, should be reasonably coordinated with the district's policy regarding gifts, donations, and bequests. The sample clarifies that the administration is expected to take all steps that are necessary to seek and receive regular year-to-year sources of state and federal funding, even if those public funding sources are considered grants.)*~~

Grants from federal, state, local, and private entities can be a valuable and important source of funding and other resources for various District programs and activities. At the same time, grant opportunities often require the District to commit significant resources to the grant application and grant administration processes, and some grants require the District to commit funds and/or make other specific operational or programmatic commitments related to the acceptance and use of the grant. Accordingly, subject to the exceptions identified below, the following apply to seeking and accepting grants on behalf of the District:

1. Employees shall obtain approval from a supervising administrator prior to applying for new grants on behalf of the District.
 - a. At a minimum, the administration shall review a request to pursue a grant application in light of factors that are substantially similar to the factors that the District would consider when evaluating a gift or donation that might be offered for a similar purpose, such as whether the grant would be substantially likely to impose any undesirable or unacceptable costs (whether direct or indirect) upon the District and whether the terms of the grant would be sufficiently compatible with the District's curricular, technological, instructional, programmatic, and operational practices. The administration shall also consider the resources required to apply for and, if it is accepted, administer the grant.
 - b. The administration is strongly encouraged to present a proposal to pursue a grant to the School Board for approval prior to the submission of even a non-binding grant application where the administration determines that the amount, structure, conditions, or purpose of the grant warrants advance Board evaluation and input (e.g., where the grant would require the District to hire new staff, establish a new District program, or require the District to provide matching funds).
2. Except as otherwise approved or authorized by the Board, the administration shall ensure that a grant application, if approved by the grantor, remains subject to final acceptance by the District before the District is committed to receiving, implementing, and administering the grant.
3. Except as otherwise approved or authorized by the Board, the Board shall approve final acceptance of a grant that the District commits to receiving, implementing, and administering. **Editor's Note: If the district can readily identify any exceptions under which the administration has final authority to accept and commit the district to a grant arrangement on behalf of the board, consider adding the exception to this policy. Any administrative authority to directly accept a gift or other donation on behalf of the board may be a useful benchmark for determining the extent of administrative authority to accept a grant. For example, the following sentence could be added to the end of this paragraph of the policy if applicable in the district: "One such Board-authorized exception is that, unless**

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GRANT APPLICATIONS AND ACCEPTANCE OF GRANTS

Waukegan Community School District

Policy 657

Page 2 of 3

~~the terms of the grant itself require direct Board approval, the District Administrator may accept a monetary grant on behalf of the Board, if the value of the grant is no more than [insert amount: \$#,###] and if the only material conditions of the grant are that the funds must be used for a specified cost/purpose that the District is reasonably likely to incur even if the cost is not funded by the grant.~~

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- The District Administrator and/or the District's Business Office shall determine whether the receipt or expenditure of grant funds requires approval by the Board as an amendment to a previously-adopted District annual budget. The District Administrator shall ensure that the Board approval is secured for any necessary budget amendments.
- Upon acceptance and receipt, all grant-based funding shall be adequately segregated and accounted for in accordance with the terms of the grant, applicable law, and the Wisconsin Uniform Financial Accounting Requirements (WUFAR).

Notwithstanding any requirements that might otherwise apply under this policy, the Board authorizes and expects the administration to take all steps that are required to ensure that the District timely applies for and receives the District's regular, year-to-year sources of state and federal funding (e.g., federal Title I funds), even if such state or federal funds are deemed grants by their enabling legislation or regulations. This includes periodic renewals of existing state and federal grants. Regarding such state and federal funding sources, specific Board action is required only to the extent mandated by the requirements of the particular state or federal program.

In connection with the District's acceptance or administration of any grant that provides aids, benefits, or services to students from a private agency, organization, or person, the District shall not unlawfully discriminate on the basis of age, sex, color, race, religion, national origin, ancestry, creed, pregnancy, marital or parental status, sexual orientation, physical disability, mental disability, emotional disability, or learning disability, or any other category protected by applicable law.

Legal References:

Wisconsin Statutes

- [Section 118.13](#) [student nondiscrimination requirements]
- [Section 118.27](#) [authority to receive, accept, and use grants]

Wisconsin Administrative Code

- [PI 9.03\(1\)\(d\)](#) [student nondiscrimination requirements related to certain gifts, bequests, scholarships and other aids, benefits, or services]
- [Chapter PI 38](#) [state grant programs]

Cross References:

- WASB PRG 657 Sample Policy 1
- [411-Rule \(1\), Student Discrimination/Harassment Complaint Procedures](#)
- [840, Public Gifts to the Schools](#)

Adoption Date: 10/11/82

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**GRANT APPLICATIONS AND
ACCEPTANCE OF GRANTS**
Waunakee Community School District

Policy 657

Page **3** of **3**

Revised: ~~March 1994~~
~~April 2002~~

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Policies of the Board of Education

Series 600: Fiscal Management

GATE RECEIPTS AND ADMISSIONS

654

Admissions receipts of school events shall be adequately controlled. The principal is responsible for the administration and supervision of all phases of school events for which an admission is charged.

Persons presenting season, faculty, or special passes will be admitted to all events. Adequate records shall be maintained to provide chronological and accounting data for subsequent review and analysis.

The Board of Education shall review annually and set prices for high school varsity athletic events.

Cross Ref.: 654.1, Free Admissions/Passes to Events

Adopted: 10/11/82

Revised: March 1994
April 2002

Waunakee Community School District

FREE ADMISSIONS/PASSES TO EVENTS

654.1

I. SENIOR CITIZENS

Senior citizens of the District (persons 62 years of age or older) are eligible for lifetime membership in the Golden Card Club which shall permit them to attend all K-12 activities of the schools, including athletic events, free of charge. This does not apply to WIAA tournament events.

Application for membership must be made in person at the School District Administration Building.

These guest passes shall represent a small token of appreciation from the District for all that the District's senior citizens have done for the schools over the years.

II. ADULT NON-STUDENT VOLUNTEER WORKERS

Adult non-student volunteer workers assigned to tasks at a school event (e.g. timer at track, "chain gang" at football games, etc.) shall receive a single event pass to be admitted free to that event. In addition, the individual shall receive one additional single event pass to be used within one year by any member of his/her immediate family for any school event that requires admission. This does not apply to WIAA tournament events.

Adopted: 9/9/85

Revised: March 1994
1/10/96

Waunakee Community School District

Policies of the Board of Education

Series 600: Fiscal Management

INCOME FROM SCHOOL SHOP SALES AND SERVICES

655

The services provided through school shops and laboratories, and products offered for sale through school programs, shall not be considered income-producing for the District.

Customers shall be charged on the basis of materials used, any parts used, and the incidental costs of providing the product or service.

The instructor in charge of the particular program or shop shall be responsible for setting prices or charges. Additionally, a registration fee shall be charged for repair of all items left with the school overnight.

In all instances, the client for repairs shall:

- pay the estimated cost of materials and parts in advance.
- Pay any additional cost of parts over and above the estimate prior to receipt of the repaired item.

All money received from customers for all sales and services shall be turned in each day to the school business office. This money shall go into the general account, with the exception of that received for repairs in school shops. The latter shall go into a special clearing account specifically set up to cover parts, materials, and miscellaneous costs.

Refunds will be made to customers if costs of parts were overestimated. However, these can be made only after all vouchers from suppliers are processed and have been approved by the Board of Education.

Cross Ref.: 655-Rule

Adopted: 10/11/82

Revised: March 1994
April 2002

Waunakee Community School District

PRODUCT LIABILITY

655-Rule

The following is a list of guidelines regarding product liability:

1) Products made by employees or students that are sold as a fund raising activity.

Students, with the assistance of staff, would be able to make products and resell them to the public at a profit. Approval from the building principal, superintendent, and Board of Education must be obtained. Examples of products made would be sandwiches, pizzas, etc.

2) Special products made by students as a learning experience that they take home or sell to the public at no profit.

Students shall be able to make special projects in class as part of the instructional program. Approval by the teacher shall be given to the project before it is allowed to be taken off school property. Examples of special products made by students would be sheds, industrial art projects, etc.

3) Maintenance to vehicles by employees and students.

Students, with the assistance of staff, may work on parent, staff or student vehicles in a classroom environment. They must have proper supervision and instruction by the teacher. No student or employee shall do any maintenance to brakes or steering mechanism (anything that would affect the steering) on any vehicle. It is recommended that whenever possible donated vehicles be used in the instructional process.

Cross Ref.: 655, Income from School Shop Sales and Services

Adopted: 1/13/86

Revised: March 1994
June 2002

Waunakee Community School District

DESIGNATION OF DEPOSITORIES

Policy 661

Waukegan Community School District

Page 1 of 2

~~(This sample policy addresses the school board's responsibility to designate official public depositories and the board's related authority to further define the scope of such designations. The policy also assigns certain related responsibilities to the administration.)~~

The School Board shall, by resolution adopted at a Board meeting, designate the financial institutions that shall serve as official public depositories for District funds that are not invested or maintained in other lawful, Board-approved methods.

All financial institutions(s) located within the District shall be notified every at least every five years inviting them to serve as the official depository or treasury of the District for the next biennium beginning July 1.¹

1. Whenever such a designation is made, the resolution shall specify:
 - a. Whether District moneys deposited at the financial institution may be maintained in demand deposits, savings deposits, time deposits, or any combination thereof; and
 - b. If a surety bond or other security shall be required to be furnished by the public depository to secure the repayment of deposits in any amounts that exceed the amount of deposit insurance or similar coverage provided under federal or state law.
2. The Board may authorize or direct the officers and employees who are charged with the management of District funds to deposit District moneys in a selected public depository that has been given instructions by the District to arrange for the redeposit of the moneys through a deposit placement program that meets the requirements of state law.
3. The Board may otherwise designate an official depository for a limited amount of funds or for a limited or particular purpose.
4. Unless the Board's designation of an official depository includes an express expiration date or is made subject to an express condition that, if satisfied, causes the termination of the designation, a designation shall remain valid until modified or until removed by a future action of the Board.

District officers and employees who are charged with the management of District funds shall ensure that they adhere to the designations and related limitations/directives established by the Board.

The ~~insert applicable position title(s) – e.g., District Administrator and the District's licensed business official~~, Director of Business Services shall:

1. Ensure that the District periodically reviews the existing designations of official depositories and the District holdings at each depository, consulting with the District's professional financial advisors as needed to establish and apply appropriate standards and criteria. Any recommendations for changes to existing designations or to existing deposit structures shall be submitted to the Board.
2. Ensure that, for each authorized depository, the District provides and updates as necessary

¹ I took this from your current 661 policy. This is a local policy choice, you are not required to seek new depositories every 5 years.

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DESIGNATION OF DEPOSITORIES

Policy 661

Waunakee Community School District

Page 2 of 2

any account-related information, such as the identity of current District officers, signature cards, etc.

3. Follow reasonable and prudent business practices so that deposited funds remain adequately protected under the limits established by applicable state or federal insurance/coverage programs or by any bonding or other security that may apply to particular deposits, unless otherwise approved by the Board.

Legal References:

Wisconsin Statutes

- [Section 34.05](#) [designation of public depositories]
- [Section 34.07](#) [security for deposits held by a public depository]
- [Section 34.08](#) [payment for loss of funds held by a public depository]
- [Section 66.0603](#) [investments; including time deposits]
- [Section 66.0607](#) [withdrawal or disbursement from local treasury]
- [Section 120.12\(7\)](#) [school board duty to designate public depositories for district funds]

Cross References:

WASB PRG 661 Sample Policy 1

Adoption Date: 10/11/82

Revised: March 1994

April 2002

November 2005

January 2011

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Policies of the Board of Education

Series 600: Fiscal Management

AUTHORIZED SIGNATURES
(Use of Facsimile Signatures)

661.1

Signatures, including facsimile signatures of the Board president, clerk, and treasurer are to be used on checks, drafts, warrant-checks, vouchers, or other orders on public funds deposited in designated depositories. Each officer shall authorize said depository financial institutions to honor any such instrument bearing his/her facsimile signature in such form as he/she may designate and to charge the same to the account in said depository financial institution upon which drawn, as fully as though it bore a manually written signature.

The Board of Education shall purchase depositor's forgery bond insurance to protect the loss of any public funds.

Legal Ref.: Sections 66.0607 Wisconsin Statutes
120.16(2)
120.13(23)

Cross Ref.: 661.2, Check Writing Services

Adopted: 10/11/82

Revised: March 1994
April 2002

Waunakee Community School District

Policies of the Board of Education

Series 600: Fiscal Management

CHECK-WRITING SERVICES

661.2

The Board authorizes the use of check-signing software in accordance with the following provisions:

1. The treasurer, clerk and president shall sign checks in accordance with the provisions of state law and Board policy.
2. The signature document for the check-writing software shall be kept in a secure place.
3. The signing of blank checks shall be prohibited.
4. All void or spoiled checks shall be marked and retained and the signature section shall be removed and destroyed.

The check signer software will be controlled by the business manager. Administrative procedures for the use of the check signer software will be established by the treasurer and the business manager. In the absence of the treasurer, the Board president will act as assistant treasurer. The assistant treasurer performs the treasurer's functions in his/her absence.

Cross Ref: 661.1, Authorized Signatures

Adopted: 10/11/82

Revised: March 1994
November 2005

Waunakee Community School District

FUND BALANCE

Policy 662.3

Waukeek Community School District

Page 1 of 2

(This sample policy provides for the maintenance of a target fund balance in the General Fund. Separate targets are defined for total unrestricted fund balance and total unassigned fund balance, where the latter target focuses on the district's need for resources to use for cash-flow purposes. This sample policy articulates general purposes for the accumulation and use of the fund balance and addresses fund balance reporting. In this sample, the board retains authority to commit and assign the fund balance for specific purposes rather than delegating assignment authority to someone else in the district. Under this policy, a two-thirds vote of the membership of the school board is required to make some specific appropriations of fund balance, even though such a "super-majority" may not necessarily be required by state law in all cases.)

The School Board shall support and continually strive to develop conservative operating budgets that will add and/or maintain sufficient funds to achieve a minimum year-end fund balance of unrestricted resources in the General Fund that is equivalent to at least ~~identify the designated percentage – e.g., 10%, 15%, 20%~~ of the anticipated General Fund expenditure budget for the subsequent fiscal year. The unrestricted fund balance within the General Fund is intended to be used primarily for the following purposes:

1. Any specific purpose identified for fund balance resources that falls under the "committed" classification of fund balance resources, as defined by the accounting principles applicable to governmental entities.
2. To maintain or improve the District's credit rating.
3. To provide a resource to cover emergency expenditures or revenue shortfalls.
4. To provide sufficient working capital and reduce the need for short-term borrowing. Within the District's total unrestricted fund balance in the General Fund, it is the Board's further goal to maintain a minimum year-end balance of unassigned resources of at least ~~identify the designated percentage – e.g., 10%, 15%, 20% – which will be lower than the larger percentage established above for total unrestricted fund balance~~ of the anticipated General Fund expenditure budget for the subsequent fiscal year, to be available as working capital for cash-flow purposes and to reduce the need for short-term borrowing. This amount shall be calculated by including any amounts that have been expended for cash-flow purposes that will be replenished by the receipt of expected revenues within the normal cash-flow cycle.

It is not the intent of the Board to accumulate substantial unassigned monies in the General Fund above-and-beyond the target percentage for total unrestricted fund balance resources established by this policy, provided the separate target for minimum unassigned fund balance resources is also met.

Regardless of whether the state law applicable to budget amendments would separately require a two-thirds vote, any Board action to restrict, commit, assign, or directly appropriate unassigned fund balance resources within the General Fund that would cause the balance of unassigned resources in the fund balance to fall below the target level for unassigned resources established by this policy shall require a two-thirds vote of the entire membership of the Board for approval. However, appropriations of unassigned fund balance within the General Fund for cash-flow purposes, where the amounts appropriated are expected to be replenished by future

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FUND BALANCE

Policy 662.3

Waunakee Community School District

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revenue receipts within the cash-flow cycle, shall only be subject to a two-thirds vote requirement if the requirement is separately applicable under state law.

All fund balance commitments and assignments must be reasonably justified and documented in appropriate District financial statements.

Fund balance information shall be reported to the public and to the Department of Public Instruction in accordance with legal requirements and generally accepted accounting principles applicable to governmental entities.

The District Administrator or his/her designee shall review this policy with the Board at least every three years and shall be responsible for overseeing District compliance with the policy.

Legal References:

Wisconsin Statutes

- [Section 65.90\(3\)](#) [budget summary requirements, includes fund balance information]
- [Section 65.90\(5\)](#) [making changes to appropriation amounts or purposes of appropriations in an adopted operating budget]
- [Section 120.14](#) [school district audit reports]
- [Section 120.18](#) [annual school district report]

State Guidance

[Wisconsin Uniform Financial Accounting Requirements](#) (WUFAR) [school district financial accounting requirements, includes fund balance classifications]

Federal Guidance

Government Accounting Standards Board (GASB) [Statement No. 54](#) [fund balance reporting requirements]

Cross References:

WASB PRG 662.3 Sample Policy 3
[680, Fiscal Accounting and Reporting](#)

Adoption Date: January 2000

Revised: April 2002

March 2011

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RETURNED CHECKS AND OTHER DENIED PAYMENTS

When the District receives a check, or an equivalent instrument (including certain electronic payments), as a form of payment from another person, a financial institution may deny payment when, for example, the check/payment was written on a closed account, the account has insufficient funds on deposit to cover the withdrawal, a "stop payment" order has been placed on the check, or the account on which the check was written has been frozen. Such checks are sometimes referred to as "returned checks," "bad checks," or "nonsufficient funds checks."

Under the ultimate supervision of the District Administrator, the School Board directs the administration to develop and implement written procedures that apply when (1) the District receives notice of nonpayment on a check (or equivalent payment instrument) that a payer issued/submitted to the District, or (2) such a check/payment is otherwise returned or rejected by a financial institution without full payment.

The procedures shall address at least (1) the manner in which the District will seek prompt payment in place of a failed payment; and (2) in situations where a payer is responsible for multiple failed payments, the District's authority to place restrictions on the payer's methods for making future payments (e.g., requiring payment by means other than a personal check or equivalent instrument). Such procedures may also provide for the District to charge a reasonable and lawful service fee to the payer for any failed payment. **Editor's Note: if the final board policy includes this paragraph, which requires the development of written procedures, ensure that the district actually does develop and implement such procedures—such as the sample procedures found in 661.3 Sample Rule 1 in the PRG. Alternatively, if the district prefers to include all of the relevant procedures within the board policy as single document, then delete this entire paragraph and, in its place, insert procedures similar to those found in 661.3 Sample Rule 1.**¹

When any original amount owed, or any fee or service charge imposed pursuant to this policy remains unpaid following a payment issue, the District may apply any established policies or procedures regarding unpaid fees and debt collection and/or exercise other legal rights.

If the ~~insert applicable position(s) — e.g., District Administrator or Business Manager~~ Director of Business Services determines that there is reason to suspect that any party may have engaged in intentionally fraudulent activity regarding a payment (e.g., falsifying a check on a nonexistent account or forging a check on an account belonging to another person), the District will refer the matter to law enforcement.

Legal References:

Wisconsin Statutes

- [Section 943.24](#) [issuing worthless check]
- [Section 943.245\(1m\)](#) [civil proceedings regarding worthless checks]

Cross References:

WASB PRG 661.3 Sample Policy 1

¹ You can use your current policy 661.4 as a rule under this policy.

RETURNED CHECKS AND OTHER DENIED PAYMENTS

Waunakee Community School District

Policy 661.3

Page **2** of **2**

Adoption Date: September 2015

Policies of the Board of Education

Series 600: Fiscal Management

2014 OPERATIONAL REFERENDUM FUNDS

661.5

The Waunakee Community School District Board of Education will annually approve budgets for both maintenance and technology departments that are at least \$300,000 higher for each department than the base budget of the 2013-14 fiscal year.

These funds are allocated from the November 4th, 2014 recurring operational referendum funds. The allocation of \$300,000 for the maintenance department and the allocation of \$300,000 for the technology departments shall be effective with the 2017-18 fiscal year, upon the conclusion of the phased in referendum funds. The allocations for the maintenance and technology departments will be committed to Fund 10. Any unspent funds will carry forward to the next fiscal year, and will remain in either the maintenance or technology department.

Legal Ref.:

Cross Ref.: 621, Budget Development

Adopted: September 2015

Revised: July, 2021

Waunakee Community School District

FRAUD PREVENTION AND REPORTING

Waukegan Community School District

Policy 665

Page 1 of 2

~~(This sample policy serves as part of the district's system of internal controls for fraud prevention and reporting. However, the expectation established by the policy is that the administration will implement further financial management systems and procedures that support the policy goal of preventing and discovering fraud. This sample policy is generally a less detailed and less specific version of PRG 665 Sample Policy 2, but the key policy positions are essentially the same.)~~

The School Board expects all employees, Board members, consultants, vendors, contractors and other parties maintaining any business or programmatic relationship with the District to act with integrity, due diligence and in accordance with all applicable laws, District policies and procedures in matters involving District fiscal resources. The District is entrusted with public dollars and no person connected with the District should do anything to erode that trust.

The District Administrator or designee shall be responsible for developing internal controls designed to prevent and detect fraud, financial impropriety or fiscal irregularities within the District. Every member of the District's administrative team shall be alert for any indication of fraud, financial impropriety or irregularity within his or her areas of responsibility.

Except in situations where an employee has exercised a legal right to make a confidential report to an external agency or to participate in an official investigation or legal proceeding that is not disclosed to his or her employer, any employee who has knowledge of or who has reason to suspect fraud or any similar impropriety in relation to any aspect of District programs or operations shall immediately report the relevant circumstances to his or her supervisor and/or to the District Administrator. In the event the concern or complaint involves the District Administrator, the concern shall be brought to the attention of the **Director of Business Services** ~~insert alternative administrator – e.g., Business Manager~~ and/or Board President. Such reports may involve or relate to the conduct of any person, including District employees, Board members, volunteers, consultants, vendors, contractors and other parties maintaining any business or programmatic relationship with the District.

The Board also encourages any other person who has knowledge of or who has reason to suspect fraud or some other similar impropriety in relation to any aspect of District programs or operations to report the relevant circumstances to the ~~insert position(s) – e.g., District Administrator, Business Manager, or Board President~~.

No official, employee, or agent of the District may retaliate or discriminate against any person who, acting reasonably and in good faith, has filed a report under this policy or participated in any investigation related to a report of fraud, suspected fraud, or other similar impropriety.

Following a report of alleged or suspected fraud, and except in the case of a report involving his or her own actions, the District Administrator shall be responsible for initiating an appropriate investigation. Whenever necessary or appropriate, investigations will be conducted in coordination with District legal counsel and/or with other internal or external departments, agencies, or officials. Although strict and absolute confidentiality cannot be guaranteed, the confidentiality concerns of all involved parties shall be a consideration in the manner in which any investigation is conducted, including the manner in which relevant records are maintained.

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FRAUD PREVENTION AND REPORTING

Waukeek Community School District

Policy 665

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Legal References:

Wisconsin Statutes

- [Section 19.42](#) [statutory definitions related to the code of ethics for local government officials]
- [Section 19.59](#) [ethical standards for local government officials]
- [Section 946.12](#) [misconduct in public office]
- [Section 946.13](#) [prohibiting public officials and employees from having a private interest in a public contract]

State Guidance

- [Wisconsin Uniform Financial Accounting Requirements \(WUFAR\)](#)
- [Department of Public Instruction School District Audit Manual Index](#)

Federal Law

- [31 U.S.C. §3729](#) [federal False Claims Act]
- [41 U.S.C. §4712](#) [federal whistleblower protections; initially effective through July 2017]
- [2 C.F.R. §200.300](#) [federal Uniform Guidance regulation referencing statutory requirements for whistleblower protections]

Cross References:

WASB PRG 665 Sample Policy 1

Adoption Date: July 2011

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HANDLING MONEY IN DISTRICT BUILDINGS/ACTIVITIES

Waukeek Community School District

Policy 664

Page 1 of 2

(This sample policy delegates responsibility for the development of specific cash-handling procedures to the administration, while specifying key parameters and expectations.)

The administration, under the direction of the ~~insert appropriate position – e.g., business manager or other head of business office operations~~ Director of Business Services and in consultation with the District financial auditor as needed, shall develop cash-handling procedures that are consistent with sound business practices and that are appropriate for particular building functions and operational needs. As general parameters, such cash-handling procedures shall:

1. Promote safe and secure cash management and minimize opportunities for theft or loss by, for example, utilizing secured locations within buildings and making regular transfers to an approved depository;
2. Promote accurate cash management and accurate recordkeeping by, for example, consistently issuing receipts and using other methods of reconciling accounts and funds;
3. Promote the security and privacy of sensitive financial data, including District and personal account numbers, other account access information, etc.; and
4. Minimize the extent to which any individual has sole responsibility for cash handling and cash/account reconciliation in connection with specific activities and functions.

District funds may be deposited only in District accounts that have been established at a financial institution that is a Board-approved depository.

The ~~insert appropriate position – e.g., business manager or other head of business office operations~~ Director of Business Services shall have primary responsibility for verifying that relevant personnel are aware of their responsibility to consistently follow established cash-handling procedures.

Legal References:

Wisconsin Statutes

[Section 120.12\(7\)](#)

[board duty to designate approved depositories]

[Section 120.16\(2\)](#)

[authority of the school district treasurer to receive money raised in extracurricular activities]

State Guidance

[Wisconsin Uniform Financial Accounting Requirements](#) (WUFAR)

Cross References:

WASB PRG 664 Sample Policy 1

[375, Student Activity Funds Management](#)

[661, Depository of Funds](#)

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HANDLING MONEY IN DISTRICT BUILDINGS/ACTIVITIES

Waukegan Community School District

Policy 664

Page 2 of 2

Adoption Date: 10/11/82

Revised: March 1994

April 2002

November 2005

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Policies of the Board of Education

Series 600: Fiscal Management

PETTY CASH ACCOUNT

665

A petty cash account may be established for education purposes. Educational accounts shall be approved by the business manager and all regular business office procedures shall be followed.

Cross Ref.: 672, Purchasing
680, Fiscal Accounting and Reporting

Adopted: 10/11/82

Revised: 4/22/91
March 1994
April 2002
November 2005

Waunakee Community School District

Policies of the Board of Education

Series 600: Fiscal Management

PAYDAY SCHEDULES

671.1

The District issues electronic payment for all payrolls. Paper checks are not issued. All district personnel shall receive their payroll information via direct deposit on the 15th and 30th of the month. When the 15th or 30th of the month falls on a Saturday, Sunday or on a bank holiday, payment shall be made on the preceding business day. District employees shall receive all payroll information electronically. All other staff will have a deposit of advice mailed to the address on file.

Cross Ref.: Current Employee Agreements
671.3, Salary Deductions

Adopted: 10/11/82

Revised: March 1994
April 2002
July 2009

Waunakee Community School District

Policies of the Board of Education

Series 600: Fiscal Management

EXPENSE REIMBURSEMENT

671.2

District personnel and officials who incur expenses in carrying out their authorized duties shall be reimbursed by the District upon submission of a properly filled out and approved purchase order/check request. Such expenses must be approved in advance by the building/department administrator and incurred in line with budgetary allocations for the specific type of expense outlined in District guidelines. Grant funds may receive expense reimbursements following this policy or the amount approved by their grant if that amount is higher. Fund 21 expenditures are eligible for expense reimbursements following this policy or following the USGSA rates for the out of state location they are travelling to, whichever is higher.

Expense Guidelines:

Mileage:

Shall be at the rate established by the IRS for school business and conference related travel. Mileage log/map must be submitted with the purchase order showing travel details. Inter-district travel as part of job duties is reimbursable through the District mileage account.

Housing:

Shall be paid at the rate no higher than that established for the hotel hosting the conference or convention but shall only cover the actual costs up to that amount. Housing for school business not related to a conference or convention with a headquarter hotel shall be reimbursed at the actual costs if the hotel reservations have been made through the school district. The district shall reimburse or pay for the costs of school personnel. If additional costs are incurred by a spouse or family member sharing the room that will be at the employee's expense.

No reimbursement shall be paid for housing/hotels or events within 60 miles of the District. Reimbursement for housing/hotels within 60 miles may be considered on a case-by-case basis, with pre-approval of the District Administrator or Designee.

Commercial Travel:

Travel by commercial carrier shall be arranged by the employee and costs reimbursed by the district if it is not paid for by the district. The travel of spouses or other family members can be arranged at the same time; however, the employee must pay for the cost of family members at the time arrangements are made.

General Transportation:

The costs for ground transportation (taxi, bus, rental car) necessary for the employee to participate in school related business or attendance at a conference or workshop shall be reimbursed. Approval of a rental car at school district expenses must be given in advance by the superintendent. Reasonable charges for taxi service (including standard tip not to exceed more than a range of 15% to 20%) are reimbursable. Receipts are required for reimbursement of transportation

Parking:

Receipts from parking facilities must be provided.

Meals:

The cost of meals for employees and Board members only shall be reimbursed at the full cost of the meal, including tip, up to a maximum amount based on the U.S. General Services Administration guidelines. This maximum will be reviewed annually and provided to all district personnel. The maximum can be evenly divided between employees for groups of four (4) or more.

Separate meal maximums for travel outside of the U.S. may be approved by the Director of Business Services.

Employees are to submit check request for the above costs to include receipts. Employees must provide itemized receipts to support claims for reimbursement for meals purchased. Receipts submitted for meals purchased for other individuals while conducting District business must note the name of the individual(s) and the reason for paying the meal cost. For meetings over the meal period, the reason for the meeting must also be indicated. Tips are limited to no more than a range of 15% to 20% of the total bill.

District funds shall not be used for the purchase of alcoholic beverages.

Other Activities

Social activities such as golf outings, non-educational related tours, etc. that may or may not be part of a professional conference, are the responsibility of the individual and are not reimbursable.

Reimbursements for Administrators, Administrative Support Staff, and Administrative Assistants:

Reimbursements for Administrators, Administrative Support and Administrative Assistants must be submitted through the 775 (Administrative Reimbursements) Budget Group and approved by the Business Office. This ensures independent review and approval of any reimbursement requests.

Cross Ref.: Current Employee Agreements
163, Board Member Development Opportunities
223, Administrator Development Opportunities
537, Staff Development

Adopted: October 1982

Revised: March 1994
August 2000
April 2002
November 2005
October 2015
February 2019
June 2022

Waunakee Community School District

Policies of the Board of Education

Series 600: Fiscal Management

SALARY DEDUCTIONS

671.3

Salary deductions are allowed only upon approval by the Board of Education and are subject to the following requirements:

1. Organizations, companies, or individuals desiring the institution of a salary deduction plan must submit a desired plan to the Board for advance approval.
2. Deductions are to be withheld in equal installments, with the number of installments being determined by the number of pay periods included in the employee's job description.
3. All salary deductions other than those regulated by the federal or state government will be deducted only upon written approval of the employee or on a court order.

The Board authorizes, within the above requirements, salary deduction plans for Teacher's Association dues, and annuities paid in full by the employee.

Cross Ref.: Current Employee Agreements

Adopted: 10/11/82

Revised: 5/14/84
March 1994

Waunakee Community School District

PURCHASING APPROVALS

672.1

This policy refers to purchase approvals using non-federal funds. Federal Funds must follow the federal purchasing approval guidelines.

Purchases made in excess of \$1,500 shall be individually approved by the Building/Department Administrator, purchases made in excess of \$10,000 shall be individually approved by the District Administrator, and purchases made in excess of \$25,000 shall be individually approved by the Board. Purchases over \$5,000 shall be based on quotations, advertised bids and/or other evidence that competitive pricing has been sought. Exceptions to purchasing approvals shall be made for the following:

- a. Textbooks, books, and instructional materials
- b. Replacement parts for existing equipment or if the value of the replacement parts are estimated to be less than fifty percent (50%) of the total value of the existing equipment.
- c. Cooperative Educational Service Agency (CESA) contracts
- d. Professional service contracts/agreements
- e. State of Wisconsin or other national purchasing contracts
- f. Emergency circumstances jointly recommended to the Board President by the District Administrator and the Business Manager and approved for exemption by the Board President.
- g. Purchases from Fund 21 or Fund 60 (non-taxpayer funds).
- h. Competitive pricing is not available from other vendors.
- i. Purchases approved by the Business Manager under special circumstances (Examples include invoices from local and state government agencies).
- j. Expenditures committed by an IEP team

Technology equipment purchases shall require ~~final~~ approval from the Building/Department Administrator and the Director of Technology.

A monthly report shall be provided to the Board of Education that lists purchases made under any of the approved exception categories.

The District reserves the right to reject any or all formal bids or informal quotations, to waive technicalities, to make adjustments in specifications or quantities and/or to make selections based on best interests of the school district.

Legal Ref.: Sections 66.0901 Wisconsin Statutes

Cross Ref.: 672, Purchasing 51
672.3, Cooperative Purchasing
780, Insurance Management
851-Rule, Sales Advertising Exception

933, Construction Contracts, Bidding and Awards

Adopted: 10/11/82

Revised: 4/22/91
March 1994
October 12, 1998
April 2002
November 2005
September 2015
September 2018

Waunakee Community School District

COOPERATIVE PURCHASING

Policy 672.3

Waunakee Community School District

Page 1 of 2

~~(This sample policy addresses cooperative purchasing as a stand-alone policy topic. The sample requires each cooperative purchasing arrangement that is binding on the district to be documented in the form of a board-approved contract that expressly identifies the competitive methods/procedures that will be used to identify, evaluate, and select vendor(s). Rather than addressing the topic within a stand-alone policy, a district could incorporate key language from this sample in a policy that addresses purchasing and procurement on a broader basis. In addition, many districts do not have a policy on this topic and instead choose to evaluate cooperative purchasing proposals/opportunities on a case-by-case basis.)~~

The School Board recognizes that the District's purchasing power can sometimes be leveraged by purchasing goods or services in larger quantities. As such, joint purchasing agreements with other governmental units, governmental agencies, or other entities may be beneficial to the District. To the extent permitted by law, such agreements may cover, for example, the purchase of materials, supplies, equipment, and capital or contractual services.

The Board encourages the administration to pursue the exploration and preliminary negotiation of such cooperative purchasing arrangements. ~~All formal cooperative purchasing agreements that are binding on the District shall be in the form of a Board-approved contract.~~¹

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In addition to other terms and conditions that may be deemed necessary or prudent, and except as otherwise approved by the Board, such agreements shall identify:

1. The competitive methods/procedures that will be used to identify, evaluate, and select vendor(s) under the agreement, including a process for the retention of appropriate documentation regarding such methods and procedures that will be sufficient to demonstrate compliance with any applicable federal, state, or District competitive purchasing requirements.
2. The duration of the agreement and terms that address renewal of the agreement, termination of the agreement prior to expiration, and (if permitted) withdrawal from the agreement by any party prior to termination.
3. ~~Insert any other subjects that the district wishes to ensure are covered in such contracts.~~

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Purchases conducted through a Board-approved cooperative purchasing agreement are exempt from any further District-imposed competitive proposal/price quote requirements. However, legal mandates to use and document competitive processes for certain purchases, such as requirements applicable to certain purchases made with federal funds, may still apply.

This policy is not intended to address intergovernmental agreements under which the District contracts for the receipt (or furnishing) of services directly from (or directly to) one other governmental entity.

Legal References:

¹ Your current policy delegates to administration purchases made through the state and through CESA. You may wish to modify this sentence to allow that exception – note the remainder of the policy references compliance with the federal procurement guidelines and those guidelines may require board approval for certain large purchases.

COOPERATIVE PURCHASING

Policy 672.3

Waunakee Community School District

Page 2 of 2

Wisconsin Statutes

[Section 16.73](#)

[purchasing transactions under a joint contract between or among local governments and/or the Department of Administration]

[Section 66.0301](#)

[local governments may contract with each other for the receipt or furnishing of services or the joint exercise of any power or duty required or authorized by law]

[Section 66.0303](#)

[local governments may contract with specified out-of-state entities for the receipt or furnishing of services or the joint exercise of any power or duty required or authorized by statute]

Federal Law

[2 C.F.R. Part 200 Subpart D](#)

[federal funds post-award requirements, generally]

[2 C.F.R. §200.318](#)

[general standards for procurement supported by federal funds; including express encouragement to consider and use intergovernmental agreements or inter-entity agreements for procurement or use of common or shared goods and services]

Cross References:

WASB PRG 672.3 Sample Policy 1

[672 Purchasing](#)

Adoption Date: ~~10/11/82~~

Revised: ~~4/22/91~~

~~March 1994~~

~~April 2002~~

~~November 2005~~

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Policies of the Board of Education

Series 600: Fiscal Management

SALES/VENDOR RELATIONS

672.4

Representatives of entities doing business with the Waunakee community School District, or desiring to do business with the District, shall receive a hearing relative to their products the first time they call. Subsequent visits shall be acknowledged and interviews granted or not, depending on the circumstances. Representatives of business firms shall limit their visits to members of the administrative staff or their appointment agents.

The District shall not regularly purchase supplies or materials from a staff member of the district. Neither shall the District regularly purchase supplies, materials, or services from a member of the Board or from a firm in which he/she holds a major interest.

Employees of the District shall not endorse products or services in such a manner that will identify him/her as an employee of the District.

Sales representatives shall not be permitted to contact personnel for the purpose of making sales or demonstrations, except by special permission of a member of the administrative staff.

School principals may grant permission to sales representatives of educational products to see a member of the school staff at times that will not interfere with the educational program.

Legal Ref.: Sections 19.59 Wisconsin Statutes
118.12

Cross Ref.: 165.1, Conflicts of Interest
524, Staff Conflicts of Interest
850, Sales and Solicitations on School Premises

Adopted: 10/11/82

Revised: March 1994
April 2002

Waunakee Community School District

DISBURSEMENTS OF FUNDS

Policy 673

Waunakee Community School District

Page 1 of 4

(This sample policy (1) assigns responsibilities regarding payment processing, including approvals and actual disbursements; (2) identifies the normal statutory requirements for disbursements from the district treasury accounts at public depositories; and (3) identifies various exceptions and special circumstances that apply to many, but not all, school districts — including the use of facsimile signatures, disbursements made through authorized money transfer techniques other than actual checks, etc.)

Under the direction and supervision of the ~~insert applicable position(s) — e.g., District Administrator and the District's licensed Business Official/Director of Business Services,~~ the District's Business Office shall be responsible for preparing and/or processing:

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1. Appropriate payment vouchers (such as purchase orders, invoices, receipts, etc.) that are submitted for approval for payment. Vouchers/payment requests that are not otherwise already approved for disbursement shall be presented to the School Board as bills for approval. ~~Insert the following provision only if it is desired, practical to implement, and consistent with local practices: "Unless expressly noted for the Board's consideration or unless consistent with a previously-approved contract or previously-approved purchase, such bills presented for approval shall be for goods, property, or services that have been verified as received/completed."~~¹
2. Draw orders, on behalf of the Board Clerk, that reflect approved vouchers/payments (i.e., requested payments approved for disbursement). ~~Insert if the district desires to mention in policy this legal requirement found in section 66.0607(7) of the state statutes: "No order for a disbursement from the District treasury may be issued in excess of the funds available or appropriated for the purpose(s) for which the order is drawn unless authorized by the affirmative vote of two-thirds of the entire membership of the Board."~~²
3. Entries of disbursements, on behalf of the Board Treasurer, that adequately document the amount and date of each disbursement, the person to whom it was paid, and the object for which it was paid.

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The Board expects the District's payment approval and disbursement procedures to be managed in a manner that results in the timely payment of the District's financial obligations and that, to the extent reasonably practical, avoids interest or fees on late payments or other similar financing charges.

Subject to exceptions permitted by law and authorized by the Board, disbursements of District funds from the District's official public depositories shall normally be made as follows:

1. Disbursements from a demand deposit account shall be by draft or order check.
2. Withdrawals from a time deposit or savings account shall be by a transfer order that serves to transfer such deposits to another District-controlled deposit account in the same or another District-authorized public depository.

¹ I think this optional language aligns with your current 673.
² This language is optional and it merely restates the law.

DISBURSEMENTS OF FUNDS

Policy 673

Waunakee Community School District

Page 2 of 4

- 3. Such drafts, order checks, and transfer orders must be signed by the Board Clerk and Treasurer and countersigned by either the Board President or another Board member who is authorized to countersign in place of the President.

The following also apply to disbursements of District funds and other money managed by the District:

Editor's Note: It is critical to carefully review each item listed below and to evaluate its applicability to the district. Modify or delete the listed items as appropriate and add additional items to the list that are determined to be important under local expectations and local procedures. Consider consulting with the district's legal counsel, auditor, and/or official depositories in the process of adapting this sample policy to local needs and circumstances.

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1. In lieu of the personal signatures of the Board Clerk, Board Treasurer, and any other required signature(s), a facsimile signature adopted by the particular person may be affixed to a draft, order check, or transfer order for the disbursement of funds. *Insert whichever of the following statements is applicable to the District: "This policy serves as the required School Board resolution authorizing the use of such facsimile signatures, and the insert applicable position – e.g., District's licensed Business Official, Director of Business Services shall ensure that a certified copy of this policy is filed in the District Office on behalf of the Clerk and with each of the District's official public depositories." OR "A separate, Board-adopted resolution authorizing the use of such facsimile signatures exists. A certified copy of such resolution is retained on file in the District Office on behalf of the Clerk, and the insert applicable position – e.g., District's licensed Business Official shall ensure that a certified copy of the resolution is filed with each of the District's official public depositories."]*

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1. The Board of Education shall purchase depositor's forgery bond insurance to protect the loss of any public funds.³

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2. Under the management of the *insert applicable position(s) – e.g., District Administrator and the District's licensed Business Official, Director of Business Services*, authorized District personnel may process disbursements that are approved periodic payments through the use of money transfer techniques, including direct deposit, electronic funds transfer, and automated clearinghouse methods provided that a record is kept of the date, payee, and amount of each such disbursement. Such authority includes, but is not limited to, the processing of payroll-related transactions.

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3. A petty cash account may be established for education purposes. Educational accounts shall be approved by the *Director of Business Services, business manager and all regular business office procedures shall be followed.*⁴

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3. Except to the extent consistent with District procedures established regarding the use and management of petty cash funds or as otherwise expressly approved by the Board, District officials, employees, and agents shall not make disbursements of District funds in cash (i.e., monetary currency). This provision is not intended to prohibit making change for District-authorized cash-based transactions (e.g., event admissions).

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³ This language is from your current 661.1.

⁴ This language is from your current 665.

DISBURSEMENTS OF FUNDS

Policy 673

Waunakee Community School District

Page 3 of 4

- 4. To the extent consistent with District-established procedures and restrictions regarding the use and management of District-issued purchasing cards and/or credit cards that (a) appropriately limit the amount of charges; (b) restrict any direct access to District accounts at depositories; and (c) adequately protect the District's ability to audit and dispute charges, the District may authorize District officials, employees, and agents to utilize such cards.
- 5. Disbursement of monies held by the District as agency funds (such as student activity accounts) shall be made according to disbursement procedures adopted for the applicable agency fund.
- 6. To the extent the Board authorizes the transfer to a community foundation of any gift or grant that has been received and accepted by the District, any disbursements of monetary amounts shall be consistent with state law governing such transferred gifts or grants, including that the community foundation must agree to make disbursements of the gift or grant to the District upon the written request of the Board.

~~7. A summary of all monthly payments will be distributed to all Board members before the regular monthly meeting. The Board Treasurer will review the payments with the Business Manager prior to the meeting.⁵~~

~~7.8. Insert additional item(s) as necessary or appropriate.~~

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Legal References:

Wisconsin Statutes

- [Section 25.50](#) [local government pooled investment fund]
- [Section 34.05](#) [designation of public depositories]
- [Section 66.0135](#) [interest on late payments to contractors providing goods or services]
- [Section 66.0607](#) [withdrawal or disbursement from local treasury]
- [Section 118.27\(3\)](#) [disbursements from gifts and grants transferred to a community foundation]
- [Section 120.15\(1\)](#) [board president duty to countersign disbursement instruments]
- [Section 120.16\(2\)](#) [board treasurer duties regarding disbursements]
- [Section 120.17\(5\)](#) [board clerk duties to draw orders on the treasurer and to record all such orders]

Cross References:

WASB PRG 673 Sample Policy 1

~~[622, Budget Implementation](#)~~

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Adoption Date: ~~10/11/82~~

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Revised: ~~March 1994~~

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~~April 2002~~

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~~December 2002~~

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⁵ This language is from your current 673.

DISBURSEMENTS OF FUNDS

Policy 673

Waunakee Community School District

Page 4 of 4

November 2005

August 2006

July 2009

July 2012

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CREDIT CARD PROGRAM

673.1

A Credit Card Program has been established to provide another purchasing option, particularly when a vendor does not accept ACH payments, and to reduce the paperwork and handling costs associated with the payment of these purchases. The Credit Card Program delegates the authority and capability of purchasing items directly to the designated cardholders, allowing them to acquire materials faster and more efficiently. The Credit Card Program is not intended to circumvent or replace the standard purchasing procedures of the District

This policy is intended to provide general guidelines for using the Credit Card Program. For detailed information on implementing these policies, see the Credit Card Use-User Policies and Agreement document. Questions regarding this policy may be directed to the **Director of Business Services** ~~Business Manager~~.

Responsibilities Overview

The responsibilities of a Credit Card user include, but are not limited to:

1. Checking out the Credit Card through the Budgetary Administrative Assistant using the Administrator Credit Card Use Log
2. Obtaining and retaining proper documentation of card transactions and usage
3. Providing detailed receipts and correct accounting codes for transactions to the Budgetary Administrative Assistant
4. Following up with the card bank and vendors for returns, and fraudulent or disputed charges
5. Notifying the card bank and the **Director of Business Services** ~~Business Manager~~ of suspected fraudulent charges and lost or stolen cards
6. Complying with all other applicable District policies and procedures.
7. Employees (who are not administrators) with a Credit Card issued in their name are strictly prohibited from allowing anyone else to use their district-issued Credit Card.
8. Prompt reimbursement to the district for any ineligible or unapproved charges.

The Accounts Payable Specialist is directly responsible for managing the Program, including, but not limited to:

1. Processing new card applications and closing or suspending cards
2. Making adjustments and changes to card blocks, limits, and other card information
3. Retaining documentation of all card applications, changes and related information
4. Retaining documentation of posting period audits, transactions, and related information
5. Program training for District staff

The **Director of Business Services** ~~Business Manager~~ is responsible for, but not limited to:

1. Overseeing the Credit Card Program
2. Approving cardholder applications

The Accounting Specialist is responsible for, but not limited to:

1. Providing recommendations to the Business Manager regarding updates to policies, procedures and manuals for the Credit Card Program
2. Performing monthly audits of card usage and transactions
3. Performing specific duties or tasks associated with the Program as assigned by the Business Manager

Ethics

Purchases will reflect the best available value for the District, and will be restricted to only those necessary for District purposes. It is the responsibility of every card user to meet these expectations.

Suppliers and vendors are an extension of our District resources. All District personnel are expected to maintain professional, considerate relationships and communications with District suppliers and vendors.

Types of Credit Cards

1. **Administrator:** Each administrator is issued a credit card with their name and “WCSD” embossed on the card. Use of this credit card is restricted to the named administrator or their administrative assistant.
2. **Building/Department:** A building/department card embossed with the building name and “WCSD” will be issued to each school building and departments as approved by the **Director of Business Services** ~~Business Manager~~. Employees may request use of a building/department credit card through the Budgetary Administrative Assistant, using the Building/Department Credit Card Use Log.
3. **Employee:** If warranted, a Credit Card may be issued in the name of a district employee. If a district employee has a Credit Card issued in their name, the Credit Card will be embossed with the employee’s name and “WCSD”. **Only the named user may charge any transaction on their card.** Use of an Employee-issued credit card by anyone other than the named employee is strictly prohibited. Allowing others to submit transactions on an employee-issued credit card may result in the credit card being cancelled.

Requesting and the Issuance of Credit Cards

Credit Cards for Administrators are requested through a District Credit Card Application. Applications for Credit Cards to be issued in the name of other District staff must be approved by the employee’s direct supervisor and submitted to the Business Manager. The **Director of Business Services** ~~Business Manager~~ shall determine whether an employee should be issued a Credit Card in their name.

Unauthorized Purchases

1. Personal purchases (use of the card for personal identification is prohibited)
2. Purchases intended to bypass any District purchasing procedures or policies
3. Purchases split to circumvent purchase limits or competitive pricing/bidding

requirements

4. Business related meals and/or travel not authorized by the cardholder's supervisor
5. Capital equipment purchases (unit cost of \$5,000 or more) unless specifically authorized by the **Director of Business Services** ~~Business Manager~~
6. Telephone calls
7. Alcoholic beverages, drugs or pharmaceuticals
8. Insurance
9. Hazardous materials (except for Maintenance Department)
10. Leases or rentals of facilities or property
11. Purchases that require a contract unless contract has been preapproved and signed by The **Director of Business Services** ~~Business Manager~~
12. Consultants or temporary help
13. Services from a "Tax Reportable" or "1099" vendor. A tax reportable or 1099 vendor is defined as an individual, sole proprietorship or limited partnership who is paid more than \$600 for services. All medical and/or attorney's fees are considered tax or 1099 reportable, regardless of their status
14. Purchases from companies outside of the United States, unless specifically authorized by the **Director of Business Services** ~~Business Manager~~
15. Parking tickets, speeding tickets, or other vehicular tickets or fines.
16. Fuel for your personal vehicle during business travel. Fuel and mileage incurred during approved business travel using your personal vehicle will be reimbursed through the Skyward purchase order process. If business travel is done in a District-owned vehicle, fuel may be purchased using a Credit Card.
17. Purchases that are not permitted under District policies and procedures

Credit Card Use - User Policies and Agreement

Any employee using a Credit Card must read and agree to follow all policies and procedures outlined in the Credit Card Use – User Policies and Agreement document. This document is available in print or online for staff reference. The employee must also sign the District Credit Card Issuance Form, to acknowledge their understanding and compliance with all District policies for Credit Card use.

Transaction Audits

1. The Business Office will perform both intentional and random audits of card usage. Audits will be performed at least once per month.
2. Notification of audit discrepancies will be delivered to the cardholder via e-mail. Documentation copies and written explanation of expense(s) are required to be forwarded to the Business Manager within 7 business days of receiving the notification.

Consequences of Procedure or Policy Violations

1. Misuse, abuse, and/or failure to comply with District policies and procedures will result in disciplinary measures that can include revocation of cardholder privileges or even termination of employment.

Termination or Transfer of Employment

1. A cardholder who leaves employment of the District or is transferred to another site shall return their card to their Administrator.

2. The Administrator is responsible for contacting the Accounts Payable Specialist, who will cancel the card. The supervisor will cut the card in half and return it to the Accounts Payable Specialist.

Payment to Card Bank

Payment to the card issuer shall be completed electronically via electronic funds transfer by the Business Office.

CROSS REF.:

671.2, Expense Reimbursement

672, Purchasing

672.1, Bidding Requirements

Adopted: September 2015

Waunakee Community School District

FISCAL ACCOUNTING AND REPORTING

The superintendent and business manager shall be responsible for receiving and properly accounting for all funds of the District.

The accounting system shall conform to the requirements of the Department of Public Instruction. The system shall provide for the appropriate separation of accounts, funds, and special monies.

The Board shall receive monthly financial statements from the superintendent and/or business manager showing the financial condition of the District, excluding activity fund accounts and scholarships. Such other financial statements as may be determined necessary by either the Board of Education or the superintendent shall be presented as deemed desirable. The status of activity fund accounts and scholarship accounts shall be presented as deemed desirable. The status of activity fund accounts and scholarship accounts shall be presented to the Board at the end of each fiscal year.

Legal Ref.: Sections 115.28(13) Wisconsin Statutes
120.16
120.18(1)

Cross Ref.: 375, Student Activity Funds Management
622, Budget Implementation
684, Audits

Adopted: 10/11/82

Revised: March 1994
April 2002
October 2005

Waunakee Community School District

Policies of the Board of Education

Series 600: Fiscal Management

INVENTORIES

683

The **Director of Business Services** ~~business manager~~ shall be responsible for maintaining an accurate inventory of materials and equipment in the school system. Principals of individual schools shall make reports on textbooks held and used in the school.

Cross Ref.: 741, Maintenance and Control of Instructional Materials

Adopted: 10/11/82

Revised: March 1994
April 2002

Waunakee Community School District

Policies of the Board of Education

Series 600: Fiscal Management

AUDITS

684

The books and accounts of the District shall be audited by an independent certified public accountant in conformance with the prescribed standards and legal requirements. The certified public accountant shall be selected by the Board of Education.

The audit, when completed, shall be presented to the Board for examination.

On or before November 1st ~~at~~ least every five years, the **Director of Business Services** ~~business manager~~ shall place before the Board the matter of the retaining of a certified public accountant.

The **Director of Business Services** ~~business manager~~ shall be responsible for filing copies of the audit with the proper authorities as prescribed by law.

The cost of the audit shall be paid from District funds.

Legal Ref.: Section 120.14 Wisconsin Statutes

Adopted: 10/11/82

Revised: March 1994
April 2002
November 2005
January 2011

Waunakee Community School District

Sale or Other Disposition of District Real Estate, Buildings, or Property Interests

The School Board retains sole and exclusive authority to approve the sale or other disposition of any land, buildings, or other improvements to land that are owned by the District and no longer needed by the District. The Board shall also directly and expressly approve any sale, release, or modification of any District-owned or District-controlled interest in real property (e.g., an easement or covenant).

Sale or Other Disposition of Other District Property

The Board also has authority to dispose of other District property not addressed in the previous section of this policy, including equipment, materials, or supplies found to be surplus, replaced, broken, damaged, in unusable condition, or obsolete.

The following positions are designated as authorized Director of Business Services under this policy:

1. The Director of Business Services shall oversee the allocation, review, and disposition of all equipment, materials, or supplies.

Whenever the Director of Business Services determines that District property is no longer going to be used in its current function or location, the Director of Business Services shall ensure that reasonable efforts are made to determine whether the property can be appropriately used in another District function or location. If so, the Director of Business Services shall arrange for the internal transfer/re-designation of the property.

For any property that the Director of Business Services determines is no longer going to be used in the District, the following general parameters for further disposition of the property shall apply:

1. Any items that the Director of Business Services, or his or her designee, has determined have minimal or no resale value may, without further Board approval, be (a) offered without cost to a charitable or civic organization or other governmental entity, or (b) discarded or otherwise disposed of using an efficient method.

Any per-item estimated resale value in excess of \$25 shall not be considered minimal, except that any property that does not require further Board approval prior to disposal and that remains unsold after having been offered for sale may be deemed to have minimal resale value.

2. Items (whether individually or grouped for a single transaction) that the Director of Business Services determines can be economically sold (or traded in) for value and that have an estimated resale/fair-market value below \$5,000 may be sold (or traded in) using a process approved by the Executive Director of Operations without further Board approval. Public processes intended to inform/solicit multiple potential buyers (e.g., the use of online public advertising or auctions) shall be the preferred means of attempting to sell such property, except where the Director of Business Services determines that another method of disposition is in the best interest of the District considering all relevant circumstances.
3. Items (whether individually or grouped for a single transaction) that the Director of Business Services estimates to have a resale or other fair-market value of \$5,000 or more may be disposed of only if the Board has expressly approved the specific disposition or expressly

authorized the administration to dispose of the specific piece(s) of property under approved parameters.

The disposition of District property under this policy shall be conducted in the public interest for the benefit of the District. Unless otherwise required by law or by some other special and enforceable condition, all money received from the sale or other disposition of District property shall be directed to the District's general fund.

Legal References:

Wisconsin Statutes

- [Section 77.54\(4\)](#) [sales tax treatment of certain sales of tangible personal property]
- [Section 118.12\(1\)\(b\)](#) [school board authority over sales of goods on school property]
- [Section 120.12\(21\)](#) [sales tax treatment of certain sales of tangible personal property]
- [Section 120.13\(19m\)](#) [school board authority to sell any property belonging to and not needed by the school district]
- [Section 120.13\(25\)](#) [school board lease of school district property at reasonable rental]
- [Section 175.10](#) [certain procurements for sales to employees prohibited by statute]
- [Chapter 287](#) [state solid waste reduction and recycling policy and requirements]
- [Chapter 291](#) [disposal of hazardous materials/substances; including electronic devices]

Wisconsin Administrative Code

- [NR 660 to NR 679](#) [regulations related to hazardous waste management]

Federal Law

- [2 C.F.R. §200.33](#) [definition of "equipment" tied to local capitalization threshold within the federal Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)]
- [2 C.F.R. §200.94](#) [definition of "supplies" tied to local capitalization threshold within the federal Uniform Guidance]
- [2 C.F.R. part 200 subpt. D](#) [general post-award requirements under the federal Uniform Guidance]
- [2 C.F.R. §200.311](#) [disposition of real property that is subject to the requirements of the federal Uniform Guidance]
- [2 C.F.R. §200.313](#) [disposition of equipment that is subject to the requirements of the federal Uniform Guidance]
- [2 C.F.R. §200.314](#) [disposition of supplies that are subject to the requirements of the federal Uniform Guidance]
- [2 C.F.R. §200.315](#) [disposition of intangible property that is subject to the requirements of the federal Uniform Guidance]
- [2 C.F.R. §200.322](#) [applicability of federal Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act, under the federal Uniform Guidance]

Cross References:

[Insert appropriate cross references to the policy as applicable to your district.]

DISPOSITION OF DISTRICT PROPERTY

Policy 690

Sample Policy 1

Page 3 of 3

Adoption Date:

March 1994

November 2005

January 2014

April 2022