



Book Policy Manual
Section 7000 Financial Management

Title Financial Management – Goals
Code 7000
Status Active
Adopted 05/04/2021

White Pine Charter Schools

FINANCIAL MANAGEMENT 7000

Goals

Since educational programs are dependent on adequate funding and the proper management of those funds, the Charter School's goals can best be attained through efficient fiscal management. As the party responsible for local, state, and federal funds allocated for use in public education, the Board shall fulfill its responsibility to see that funds are used to achieve the purposes intended.

Because of resource limitations, fiscal concerns often overshadow the educational program. Recognizing this, the School must take specific action to ensure that education remains primary. This concept shall be incorporated into Board operations and into all aspects of School management and operation.

In the School's fiscal management, the Board seeks to achieve the following goals:

- Engage in advanced planning with staff and community involvement, to develop budgets that will achieve the greatest educational returns in relation to dollars expended;
- Establish levels of funding which shall provide superior education for the School's students;
- Provide timely and appropriate information to staff who have fiscal responsibilities; and
- Establish efficient procedures in all areas of fiscal management.

Legal Reference: I.C. § 33-701 et seq. Fiscal Affairs of School Districts



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Title Budget And Program Planning
Code 7100
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White Pine Charter Schools

FINANCIAL MANAGEMENT 7100

Budget and Program Planning

The annual budget is evidence of the Board's commitment to the objectives of the instruction programs. The budget supports the immediate and long-range goals and established priorities within all areas: instructional, non-instructional, and administrative programs.

Prior to presentation of the proposed budget for adoption, the Executive Director or designee shall prepare, for the Board's consideration, recommendations (with supporting documentation) which shall be designed to meet the needs of students within the limits of anticipated revenues.

Program planning and budget development shall provide for staff participation and the sharing of information with patrons prior to action by the Board.



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White Pine Charter Schools

FINANCIAL MANAGEMENT 7110

Budget Implementation and Execution

Once adopted by the Board, the operating budget shall be administered by the Executive Director and his or her designees. All actions of the Executive Director or designees in executing the programs and/or activities delineated in that budget are authorized according to these provisions:

- Expenditure of funds for the employment and assignment of staff shall meet the legal requirements of the State of Idaho and adopted Board policies;
- Funds held for contingencies may not be expended without approval from the Board;
- A listing of warrants describing goods and/or services for which payment has been made must be presented for Board approval each month; and
- Purchases shall be made according to the legal requirements of the State of Idaho and adopted Board policy.

Legal Reference: I.C. § 33-701 et seq. Fiscal Affairs of School Charter School



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Title Budget Adjustments
Code 7120
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White Pine Charter Schools

Budget Adjustments

Any person(s) proposing a budget amendment must provide written notice of the same [to each Board Member at least seven](#) days in advance of the meeting at which such budget amendment will be proposed.

Prior to the final vote on a budget amendment proposal, notice shall be posted and published once in the manner prescribed by Idaho law. The meeting to adopt a budget amendment shall be open and shall provide opportunity for any taxpayer to appear and be heard. Budget procedures shall be consistent with statutory requirements.

With timely notice of a public meeting, Board Members, by 60 percent of the members of the Board of Directors, may declare by resolution that a budget amendment is necessary to reflect the availability of funds and the requirements of the Charter School. Budget amendments are specifically authorized by I.C. § 33-701.

Budget amendments shall be submitted to the State Superintendent of Public Instruction.

Legal Reference: I.C. § 33-701 Fiscal Year – Payment and Accounting of Funds



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Title Fixed Assets And Management Discussion And Analysis (GASB Statement 34)
Code 7210
Status Active
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White Pine Charter Schools

FINANCIAL MANAGEMENT 7210

Fixed Assets and Management Discussion and Analysis (GASB Statement 34)

Purpose

The Board recognizes the need to implement the required accounting and financial reporting standards set out in Governmental Accounting Standards Board Statement 34 (GASB 34)

The primary objectives of implementing the GASB 34 are to assure compliance with State requirements, to properly account for both the financial and economic resources, and to provide new and additional information to users of Charter School financial statements.

Authority

Participation and reporting shall be in accordance with Board policy, State of Idaho Fiscal Policy manuals as prepared by the office of the State of Idaho Controller's Office, and GASB 34.

Delegation of Responsibility

The responsibility to coordinate the compilation and preparations of all information necessary to implement this policy is delegated to the Executive Director or his or her designee in cooperation with the Charter School accountant.

The designated individual shall be responsible for implementing the necessary procedures to establish and maintain a fixed asset inventory, including depreciation schedules. Depreciation shall be computed on a straight-line basis over the useful lives of the assets, using an averaging convention. Normal maintenance and repairs shall be charged to expense as incurred; major renewals and betterments that materially extend the life or increase the value of the asset shall be capitalized. A schedule of accumulated depreciation shall be consistent from year to year. The basis for depreciation, including groups of assets and useful lives, shall be in writing and submitted for review to the Board of Directors.

The Executive Director or designee, in cooperation with the Charter School s accountant, shall prepare, if required, the Management Discussion and Analysis (MD&A). If required, the MD&A shall be in the form required by GASB Statement 34 and shall be submitted to the Board for approval prior to publication.

Guidelines



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In order to associate debt with acquired assets, and to avoid net asset deficits, any asset that has been acquired with debt proceeds shall be capitalized, regardless of the cost of the asset. Any assets capitalized should be depreciated using their estimated useful life, not their amortization schedule.

For all other assets not acquired by debt proceeds, the dollar value of any single item for inclusion in the fixed assets accounts shall be not less than \$5,000.

The assets listed below do not normally individually meet capitalization threshold criteria:

- Library books;
- Classroom furniture;
- Classroom texts;
- Computer equipment;

These asset category costs shall be capitalized and depreciated as groups when that group's acquisition cost exceeds the capitalization threshold in any given fiscal year.

For group asset depreciation purposes, the estimated useful life of the group may be based on the weighted average or simple average of the useful life of individual items, or on an assessment of the life of the group as a whole. Periodically, the intermediate unit shall review the estimated life of groups of assets and adjust the remaining depreciation life of the group.

Assets that fall below the capitalization threshold for GASB 34 reporting purposes may still be significant for insurance, warranty service, and obsolescence/replacement policy tracking purposes. The intermediate unit may record and maintain these non-GASB 34 asset inventories in subsidiary ledgers.

Legal Reference: Governmental Accounting Standards Board (GASB) Statement No. 34



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Title Fund Accounting System (gasb Statement 54)
Code 7215
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Fund Accounting System (GASB Statement 54)

To enhance the usefulness of fund balance information, the Charter School will provide clear fund balance classifications and use fund type definitions consistently.

The policy is designed to encourage consideration of unanticipated events that could adversely affect the financial condition of the School and jeopardize the continuation of necessary public services. The School should maintain adequate fund balances and reserves in order to:

Provide sufficient cash flow for daily financial needs;

- Secure and maintain investment grade bond ratings; Offset significant economic downturns or revenue shortfalls; and
- Provide funds for unforeseen expenditures related to
- emergencies.

Fund Types

The accounts of the Charter School are organized on the basis of funds, each of which is considered to be a separate accounting entity. The operations of each fund is accounted for by providing a separate set of self-balancing accounts. The following funds are maintained by the School:

- The General Fund is used to account for all financial resources not accounted for and reported in another fund;
- Special Revenue Funds are used to account and report the proceeds of specific revenue sources that are restricted or committed to expenditure for specific purposes other than debt service or capital projects;
- Debt Service Funds are used to account for all financial resources restricted, committed, or assigned to expenditure for principle and interest;
- Capital Projects Funds or Plant Facilities Funds are used to account for all financial resources restricted, committed, or assigned to expenditure for the acquisition or construction of capital assets.
- Permanent Funds are used to account for resources restricted to the extent that only earnings, and not principle, may be used for purposes that support the Charter School s purposes.

Note: The above list is not comprehensive and the Charter School may have other funds such as an Activities Fund.



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Fund Balance Reporting in Governmental Funds

The following definitions will be used in reporting activity in the Charter School's governmental funds. The School may or may not report all fund types in any given reporting period, based on actual circumstances and activity.

- Non-spendable Fund Balance: Includes amounts that cannot be spent because they are either:
 1. Not in spendable form;
 2. or Legally or contractually required to be maintained intact.
- Restricted Fund Balance: Includes amounts that can be spent only for the specific purposes stipulated by Charter School policy, external resource providers, or through federal regulations or State laws or rules.
- Committed Fund Balance: Includes amounts that can be used only for the specific purposes determined by a formal action of the Board.
- Assigned Fund Balance: Includes amounts intended to be used by the School for specific purposes, but do not meet the criteria to be classified as restricted or committed. In funds other than the general fund, the assigned fund balance represents the remaining amount that is not restricted or committed.
- Authority to Assign: The Board delegates to the Executive Director or designee the authority to assign amounts to be used for specific purposes. Such assignments cannot exceed the available (spendable, unrestricted, uncommitted) fund balance in any particular fund.
- Unassigned Fund Balance: Includes the residual classification for the School's general fund and includes all spendable amounts not contained in the other classifications. In other funds, the unassigned classification should be used only to report a deficit balance from overspending for specific purposes for which amounts had been restricted, committed, or assigned.

Prioritization of Fund Balance Use

The Board's primary role in adopting this policy is to identify the order of spending unrestricted resources and to acknowledge that the Board is the ultimate decision-making authority with regard to committing balances upon recommendation of the Executive Director or designee.

If the Board chooses not to adopt a policy addressing the order of spending, the default approach of reducing restricted, then committed, then assigned, then unassigned fund balances will be used.

Guidelines

Classifying Fund Balance Amounts: Fund balance classifications depict the nature of the net resources that are reported in a fund. An individual fund may include non-spendable resources and amounts that are restricted, committed, or assigned, or any combination of those classifications. The general fund may also include an unassigned amount.

Encumbrance Reporting: Encumbering amounts for specific purposes for which resources have already been restricted, committed, or assigned should not result in separate display of encumbered amounts. Encumbered amounts for specific purposes for which amounts have not been previously restricted, committed, or assigned, will be classified as committed or assigned, as appropriate, based on the definitions and criteria set forth above.

Legal Reference: I.C. § 33-701 et seq. Fiscal Affairs of School Charter School Governmental Accounting Standards Board (GASB) Statement No. 54



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Title Federal Grant Financial Management System
Code 7218
Status Active
Adopted 05/04/2021

White Pine Charter Schools

FINANCIAL MANAGEMENT 7218

Federal Grant Financial Management System

White Pine Charter Schools maintain a proper financial management system in order to receive both direct and state-administered grants and to expend funds associated with a grant award. Certain fiscal controls and procedures must be in place to ensure that all financial management system requirements are met.

Idaho Financial Reporting Management System (IFARMS)

IFARMS provides the basis for complete financial and cost accounting, for the development of program budgets, and for the preparation of periodic financial reports. The uniformity of the system enables White Pine Charter Schools to fulfill state requirements and provides the flexibility to obtain program and account detail to meet management needs.

Financial Management Standards

The standards for financial management systems are found at 2 C.F.R. § 200.302. The required standards include:

- Identification: The Charter School shall identify, in its accounts, all federal awards received and expended and the federal programs under which they were received. Federal program and award identification shall include the information described below under Overview of the Financial Management/Accounting System.
- Financial Reporting: Accurate, current, and complete disclosure of the financial results of each federal award or program will be made in accordance with the financial reporting requirements set forth in the Education Department General Administrative Regulations (EDGAR).
- Accounting Records: The Charter School shall maintain records that adequately identify the source and application of funds provided for federally-assisted activities. These records will contain information pertaining to grant or subgrant awards, authorizations, obligations, unobligated balances, assets, expenditures, income and interest, and be supported by source documentation.

Internal Controls: Effective control and accountability shall be maintained for all funds, real and personal property, and other assets. The Charter School shall adequately safeguard all such property and shall assure that it is used solely for authorized purposes.

Internal controls are tools to help program and financial managers achieve results and safeguard the integrity of their program. Internal controls should be designed to provide reasonable assurance that the following objectives are achieved:

- Effectiveness and efficiency of operations;
 - Adequate safeguarding of property;
 - Assurance property and money is spent in accordance with grant program and to further the selected objectives; and
 - Compliance with applicable laws and regulations.
- Budget Control: Actual expenditures or outlays shall be compared with budgeted amounts for each federal award.



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Budget Control: The Chief Financial Officer shall prepare monthly financial reports that monitor budget performance by comparing actual to budgeted revenues and expenditures. Monthly financial reports indicate budgeted amounts, monthly expenditures, year-to-date-expenditures and percentage of budget spent. The Executive Director or designee shall review these reports for the preceding month prior to presentation to the Board.

Accounting Records

The Chief Financial Officer shall be responsible for the maintenance of accounting records. Electronic accounting records are maintained in the Infinite Visions program and paper records are maintained on file in the Charter School office. All accounting records shall be reviewed by the Executive Director or designee and, where appropriate and required, the Board. The School chart of accounts and financial reports shall be established and maintained in accordance with Generally Accepted Accounting Principles (GAAP) and IFARMS, as required by Idaho Code. Accounting records shall be available for public inspection at any time.

Spending Grant Funds

In determining what items will be included in individual program budgets, the Chief Financial Officer and the Executive Director or designee will follow the federal cost principles and individual program statutes and regulations, as the basis for determining whether individual expenditures are allowable.

While developing and reviewing the grant budget, the Charter School will keep in mind the difference between direct costs and indirect costs.

Direct and Indirect Costs

Determining Whether a Cost is Direct or Indirect: 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.

Indirect costs are those that have been incurred for a common or joint purpose benefiting more than one cost objective, and not readily assignable to the cost objectives specifically benefited, without effort disproportionate to the results achieved.

Costs incurred for the same purpose in like circumstances shall be treated consistently as either direct or indirect costs.

Identification with the federal award rather than the nature of the goods and services involved is the determining factor in distinguishing direct from indirect costs of Federal awards. Typical costs charged directly to a Federal award are the compensation of employees who work on that award, their related fringe benefit costs, the costs of materials, and other items of expense incurred for the Federal award.

The salaries of administrative and clerical staff shall normally be treated as indirect costs. Direct charging of these costs may be appropriate only if all of the following conditions are met:

- Administrative or clerical services are integral to a project or activity;
 - Individuals involved can be specifically identified with the project or activity;
 - Such costs are explicitly included in the budget or have the prior written approval of the federal awarding agency; and
- The costs are not also recovered as indirect costs.



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Indirect Cost Rate

It is at the discretion of the White Pine Charter Schools to use the indirect cost rate. It is the normal policy of the School not to take indirect costs on federal awards. If the School elects to take indirect costs, it shall follow the procedures for calculating the indirect cost rate prescribed by the State Department of Education and apply the policies and procedures outlined in the federal regulations as described below.

Applying the Indirect Cost Rate

Once the Charter School has an approved indirect cost rate, the percentage is multiplied against the actual direct costs (excluding distorting items such as equipment, contracts in excess of \$25,000, pass-through funds, etc.) incurred under a particular grant to produce the dollar amount of indirect costs allowable to that award.

Once the School applies the approved rate, the funds that may be claimed for indirect costs have no federal accountability and may be used as if they were non-federal funds. For direct grants, reimbursement of indirect costs is subject to the availability of funds and statutory or administrative restrictions.

Where a federal program has a specific cap on the percentage of administrative costs that may be charged to a grant, that cap must include all direct administrative charges as well as any recovered indirect charges.

Cross Reference:	7230	Financial Reporting and Audits
Legal Reference	2 C.F.R. § 200.300 et seq.	Post Federal Award Requirements
	2 C.F.R. § 200.56	Indirect (Facilities & Administrative (F&A)) Costs
	2 C.F.R. § 200.413	Direct Costs
	34 C.F.R. § 75.564	Reimbursement of Indirect Costs
	34 C.F.R. § 76.569	Using the Restricted Indirect Cost Rate



Book	Policy Manual
Section	7000 Financial Management
Title	Documentation And Approval Of Claims
Coed	7220
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Adopted	05/04/2021

White Pine Charter Schools

FINANCIAL MANAGEMENT 7220

Documentation and Approval of Claims

All financial obligations and disbursements must be documented in compliance with the statutory provisions and audit guidelines. The documentation will specifically describe acquired goods and/or services, the budget appropriations applicable to payment, and the required approvals. All purchases, encumbrances and obligations, and disbursements must be approved by the administrator designated with the authority, responsibility, and control over the budget appropriations. The responsibility for approving these documents should not be delegated.

The Charter School business office will be responsible for the development of the procedures and forms to be used in the requisition, purchase, and payment of claims.



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prohibited from preventing or interfering with those who make good faith disclosures of misconduct. This policy shall not apply when an employee knowingly makes a false report.

In the event the concern or complaint involves the Executive Director, the concern shall be brought to the attention of the Chair of the Board who is hereby empowered to contact the Charter School's legal counsel, auditing firm, and any other agency to investigate the concern or complaint.

Definition

As used in this policy, fraud refers to intentionally misrepresenting, concealing, or misusing information in an attempt to commit fiscal wrongdoing. Fraudulent actions include, but are not limited to:

- Behaving in a dishonest or false manner in relation to Charter School assets, including theft of funds, securities, supplies, or other School properties;
- Forging or altering financial documents or accounts illegally or without proper authorization;
- Improper handling or reporting of financial transactions;
- Personally profiting as a result of insider knowledge;
- Disregarding confidentiality safeguards concerning financial information;
- Violating Board conflict of interest policies; and
- Mishandling (destroying, removing, or misusing) financial records of School assets.

Internal Controls

The following internal controls shall be a regular practice of the Charter School in an effort to prevent the possibility of fraud:

Budgetary Transfers: The transfer of appropriations is important for the Executive Director or designee, purchasing agent, business official, and treasurer, and all should have written confirmation of the information. The purchasing agent shall be apprised if the transfer has been approved, the treasurer shall document it and the business official shall record it;

Treasurer's Receipts: The treasurer should have receipts and numbered duplicates for everything paid out in his or her custody;

Checks: The treasurer shall keep personal custody of any signature stamps and maintain a log for every check written;

Audit: An individual not connected to the business office should audit the check register regularly;

Conduct Background Checks on Potential Business Office Employees: Check all possible references, not just those offered, and perform criminal background checks on key business officials and other warranted positions; and

Segregation of Duties: Segregate functions within the business office so to avoid the opportunity for fraud without collusion.



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Title Financial Reporting And Audits
Code 7230
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White Pine Charter Schools

FINANCIAL MANAGEMENT 7230

Financial Reporting and Audits

The Board directs that financial reports of all Charter School funds shall be prepared in compliance with statutory provisions and generally accepted accounting and financial reporting standards. In addition to the reports required for local, State, and federal agencies, financial reports will be prepared monthly and annually and presented to the Board. The financial reports shall reflect the financial activity and status of the School funds.

Appropriate interim financial statements and reports of financial position, operating results, and other pertinent information will be prepared to facilitate management control of financial operations.

The Board directs that School audits shall be conducted in accordance with Idaho Code § 67-450B. Each audit shall be a comprehensive audit of the affairs of the Charter School and the School funds. The audits shall comply with all statutory provisions and generally accepted governmental auditing standards, as defined by the United States Government Accountability Office. Within ten days after receiving the audit from the School's independent auditor, the Charter School shall file two copies of the completed audit report with the legislative counsel at:

Idaho Legislative Services Office

Legislative Services Audit
Staff of Legislative Counsel
P.O. Box 83720
Boise, Idaho 83720-0054

The report shall be filed with the State Department of Education after its acceptance by the Board of Directors not later than November 10.

Legal Reference: I.C. § 33-701 I.C. § 67-450B Fiscal Year Payment and Accounting of Funds Independent Financial Audits by Government Entities



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Title Fiscal Accountability And Idea Part B Funds
Code 7235
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White Pine Charter Schools

FINANCIAL MANAGEMENT 7235

Fiscal Accountability and IDEA Part B Funds

The Charter School must ensure fiscal accountability at each phase in the use of Individuals with Disabilities Education Act (IDEA) Part B funds. The purpose of this policy is to ensure that the School complies with the State Department of Education requirements described in the Idaho State Department of Education IDEA Funding Manual.

Use of IDEA Part B Funds

The Charter School shall use IDEA funds only to pay excess costs of providing special education and related services to children with disabilities. A cost is determined to be an excess cost of providing special education only if it meets each of the following criteria:

- The cost would not exist in the absence of special education needs;
- The cost is not also generated by students without disabilities; and
- If the cost is specific to a particular child, it is documented if that child is on an Individual Education Plan (IEP).

The Board directs the Executive Director or designee to establish procedures and internal controls to ensure that IDEA Part B funds are used only for allowable, excess costs of providing special education and that these costs are accounted for in the proper function/program codes described in 34 CFR 300.202-205. These procedures and controls shall also ensure the accuracy of the Charter School's Excess Cost Calculation, as required by 34 C.F.R. 300.16 and Appendix A to 34 C.F.R.300.

The Special Education Director and the Chief Financial Officer approve all IDEA Part B expenditures (PO, invoices) following the process described in the written procedures for determining allowability of cost (cost principles).

Time and Effort Reporting

Charges to federal awards for salaries and wages must be based on records that accurately reflect the work performed. In order to determine if personnel costs are allowable under IDEA Part B, the Charter School shall maintain auditable "time and effort" documentation that shows how each employee paid with IDEA Part B funds spent his or her compensated time. Such work shall be documented on the time and effort forms. The form shall be kept for employees paid in full or in part with federal funds or whose salary is used to meet a matching requirement in a federal program. Such documents are written reports of how the time was spent

The Board directs the Executive Director or designee to establish a system for time and effort reporting that complies with the requirements of OMB Circular A-87 and OMB Circular A-133 and with the 4235P Written Compensation Procedure.

Maintenance of Effort.



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In order to ensure that the requirement of Maintenance of Effort is met, the Board directs the Executive Director or designee to establish a means of tracking and reporting local expenditures separate from the expenditure of State funds. This is to be done for the purpose of verifying that local funds are used for special education expenditures.

Property Procurement and Tracking

The Board directs the Executive Director or designee to establish written procedures to ensure that the Charter School's mechanism for procurements using IDEA Part B funds conforms to the standards outlined in 34 C.F.R. 80.36 and with Policy 7400 Procurement Management System and any related procedures. The Board also directs the Executive Director or designee to establish a system to maintain adequate inventory management of property purchased with IDEA Part B funds.

Property records in the inventory management system should include, at a minimum:

- Property description;
- Identification number;
- Source of funding;
- Acquisition date and cost;
- The location, use, and condition of the property; and
- Any ultimate disposition data including the date of disposal and sale price of the property.

In addition to the above information, the inventory management system should ensure that all source documents in support of the above information are maintained throughout the life and disposition of the equipment. These records should be updated frequently so that every piece of equipment purchased with federal funds can be accounted for at any given time.

Cross Reference 7400 Procurement Management System

Legal Reference: 2 C.F.R. §§200.430 Time and Effort
 34 C.F.R. §§80.36 Procurement
 34 C.F.R. §§80.42 Retention and Access Requirements for Records
 C.F.R. §§300.132-133 Provision of Services for Parentally-Placed Private School Children
 34 with
Disabilities
 34 C.F.R. §§300.16 Excess Costs
 34 C.F.R. §§300.202-205 Use of Amounts
 34 C.F.R. §300, Appendix A Excess Costs Calculation
Fiscal Accountability Checklist: For Sub-Recipients of IDEA Part B Funds
OMB Circular A-87
OMB Circular A-133

Other Reference: Idaho SDE IDEA Part B Funding Manual



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White Pine Charter Schools

FINANCIAL MANAGEMENT 7237

Retention of Records Relating to Federal Grants

The Board directs the Executive Director or designee to ensure that fiscal records related to federal grants are retained for a minimum of six years from the obligation of funds. These records shall be available for inspection if required.

Procedures

The Charter School shall maintain records that fully show:

- The amount of funds under the grant or subgrant;
- How the Charter School uses those funds;
- The total cost of each project;
- The share of the total cost of each project provided from other sources;
- Other records to facilitate an effective audit; and
- Other records to show compliance with federal program requirements.

The School shall also maintain records of significant project experiences and results. These records and accounts shall be retained and made available for programmatic or financial audits.

In accordance with State Department of Education record retention policy 4.16.02 Administration of Federal Grant Program, the School shall maintain all fiscal and programmatic records relating to federal grants for a minimum of five years and one additional audit.

The Charter School will destroy paper records by shredding only. In the event of the disposal of computers or electronic equipment that may contain confidential student or personnel records, the School will ensure that hard drives are appropriately wiped clean of information prior to disposal.

The School shall retain records based on the schedule provided [in](#) Policy 8605.



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Collection and Transmission of Records

The Charter School shall maintain electronic records in the Infinite Visions system, and paper records shall be maintained in the School office under the supervision of the Business Manager or designee. The clerk will have authorized access as directed. Electronic and/or paper records shall be provided to awarding agencies to meet reporting requirements and to auditors and monitors, as appropriate and required. Records that are kept electronically may be transmitted electronically as allowed by 2 CFR 200.335.

Access to Records

The Charter School shall provide the awarding agency, Inspectors General, the Comptroller General of the United States, and the pass-through entity, or any of their authorized representatives, the right of access to any documents, papers, or other records of the School which are pertinent to the Federal award, in order to make audits, examinations, excerpts, and transcripts. The right also includes timely and reasonable access to the School's personnel for the purpose of interview and discussion related to such documents.

Privacy

Access to both Infinite Visions system, personnel files, the Student Management System, confidential student files, Special Education IEP files shall be password protected in the case of electronically maintained records and kept in locked filing cabinets in the case of paper records. These records are maintained under the supervision of the Executive Director or designee and the Business Manager, or Federal Programs Director with exclusive access to paper files and passwords for electronic systems. The Charter School clerk may also have access to these records. Employees shall be trained in the requirements of the Family Educational Rights and Privacy Act (FERPA). If a request for confidential information is received from a source not having clear authority under FERPA or other statute, the School shall consult appropriate legal counsel prior to providing records.

Legal Reference: 34 C.F.R. § 76.730-.731
 34 C.F.R. § 75.730-.731
 34 C.F.R. § 75.732
 2 CFR 200.335
 2 C.F.R.§§ 200.333-.337

Other Reference: Idaho SDE IDEA Part B Funding Manual



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Title Student Activity Fund
Code 7260
Status Active
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White Pine Charter Schools

FINANCIAL MANAGEMENT 7260

Student Activity Fund

The Board is responsible for the establishment and management of student activity funds. The purpose of student activity funds shall be to account for revenues, disbursements, deposits, expenditures, assets, liabilities, and fund balances of those funds raised by students through recognized student body organizations and activities, including:

- Admission charges for interscholastic activities;
- The sale of yearbooks and annuals;
- Student fee collections which are used to provide more than one activity or benefit to all of the students of the School; and
- Receipt from vending machines located on School property.

Such funds shall be used for expenditures that support and enhance student extra-curricular or co-curricular experiences.

The funds collected by the School shall be maintained in accounts requiring two authorized signatures for the distribution of funds: one signature shall be by a person designated by the Board as an assistant treasurer and the other shall be a designated Charter School signatory.

The funds shall be deposited and expended by regular check in a bank account maintained by the Charter School for each student activity fund. The use of the student extra- and co-curricular funds is limited to the benefit of the students. All funds collected or received for Charter School programs, activities, or student use are, by Idaho law, public monies; and the care, custody, control, and accounting for such monies is the duty and responsibility of the treasurer and the administrative officer of the School. The treasurer of the School shall provide accounting procedures for the receipt, deposit, expenditure, and withdrawal of such moneys.

The management of student activity funds shall be consistent with sound business practices. Authority is delegated to the Executive Director or designee to require the Charter School to conform to accounting procedures for the receipt, deposit, and withdrawal of funds. A report of the activity of these funds shall be submitted to the Board and Executive Director or designee each month by the treasurer. This includes providing for the safekeeping of monies, proper accounting and

administration of the funds, and compliance with the Board of Directors policies and procedures. The Executive Director or designee is responsible for the proper collection, disbursement, and control of all School activity funds.

The official financial records of the student activity funds for the Charter School will be audited annually by a qualified public accountant or other responsible person approved by the Board. The employee responsible for maintaining student activity funds will be under bond in an amount which protects the maximum funds on hand at any time. An annual report will be prepared for the Board disclosing all results of the audit.



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For other activity or student funds, the Board may create a separate fund(s) and implement procedures for the accounting and control of the same.

Projects for the raising of funds shall generally contribute to the educational experience of students and shall not detract from the instructional program. All fundraising projects must have the approval of the Executive Director or designee. Solicitation of funds outside the School must have the approval of the Executive Director or designee.

Receipts

All cash and check collection will be recorded by the person receiving the collection. A cash receipt will be prepared immediately. Cash receipts are to be issued in numerical sequence.

The receipt must be filled in completely, including:

1. Date;
2. The amount;
3. The name of the person or company delivering the funds;
4. The source of the funds, such as a fundraiser, yearbook payment, etc; and
5. The account code and description of the account.

An actual cash count of all money must be made by the person receiving the funds in the presence of the person delivering the funds.

Checks received will not be post-dated for any reason.

A cash receipt will not be altered for any reason. If an error occurs, the person receiving the cash or check will indicate the receipt was voided, will mark void on the receipt, and file the voided receipt in numerical sequence with the copies of the receipts.

The original receipt will be given to the person delivering the money. If an individual mails a check and requests a receipt for the payment, a receipt acknowledging the check number will be prepared and returned to the individual making the payment. The copy of the receipt will be filed in numerical order and retained for auditing purposes.

Access to receipts will be limited to the individual responsible for the particular fund.

If funds are delivered to a building office when the person responsible for the School fund is out of the office, the employee receiving the cash or check will follow the receipt procedures set forth above. The funds will then be locked in a safe until the person responsible for the School fund is available. The individual who received the funds will then count the money in the presence of the person responsible for the School fund and indicate that the money was received. All funds received by clubs or School organizations must be properly documented.

All funds collected by staff members will be submitted daily to the Executive Director or his or her designee for receipt. No money will be kept overnight in classrooms, desks, file cabinets, or other areas within the building.



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Title Property Records
Code 7270
Status Active
Adopted 05/04/2021

White Pine Charter Schools

FINANCIAL MANAGEMENT 7270

Property Records

Property records and inventory records shall be maintained on all land, buildings, and physical property under the control of the Charter School. Such records shall be updated annually.

Property records of facilities and other fixed assets shall be maintained on an ongoing basis. All goods purchased using federal funds shall be delivered to the School office and received by the Chief Financial Officer. Upon receipt of goods, the Chief Financial Officer shall notify the Executive Director or designee of fulfillment of the purchase order.

The Chief Financial Officer checks all items against the invoice to ensure accuracy of delivery. Inventory items will be recorded on the Master Inventory list. No equipment shall be removed for personal or non-School use except according to Board policy.

Property records shall show, appropriate to the item recorded, the:

- Description and identification;
- Manufacturer;
- Date of purchase;
- Initial cost;
- Location;
- Serial number, if available; and
- Model number, if available

For each equipment and computing device purchased with federal funds, the following information is maintained in the Special Services office mastery inventory list. The list includes the following information:

1. Serial number or other identification number;
2. Source of funding for the property;
3. Identification of title holder;
4. Acquisition date and cost of the property;
5. Percentage of federal participation in the project costs for the federal award under which the property was acquired;
6. Location, use, and condition of the property; and
7. Any ultimate disposition data including the date of disposal and sale price of the property.

In the event the property is sold, lost, stolen, or cannot be repaired, the item will be deducted from the master inventory list. The date of the change will be listed along with the sale price if the item is sold.

Property Classifications

Equipment and supplies with a useful life of more than 1 year, including computing devices, will be engraved with Property of the White Pine Charter Schools and with appropriate equipment identification.



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Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the Charter School for financial statement purposes, or \$5,000.

Supplies means all tangible personal property other than those described in § 200.33 Equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the School for financial statement purposes or \$5,000, regardless of the length of its useful life.

Computing devices means machines used to acquire, store, analyze, process, and publish data and other information electronically, including accessories (or peripherals) for printing, transmitting and receiving, or storing electronic information.

Capital assets means tangible or intangible assets used in operations having a useful life of more than one year that are capitalized in accordance with GAAP. Capital assets include:

1. Land, buildings (facilities), equipment, and intellectual property (including software) whether acquired by purchase, construction, manufacture, lease-purchase, exchange, or through capital leases; and
2. Additions, improvements, modifications, replacements, rearrangements, reinstallations, renovations or alterations to capital assets that materially increase their value or useful life (not ordinary repairs and maintenance).

Physical Inventory

A physical inventory of the property must be taken and the results reconciled with the property records at least yearly.

Each staff member will inventory property items in their room at the end of each school year. The inventory sheet is signed by the staff member taking the inventory as verification and is reviewed by the Chief Financial Officer and kept in the vault. Computer and technology equipment is inventoried through a system adopted by management s, and maintained by the Chief Financial Officer. Electronic equipment, should be labeled or engraved with Property of White Pine Charter Schools .

Any discrepancy between physical inventory and the master inventory sheet will be researched by the Chief Financial Officer and noted on the master inventory.

Maintenance

In accordance with 2 C.F.R. § 313(d)(4), the Charter School maintains adequate maintenance procedures to ensure that property is kept in good condition. If an item needs repair, the Chief Financial Officer will be notified and proper repair procedures will be determined, either at the School or by sending the item to a qualified repair facility.

Lost or Stolen Items

The Charter School maintains a control system that ensures adequate safeguards are in place to prevent loss, damage, or theft of the property.

Use of Equipment Purchased with Federal Funds

Equipment purchased with federal funds must be used in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by the federal award, and the Charter



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School will not encumber the property without prior approval of the federal awarding agency and the pass-through entity.

During the time equipment is used on the project or program for which it was acquired, the equipment will also be made available for use on other projects or programs currently or previously supported by the federal government, provided that such use will not interfere with the work on the projects or program for which it was originally acquired. First preference for other use must be given to other programs or projects supported by the federal awarding agency that financed the equipment. Second preference is given to programs or projects under federal awards from other federal awarding agencies. Use for non-federally funded programs or projects is also permissible.

When no longer needed for the original program or project, the equipment may be used in other activities supported by the federal awarding agency, in the following order of priority:

1. Activities under a federal award from the federal awarding agency which funded the original program or project; then
2. Activities under federal awards from other federal awarding agencies.

In the event that the School no longer needs real or personal or real property, it will follow the rules, policies, and procedures required by Idaho Code §33-601(4)(b) and by Policy 9100.

Cross Reference: 7210 GASB Statement 34 (Accounting System)

Legal Reference:	I.C. §33-601(4)(b)	Real and Personal Property Acquisition, Use or Disposal of Same
	I.C. § 33-701	Fiscal Year Payment and Accounting of Funds
	2 C.F.R. § 200.12	Capital Assets
	2 C.F.R. § 200.20	Computing Devices
	2 C.F.R. § 200.33	Equipment
	2 C.F.R. § 200.94	Supplies
	2 C.F.R. § 200.313	Equipment



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Title Revenues
Code 7300
Status Active
Adopted 05/04/2021

White Pine Charter Schools

FINANCIAL MANAGEMENT 7300

Revenues

The Charter School will seek and utilize all available sources of revenue for financing its educational programs. This includes revenues from non-tax, local, State, and federal sources. All revenues received for the School will be properly credited to the appropriate fund and account as specified by federal and State statute and the accounting and reporting regulations for Idaho charter schools.

The Charter School will collect and deposit all direct receipts of revenues as necessary but at least once monthly. The School will make an effort to collect all revenues due from all sources, including, but not limited to, rental fees, bus fees, fines, tuition fees, other fees and charges.



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Title Investment Of Funds
Code 7305
Status Active
Adopted 05/04/2021

White Pine Charter Schools

FINANCIAL MANAGEMENT 7305

Investment of Funds

The Board authorizes the Executive Director to invest all or part of any reserve fund, or any fund accumulated for the payment of interest. The Executive Director or designee shall develop criteria and procedures for appropriate investments which shall be reviewed by the Board. A progress report of investments shall be made to the Board on a regular basis.

Policy Considerations

The investment policy shall be reviewed annually by the Executive Director or designee and recommended changes will be presented to the Board for consideration.



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Title Advertising In Schools Revenue Enhancement
Code 7310
Status Active
Adopted 05/04/2021

White Pine Charter Schools

FINANCIAL MANAGEMENT 7310

Advertising in Schools/Revenue Enhancement

Revenue enhancement through a variety of Charter School approved marketing activities, including but not limited to advertising, corporate sponsorship, signage, etc., is a Board-approved venture. These opportunities are subject to certain restrictions as approved by the Board in keeping with the contemporary standards of good taste. Such advertising will seek to model and promote positive values for the students of the School through proactive educational messages and not just traditional advertising of a product. Preferred advertising includes messages that encourage student achievement and the establishment of high standards of personal conduct.

All sponsorship contracts will allow the School to terminate the contract at least on an annual basis if it is determined that it will have an adverse impact on implementation of curriculum or the educational experience of students.

The revenue derived should:

- Enhance student achievement;
- Assist in the maintenance of existing Charter School athletics and activity programs; and
- Provide scholarships for students participating in athletic, academic, and activity programs who demonstrate financial need and merit.

Appropriate opportunities for these marketing activities include but are not limited to:

- Fixed signage;
- Banners;
- Television and radio broadcasts;
- Athletic facilities, to include stadiums, high school baseball fields, and high school gymnasiums; School level projects;
- Expanded usage of facilities beyond traditional use (i.e., concerts, rallies, etc.);
Interior and exterior of a limited number of school buses only if the advertising is associated with student art selected by the School. The only advertising information will note that the student art is sponsored by the participant in the Charter School sponsorship. Maintenance for these buses will include but not exceed
- normal maintenance costs; anSchool publications (when not in conflict with current contracts).

Advertising will not be allowed in classrooms, and corporate-sponsored curriculum materials are subject to the requirements of Board policy.

The following restrictions will be in place when seeking revenue enhancement. Revenue enhancement activities will not:

- Promote hostility, disorder, or violence;
- Attack ethnic, racial, sexual orientation, gender identity or expression, or religious groups;
- Discriminate, demean, harass, or ridicule any person or group of persons on the basis of gender;
- Be libelous;



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- Inhibit the functioning of the Charter School;
- Promote, favor, or oppose the candidacy of any candidate for election, adoption of any bond or budget issues, or any public question submitted at any general, county, or municipal election; Be obscene or pornographic as defined by prevailing community standards;
- Promote the use of drugs, alcohol, tobacco, firearms, or certain products that create community concerns;
- Promote foods or beverages which do not meet the standards for foods sold at the School described in Policy 8250. This restriction shall apply to all advertising, including signage, scoreboards, School stores, cups, packaging, vending machines, trash cans, coolers, menu boards, and food service equipment; Promote any religious or political organization;
- Use any Charter School logo without prior approval;
- Use age-inappropriate material; or
- Advertises, promotes or constitutes unauthorized use of copyrighted material.

Exception

Nothing herein shall be construed to prevent advertising in publications which are published by student organizations, PTA/PTO, booster club, or other parent groups. Funds received for approved projects involving advertising in said publications may be retained by the School-related group that is sponsoring the activity as a fund-raising event.

Solicitations

Salespersons, representatives, or agents shall not solicit or contact pupils, teachers, or other employees in the School buildings or on School grounds without prior approval.

Cross Reference: Curriculum Development and
 2100 Assessment

 2500 Library Materials
 2520 Curricular Materials
 8250 Guidelines for Food and Beverages Sales

Legal References: 7 CFR § 210.30 Local School Wellness Policy
 42 USC § 1758b, Section 204 Healthy and Hunger-Free Kids Act of 2010
 42 USC § 1771 et seq. Child Nutrition Act of 1966
 42 USC § 1751 et seq. National School Lunch Act



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Title Allowable Uses For Grant Funds
Code 7320
Status Active
Adopted 05/04/2021

White Pine Charter Schools

FINANCIAL MANAGEMENT 7320

Allowable Uses for Grant Funds

Expenditures will be aligned with approved budgeted items. Any changes or variations from the state-approved budget and grant application need prior approval from the State. When determining how the Charter School will spend its grant funds, the Executive Director or designee and the Chief Financial Officer will review the proposed cost to determine whether it is an allowable use of federal grant funds before obligating and spending those funds on the proposed good or service. All costs supported by federal education funds must meet the standards outlined in Education Department General Administrative Regulations (EDGAR), which are provided in the bulleted list below. The Chief Financial Officer and Executive Director or designee must consider these factors when making an allowability determination. All costs must:

Be allocable to the federal award. A cost is allocable to the federal award if the goods or services involved are chargeable or assignable to the federal award in accordance with the relative benefit received. This means that the federal grant program derived a benefit in proportion to the funds charged to the program. For example, if 50% of a teacher's salary is paid with grant funds, then that teacher must spend at least 50% of his or her time on the grant program.

Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the Charter School.

Conform to any limitations or exclusions set forth as cost principles in 2 CFR Part 200 or in the terms and conditions of the federal award.

Consistent treatment. A cost cannot be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been assigned as an indirect cost under another award.

Be adequately documented. All expenditures must be properly documented.

Be determined in accordance with General Accepted Accounting Principles (GAAP), unless provided otherwise in Part 200.

Not be included as a match or cost-share, unless the specific federal program authorizes federal costs to be treated as such. Some federal program statutes require the non-federal entity to contribute a certain amount of non-federal resources to be eligible for the federal program.

Be the net of all applicable credits. The term applicable credits refers to those receipts or reduction of expenditures that operate to offset or reduce expense items allocable to the federal award. Typical examples of such transactions are: purchase discounts, rebates or allowances, recoveries or indemnities on losses, and adjustments of overpayments or erroneous charges. To the extent that such credits accruing to or received by the State relate to the federal award, they shall be credited to the federal award, either as a cost reduction or a cash refund, as appropriate.

Part 200's cost guidelines must be considered when federal grant funds are expended. In addition, as required by federal rules, the Charter School will follow, as appropriate, all state and School-level requirements and policies regarding expenditures.



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Helpful Questions for Determining Whether a Cost is Allowable

In addition to the previously noted cost principles and standards, the Executive Director or designee, Chief Financial Officer, and appropriate federal programs personnel can refer to this section for a useful framework when performing an allowability analysis. In order to determine whether federal funds may be used to purchase a specific cost, it is helpful to ask the following questions:

1. Is the proposed cost allowable under the relevant program?
2. Is the proposed cost consistent with an approved program plan and budget?
3. Is the proposed cost consistent with program specific fiscal rules? For example, the Charter School may be required to use federal funds only to supplement the amount of funds available from nonfederal (and possibly other federal) sources.
4. Is the proposed cost consistent with EDGAR?
5. Is the proposed cost consistent with specific conditions imposed on the grant (if applicable)?

As a practical matter, the Executive Director or designee, Chief Financial Officer, and appropriate federal programs personnel should also consider whether the proposed cost is consistent with the underlying needs of the program. For example, program funds must benefit the appropriate population of students for which they are allocated.

Also, funds should be targeted to address areas of weakness, as necessary. To make this determination, the Executive Director or designee, Chief Financial Officer, and appropriate federal programs personnel should review data when making purchases to ensure that federal funds meet these areas of concern.

Legal Reference: 2 C.F.R. §§ 200 et seq. Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Funds.

- 2 C.F.R. §§ 200 (Subparts E and F) Cost Principles and Audit Requirements
- 2 C.F.R. §200.404 Reasonable Costs
- 2 C.F.R. §200.405 Allocable Costs
- 2 C.F.R. §200.406 Applicable Credits
- 2 C.F.R. §§ 200.420-200.475 Considerations for Selected Items of Cost



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Title Procurement Management Systems
Code 7400
Status Active
Adopted 05/04/2021

White Pine Charter Schools

FINANCIAL MANAGEMENT 7400

Procurement Management System

Authorization and Control

It is the policy of this Charter School to conduct its purchasing program in a manner to ensure optimum use of School funds. The Board, or its designee, reserves the right to determine what is in the best interest of the School.

The Executive Director or designee is authorized to direct expenditures and purchases within the limits of the detailed annual budget for the school year and pursuant to State purchasing and federal procurement requirements. Board approval for purchase of capital outlay items is required when the aggregate total of a requisition exceeds \$50,000.00, except the Executive Director or designee shall have the authority to make capital outlay purchases without advance approval when it is necessary to protect the interests of the Charter School or the health and safety of the staff or students. The Executive Director or designee shall establish requisition and purchase order procedures as a means of controlling and maintaining proper accounting of the expenditure of funds that align with State purchasing and federal procurement requirements. Staff members shall not obligate the School without express authority. Staff members who obligate the School without proper authorization may be held personally responsible for payment of such obligations.

Bids and Contracts

For micro-purchases up to \$3,000, purchases may be awarded without soliciting competitive bids if the Charter School considers the price to be reasonable. The School shall maintain evidence of this reasonableness in the records of all micro-purchases. If small purchases are between \$3,000 and \$50,000 in cost, the School shall use price or rate quotations obtained from an adequate number of qualified sources and maintain quotations in purchasing records.

Except for the purchase of curricular materials, and in accordance with the requirements of Idaho Code, whenever the cost of any construction, repair, or improvement; or the acquisition, purchase, or repair of any equipment; or other personal property necessary for the effective operation of the Charter School exceeds \$50,000 but does not exceed \$100,000, bids shall be called for by issuing written request to at least three vendors as specified in statute as well as following federal procurement requirements. Specifications shall be prepared and be made available to all vendors interested in submitting a bid. The contract shall be awarded to the lowest responsible bidder, except that the Board may reject any bid, reject all bids, or publish notice to rebid the project. If, after calling for bids a second time, no satisfactory bid is received, the Board may proceed under its own direction, subject to the approval of the State Board of Education.

For expenditures exceeding \$100,000, bids shall be called for by issuing public notice as specified in statute as well as following federal procurement requirements. Specifications shall be published in the official newspaper of the School at least two weeks before the opening date, with the second notice to be published in the succeeding week at least seven days before the date that bids are scheduled to be opened. Copies of specifications, bid forms, bidder's instructions, contract documents and general and special instructions shall be made available upon request by any interested bidder.



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When purchasing goods and services pursuant to Idaho Code, and determining the most qualified bidder for award of the contract, the School, at its sole discretion, may consider not only the amount of the bids, but may also consider additional factors including, but not limited to, the relative experience, ability, references, and integrity of the bidders to do faithful and conscientious work and promptly fulfill the contract according to contract requirements.

Except where a Request for Proposals is advertised, in the event the School awards a contract to a bidder other than the lowest responsive bidder, the Board shall declare its reason or reasons on the record and shall communicate such reason or reasons in writing to all who have submitted a competing bid. The disappointed bidders shall have the right to submit a timely written objection, at which time the School shall stop all work on the project, and shall review its decision and determine whether to affirm its prior award, modify the award, or choose to re-bid, setting forth its reason or reasons therefore. After completion of the review process, the political subdivision may proceed as it deems to be in the public interest.

The Executive Director or designee shall establish bidding and contract awarding procedures that align with State purchasing and federal procurement requirements.

Sealed Bids (Formal Advertising)

For purchases over \$150,000, bids are publicly solicited and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all of the material terms and conditions of the invitation for bids, is the lowest in price. The sealed bid method is the preferred method for procuring construction, if the following conditions apply:

1. A complete, adequate, and realistic specification or purchase description is available;
2. Two or more responsible bidders are willing and able to compete effectively for the business; and
3. The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.

If sealed bids are used, the following requirements apply:

1. Bids must be solicited from an adequate number of known suppliers, providing them sufficient response time prior to the date set for opening the bids.
2. The invitation for bids, which will include any specifications and pertinent attachments, must define the items or services in order for the bidder to properly respond;
3. All bids will be opened at the time and place prescribed in the invitation for bids.
4. A firm fixed price contract award must be made in writing to the lowest responsive and responsible bidder.

Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of. Any or all bids may be rejected if there is a sound, documented reason.

Personnel Conflicts of Interest



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No employee will make any purchase or incur any obligations for or on behalf of the Charter School from any private business, contractor, or vendor in which or with which the employee has a direct or indirect financial or ownership interest.

Purchases or contracted services from any private business or venture in which any employee of this School has a direct or indirect financial or ownership interest will be made on a competitive bid basis strictly in accordance with the following procedures:

1. The interested employee, the business, the contractor, or the vendor will fully disclose, in writing, the employee's exact relationship to the business, the contractor, or the vendor;
2. The affected business, the contractor, or the vendor may submit a bid in compliance with the specifications outlined by the School;
3. The interested employee will not be involved in any part of the bidding process, including but not limited to, preparing specifications, advertising, analyzing, or accepting bids; and
4. This policy will apply to any organization, fund, agency, or other activity maintained or operated by the School.

No employee will solicit gifts, gratuities, favors, prizes, awards, merchandise, or commissions as a result of ordering any items or as a result of placing any purchase order with a business, contractor, or vendor on behalf of the Charter School nor accept anything of monetary value from a business, contractor, or vendor except for unsolicited gifts of \$50 or less in value.

Cross Reference: 7405 Public Works Contracting and Procurement
7407 Public Procurement of Goods and Services

Legal Reference: I.C. § 18-1351 Bribery and Corrupt Practices Definitions
I.C. § 33-402 Notice Requirements
I.C. § 33-601 Real and Personal Property Acquisition, Use or Disposal of Same
I.C. § 67-2805 Procurement of Public Works Construction
I.C. § 67-2806 Procuring Services or Personal Property
I.C. § 67-2806A Request for Proposal
I.C. § 74-401 et seq. Ethics in Government
2 C.F.R. § 180.220 Are Any Procurement Contracts Included as Covered Transactions?
2 C.F.R. § 180.300 What Must I do Before I Enter into a Covered Transaction with Another Person at the Next Lower Tier?
2 C.F.R. § 200.317 Procurement by States
2 C.F.R. § 200.318 General Procurement Standards
2 C.F.R. § 200.319 General Procurement Standards
2 C.F.R. § 200.320 Methods of Procurement to be Followed
2 C.F.R. § 200.323(b) Contract Cost and Price
2 C.F.R. Part 200, Appendix II(1) Contract Provisions for Non-Federal Entity Contracts Under Federal Award

Other Reference: Policies and Procedures Used Template, Idaho State Department of Education,
<http://www.sde.idaho.gov/sped/funding/>



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Title Code Public Works Contracting And Procurement
7405
Status Active
Adopted 05/04/2021

White Pine Charter Schools

FINANCIAL MANAGEMENT 7405

Public Works Contracting and Procurement

No contract involving a public works project shall be let to any contractor who is not licensed as required by the laws of this State. Further, the Charter School shall at all times adhere to the bidding requirements for public works contracting and procurement as set out in State law.

Public Works Contractor
Licensure Requirements

\$0 to \$50,000

No licensure requirement

IC 54-
1903(9
)

\$50,000 and above

Licensure required

IC 54-
1903(9
)

Exemptions from Public
Works Contractor
Licensure



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Less than \$50,000 for number of trades construction, alteration, improvement, or repair.	Single project with any	IC 54-1903(9)
Any construction, alteration, or repair due to an emergency.	Pursuant to the provision of Chapter 10, Title 46 Idaho Code	IC 54-1903(11)
Public Works Construction Bidding		
\$0 to \$50,000	No bidding requirements	IC 67-2803(2)
\$50,000 to \$200,000	Semi-formal bidding: Issue written requests for bids describing the work to at least 3 licensed contractors. Allow 3 days for written response; objections 1 day prior to bid. Keep records for 6 months. Accept low bid, or reject all bids.	IC 67-2805(1)
\$200,000 and above	Formal bidding 2 Options A & B: Category A Open to all licensed contractors. Publication requirements. Written objections allowed. May request bid security/bond. Accept low bid, or reject all bids. See code for details. (IC 67-2805(2)(a).) Category B Open to pre-qualified contractors. After pre-qualification is determined, the bidding process is in the same manner as Category A. (IC 67-2805(2)(b).)	IC 67-2805(2)



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Legal Reference: I.C. § 54-1903 Unlawful to Engage in Public Works Contracting Without License - Exemptions
I.C. § 67-2801 et seq. Purchasing by Political Subdivisions



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Title Code Public Procurement Of Goods And Services
7407
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White Pine Charter Schools

FINANCIAL MANAGEMENT 7407

Public Procurement of Goods and Services

The Charter School shall at all times adhere to the bidding requirements for the procurement of goods and services as set out in State law.

No bidding requirements

\$0 to
\$50,000

Semi-formal bidding: Issue written requests for bids describing goods or services desired to at least three vendors. Allow three days for written response, unless an emergency exists; One day for \$50,000 objections. Keep records for six months. Accept low bid, or reject all bids. To \$100,000

IC 67-2803(2)

IC 67-2806(1)

Formal bidding: Publish bid notice at least two weeks in advance of bid opening. Make bid specifications available; written objections allowed. May request bid security/bond. Can reject all if able to purchase \$100,000 more economically in the open market. And above

IC 67-2806(2)



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Exemptions to Public Procurement of Goods and Services Bidding

Personal Property

Less than \$50,000

Any Amount

Any Amount

Any Amount

Any Amount

Already competitive bid (piggy-backing)

IC 67-
2803(1
)

Contracts or purchases of goods or services

IC 67-
2803(2
)

Payments of Wages

IC 67-
2803(3
)

Personal or professional services performed by an independent contractor.
(Refer to info on qualifications in I.C. 67-2320)

IC 67-
2803(4
)

Procurement of an interest in real property lease or purchase

IC 67-



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		2803(5)	
Procurement of insurance		IC 67- 2803(6)	
Costs of Joint Powers participation		IC 67- 2803(7)	
Procurement of used personal property		IC 67- 2803(8)	
Procurement from federal government general services administration (GSA) schedules or federal multiple award schedules (MAS)		IC 67- 2803(9)	
Procurement of personal property or services through contracts entered into by the division of purchasing of the department of administration of the State of Idaho			
Procurement of goods for direct resale		IC 67- 2803(10)	
	Procurement of travel and training;		
Any Amount	Procurement of goods and services from Idaho correctional industries Procurement of repair for heavy equipment		
Any Amount			IC 67- 2803(11)
	Procurement of software maintenance, support and licenses of an existing system or platform that was bid in compliance with state law		
Any Amount Any Amount			IC 67- 2803(12)
	Procurement of public utilities		
Any Amount			IC 67- 2803(13)
	Procurement of food for use in jails or detention facilities		IC 67- 2803(14)



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Any Amount Procurement of used equipment at an auction if authorized by the governing board IC 67-2803(15)

Any Amount

Any Amount IC 67-2803(16)

IC 67-2803(17)

IC 67-2803(18)

Emergency Expenditures

Any Amount

IC 67-2808(1)

Legal Reference: I.C. § 67-2801 et seq. Purchasing by Political Subdivisions



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Title Personal Reimbursements
Code 7420
Status Active
Adopted 05/04/2021

White Pine Charter Schools

FINANCIAL MANAGEMENT 7420

Personal Reimbursements

While it is recommended that all purchases of goods or services be made within established purchasing procedures, there may be an occasional need for an employee to make a purchase for the benefit of the Charter School from personal funds. In that event, an employee will be reimbursed for a personal purchase under the following criteria:

- It is clearly demonstrated that the purchase is of benefit to the School;
The purchase was made with the prior approval of an authorized
- administrator; The item purchased was not available from resources within
- the School; and
- The claim for personal reimbursement is properly accounted for and documented with an invoice/receipt.

The Charter School business office will be responsible for the development of the procedures and forms to be used in processing claims for personal reimbursements.



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Title Travel Allowances And Expenses
Code 7430
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White Pine Charter Schools

FINANCIAL MANAGEMENT 7430

Travel Allowances and Expenses

Every Charter School employee and Board Member will be reimbursed for travel expenses while traveling outside of the school district in which the School is located and engaged in official School business. All travel expenses must be reported on the School-approved travel voucher forms and, for employees, approval must be granted prior to traveling by the employee's supervisor and the Executive Director or designee. The School will pay mileage at the current approved federal mileage rate. Per Diem shall be paid to employees who are required to travel. The Per Diem Rate shall be established by the CEO.

The School business office will be responsible for the development of procedures and forms to be used in connection with travel expense claims and reimbursements.

Types of Travel

In-District Expenses: Charter School employees and Board Members shall be reimbursed for actual and necessary expenses incurred within the school district in which the Charter School is located while attending to School business. Actual mileage driven for pre-approved in-district travel shall be reimbursed. It is the responsibility of the Board to review travel within the district by the Executive Director or by Board Members.

Out of District Travel: Travel outside of the school district in which the Charter School is located must be pre-approved. Board Members shall obtain Board approval prior to incurring out of school district expenses, and employees shall obtain prior approval from their supervisor and the Executive Director or designee.

Charter School employees and Board Members shall be reimbursed for actual and necessary expenditures incurred outside the school district. Meals shall be paid in accordance to a Per Diem schedule.

Documentation of Expenses

Expenses not in compliance with this policy shall not be reimbursed or paid by the Board.

Prior to reimbursement of actual and necessary expenses, the Charter School employee or Board Member must submit a detailed receipt indicating the date, purpose, and nature of the expense for each claim item and any appropriate travel expense or voucher form. Expenses requiring prior approval must also include a copy of the written prior approval.

Employees shall submit their receipts, travel expense forms, and voucher forms to the Executive Director or designee. The Executive Director and Board Members shall submit such documentation to the Board. Failure to provide a detailed receipt will make the expense non-reimbursable.



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In exceptional circumstances, the Board may allow a claim without a proper receipt. Written documentation explaining the exceptional circumstances will be maintained as part of the School's record of the claim.

The Board directs the Executive Director or designee to promulgate procedures specifying which expenses shall be reimbursable for travel of different distances and durations.

Travel Costs Under Federal Award

General: Travel costs are the expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of a grant recipient. Such costs may be charged on an actual cost basis, or on a per diem or mileage basis in lieu of actual costs incurred, or on a combination of the two, provided the method used is applied to an entire trip and not selected days of the trip and results in charges consistent with those normally allowed in like circumstances in the recipient's non-federally funded activities and in accordance with the recipient's written travel reimbursement policies.

Lodging and subsistence: Costs incurred by employees and officers for travel, including costs of lodging, other subsistence, and incidental expenses, shall be considered reasonable and otherwise allowable only to the extent such costs do not exceed charges normally allowed by the Charter School in its regular operations as the result of its written travel policy. In addition, if these costs are charged directly to the federal award, the School will maintain documentation justifying the following:

Participation of the individual is necessary to the federal award; and

The costs are reasonable and consistent with this policy and any related procedures.

Temporary dependent care costs above and beyond regular dependent care that directly results from travel to conferences are allowable provided that:

- The costs are a direct result of the individual's travel for the federal
- award; The costs are consistent with this policy and any related
- procedures; and Are temporary, lasting only during the travel period.

Travel costs for dependents are unallowable, except for travel of duration of six months or more with prior approval of the federal awarding agency.

Commercial air travel: Airfare costs in excess of the basic, least expensive unrestricted accommodations class offered by commercial airlines are unallowable except when such accommodations would:

- Require circuitous routing;
- Require travel during unreasonable hours;
- Excessively prolong travel;
- Result in additional costs that would offset the transportation savings; or
- Offer accommodations not reasonably adequate for the traveler's medical needs.

Legal Reference:

2 C.F.R. § 474 Travel Costs



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White Pine Charter Schools

FINANCIAL MANAGEMENT 7440

Charter School Credit Cards

The Board of Directors permits the use of Charter School credit cards by certain School officials to pay for actual and necessary expenses incurred in the performance of work-related duties and services for the School.

All credit cards will be in the name of the Charter School. Credit cards may only be used for legitimate School business expenditures. The use of credit cards is not intended to circumvent the School's policy on purchasing. Purchases that are unauthorized, illegal, represent a conflict of interest, are personal in nature, or violate the intent of this policy may result in credit card revocation and discipline of the employee.

The Executive Director or designee shall monitor monthly the use of each credit card by reviewing credit card expenditures and reporting any serious problems and/or discrepancies directly to the Board.

Credit Card Users

A list of those individuals that will be issued a Charter School credit card will be maintained in the Business Office. Credit card users must take proper care of the credit card(s) and take all reasonable precautions against damage, loss, or theft. Any damage, loss, or theft must be reported immediately to the Business Office and to the appropriate financial institution. Failure to take proper care of credit cards or failure to report damage, loss, or theft may subject the employee to financial liability.

Users must submit detailed documentation, including itemized receipts, for services, travel, and/or other actual and necessary expenses which have been incurred in connection with School-related business for which the credit card has been used. Failure to provide a proper receipt can make the employee responsible for expenses incurred.

Credit Card Limits

The Charter School shall establish a credit line for each card issued and an aggregate credit limit of for all cards issued to the School.

Return of Credit Card

A Charter School employee who is no longer employed by the School shall return the credit card upon termination to the Executive Director or designee no later than five calendar days after termination.

Misuse and/or Unauthorized Use

An employee who violates a provision of this policy shall have his or her credit card revoked immediately and shall be subject to disciplinary action as determined by the Executive Director or designee and shall be reported to local law



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enforcement. If the Executive Director violates a provision of this policy, he or she shall be subject to disciplinary action as determined by the Board and shall be reported to local law enforcement.

Additional Procedures

The Executive Director or designee, in consultation with the Chief Financial Officer, may establish additional procedures governing the issuance and use of Charter School credit cards that do not contradict any part of this policy. Each cardholder shall be apprised of the procedures governing the use of the credit card and a copy of this policy and accompanying procedures shall be given to each cardholder.

Legal Reference:

I.C. § 18-5701 Misuse of Public Money by Officers
I.C. § 18-5703 Definitions



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White Pine Charter Schools

FINANCIAL MANAGEMENT 7450

Federal Cash Management Policy

All responsible Charter School employees shall comply with applicable methods and procedures for payment that minimize the time elapsing between the School's receipt of federal funds and their disbursement by the School, as required by in accordance with the Cash Management Improvement Act of 1990. Generally, the School receives payment of federal funds from the State Department of Education on a reimbursement basis.

According to guidance from the U.S. Department of Education (USDE), when calculating the interest earned on USDE grant funds, regardless of the date of obligation, interest is calculated from the date that the federal funds are drawn down from the G5 system until the date on which those funds are disbursed by the Charter School.

Payment Methods

Reimbursements: The Charter School will initially charge federal grant expenditures to nonfederal funds.

The School Grant Accountant or Chief Financial Officer shall request reimbursement for actual expenditures incurred under the federal grants monthly. All reimbursements are based on actual disbursements, not on obligations. Reimbursement requests shall be submitted on a School form to the State Department of Education.

The Executive Director or his or her designee shall promulgate a procedure specifying any further requirements.

Consistent with State and federal requirements, the School shall maintain source documentation supporting the federal expenditures; such as invoices, time sheets, and payroll stubs; and will make such documentation available for the State Department of Education to review upon request.

Reimbursements of actual expenditures do not require interest calculations.

Advances: To the extent the Charter School receives advance payments of federal grant funds; the School shall strive to expend the federal funds on allowable expenditures as expeditiously as possible. Specifically, the School shall attempt to expend all drawdowns of federal funds within 72 hours of receipt.

The School shall hold federal advance payments in interest-bearing accounts, unless an allowable exception applies. The Charter School shall begin to calculate interest earned on cash balances once funds are deposited into the School's account. Interest shall be calculated quarterly. Total federal grant cash balances shall be calculated on cash balances per grant and applying the School's actual interest rate. Within 30 days of the end of the quarter, the School shall remit interest earned. The Charter School may retain up to \$500 of interest earned per year.

The Executive Director or his or her designee shall promulgate a procedure specifying the process for remitting interest.

Legal Reference: 2 C.F.R. § 200.305 Payment
31C.F.R. § 205 Rules and Procedures for Efficient Federal-State Funds Transfers
31U.S.C. § 6503 Intergovernmental financing (Cash Management Improvement Act of 1990)



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Title New Fees Or Increase Of Fees
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White Pine Charter Schools

FINANCIAL MANAGEMENT 7500

New Fees or Increase of Fees

The Executive Director or designee shall review annually fees assessed to determine if an increase, decrease, new fee, or other change is necessary. The Executive Director or designee shall report the fee findings to the Board at least [annually](#).

Cross Reference: 3440 Student Fees, Fines & Charges
7300 Revenues
