

Bridge Preparatory Charter School

Accounting & Finance Procedures Manual

2024-2025 School Year September 2024

Confidentiality Agreement

I agree and understand that in connection with the performance of my employment, I may be exposed to Confidential Information regarding the business affairs, customers and processes of Bridge Preparatory Charter School (Bridge Prep, The School).

I agree that during my employment term with Bridge Prep and thereafter, I will not (a) use any such Confidential Information (including information contained in this handbook) for any purpose other than a Bridge Prep purpose or (b) disclose any such Confidential Information to any person, firm, corporation, partnership or other entity.

I agree and understand that this provision is reasonable and necessary to prevent the improper use or disclosure of Confidential Information of Bridge Prep. My obligation to keep such information confidential in accordance with this provision shall survive termination of my employment with Bridge Prep.

NAME (print)_						
SIGNATURE _						
DATE						
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Note: This page should remain in the manual. Please return a signed copy to the main office at Bridge Prep.

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This policy is not a vehicle for reporting violations of the School's applicable human resources policies or problems with co-workers or managers, nor for reporting issues related to alleged employment discrimination or sexual or any other form of unlawful harassment, all of which should be dealt with in accordance with the School's Employee Handbook, which is applicable to such matters.

The matters which should be reported under this policy include suspected fraud, theft, embezzlement, or accounting or auditing irregularities; bribery, kickbacks, or misuse of the School's assets; or suspected regulatory, compliance, or ethics-related issues, concerns or violations.

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Purpose and Revision of this Manual

This manual has been established to incorporate the financial policies and procedures for Bridge Preparatory Charter School (Bridge Prep, the School). The manual will be updated as needed in order to maintain a comprehensive guide for the school and its staff. We welcome ongoing input and suggestions as to what we might add, delete, or change. Other school policies and procedures are included in Bridge Prep's *Employee Handbook*.

This manual is reviewed annually and revisions are made where applicable, based on feedback from the school's independent auditor, Executive Director, Director of Operations and members of the Board of Trustees' Finance Committee. Should there be any modification made during the school year, policies and procedures supplementing or superseding the enclosed will be distributed via memo or email. When you receive such a memo or email over the course of a year, insert it at the front of the relevant section of this manual. Insert a copy of the first page of the memo in the last section of the manual, Memos and Updates.

Our Mission and Vision

The mission of Bridge Prep is to provide all students, especially those struggling with literacy acquisition, an innovative, student-centered learning environment that challenges them through academic rigor, builds their resiliency and fosters their academic progress and social and emotional growth. In order to assure that students struggling with literacy are able to catch up with their peers, they must be fully immersed in an academic environment designed to meet their needs.

With increased emphasis on literacy in early-childhood programs locally and nationwide, students are being exposed to literacy at an earlier age, which often brings to light the struggles children face with literacy earlier than ever before. The goal of Bridge Prep is to graduate confident and creative learners prepared for secondary school and beyond. Bridge Prep will provide a unique and rigorous educational option for students on Staten Island, where many students remain at risk of academic failure as a result of their continued struggles with literacy. Bridge Prep will position these students for long-term and sustained academic success. In order to put our students on a path of expanded opportunity, we will create a caring school community where all students, family and staff feel valued, safe, and respected. We have high behavioral and academic standards for all students, we encourage family engagement, and our faculty and staff serve students with our mission in mind.

Code of Ethics

Code of Conduct: Employees have an obligation to observe and follow the School's policies and to maintain proper standards of conduct at all times. The conduct of our employees reflects on the School, so all employees are encouraged to observe the highest standards of professionalism and integrity. The School expects employees to conduct themselves ethically and appropriately. This not only involves sincere respect for the rights and feelings of others, but also demands that employees avoid any behavior that might be harmful to themselves, co-workers, students or the School, or that might be viewed unfavorably by those with whom the School does business, by our students or families, or by the public at large.

Conflict of Interest: Any Bridge Prep employee or member of the School's Board of Trustees ("Board") may not participate or benefit directly or indirectly in negotiating a contract for the purchase of a good or service in which any employee, officer, trustee, or their family member or associate has a financial interest. To do so would be a conflict of interest and is a breach of Bridge Prep's ethical standards. These provisions are consistent with the New York State General Municipal Law and with the Board's Conflict of Interest Policy, which outlines the process for reviewing, approving and documenting any related party transactions that arise.

Gratuities and Kickbacks: Neither an employee, nor anyone under their direction, control or advice, may solicit, demand, accept or agree to accept a gratuity, kickback or offer of employment in connection with any business transaction conducted on behalf of the School. Such transactions include, but are not limited to,

approvals on purchase requests, influencing the content of any procurement standard, or auditing or rendering of other consultative advice.

Use of Confidential Information: In accordance with the Confidentiality Agreement that appears in this manual, employees must not knowingly use or disclose Confidential Information acquired in the course of their official duties for actual or anticipated personal gain, or for the actual or anticipated personal gain of any other person.

Reprimands and Penalties: If an employee knowingly and intentionally participates in any breach of ethical standards, according to the School's Code of Ethics, the Executive Director and the Board may impose oral or written warnings or reprimands; suspension of the employee with or without pay for specified periods of time; and/or a termination of employment, in the manner provided by law.

Whistleblower Policy: The School requires all of its employees to observe high standards of professional and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the School must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. This policy is not a vehicle for reporting violations of the School's applicable human resources policies or problems with co-workers or managers, nor for reporting issues related to alleged employment discrimination or sexual or any other form of unlawful harassment, all of which should be dealt with in accordance with the School's Employee Handbook, which is applicable to such matters.

The matters which should be reported under this policy include suspected fraud, theft, embezzlement, or accounting or auditing irregularities; bribery, kickbacks, or misuse of the School's assets; or suspected regulatory, compliance, or ethics-related issues, concerns or violations.

Reporting Responsibility: It is the responsibility of all employees, trustees and representatives of the School to report in good faith violations or suspected violations of high business and personal ethical standards, as such personal ethics relate to the organization and/or applicable legal requirements (Violations) in accordance with this Whistleblower Policy.

Reporting Violations: Questions, concerns, suggestions, or complaints regarding the ethical and legal standards noted above should be addressed directly to the Executive Director or the Board. The Executive Director shall report all such communications to the Board in a timely manner.

Accounting and Auditing Matters: The Executive Director shall address all reported concerns or complaints regarding the School's accounting practices, internal controls, or auditing. The Executive Director shall notify the Board of any such complaint and work with the Board until the matter is resolved. Promptly, upon receipt, the Board shall evaluate whether a complaint constitutes an accounting complaint, and if so, shall promptly determine what professional assistance, if any, it needs in order to conduct an investigation. The Board's will be free in its sole discretion to engage outside auditors, counsel, or other experts to assist in the investigation and in the analysis of results.

Non-Retaliation: No employee who in good faith reports a violation or suspected violation shall suffer harassment, retaliation or adverse employment consequences because of such a report. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. The Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the School prior to seeking resolution outside the School.

Notwithstanding anything contained herein to the contrary, the Whistleblower Policy is not an employment contract and does not modify the employment relationship between the School and its employees, nor does it change the fact that employees of the School are employees at will. Where provisions exist elsewhere under law and/or School policy governing the disclosure of information and other obligations, and /or retaliation

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relative to such disclosure, such laws and/or School policies shall govern in accordance with applicable law and these policies and procedures.

Please refer to Bridge Prep's Employee Handbook for additional School Policies and Procedures.

Team Member Financial Roles and Responsibilities

Board of Trustees

Responsible for approving substantial policies related to the school's finances and provide support and oversight on the following:

- Signing of purchase order and check request for any non-contractually approved expenditure over \$15,000.
- Annual review of School's financial policies.
- Annual budget review and approval
- Annual Financial Audit Report review and approval
- The selection of the School's independent auditor.

Executive Director

Responsible for supervision of all school level staff and specific financial and operational procedures including but not limited to:

- Approval of order requisition, purchase order, and check request up to \$15,000.
- Signing of any contracts/agreements up to \$15,000 or those previously approved by the Board of Trustees.
- Annual budget production, review and approval.
- Annual Financial Audit Report review and approval
- Review of monthly financials, discussion and resolution of any issues and delivery of feedback.
- Manage monthly budgets with Financial Services Provider
- Oversee the District Billing Process
- Oversee all grant development and submissions and serve as FS10, FS25, FS10A signer or assign an authorized designee.

Director of Operations

Responsible for supervising school operations staff and for day to day school operations including but not limited to:

- Approval of order requisitions, purchase orders, and check requests up to \$5,000. If \$5,000 or over, approval of the Executive Director is required;
- Approval of Contracts/Agreements up to \$5,000;
- Maintain and manage processes related to the purchases of goods and services (purchase orders)
- Managing day to day accounting processes of the school (accounts payable and receivable, cash receipts and disbursements);
- Maintain book keeping records utilizing software applications as needed.
- Managing and overseeing the payroll process with the school's HR provider.
- Maintaining records of the check stub and supporting backup
- Maintaining petty cash controls and approvals (including cash distribution and reconciliation as well as replenishment submission

Note: In the event that the Director of Operations is unavailable or unable to perform these responsibilities, the Executive Director or his/her designee will maintain these responsibilities.

Operations Assistant

- Gathering and reviewing supporting documents such as invoices, packing slips, order requisition forms, W-9s, contracts (if applicable)
- Submitting orders via email or fax to vendors.
- Creating documents, such as check requests, and employee reimbursement forms and obtaining corresponding approvals

Internal Controls: Structure and Procedures

Internal Controls Structure: The School receives funds granted by government agencies, private foundations and individual contributors. It is imperative that spending of these resources is properly recorded and applied in accordance with state law and generally accepted accounting principles.

Internal Controls are established by the School to maintain integrity, promote accountability, and provide policies and procedures that serve as guidelines in achieving the highest standards for Bridge Prep's financial management. The Fiscal Control Structure exists to:

- Provide clarity of roles and responsibilities;
- Ensure efficient use of resources:
- Safeguard the organization's assets;
- Facilitate the organization's ability to accurately record, process, summarize, and report financial information;
- Serve as a reference point during staff transitions; and
- Detect fraud or reduce its risk.

Segregation of Duties: It is important to recognize that "no one person should perform all accounting functions, nor have the ability to cover up errors." By separating responsibilities to different hierarchies, segregation of duties provides the school multiple levels of oversight and review to detect error and avoid fraud. The Executive Director provides final approval on the segregation of duties within the School, which may be modified during the Fiscal Year.

Document Control: All documents and their appropriate support must be neatly stacked, properly approved and safely filed away.

Records Retention: Like all businesses, the School is required to maintain all records long enough to meet the needs of the Internal Revenue Service (IRS), government agencies, legal counsel, and external auditors. Bridge Prep maintains a policy of retaining all accounting records for a minimum of 7 years. Records will be maintained for the periods sufficient to satisfy IRS regulations, federal grants requirements, A-133 requirements and other legal needs, as may be determined. All document destruction will be suspended if the School becomes aware of any investigations. Records must be securely stored and easily accessible for review and retrieval.

Reconciliation Control: The reconciliation process is critical not only for the opportunity to review beginning and ending balances, but also to verify each transaction that has been posted to the various accounts held by the School. This step is significant in determining the accuracy of the school's accounts. A non-signatory completes the bank reconciliation process for Bridge Prep.

Fraud Prevention: Bridge Prep's policies and procedures are implemented to deter and detect fraud. Through segregation of duties, multiple levels of review, approval process adherence, and regular accounts reconciliation, management can help avoid the risk of misappropriation of school assets and finances.

Accounting System: Bridge Prep has established an accounting system to record, classify, and retain financial and accounting data for current, past and future reference. This system provides the School the ability to:

- Enter revenue and expenditures by account and classification;
- Track accounts balances by time period;
- Generate reports for financial reporting and business requirements; and
- Obtain detailed or summarized reports to determine the School's financial status.

Account Numbers and Classifications: Account numbers and classifications are used to organize and consolidate the School's financial recording for internal management reports and for external compliance reports.

Any time the School receives or sends money, a General Ledger (GL) Account Number must be used to describe the purpose of the transaction. For example, a GL Account Number must be used on every payroll, purchase order (PO), or expense reimbursement request.

Bridge Prep's Chart of Accounts, which can be found as Appendix 1 attached, lists the GL Account Numbers as four-digit numbers with the following guidelines:

- 1000 1999 Assets
- 2000 2999 Liabilities
- 3000 3999 Equity
- 4000 4999 (Unused)
- 5000 5999 Revenue
- 6000 9999 Expense

When applicable, a classification should also be included on transaction reports. Classifications are groupings of expenses/revenue that might cut across multiple Account Numbers. Examples of classifications include Title I, SSF (State Startup Fund), and PCSP (Public Charter School Project). For example, Title I money (expended to help students who are not on grade level) may be used for teacher salaries (account 6020), texts and materials (account 8100), or teaching assistant salaries (account 6040).

Procurement Goals: Understanding why procedures are designed as they are will facilitate adherence to them. With that in mind, Bridge Prep's procurement procedures are designed to achieve the following goals in the most straightforward manner possible

- Obtain goods and services at the lowest possible cost;
- Receive all goods and services ordered in a timely manner;
- Pay vendors in a timely manner only for those goods approved for purchase by appropriate administrators and actually received;
- Properly account for all purchases on Bridge Prep's financial statements;
- Maintain an accurate list of assets and unused consumables to facilitate future ordering and financial reporting;
- Ensure advance notice to and approval from financially-accountable school administrators for high cost purchases;
- Allow school staff some flexibility in procurement method for expenditures for which purchase orders are not a practical method of procurement; and
- Require the smallest administrative burden necessary to achieve all other goals.

Bridge Prep's Accounts Payable department (or any external financial services provider it has so authorized) processes all payments made by the School. In cases where it is necessary for the Executive Director or their designee to process payments to vendors, the procedures outlined in this manual will be followed.

ORDER REQUISITION

When requesting the purchase of certain goods or services, members of the staff must complete an order requisition form with the Director of Operations via the following process:

- Staff should go to the Director of Operations to get supplies needed from the inventory of supplies and materials available. If supplies are not available, staff should submit a request via email to the Director of Operations for review and approval using the order requisition form;
- The Director of Operations will review the form for approval and advise the requestor accordingly.

Once the requisition is approved, the Director of Operations or their designee prepares a PO, if necessary; otherwise, the order will be submitted to the vendor via email, fax, or through the merchant's website.

PURCHASE ORDERS

POs are the preferred method for obtaining goods and are to be used for procurement in every case possible. POs are preferred because they clearly communicate to the School and the vendor exactly what is being purchased and provide a systematic way for the School to follow up on orders not completed. They help ensure that the School pays only for items ordered *and* received. Additionally, they allow the school to accrue expenses, if necessary, in order to prepare accurate financial statements when delivery of goods is anticipated. PO approvals will follow the Levels of Authorization below.

If purchasing a new item for the first time, the School will consider numerous vendors to find the best price quote (or structures bidding where applicable and necessary). Factors considered in sourcing should include not only pricing, quality, reliability and past experience, but also group purchasing opportunities or vendor agreements with state agencies specifying a set price for any purchase by a State agency. In New York these are available through the New York State Office of General Services and typically confer cost savings. The Director of Operations will work with the Executive Director to consult the budget to get a rough estimate of the availability of funds. If funds are available, the Executive Director will approve the purchase, and the Director of Operations will complete a PO, which must include the following information:

• PO Number

- The PO number format begins with the first four characters of the School's acronym, (e.g., BPCS for Bridge Prep Charter School).
- o The next two digits denote the fiscal year in which the purchase order is prepared and approved, e.g., "25" would be used in a PO completed in fiscal year 2025.
- The last 3 numbers of the PO represent the sequential order of the school's purchase orders as they are prepared in any fiscal year, e.g., "BPCS-25-001" would identify the first PO written in FY 2025 at Bridge Prep. At the beginning of each fiscal year, the first PO number is assigned 001, and subsequent purchase orders are assigned 002, 003 etc.
- **PO Total** to determine the authorization required.

LEVELS OF AUTHORIZATION

\$0 - \$5,000 Director of Operations
\$0 - \$15,000 Executive Director
Over \$15,000 Board of Trustees

Account Number and Funding Classification: A General Ledger (G/L) Account Number must be included on the PO for every line. The Director of Operations or his/her designee will indicate whether PO falls under any relevant funding classifications, such as Title I or Title IIA, for example.

Shipping and delivery Specifics: The Director of Operations should indicate if the order is a rush, whether inside delivery is required, and if advance notification of delivery date is required.

Tax: Bridge Prep is tax exempt and the School's Tax Exempt form, which is maintained by the School, must be forwarded to every vendor.

Submitting PO to Vendor: The Operations Assistant will fax or email the signed copy of the Purchase Order to the vendor.

Purchase Order Filing: POs are maintained in the School's PO binder. POs are filed by fiscal year in reverse chronological order according to PO number, within the PO binder for their corresponding fiscal year. The binder will be maintained by the School and will be easily accessible.

RECEIVING PROCEDURES FOR GOODS AND MATERIALS

The following procedures are for the tracking and receiving of purchases made via PO. Prompt delivery of supplies and equipment is crucial to school operations; accordingly, the Office Manager will track and follow-up on scheduled delivery of all goods and materials. The steps are as follows:

- All delivery personnel are to be notified that, unless otherwise specified, deliveries are to go directly to the school's Main Office:
- As goods are received, the Director of Operations or their designee will inspect and assess the condition of
 all packages upon arrival. If packages show damage, or if a different number of packages is delivered than is
 indicated on the delivery receipt, the Operations Assistant will note the condition or discrepancy on the
 delivery receipt, providing a copy for delivery personnel and retaining a copy for the school. This is to
 ensure that the school has a basis for a claim to the vendor should it require replacement of a damaged or
 missing item.
 - o If there is evidence at delivery that any item is damaged or has been incorrectly delivered, the Director of Operations must refuse the delivery, request that the delivery personnel take it back, and follow-up with the vendor. All packages, regardless of total cost must be opened and their contents inspected by the end of the week received;
- Upon opening the package and examining the contents of the delivery package, the Director of Operations should locate the packing slip. If no packing slip exists, the Director of Operations must fill out an Acknowledgment of Receipt Form and then open and examine the contents of the box.
- In examining the contents of the package, the Director of Operations will carefully check the packing slip against the contents of the package. For every item included in the shipment, he/she must assess its condition and initial the corresponding line on the packing slip, noting the item's condition.
- If the packing slip does not match the exact contents of the box, the Director of Operations notes on the packing slip and contacts the appropriate vendor to arrange delivery of missing items or replacement of damaged items;
- The Director of Operations must compare all Packing Slips or Acknowledgment of Receipt forms to the corresponding PO on file; and
- The Director of Operations must attach the receiving documents to the PO and provide the documents to the Operations Assistant for retention in the PO binder for audit purposes.

Follow up for purchase: If goods or services are not provided, the Director of Operations will follow up with the vendor. The Director of Operations must keep a record of POs with undelivered or outstanding items, along with a log of follow-up calls, emails or other contact until delivery is completed, credited or otherwise resolved.

RECEIVING PROCEDURES FOR SERVICES

The following steps outline procedures for contract services performed:

- A signed Work Order must be completed to request services. For services contracted on an hourly basis, it is the responsibility of the Director of Operations to see that hours worked are tracked and documented via a sign in/out log. This may be done directly by the Director of Operations or by the appropriate designee, provided such designee is noted on the work order and informed of this obligation. In all cases the contractor will submit an invoice in order to be paid and will in no case be paid off of a timesheet only. The Director of Operations must discuss all work to be performed with the Executive Director.
- Once the service is completed to the School's satisfaction, the Director of Operations matches the services
 performed against the agreed contract detailing the services. In some cases, the Work Order can serve as the
 receiving document.

OPENING A CREDIT ACCOUNT WITH A VENDOR

Vendors may require the school to substantiate that payment will promptly be processed if an order is placed without advance payment. For most vendors, this substantiation is a credit application that contains bank information and credit references for the School.

When opening a credit account with a vendor, the vendor must be informed of the School's non-profit status, which confers exemption from sales tax and the vendor's obligation to charge it. Customarily, a vendor will accept one of three documents to validate the School's exemption:

- A letter from the New York State Department of Tax and Finance stating the school pays no sales tax;
- Bridge Prep's Provisional Charter issued by NYSED, stating the school is a 501(c)(3) organization; or
- The School's 501(c)(3) status confirmation issued by the IRS.

The Director of Operations will complete or assist the vendor in completion of the credit application, furnishing the School's current bank information and the names of vendors who have agreed to serve as credit references for the School. All accounts with vendors are to be in the name of the school (not any other entity), and all POs must have the school's address as the shipping and billing address.

OTHER METHODS OF PAYMENT

In circumstances when a PO is not an option, alternative methods of payment must be authorized. In these cases, as with a PO, the same Authorization Levels outlined above apply.

CHECK REQUEST

For any payment to a vendor that is not captured under the PO system, please follow the following steps:

- The Operations Assistant opens the mail and sets aside invoices to be paid;
- The Operations Assistant gathers the necessary backup, such as quotes, POs, packing slips, contracts and W-9s, and matches them to the proper invoice. A completed W-9 form is required from every vendor;
- The Director of Operations reviews all bills/invoices and creates a check request, attaching all supporting documents, and submits the check request for approval; and
- Once the check request is approved, the Director of Operations submits the entire documentation to the School's financial services provider for payment processing.

SCHOOL BASED CHECKING ACCOUNT

Bridge Prep has established a School-Based Checking Account, maintained by the School for necessary purchases, expense reimbursements, and emergency expenditures. This account exists in addition to the School's other main operating accounts, which are authorized also by the board.

Bills are only paid following verification that services were actually performed or goods delivered. Payment documentation must be attached to a check copy and filed. In order to issue a check from the school-based checking account, supporting documents must be provided such as expense receipts and/or invoice.

Any check request for an amount of \$15,000 or more requires approval by any two of the following:

- The Chair of the Board of Trustees;
- The Executive Director; and
- Another member of the Executive Committee of the Board of Trustees.

The check signer or non-signing approver for amounts over \$15,000 is responsible for reviewing all supporting documents. Blank checks must never be signed in advance. Pre-numbered checks are used for all disbursements and any unused check supply will be kept in a locked drawer or file cabinet at all times. Voided checks must be defaced and clearly marked VOID across payee and signature lines. Receipts or bills are attached to a check copy and filed in numerical order by check. Copies are kept in the School-Based Checking Account binder. The use of school-based checks will follow proper check handling procedures.

CREDIT CARD

The Executive Director and the Director of Operations may be issued a credit card in the name of the School for use in circumstances where standard procurement methods (e.g., POs, check requests, school-based checks or petty cash) are not feasible. Such circumstances may include Travel & Entertainment charges as well as emergency purchases for school operations where a vendor will not accept a purchase order or check. Credit cards are to be used only when all other options have been exhausted. Generally, the School credit card(s) should not be used for regular operating expenses, unless the purchase does not allow for payment to be completed by check at which point the circumstances necessitating such use must be provided as part of the request for securing approval for usage. The cardholder is responsible for maintaining and submitting all receipts and supporting documents.

Processing of Charges: The card holder receives and matches the account's purchase receipts against the charges on the monthly statement and subsequently submits the credit card statement and receipts to the Director of Operations for approval, processing and payment to the card issuer. Approvals of expenses made on the school credit card will follow the school's levels of approval for purchasing. Credit card charges are to be submitted for processing no later than 10 business days ahead of the payment due date that appears on the monthly statement.

Pre-Approval of Charges: The School's schedule and tiers of approval authority apply for all instances where pre-approval of charges is feasible, including those instances where purchases are made by credit card.

Credit Line Maximum: There will be a \$15,000 limit on the line of credit on any credit card established in the School's name.

Personal Charges: The School credit card is issued only for school-related use, and there must be no other expenses charged to the credit card. In the event this does happen, the employee must reimburse the School the full amount via check payable and submitted to the school when the billing statement is received and processed.

Authorized Use: Only the cardholder is authorized to maintain and use the card. Cards should be kept on the person at all times and will be surrendered to the school upon request or at the time of separation from employment at the school. Lost or stolen cards must be reported to school administration and the credit card company immediately. Violation of the school's credit card policy may result in revocation of credit card privileges and other disciplinary action, up to and including termination.

PETTY CASH

There will be no more than \$300.00 of Petty Cash on hand at the School at a given time, and funds can be distributed to employees only after approval is obtained from the Director of Operations. Anyone who receives Petty Cash is personally responsible for that money. All requests for Petty Cash are to be presented to the Director of Operations for approval and distribution of the approved amount to the requestor.

Petty Cash is only to be used for urgent, inexpensive purchases from a business or vendor that does not accept checks or on an "immediate need" basis, such as for providing a tip to a delivery driver, and is to be stored in the School safe.

At the time of disbursement of, a Petty Cash Receipt (PCR) must be filled out with the date, the recipient's name and signature, and the amount received noted on the form. After making the purchase, the recipient must present the Director of Operations with a store receipt and any change. The store receipt should always match the money taken from Petty Cash and, along with any change received, should always add up to the amount on the PCR.

The Director of Operations must put the change and store receipt in the School safe, mark the PCR "closed," and return the PCR to the recipient. If the employee contributes towards the purchase with his or her own

money, he or she should be reimbursed from Petty Cash and the amount of contributed personal funds reimbursed should be noted on the store receipt retained in the School safe and the closed PCR should be returned to the recipient.

Reconciling Petty Cash: The Director of Operations will reconcile Petty Cash once a week, or any time Petty Cash is replenished, by adding up the cash, store receipts and any open PCR. The total of these should always be exactly equal to the original Petty Cash Balance.

In order to replenish Petty Cash, the following procedure must be followed:

- Number the store receipts;
- Enter the store receipts on the Petty Cash Expenditure Report (see Appendix for form blank), which must contain the following information:
 - o School Name
 - o Week Ending Date
 - o Receipt Date
 - o Receipt #
 - o Purpose of Purchase
 - o Account Number
 - o Amount
- Enter the total amount of receipts on the box marked "Receipts Total" and log the receipt amounts again by Account Number in the columns on the lower half of the report;
- Total each account's column and enter the total on the "Total Expenses" line at the bottom of the report (the total of all the account columns should be the same as the "Receipts Total");
- Enter the total on the "Total Expenses" line at the bottom of the report;
- Affix the store receipts to sheets of paper in numerical order and staple the sheets, together with the Petty Cash Expenditures Report, on top;
- Submit the Petty Cash Expenditure Report along with the back up to the School's Financial Services provider for cash replenishment; and
- Cash and return the funds into the lockbox.

MONEY RECEIVED AT SCHOOL (INCOMING MONEY)

Bridge Prep collects money from students for transportation, meals, field trips and fundraising. In accordance with New York Education Law, Bridge Prep may not charge students for any item that students at another local public school student would not be charged for. This includes, but is not limited to, books, summer-school programs, school clubs/after-school programs and supplemental books and educational materials.

While Bridge Prep may not charge students for activities associated with an after-school program, an outside agency may run an after-school program in conjunction with the school on or off School premises and charge a fee. The School may collect fees from students for programs run by an outside agency on the student's behalf. In such instances, the School will do so according to the procedures described herein.

The collection of money from students or families by Bridge Prep will be accounted for and will follow proper cash and check handling procedures. Any money collected by the school, including cash and personal check, must be turned in to the Director of Family and Community Development that day and should be stored in the school safe. At the Executive Director's discretion, Bridge Prep can require all money received to be in the form of a personal check and refuse cash payments.

All personal checks should be made payable to Bridge Prep and include the student's name, teacher, and the name of the activity. The cashed check will serve as a receipt for those submitting payment.

In the event that cash is collected as a method of payment from a student or family, a receipt will be written and will be provided to the family, with a copy being kept for the school's records. Receipts must be dated and signed by the person receiving the money and must include the following information:

- Student's name and class designation;
- Parent/Guardian name and name of person paying, if different;
- Amount received; and
- Name of the activity.

The responsibility for receiving payments and preparing cash receipts must be segregated from that for issuing disbursements of funds to cover an activity, in accordance with proper cash handling procedures. While staff might be responsible for collecting cash and checks, the Director of Operations is ultimately responsible for accounting for all of these transactions and making bank deposits. In no case are expenditures to be made directly from cash collections without approval of the Director of Operations and proper documentation. Such documentation must specify the reason other forms of payment are not possible.

EXPENSE REIMBURSEMENT

Each year, Bridge Prep will provide teaching staff with discretionary funding for the purchase of materials to be used within classrooms. The total amount of discretionary funding is subject to change annually. Employees who need to purchase materials out of pocket will be reimbursed according to the procedures outlined below. For the 2024-2025 school year, the individual limit for each teachers' discretionary is \$150.

In order to reimburse employees for expenses paid out of pocket, the following process should be followed:

- Employees must obtain approval of an expense before it is incurred by completing and signing an Expense Reimbursement Request form obtained from the Director of Operations. Without prior approval, reimbursement cannot be made to the purchaser.
- Approval of reimbursement requests must be directed to either the Director of Operations or the Executive Director, depending on the reporting relationship of the employee seeking approval.
- The Executive Director will approve the expenses of the Director of Operations, the Director of Teaching and Learning, Director of Family and Community Development and the Board of Trustees will approve those of the Executive Director. Authorizing signatures must be obtained. No employee may approve his or her own expenses.
- In the event approval cannot be granted prior to the incurrence of an expense by an employee, any follow-up request for approval for reimbursement must include a description or documentation of the circumstance that prevented timely request for pre-approval. All expense reimbursement requests must include the original receipt or a faxed copy.
- The school has NO obligation to reimburse expenses without a receipt.
- Expenses associated with the use of a personal vehicle are reimbursed at the applicable per mile rate established by the Internal Revenue Service.
- In order to be eligible for reimbursement of travel expenses, employees must follow the protocols outlined in the Business Travel policy below.

BUSINESS TRAVEL AND RELATED EXPENSES

Bridge Prep is excited to provide staff with opportunities to attend conferences, trainings or meetings in order to advance their professional learning and further the mission of the organization. This policy exists to ensure that staff understand the parameters, conditions and processes related to attendance at and participation in any conference, training or meeting that requires out of town travel.

General: Employees have an obligation to observe and follow the School's policies as reflected in the Staff Handbook and to maintain proper standards of conduct at all times, as the conduct of our employees reflects on

the School. Employees are encouraged to observe the highest standards of professionalism and integrity at all times, and most especially when they are representing the school at a conference, meeting, training or other external event.

When representing the school at conference, training, meeting or other external event, employees are expected to conduct themselves ethically and appropriately, which demands that employees avoid any behavior that might be harmful to themselves, co-workers, or the School, or that might be viewed unfavorably by those with whom the School does business, by our students or families, or by the public at large.

The school recognizes that during this travel, the school and employees will incur expenses and this policy exists to ensure that all travel expenditures are appropriate, that adequate cost controls are in place and that employees are aware of the uniform and consistent approach for the timely reimbursement of authorized expenses incurred.

Expense Report and Reimbursement: Within 30 days of completion of a trip, the traveler must submit an Expense Reimbursement form and all supporting documentation to obtain reimbursement of expenses, which must be signed by the Executive Director. Approved expenses, samples of which are outlined below, will not be reimbursed unless the individual requesting reimbursement completes and submits this form, which will be provided upon return from the trip.

The Executive Director will review expenditures and withhold reimbursement if there is reason to believe that the expenditures are inappropriate or extravagant.

Receipts: Receipts are required for all expenditures. These include those expenses billed directly to the school, such as airfare and hotel charges, as well as all expenses that an employee will be submitting for reimbursement during the travel. No expense will be reimbursed to staff members unless the individual requesting reimbursement submits the Expense Reimbursement form with original receipts from each vendor showing the vendor's name, the date, and the total expenses, including tips (if applicable). A credit card receipt or statement may be used to document the vendor and date of an expense, provided other required details of the expenditure are fully documented.

Before the travel, the school may issue prepayments for airfare, rail transportation, rental vehicles, lodging, and conference registration fees.

Air Travel: All air travel reservations will be booked in advance for staff by the school and will be approved by the Executive Director before a final booking is complete. The school will aim to make reservations as far in advance as possible in order to take advantage of reduced fares and flight choices will be made taking several factors into account including cost, airport location from the school, flight times and conference start/end time. Coach class or economy tickets will be purchased for flights with flight time totaling less than five consecutive hours excluding layovers.

Rail Transportation: The school will prepay rail transportation provided that the cost does not exceed the cost of the least expensive airfare. The starting and ending destination for rail travel will be the location closest to the school building.

Registration Fees: Conference registration fees and other fees that are related to the conference, training or meeting that are known during the booking process can be prepaid by the School.

Lodging: For any overnight or multi-day meeting/conference, lodging reservations will be booked for staff by the school and will be approved by the Executive Director before a final booking is complete. When booking

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reservations for employees, the school will take several factors into consideration to determine reasonableness including cost, convenience and the proximity to other venues on the staff member's itinerary.

Ground Transportation: Employees are expected to use the most economical ground transportation appropriate under the circumstances for travel to and from any professional obligations related to their travel and should generally use the following, in this order of desirability:

- *Courtesy Cars/Hotel Shuttles*. Many hotels have courtesy cars, which will take the employee to and from the airport at no charge. Employees should take advantage of this free service whenever possible. Another alternative may be a shuttle or bus.
- Taxis/RideShare. When courtesy cars and airport shuttles are not available, a taxi or rideshare is often the next most economical and convenient form of transportation when the trip is for a limited time and minimal mileage is involved. Employees will be required to submit a receipt or a stamped ticket from the driver in order to be reimbursed, including any tip provided(not exceeding 20% of the total cost of the fair).

Personal Cars: Personnel are compensated for use of their personal cars when used for business travel. When individuals use their personal car for such travel, including travel to and from the airport, mileage will be allowed at the currently approved IRS allowable rate per mile which is \$0.625 per mile. Mileage will be calculated from the address that is closest to the destination - the home of the traveler or the school. The employee is expected to have appropriate insurance coverage as required by state law and the employee will need to provide proof of insurance for car use.

Parking/Tolls: Parking and toll expenses, including charges for hotel parking, incurred by staff traveling on organization business will be reimbursed. The costs of parking tickets, fines, car washes, valet service, etc., are the responsibility of the employee and will not be reimbursed.

Meals: The cost of reasonably priced meals, snacks and drinks while traveling on business that is 40 miles or more from the traveler's home or the school is reimbursable. The daily maximum individual meal reimbursement amount is \$65 per employee inclusive of any tips provided(up to 20% of the total bill). Employees will not be reimbursed for expenses above the maximum daily allowance or for meals paid for/provided by others. Employees must submit all original receipts with their reimbursement form.

Business Expenses: Business expenses incurred while on travel status can be reimbursed. These expenses can include: Photocopies, Internet charges, data ports, certain conference/training/meeting specific programming and supplies needed for participation at the conference/meeting.

Non-Reimbursable Expenditures: The school maintains a strict policy that expenses in any category that could be perceived as lavish, excessive or inappropriate will not be reimbursed. Such examples include:

- Airline club memberships.
- Airline upgrades
- Baggage fees
- Child -care, babysitting, house-sitting, or pet-sitting/kennel charges.
- Commuting between home and the school building/departing location.
- Evening or formal wear expenses.
- Haircuts and personal grooming.
- Laundry and dry cleaning.
- Passports, vaccinations and visas when not required as a specific and necessary condition of the travel assignment.
- Social Activities, outside of those events scheduled by the school or as part of the travel itinerary.

• Personal expenses related to the staff member's hotel stay or flights including in-flight movies, headsets, health

club facilities, hotel pay-per-view movies, related incidental costs.

- Alcoholic beverages.
- Travel accident insurance premiums or purchase of additional travel insurance.
- Other expenses not directly related to the purpose of the travel.

Travel for Non-Employees: Additional costs for travel, lodging, meal or other travel expenses for spouses or other family members will not be reimbursed by the school.

CONTRACTS (PROCUREMENT)

A contract is used for recurring provision of goods or services. Examples of this include food preparation, maintenance, and professional development services. Any purchase of a service lasting more than one year should be specified by a contract unless it is for general school operations (e.g., utilities). Contracts over \$20,000 must go through a competitive process, with a minimum of 2 offers required.

Federal Procurement Policy: Entities that receive federal grants are required to follow specific cost principles and regulations that are detailed in the Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards ("UG"). These cost principles require written procurement policies relating to the purchases of goods and services charged to federal grants:

- Micro purchases, which apply to goods and services less than \$10,000, do not require competitive quotes but do require attempts at equitable distribution to avoid all purchases from the same vendor.
- Small purchases, which apply to goods and services directly charged to federal awards that are more than \$10,000 but below the Simplified Acquisition Threshold (\$250,000), require multiple rate quotes from qualified sources.
- Sealed bids are to be used when services are above the \$250,000 level and are most applicable for construction.
- Competitive proposals are to be used when sealed bids are not practical.

Negotiating a contract: Before a contract is signed, the expense of the contract must be considered and the legal language must be agreed upon. The School should seek professional and legal advice whenever necessary. The advisor will assist the school to negotiate the contract, draft the contract, or provide the school with a form and contract to use, as may be required.

Authorization for contracts: As with other methods of procurement, escalating levels of approval are necessary. Levels of approval are based on the annual cost for goods and services. Contracts may be approved and signed only at the following levels of authorization:

Authorization Levels

\$0 - \$5,000 Director of Operations
\$0 - \$15,000 Executive Director
Over \$15,000 Board of Trustees

Automatic Recurring Payment: Bills for certain goods and services furnished on a regular or continual basis will be automatically paid by the School. These include items specified in advance by contract and items, such as telephone and electric service, and other types of goods and services where non-payment or delayed payment may disrupt the operation of the school.

The Executive Director will work with the Director of Operations to identify and confirm which services will receive automatic payment. The Executive Director must be aware of all goods and services that will be

automatically paid. Any automatic recurring payments will be set up using the Recurring Payment Request form, found in the attached Appendices.

Copies of invoices for all automatic payments will be forwarded to the Director of Operations for review no later than one week before the payment due date. The Director of Operations must review these invoices for erroneous, excessive or unexplained charges, and work with the School's financial consultant, and the vendor to resolve any issues. If certain goods or services are being paid automatically and the School is to no longer receive them, then the Director of Operations must confirm cancellation of the automatic payment.

PER PUPIL ENROLLMENT BILLING

Per Pupil Enrollment Billing at the School will follow the standard billing process for other NYC public schools.

There are six bi-monthly invoices submitted for each fiscal year and one reconciliation:

- Generally, billing is submitted in the following months: May (projection), July (projection), September, November, January, and March, with Reconciliation being submitted in July of the subsequent new fiscal year.
- Six bi-monthly payments follow the invoices by the first of the next month. NYC's portal titles invoices based on the payment date, not the due date.
- On or before the last day of July, enrollment reconciliation must be submitted to adjust for any enrollment changes that took place between April and June. Any payment adjustments will generally be reflected in the November payment.

Invoicing/Reporting

- Funding is based on student Full Time Equivalency (FTE), or the amount of *time* the student is enrolled.
- FTE is the decimal expression of the length of a student's enrollment in the school compared to the length of the annual school session. A student who is enrolled for the full school year has an FTE of 1.000, while a student who is only enrolled for half of the school year may have an FTE of 0.500. The length of the school year and each student's period of enrollment are measured in weeks for this purpose. The same FTE calculations apply to the amount of time students receive IEP-mandated services.
- Enrollment invoices for NYC-resident students are now submitted through NYC's Vendor Portal (https://vendorportal.nycenet.edu/vendorportal/Login.aspx), which automatically calculates students' FTE's based on their enrollment dates.
- Enrollment invoices for students who reside outside of NYC should be sent to their district of residence. Their FTE's may be calculated in the NYSED FTE calculator (https://stateaid.nysed.gov/ftecalc/calcfte.htm). The start and end dates for the year and the student's individual enrollment dates will be necessary to calculate this.

NYC Vendor Portal Instructions:

- Calendar dates have to be added each year in order to calculate FTE for each student's period of attendance. Once logged into the portal, select 'Charter School' under 'Other App,' 'Miscellaneous,' then select the 'Calendar Management' from the dropdown menu. Select the current fiscal year, then enter start and end dates. Remember to update the end date during the year if it changes.
- Enter the current number of ELL students by grade, also under 'Miscellaneous,' then select 'ELL Report Count' from the dropdown menu. Select the current fiscal year then payment cycle. This will need to be updated during each invoice period before you can create an invoice.
- Under 'Invoicing,' select 'Create New Invoice' and enter the current fiscal year and payment cycle.
- For Gen Ed enrollment, work with the Office Manager to ensure that all students who have been enrolled during the current year are accurately reflected. Be sure to verify the following:

- o Compare data in the portal with school records to verify that all admission and discharge dates are accurate (make sure to sort and use the navigation buttons to view all student records, or export data to excel for easier viewing).
- o All students who appear on enrollment reports but did not physically attend during the current school year should be marked as "Never Attended." This will change their FTE to 0.
- o Any students recently enrolled may need to be manually entered if they were not included in the most recent ATS import. You will need to enter the following:
 - Full Name
 - Birthdate
 - Grade
 - OSIS #
 - Admit & Discharge Dates
- o If your school's year began before NYC public school's year began, you may need to manually update dates to reflect when students actually first attended or left the school.
- o "As per School: Discharge" dates often need to be revised, as they do not always match the "As per ATS: Discharge" dates.
- o Make sure there are no duplicates in the system. These occasionally show up with a red "X" next to the FTE. Click an "X" to remove the extra enrollment dates, or revise one set of dates if the student was discharged and readmitted. The same set of dates often shows up twice, rather than as two distinct sets of enrollment dates.
- o Crosscheck to make sure all students in the portal have attended this school year. Occasionally students who were discharged in years prior will still show up. Students who previously had 2 OSIS ID's that were later merged may also show up again under their old ID.
- o Any student who resides outside NYC should be marked "Never Attended" in the portal, and the invoice for that student's FTE reimbursement should be sent to their local school district, per the instructions below under "After Invoice Completion."
- Once all general education student (Gen Ed) info is complete, click "Proceed to Sp Ed."
- For special education services, work with the Dean of Specialized Instruction and/or special education teacher(s) to ensure that all students who have received special education services during the current year are accurately reflected and invoiced. Be sure to verify the following:
 - o For any student who does not show up on the Sp Ed page, go back to the Gen Ed page and edit their entry to check-off "Sp Ed."
 - Enter all services that are currently received according to the student's IEP. Select the service (e.g., Collaborative Team Teaching, Speech Individual, etc.), and then check-off whether the service is provided by a School employee or an external agency or consultant paid by the School. Leave blank for services provided by district staff.
 - o Enter the frequency (number of times per week), duration (number of minutes), group size, and start and end dates for each service).
 - o Select each student's "Sp Ed Category" and enter the "Category Start Date" and "Category End Date" in order to calculate the student's special education FTE. Only include services provided by the school in your calculation of Sp Ed category (e.g., if a student has a full time paraprofessional provided by NYCDOE but no services provided by the school, they would be in the "<20%" category, meaning they receive services less than 20% of the day per their IEP). Follow NYSED guidelines
 - (<u>http://www.oms.nysed.gov/stac/schoolage/policy/school-age_reporting.html</u>) to determine the number of minutes services are provided in each category based on students' grade levels.
 - o If a student's category changes during the year, as a result of IEP changes, make sure this is reflected in both the service details and the category details noted for the student on the invoice. Update the end date for any old service and category, and add rows for any new service and category start date.

- o Notify the Director of Teaching and Learning or their designee of any student who automatically shows up with special education data on the invoice and is not on the Director of Teaching and Learning or their designee's list of students who have IEPs. Students may show up in error for various reasons, but occasionally students have valid IEPs that the Director of Teaching and Learning or their designee is not aware of.
- Make sure that the school has records that can be used as backup for all manually entered data. The NYC DOE periodically cross-references data with the source systems (ATS and CAP/SESIS) and asks for backup for conflicting information. Schools can be denied payment for student information not found in the system(s) if backup cannot be provided.
- If you are submitting a projection invoice, you will only need to enter the number of anticipated students in each grade, and in each category of service for special education services.
 - o General enrollment projections should be aligned with your charter's enrollment plan as approved by your authorizer. If preliminary registration data are trending higher or lower than the approved enrollment plan, discuss whether the targeted enrollment can be met or whether a revision should be considered.
- Once the Gen Ed and Sp Ed data are complete and verified, continue by clicking "Next" and then clicking "Proceed to Summary." Next enter the submitter's name and title, and certify the invoice to submit for payment.

After Invoice Completion

- Save and file the final summary, specifying the payment amount and Gen Ed and Sp Ed details as backup. Auditors may request this data.
- Send the final summary page to the Executive Director and to the School's accounts receivable staff or provider.
- If you have students who live outside NYC that are marked as never attended on the School's invoice, contact their District of residence to determine who should receive their FTE report and copy the Executive Director on all correspondence by the School and responses to it by the District of residence.
- If the School's invoice includes a student who is not a resident of NYC who receives special education services, you must also include a list of those services in the School's invoice to the student's District of residence. Be sure to indicate whether the service is provided by the School or the District.
 - o Send copies of any non-NYC invoices to the School's School's accounts receivable staff or provider, so they can follow up with an invoice that includes the amount due.
 - o If the districts respond that they are unfamiliar with Charter School Funding and their obligations around tuition, you may refer them to the New York State Laws and Regulations, specifically Section 119.1, on the Financing of Charter Schools http://www.p12.nysed.gov/psc/section119.html.

Procedures For Contributions and Grants

All contributions and grants received by the School will be recorded in accordance with GAAP and all expenditures are reviewed for grant and restricted contribution applicability. If it is determined that an expense is applicable, then the expense is tagged in the School's accounting system against the specific grant or restricted contribution. Periodic financial statements are reviewed by the Executive Director and the School's financial service provider to determine if the School is in compliance with the spending requirements of any grants or restricted contribution.

Maintaining Documentation: Any and all award letters or grant documents and budgets are kept by the School in accordance with the School's Record Retention Policy. Any expenses related to restricted contributions and grants are copied and kept alongside the documents referenced above.

Cash Donations: As soon as a cash donation is made to the school, the funds are immediately deposited in the School's bank account and a Contribution Receipt is generated by the School to be sent to the donor along with a letter of acknowledgement and thanks from the Executive Director and, if appropriate, the Board or any other party involved with the sourcing of the donation.

Donated Securities: Any securities donated to the School will be delivered to the School's custodial investment account and handled according to the direction of the School's board or investment committee.

Once a donation of security has been delivered and received, the School will send a letter of acknowledgement and thanks, as specified under Cash Donations above, to the donor. This letter should acknowledge the gift of the security and identify it by name and quantity, if appropriate, but not establish or make reference to its value. For example, in the instance of a donation of equity securities, the name of the stock and the number of shares donated would be included in the letter, but the letter would not include or make reference to their value. The donor should have a record of the transaction from his or her broker which will serve as the basis of the donor's valuation.

The security becomes an asset of the School once it is transferred to and received by the School's securities custodian, which may or may not coincide with the time—and value—when it is subsequently sold by the School. In accordance with generally accepted accounting principles (GAAP) and IRS guidelines, once the School receives the security, it records it as a contribution at fair value as of the date it is received.

If a donor would like to use stock to pay a pledge, the School will reduce the balance of the corresponding pledge receivable by the fair value of the security on the date it is received per GAAP and IRS guidelines. If the fair value of the security upon receipt of the contribution is greater than the pledge receivable balance, the School will record a contribution for the difference.

If the School elects to sell the security, any difference between the proceeds resulting from its sale and its fair value recorded on the date it was received by the School's custodian will be recorded as a realized gain or loss on the School's books. If the School incurs any fee related to the selling of the security, that amount should be recorded as an investment fee expense.

Donated Goods and Services: Any donated goods or services to the School will be evaluated and recorded at Fair Market Value, as determined and documented by appropriate means according to GAAP and IRS guidelines.

Procedures For Title I, Title IIA and Title III-ELL Grants

Title I Grant: This annual grant is available to K-12 public schools to provide academic intervention services to students identified as being in the greatest academic need. Application for Title I grant funds is done through an annual* application submitted to the New York State Education Department (SED). The amount of the school's annual grant allocation is released by SED each year in June as a Preliminary Allocation and is subject to change in January, based on the School's actual number of enrolled students reporting to SED in November.

Title IIA Grant: This annual grant is available to K-12 public schools to support professional development activities for teachers, principals and other school leaders; recruitment and retention of teachers, principals and other school leaders; and support of Title I activities. Application for Title IIA grant funds is done through an annual* application submitted to SED. The amount of the school's annual grant allocation, released by SED in June each year, will not change during the school year.

Title III-ELL Grant: This annual grant is available to K-12 public schools to support the academic needs of the school's English Language Learners. Application for Title III-ELL grant funds is done through an annual*

application submitted to SED. The amount of the school's annual grant allocation, released by SED in July each year, is based on the number of ELL students that the school reported to SED in the previous school year; however, the amount of the allocation will not change during the subsequent school year. Schools receiving \$10,000 or more as an annual allocation are eligible to apply directly to SED to receive these grant funds. Schools receiving less than a \$10,000 annual allocation are not eligible to apply but may transfer their allocation to a regional organization that provides professional development services related to instruction of ELL students to the school's staff.

* Note: The Fiscal Year for all three Title grants is always September 1 to August 31, and the LEA Application for ESSA-Funded Programs required to apply for these grants must be submitted annually to SED by August 31st.

Grant Budgets – FS10

The initial FS10 grant budgets must be submitted to SED by August 31, along with the annual LEA Application for ESSA-Funded Programs. Staff completing the submission on behalf of the school should be mindful of the following:

- **FS10 Budgets** the SED prefers that FS10's be submitted in Excel format.
- After completing the FS10, hard copies must be printed in portrait format for signing *SED will not accept fiscal documents in landscape format*.
- Each FS10 must be signed by the Executive Director or another properly authorized designee of the School.
 - o Only original signatures, executed in blue ink, are acceptable to SED no signature stamps.
- 1 signed original + 2 copies of the signed original must be sent to

Grants Management

New York State Education Department

EBA-481

89 Washington Avenue

Albany, NY 12234

- 1 copy of the signed original must be kept on file at the school in its Title Grants Compliance Binder.
- FS10s must be accompanied by a Budget Narrative in Word format.

Grant Payments – FS25

20% Initial Payment: Upon SED's approval of a Title grant budget, the State will automatically make a 20% initial electronic payment of the approved grant award to the school.

Additional Payments – FS25: Once a school receives its initial payment – *normally in October/November*, it may request subsequent payments by submitting FS25 Request for Funds reports to the SED during the grant period. This will allow the school to be reimbursed for any expenditure that exceeds the first payment, as well as for expenditures the School expects to incur the next month.

- FS25 Request for Funds the SED prefers that FS25's be submitted in Excel format.
- After completing the FS25, hard copies must be printed in portrait format for signing SED will not accept fiscal documents in landscape format.
- Each FS25 must be signed by the Executive Director or another properly authorized designee of the School.
 - o Only original signatures, executed in **blue ink**, are acceptable to SED no signature stamps.
- 1 signed original must be sent to

Grants Finance

New York State Education Department

EB-510W

89 Washington Avenue

Albany, NY 12234

• 1 copy of the signed original must be kept on file at the school in its Title Grants Compliance Binder.

Changes to Grant Budgets – FS10A

If the School wishes to make a change in how it is using its Title grant funds **and/or** to add to or decrease from the approved budget amount, an official request must be made to the appropriate SED Program Office using an FS10A Budget Amendment and an accompanying Amended Budget Narrative. SED program offices want to receive, review and approve proposed budget changes before any changes are implemented by a school.

Legally, if a school implements a change before SED approves the change, the school is liable for any costs incurred if SED subsequently disapproves the change. However, if a school forgets to submit an amendment in a timely manner, they can still submit an amendment no later than June 1st if they want to have it considered by SED. SED program office staff want budget amendments processed before the end of the school year.

- FS10A Budget Amendments the SED prefers that FS10A's be submitted in Excel format.
- After completing the FS10A, hard copies must be printed in portrait format for signing SED will not accept fiscal documents in landscape format.
- Each FS10A must be signed by the Executive Director or another properly authorized designee of the School.
 - o Only original signatures, signed in blue ink, are acceptable to SED no signature stamps.
- 1 signed original + 2 copies of the signed original must be sent to:

Grants Management

New York State Education Department

EBA-481

89 Washington Avenue

Albany, NY 12234

- 1 copy of the signed original must be kept on file at the school in its Title Grants Compliance Binder.
- FS10As must be accompanied by an Amended Budget Narrative in Word format.

Completion of Grant – FS10F

Upon completion of the grant period (August 31st), or if grant funds have been fully expended prior to end of grant period, an FS10F Final Expenditure Report must be submitted to the SED for each Title grant for which the school received funds – but no later than November 30th.

- FS10F Final Expenditure Report (long form) –SED prefers that FS10F's be submitted in Excel format.
- After completing the FS10F, hard copies must be printed in portrait format for signing SED will not accept fiscal documents in a landscape format.
- Each FS10F must be signed by the Executive Director or another properly authorized designee of the School.
 - o Only original signatures, signed in blue ink, are acceptable to SED no signature stamps.
- 1 signed original + 1 copy of the signed original must be sent to

Grants Finance

New York State Education Department

EB-510W

89 Washington Avenue

Albany, NY 12234

• 1 copy of the signed original must be kept on file at the school in its Title Grants Compliance Binder.

FS10, FS25, FS10A, and FS10F fiscal documents: The most current Excel fiscal documents can be found at the following SED website: http://www.oms.nysed.gov/cafe/forms/

Payroll Certification Form – Grant Funded Employees

Every school employee, funded partially or in whole by Title grants, is required to sign a **Payroll Certification Form** verifying that they are aware of the federal program supporting their salary and aware of their responsibilities under the program.

- Employees that are 100% supported by federal funds must sign their Form in December and June.
- Employees that are less than 100% supported by federal funds must sign their Form each month in which they provided services or support to Title I students.

This requirement includes both full and part-time staff supported by a Title grant during the <u>regular school day</u>, Before-School Program, After-School Program, Saturday Program, and Summer School Program.

Unless the School's Board of Trustees decides otherwise, the School's administration will obtain the required signatures and maintain the Forms on which they are executed on site with other official fiscal documents. These Forms will need to be made available to State monitors and auditors when requested by them.

At the end of school year, the School will transfer all of the signed Payroll Certification Forms to the **Title Grants Compliance Binder.**

Use of Title Funded Equipment and Supplies & Materials

Any items acquired by a school with Title I grant funds are intended for the primary use of Title I students and remain property of NYSED. While these items are in the school's possession, Title I students have priority use of them. Other students in the school *may* have limited access to them – but only if they are not needed by a Title I student

Equipment items acquired with Title I grant funds, such as desktop computers, laptop computers, iPads, Chromebooks, computer charging carts, and printers are technically considered Supplies & Materials because they normally have a unit cost less than \$5,000.

However, it is recommended that schools individually label each equipment item and take inventory of them at least once a year. The annual inventory record should be filed in **Title Grants Compliance Binder.** The label must include the following:

Property of Title I SED Project #0021-16-4000*

*The SED Project # above is simply an example – each school has its own specific project number that must be used.

Include the name of the school on the label, mindful that:

- The school is essentially the caretaker of the equipment and its ownership remains with the NYSED.
- If the school wishes to dispose of, trade-in or sell the equipment, it must notify the NYSED Title I
 Office.

Title I School and Community Services New York State Education Department EB-320 89 Washington Avenue Albany, NY 12234

ACCOUNTS RECEIVABLE

District, State and Federal Revenues: Bridge Prep is responsible for collecting money from district, state or federal resources, and will directly or through any business services provider it has engaged, undertake appropriate follow up if any of these funds are outstanding. This may include sending out a Current Balance Due notification to any school district, state government or other entity owing money to the school.

For all balances past due 60 days, or for balances greater than \$10,000 that are more than 30 days past due, the School will regularly contact the entity or person owing money to inquire why payment has not been made. All follow up billing notices will contain the Current Balance Due, corresponding to the report as well as a Past Due Balance form (e.g., bi-monthly NYCRR Section 119 Enrollment Report/Billing Document for Charter Schools). Agencies with unusual or ongoing payment problems will require escalated follow-up.

BUDGETING

Developing the budget: Bridge Prep's budgets are developed annually based on input from the Executive Director, the Board of Trustees, any financial services provider or advisor it may engage, and other sources to support the School's medium and long-term financial planning process.

Bridge Prep's fiscal year runs from July 1 to June 30. Budgets for the upcoming fiscal year must be approved by the Board of Trustees and submitted to the school's chartering entity by June 30th. The schedule below is based on that deadline:

- **December 15 January 31:** The Executive Director reviews monthly financial reports to assess/anticipate budget amounts in each accounting code for the upcoming year. These amounts are based on a rough estimate of personnel and goods and services required to meet the developing needs of the school. Line-by-line analysis of the General Ledger and Purchase Orders and detailed review of non-personnel accounts, such as Texts and Materials, Classroom Supplies, Office Supplies, and Operational Supplies, will provide information on reasonable budgeted amounts.
- **February 1 28:** The Executive Director meets with members of the School's Leadership Team, such as the Director of Operations and Director of Teaching and Learning, to assess budgetary needs for the upcoming fiscal year. In particular, personnel needs should be identified and priced out.
- **March 1 15:** The Executive Director works with the School's financial leadership team, including any outside business service provider, and other members of the School's Leadership Team (at the discretion of the Executive Director) to develop a Framework Budget.
- **March 15 31:** The Executive Director and other members of the School's leadership team and advisors will refine and revise the Framework Budget and agree upon a Draft Budget.
- **April 30:** The Executive Director signs off on the approved staffing plan, including headcount and salaries reviewed with other members of the School's Leadership Team, and integrates it into the Draft Budget to formulate the proposed Comprehensive School Budget.
- **May 1:** The Executive Director submits the proposed Comprehensive School Budget to the Board of Trustees' Finance Committee for feedback.
- **May 1 30:** The Executive Directors revises the proposed Comprehensive School Budget based on feedback from the Board of Trustees and resubmits it to the Board of Trustees' Finance Committee.
- **June 1 10:** The Board of Trustees reviews and approves the Final Budget.

June 30: The Executive director submits the approved Final Budget to the School's authorizer.

INVENTORY: FIXED ASSETS

Bridge Prep must maintain an ongoing inventory of its fixed assets and curricular materials. This ensures that the School has all the resources needed to support its educational mission and operational needs. As the School acquires and replaces items, the inventory must be updated. At a minimum, a physical count of all items must be made annually to confirm that the inventory is consistent with the School's property. Additional counts of certain assets may be required more frequently.

Fixed Assets: Fixed assets are durable goods whose purchases cost \$1,000 or more, such as cafeteria tables, the Executive Director's desk, a refrigerator or computers. These assets will be depreciated on a monthly basis, and the identification and classification of all fixed assets will be maintained by the School's technology team or services provider.

All fixed assets purchased at the School must first be tagged or identified in accounting records by a control number. The Director of Operations or his/her designee, e.g., a technology staff member or consultant, will issue pre-numbered tags for computers and equipment. All tag numbers must be accounted for, as they identify the assets that belong to the School. Tags must identify the name of the school and must be affixed to the item permanently.

School assets are not loaned out. If the Executive Director should authorize a loan, the borrower and the Office Manager will sign a document attesting to the loan and subsequent return of the item. This document will include the date the item is loaned, the date of its expected return, the accounting control number per the item's asset identification tag, and the purpose of the loan. The Director of Operations or his/her designee is responsible for confirming and logging the return and check-in of loaned equipment or follow-up on any outstanding loan.

Inventory Procedure: Schools must conduct an inventory annually of all current fixed assets. It is recommended that inventory is taken during the spring-recess, so needs for the School can be assessed and budgeted and orders for the following year can be placed—typically in early to mid-May. The inventory should be maintained in a Spreadsheet Record that includes

- The serial number on the tag that is permanently attached to the asset;
- A description of the asset;
- The location of the asset;
- The date the asset was received at the site;
- The value of the asset from the purchasing records;
- The date any improvement or additions were made and a description of those changes;
- The cost of any improvements or additions;
- The date the asset was retired from service, and what type or retirement;
- The date the asset was loaned, if applicable; and
- The date it was returned or is expected to be returned, if it was loaned.

The physical count is reported to the Director of Operations and the School's technology services team, who will reconcile the physical count against the record of fixed assets on the School's balance sheet. The Director of Operations or his/her designee must also conduct a physical count of all technology equipment and indicate whether it is working properly.

Any change in status of an asset, such as damage, location changes, or removal of the asset from the location for any reason must be recorded on inventory spreadsheets.

"Sign Out" of Fixed Assets: At the beginning of each year, the Director of Operations or his/her designee will develop and maintain a list of all fixed assets distributed to teachers and other staff members. Teachers and staff sign off on this list, indicating that they take responsibility for those items. At the end of the year, the Director of Operations meets with teachers and staff to inventory the actual items in their classrooms against the beginning of the year list. These inventories should be turned in to the Executive Director so that maintenance or replacement can be planned and the Executive Director can address any unusual level of material loss.

NYSTL, NYSLIBL, NYSSL

Background and General Information: The New York State Textbook Law (NYSTL) provides state funds to facilitate adequate purchase of textbooks for each child. NYSTL funds up to a given amount per year for each student on register at district schools, chartered public schools, and non-public schools. The New York State Library Law (NYSLIBL) provides state funds for the purchase of single copies of books for use in a school library, classroom library or comparable settings. The New York State Software Law (NYSSL) allows for the purchase of software as detailed below.

NYSTL, NYSLIBL and NYSSL can be considered as alternate methods of procurement. In lieu of the school paying for books and software, the School may have the NYC DoE or the student's District of Residence pay. Funds for this are available annually but do not carry over each year. These funds will expire if they are not used.

The New York City deadline to request orders using these funds usually falls at the end of April; funds should be used as needed throughout the year. This is especially applicable to materials, such as Direct Instruction texts and workbooks, as they are used based on the students' needs throughout each school year. Outside New York City the deadline for school districts to receive NYSTL, NUSLIBL and NYSSL requests is June 1. The funding amount for these programs are:

NYSTL: \$61.60 per student
NYSLIBL: \$6.60 per student
NYSSL: \$15.80 Per student

NYSTL Specific Information: Despite the name of the law, the funds are not restricted to only textbooks; a variety of books can be obtained for use within the curriculum. For example, most educators may not first describe works of authentic literature as textbooks; however, thirty copies of works like Charlotte's Web may be obtained under NYSTL funds for classroom reading.

The local school district and New York State may have a list of approved books from which the School can request books for purchase using NYSTL funds. In New York City, the list of approved books is available on CD-ROM from the Board of Education Office of Purchasing Management. It is also available on FAMIS, the computer system that the School uses to request books from the district. To access the FAMIS website, a new user must complete a FAMIS User ID Request by clicking on this link; http://schools.nyc.gov/NR/rdonlyres/E31012F3-3C37-4E9E-98CD-D914663E1921/0/FAMISNewUserIDReq.p df.

NYSLIBL Specific Information: NYSLIBL funds can be used for classroom libraries (e.g., a set of supplemental art books) and for authentic literature for grades K-2, as often only one copy is required for group reading.

NYSLL Specific Information: Schools are able to transfer dollars around. Specifically:

- Textbook and Software funds may be used to purchase Library Books;
- Textbooks and Software funds may also be transferred to each other; and
- Library Books funds may **not** be used to purchase Textbooks or Software.

How to Order and Receive Inventory: Based on the School's current book inventory, items are ordered by placing a request to the local school district for needed items. The same approval levels are required as exist for other, standard methods of Procurement. Employees should use a Requisition Form to specify materials needed.

Received Items: When items are received, all of the outlined receiving procedures apply in regard to receiving requested goods. The Director of Community Development will send the packing slip/receiving document to the School's financial and accounting services team or provider, and these materials will automatically be included as both revenues and expenses.

As mandated by the State, all books purchased with NYSTL funds must be affixed with NYSTL identification. Bridge Prep should purchase a rubber stamp or printed stickers for this purpose. Inventory records for NYSTL materials must be designated as such.

MANAGEMENT REPORTING

All financial reports at the School will be maintained in accordance with GAAP. In order to confirm that management reports accurately reflect the School's finances, all PO, non-cash Revenue Forms, and School-based account activity must be forwarded to the School's financial services team or provider. The School's financial services team or provider will depreciate fixed assets, calculate management fees, book any interest expense and address any other items required to ensure accurate financial statements for the School.

Reviewing Reports: The Executive Director and Director of Operations will assure review of these reports and do the following:

- Provide feedback and substantiation to correct any misallocation for misclassification of items;
- Evaluate levels of spending vs. current budget to estimate future expenditures or request budget amendments (see section Budgeting for more details.);
- Evaluate the necessity of every expenditure and implement procedures to correct for any inappropriate or unnecessary expenditure; and
- Provide feedback for designing the next year's budget and usual actual expenditures as guidelines.

Steps for Evaluating Reports: In order to properly assess reports, the Executive Director and the School's management team will follow these steps:

- Scan report for items that are unusually over or under budget or otherwise might need attention based on related circumstances;
- Look to corresponding categories on the General Ledger Trial Balance for a line-by-line detail of what made up the month's expenses of revenues; and
- Look at the Payroll Report, Purchase Orders, Accounting Department Check Requests Expense Reimbursements and other documents, which provide further detail on the lines for the General Ledger Trial Balance.

If these reports are found to be inaccurate in any respect, the Executive Director will resolve the inaccuracy with the School's financial services provider.

Audits: The financial procedures in this manual are in place to ensure appropriate use of the School's funds. External agencies will request to see documentation of these procedures and policies in connection with an audit.

Annually, the Board contracts an outside agency to conduct an independent audit of Bridge Prep's financials. Bridge Prep is also subject to scheduled and spot or ad-hoc audits by the New York State Education Department, NY State Office of Auditing, Department of Labor, and other government agencies.

*Note: These external auditors require many of the policies, paperwork, and procedures within this manual.

INSURANCE

Bridge Prep Charter School maintains the following insurance policies:

- General Liability
- Employee Benefit Liability
- Hired & Non-Owned Auto
- Sexual Abuse / Molestation
- Educators Legal Liability
- Excess Liability
- Property
- Workers Comp
- Crime / Fiduciary
- Student Accident
- Security Risk Management
- Cyber

Bridge Prep's insurance only covers employee use of non-School owned vehicles for school visits, and meetings, etc. on company business. Use of personal vehicles to transport children is not permitted. Please refer to the school's Employee Handbook for information regarding Disability & Unemployment Insurance and the School's policy on Paid Family Leave.

Copies of Bridge Prep's insurance policies are kept on file and maintained by the School.

Insurance Required for Vendors and Independent Consultants: A copy of the Risk Transfer manual that provides guidance on what the insurance requirements should be for various vendors will be given to the School by its designated Insurance provider.

Any vendor (including an Independent Consultant) doing business on School grounds, e.g., for food service, construction, maintenance etc., or with the School's students, e.g., a bus company, **MUST** carry adequate insurance that satisfies the requirements of the School's insurance providers and must issue a certificate of insurance that names the School and, when requested, any of the School's business and strategic partners or service providers who require to be so named, as Additional Insured.

When negotiating contracts for vendors performing services for the school, requirements for indemnification should be a part of each agreement. Based on guidance from Bridge Prep's insurance provider, when negotiating contracts and requesting Certificates of Insurance, a subcontractor must provide Bridge Prep with a Certificate of Insurance, the coverage and the following minimum limits:

- Worker's Compensation: Statutory, including Employers Liability with a minimum limit of:
 - o \$500,000 Single Limit preferably \$1,000,000
- Commercial General Liability (occurrence form), (including Completed Operations, Broad Form Property Damage and Contractual Liability for the Indemnification Agreement included in this Agreement):
 - o General Aggregate Limit: \$2,000,000
 - o (Other than Products Completed Operations)
 - o Products Completed Operations Aggregate Limit: \$2,000,000
 - o Personal & Advertising Injury Limit: \$1,000,000
 - o Each Occurrence Limit: \$1,000,000
- Comprehensive Automobile Liability (include Owned, non-owned and hired autos):
 - o 1,000,000.00......Combined Single Limit
- All policies shall be issued by responsible insurance companies licensed to do business in the state in which the Project is located that have a rating of "A-" or better by A.M. Best Company and shall

provide that the policies will not be canceled or modified without at least thirty (30) days' prior written notice to Bridge Prep.

- o All policies required to be carried by hereunder will name the school, its officers, employees, agents and volunteers to be covered as Additional Insured and be primary and noncontributory.
- o Commercial General Liability (occurrence form) coverage to include: Premises and Operations Coverage, Contractual Liability, Product/Completed Operations Coverage, and Broad Form Comprehensive General Liability Endorsement.
- o Worker's Compensation Insurance shall contain a waiver of subrogation clause for the benefit of the School.
- **Umbrella limits** with a **minimum** of \$1 million or more depending on the requirements of the contract in place with Bridge Prep.
 - o Charter Bus companies should carry at least \$5 million. Umbrella, \$2 million primary bodily injury, 30 day notice. The school must be named as Additional Insured, Indemnity and hold harmless.
- For **professional services** (a.k.a. Errors & Omissions) such as architects, engineers and consultants \$1,000,000 per occurrence/claim. 30-day notice of intent to cancel, non-renew or make material changes to coverage. Indemnity & hold harmless. Additional Insured not required.
- Medical Services (physicians, dentists, psychologists etc.) Medical malpractice \$1,000,000 per occurrence/claim. 30-day notice of intent to cancel, non-renew or make material changes to coverage. Indemnity & hold harmless. Additional Insured not required.
- **Sexual Abuse or Molestation** \$1,000,000 per occurrence/claim. Contractor's insurance to be primary and noncontributory and school's insurance shall not contribute to loss costs. Indemnity & hold harmless for any contractor with potential to harm. Bridge Prep must be named as an Additional Insured.
- Cyber Liability \$1,000,000 limit per occurrence/claim for entities with access to Personal Identifiable Information (PII) with 3rd party liability coverage. Bridge Prep must be named as Additional Insured.

*Note: The coverage shown on the certificate provided is not the school's insurance coverage.

GENERAL PAYROLL PROCEDURE

Bridge Prep processes payroll on a bi-weekly basis (1 week arrears for all employees) over 26 pay periods each calendar year, and the School's fiscal year calendar is from July 1 through June 30. The School employs year-round administrative staff, who typically start the year on July 1 and instructional and operational staff, who typically in mid-August.

Time and Attendance: Bridge Prep tracks staff records via a system that manages time records by having staff login via an electronic clock. In addition, the School tracks time off requests as well as stipends and supplemental wages via the school's HR services partner time & labor portal. All records are reviewed and corrected (if necessary) prior to payroll processing.

Payroll: The payroll process begins with the approval of time records and migration of data from the time & attendance system to the payroll portal. Bridge Prep processes payroll via the system of the school's payroll partner.

Administrative approval of time records for all hourly employees is performed on Monday of the week following the conclusion of the pay period that has passed, since payroll for all hourly employees is processed with 1-week arrears. For all employees, with the approval and confirmation by the employee's Supervisor that all punches have been corrected, all time off requests approved, and additional stipends added, the records are passed over into the payroll platform/batch.

The Director of Operations generates the payroll batch with merged time records for the Executive Director to review, edit and approve. Bridge Prep reviews all pertinent information in the payroll batch, up to and including all merged time records as well as any recurring earnings, benefit deductions and retro calculations. Bridge Prep has the final say on all payroll records before payroll is processed.

Upon approval of the payroll batch, the school's payroll partner generates a preprocessing report for Bridge Prep to review and approve. It is best practice for Bridge Prep to review and compare the data with the prior processed payroll. Common areas for review include ensuring that existing staff receive all pay accordingly, that terminated employees are either removed or are receiving their final pay, and that new hires are receiving pay based on their hire date. Once the pre-process report is approved, Bridge Prep completes another audit of the batch to catch any errors or erroneous payments before submission of payroll.

Once payroll has been approved and submitted by Bridge Prep to the school's payroll partner, several audit steps are completed by the school's payroll partner, including but not limited to verification of payroll package delivery, confirmation that all benefit files have been processed on the check date (e.g., retirement and commuter benefits), and confirmation that no active employee remains unpaid unless on leave or not due pay.

AFTER-SCHOOL and SUMMER SCHOOL

After school and summer school programs generally fall into two categories: Those run by the school and those run by outside agencies. Bridge Prep may not charge money for any programs run at the school. However, an outside agency may charge money for any programs that are run on the school's property.

Budget: The Executive Director must approve the budget for after-school, which is part of the overall After-school/Summer-school plan and is included in the school's overall budget each fiscal year. It is designed using the Chart of Accounts for the school and includes:

- Personnel;
- Payroll Taxes;
- Classroom Supplies;
- Office Supplies;
- Field trips;
- Transportation;
- Food:
- Government subsidies for food; and
- Texts and materials.

Payroll: The name of the employee who will be doing payroll, must be communicated to the Payroll Department in advance and that person must be named in the overall After/Summer-School Plan. The payroll schedule will be the same as the regular biweekly payroll schedule.

Insurance: Bridge Prep's insurance will cover any after-school and summer-school program run by the school as long as the program is conducted during normal school hours, on school-insured premises by school employees. Any extra-curricular activity or activity conducted off school premises require special insurance, including coverage from any community partner or vendor involved in the activity. Before signing any agreement or planning any extra-curricular activity, the Executive Director should discuss the activity with the School's insurance provider.

Government Subsidies for Meals: Bridge Prep follows normal reporting procedures to the State and local school district for government subsidized food. Bridge Prep will record and report all reimbursement, so it can be properly accounted for in the After/Summer-School financial reports.

Outside Agency-run Programs: If an outside agency becomes involved with Bridge Prep's After- or Summer-school programs, the school must sign a Memorandum Of Understanding (M.O.U.) with the outside agency. The M.O.U. is subject to the approval process for contracts described earlier in this manual and must address the following:

- Budget;
- Payroll;
- Use of Premises;
- Procurement;
- Money received; and
- Insurance.

The outside agency must carry adequate insurance that satisfies the requirements of the School's insurance providers and must name Bridge Prep as Additional Insured's on its insurance policy. Bridge Prep must notify its insurance providers of any such associations. The outside agency must provide Bridge Prep with all necessary and proper documentation, which will be provided to the School's insurance providers.

Bridge Prep may or may not be eligible for government subsidies on meals. The NYSED Child Nutrition Office can be consulted for questioning. Any Management Reports should come from the agency running the program and be copied to the Regional Director.

Education Department General Administrative Regulations (EDGAR)

EDGAR is formerly known as the "Uniform Grants Guidance", the "Omni Circular" and the "Super Circular."

The New 2 CFR Part 200

Financial Management Rules 200.302: Under the new Edgar rules the following were added:

- a. Identification of Awards (New)
 - All Federal awards received and expended must include the following information:
 - The name of the federal award
 - THE CFDA title and number
 - The Federal award Identification number and the year
 - Federal Agency
 - Pass-Through
- **b.** *Financial Reporting:* Per the Federal Register (OMB) volume 78, accurate, current, complete disclosure of financial results of each Federal award or program in accordance with the reporting requirement set forth in 200.307 financial reporting and 200.328 monitoring and reporting program performances.
- c. Accounting Records: A source document must be kept on accounting records that identify adequately the source and application of funds for federally-funded activities. These records must contain information pertaining to
 - Federal Awards
 - Authorization
 - Obligations
 - Unobligated Balance
 - Assets
 - Expenditures
 - Income
 - Interest

- d. Internal Control: 200.61 Internal control means a process, implemented by a non-Federal entity, designed to provide reasonable assurance regarding the achievement of objectives in the following categories:
 - a) Effectiveness and efficiency of operations;
 - b) Reliability of reporting for internal and external use and;
 - c) (c) Compliance with applicable laws and regulations.
 - **200.62 Internal control over compliance requirement for Federal Awards** means a process implemented by a non-Federal entity designed to provide reasonable assurance regarding the achievement of the following objectives for Federal awards:
 - a) Transactions are properly recorded and accounted for.
 - b) Transactions are executed in compliance with the Federal statutes, regulations and terms and conditions of the federal award that could have a direct and material effect on a Federal program; and with any other Federal statutes and regulations that are identified in the compliance supplement.
- e. Budget Control: Each State must expend and account for Federal awards in accordance with state laws and procedures for expending and accounting for the state's own funds.
- **f.** Witten Cash Management Procedures (New): The following written procedures are needed to implement the requirements of 200.305 payment
 - a) For States, payments are governed by treasury –State CMIA agreements and default procedures codified at 31 CFR 205
 - b) For non-Federal entities other than States, payment methods must minimize the time elapsing between the transfer of funds from the United States Treasury or the pass-through entity and the disbursement by the non-Federal entity, whether the payment is made by electronic fund transfer or issuance or redemption of checks, warrants, or other means.
 - 1. The non-Federal entity must be paid in advance, provided it maintains or demonstrates the willingness to maintain both written procedures that minimize the time elapsing between the transfer of funds and disbursement by the non-Federal entity, and financial management systems that meet the standards for fund control and accountability as established in this Part. Advance payments to a non-Federal entity must be limited to the minimum amounts needed and be timed to be in accordance with the actual, immediate cash requirements of the non-Federal entity in carrying out the purpose of the approved program or project. The timing and amount of advance payments must be as close as is administratively feasible to the actual disbursements by the non-Federal entity for direct program or project costs and the proportionate share of any allowable indirect costs. The non-Federal entity must make timely payment to contractors in accordance with the contract provisions.
 - 2. Whenever possible, advance payments must be consolidated to cover anticipated cash needs for all Federal awards made by the Federal awarding agency to the recipient.
 - 2.1. Advance payment mechanisms include, but are not limited to, Treasury check and electronic funds transfer and should comply with applicable guidance in 31 CFR Part 208
 - 2.2. Non-Federal entities must be authorized to submit requests for advance payments and reimbursements at least monthly when electronic fund transfers are not used, and as often as they like when electronic transfers are used, in accordance with the provisions of the Electronic Fund Transfer Act (15 U.S.C 1601)
 - 3. Reimbursement is the preferred method when the requirements in paragraph (b) cannot be met; when the Federal awarding agency sets a specific condition per § 200.207 Specific conditions; or when the non-Federal entity requests payment by reimbursement. This method may be used on any Federal award for construction, or if the major portion of the

- construction project is accomplished through private market financing or Federal loans, and the Federal award constitutes a minor portion of the project. When the reimbursement method is used, the Federal awarding agency or pass-through entity must make payment within 30 calendar days after receipt of the billing, unless the Federal awarding agency or pass-through entity reasonably believes the request to be improper.
- 4. If the non-Federal entity cannot meet the criteria for advance payments and the Federal awarding agency or pass-through entity has determined that reimbursement is not feasible because the non-Federal entity lacks sufficient working capital, the Federal awarding agency or pass-through entity may provide cash on a working capital advance basis. Under this procedure, the Federal awarding agency or pass-through entity must advance cash payments to the non-Federal entity to cover its estimated disbursement needs for an initial period generally geared to the non-Federal entity's disbursing cycle.
- 5. Use of resources before requesting cash advance payments: To the extent available, the non-Federal entity must disburse funds available from program income (including repayments to a revolving fund), rebates, refunds, contract settlements, audit recoveries, and interest earned on such funds before requesting additional cash payments.
- 6. Unless otherwise required by Federal statutes, payments for allowable costs by non-Federal entities must not be withheld at any time during the period of performance unless the conditions of §§ 200.207 Specific conditions, Subpart D—Post Federal Award Requirements of this Part, 200.338 Remedies for Noncompliance apply.
- 7. Standards governing the use of banks and other institutions as depositories of advance payments under Federal awards are as follows.
 - 7.1. The Federal awarding agency and pass-through entity must not require separate depository accounts for funds provided to a non-Federal entity or establish any eligibility requirements for depositories for funds provided to the non-Federal entity. However, the non-Federal entity must be able to account for the receipt, obligation and expenditure of funds.
 - 7.2. Advance payments of Federal funds must be deposited and maintained in insured accounts whenever possible
- 8. The non-Federal entity must maintain advance payments of Federal awards in interest-bearing accounts, unless the following apply.
 - 8.1. The non-Federal entity receives less than \$120,000 in Federal awards per year.
 - 8.2. The best reasonably available interest-bearing account would not be expected to earn interest in excess of \$500 per year on Federal cash balances
 - 8.3. The depository would require an average or minimum balance so high that it would not be feasible within the expected Federal and non-Federal cash resources.
 - 8.4. A foreign government or banking system prohibits or precludes interest bearing accounts
- 9. Interest earned on Federal advance payments deposited in interest-bearing accounts must be remitted annually to the Department of Health and Human Services, Payment Management System, and Rockville, MD 20852. Interest amounts up to \$500 per year may be retained by the non-Federal entity for administrative expenses.

g. Written Allowability Procedures for:

200.203(b)(7): Written procedures for determining the allowability of costs in accordance with Subpart E—Cost Principles of this Part and the terms and conditions of the Federal award. 200.403 Factors affecting allowability of costs. Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under Federal awards:

- 1. Necessary, Reasonable and Allocable
- 2. Conform with federal law & grant terms
- 3. Consistent with state and local policies

- 4. Consistently treated
- 5. In accordance with GAAP
- 6. Not included as match
- 7. Net of applicable credits (moved to 200.406)
- 8. Adequately documented
 - **8.1) 200.335** Methods for Collection, Transmission and Storage of Information encourages non-Federal entities to, whenever practicable, collect, transmit and store Federal award-related information in open and machine-readable formats. When original records are electronic and cannot be altered, there is no need to create and retain paper copies

200.404 Reasonable costs. A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. The question of reasonableness is particularly important when the non-Federal entity is predominantly federally-funded.

200.405 Allocable costs. A cost is allocable to a particular Federal award or other cost objective if the goods or services involved are chargeable or assignable to that Federal award or cost objective in accordance with relative benefits received.

200.406 Applicable credits. Applicable credits refer to those receipts or reduction-of-expenditure-type transactions that offset or reduce expense items allocable to the Federal award as direct or indirect (F&A) costs. Examples of such transactions are purchase discounts, rebates or allowances, recoveries or indemnities on losses, insurance refunds or rebates, and adjustments of overpayments or erroneous charges. To the extent that such credits accruing to or received by the non-Federal entity relate to allowable costs, they must be credited to the Federal award either as a cost reduction or cash refund, as appropriate.

200.413 Direct costs. General Direct costs are those costs that can be identified specifically with a particular final cost objective, such as a Federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. Costs incurred for the same purpose in like circumstances must be treated consistently as either direct or indirect (F&A) costs. (See also § 200.405 Allocable costs.)