

ADMINISTRATION

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BRIAN J. LAPELLA

*Director of Curriculum,
Instruction and Special
Education*

LARRY NICHOLS

Middle/High School Principal

LEEANN CUCCI

Elementary Principal

MELANIE BROUILLETTE

Treasurer



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Madison Central School District

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BOARD OF EDUCATION REGULAR MEETING

NOVEMBER 16, 2021

6:30 P.M. – AUDITORIUM

- I. Call to Order
- II. Agenda Additions
- III. Consent Agenda
 - a. Approval of Agenda for This Meeting
 - b. Approval of Minutes
 1. October 19, 2021 Audit Committee Meeting Minutes
 2. October 19, 2021 Regular Meeting Minutes
- IV. Public Forum
 - a. FFA National Convention Presentation
- V. Reports
 - a. Treasurer
 1. Internal Claims Auditor's Report
 2. Treasurer's Report dated October 31, 2021
 3. Detail Warrants
 - a. Warrant Number 11 - Fund A - 10/1/21 - 4 pages
 - b. Warrant Number 13 - Fund A - 10/15/21 - 8 pages
 - c. Warrant Number 15 - Fund A - 10/29/21 - 5 pages
 - d. Warrant Number 14 - Fund A - 11/2/21 - 1 page
 - e. Warrant Number 4 - Fund TA - 11/2/21 - 4 pages
 - f. Warrant Number 6 - Fund C - 10/1/21 - 1 page
 - g. Warrant Number 7 - Fund C - 10/15/21 - 2 pages
 - h. Warrant Number 8 - Fund C - 10/29/21 - 2 pages
 - i. Warrant Number 2 - Fund FA22 - 10/1/21 - 1 page
 - j. Warrant Number 3 - Fund FA22 - 10/15/21 - 2 pages
 - k. Warrant Number 4 - Fund FA22 - 10/29/21 - 1 page
 4. Financial Status Report
 - b. Superintendent – Information Items
 1. Madison County Test-to-Stay program
 2. Option to test symptomatic students, faculty and staff

Commitment to Excellence

- c. Superintendent – Approval Items
 - 1. Discussion and Approval of Uniform Guidance-Internal Controls
 - 2. Discussion and Approval of June 2021 Reserves Report
 - 3. Approval of combination for Girls JV and Varsity Volleyball with Morrisville Eaton for the 2021-22 season
- VI. Committee Reports
- VII. Policy
 - a. First Reading of:
 - 1. Policy # 3101 entitled “Job Description: Superintendent of Schools
 - 2. Policy # ____ entitled “Job Description: Director of Curriculum, Instruction, & Special Education
 - 3. Policy # 6104 entitled “Substitute Teachers”
 - 4. ____ Organizational Chart
- VIII. Old Business
- IX. Board of Education Discussion Items
- X. New Business
 - a. Personnel
 - 1. Appointments
 - a. Jenna Barlow - Non-Certified Substitute Teacher effective October 29, 2021
 - b. Robert Maggiolino - Cleaner effective December 1, 2021
 - 2. Coach Appointments
 - a. Amanda Rossi - Girls JV Basketball for the 2021-22 season
 - b. Tyler Eaton - Volunteer Coach to Boys Basketball for the 2021-22 season
 - b. CSE/CPSE Recommendations – in official packet
 - c. Principal / Director Reports
- XI. Correspondence
- XII. Question & Answer Opportunity
- XIII. Executive Session
 - a. To discuss negotiations with the Madison Teachers’ Association
- XIV. Adjourn Executive Session
- XV. Adjournment

The Audit Committee Meeting of the Board of Education of Madison Central School was held on October 19, 2021 at 6:00 pm in the auditorium.

MEMBERS PRESENT: Mrs. Laura Billings
Mrs. Jessica Clark
Mr. Mike Filipovich
Mrs. Jennifer Lavoie

MEMBERS ABSENT: Mrs. Brittany Rizzo
Mr. Jona Snyder
Mrs. Jennah Turner

OTHERS PRESENT: Mr. Jason Mitchell, Superintendent
Mrs. LeeAnn Cucci, Elementary Principal
Mr. Brian Latella, Director of Curriculum
Mrs. Melanie Brouillette, Treasurer
Ms. Tracey Lewis, District Clerk

- I. Call to Order
 - a. The Audit Committee Meeting was called to order at 6:03 pm.
- II. Audit Review
 - a. Mr. David Brownell of Mostert, Manzanero & Scott, LLP, Certified Public Accountants, presented the 2020-2021 Fiscal Year Audit.
- III. Adjourn Audit Committee Meeting

MOTION # 1 - ADJOURNMENT

ON THE MOTION of Mrs. Clark, seconded by Mrs. Billings, the Board moved to adjourn the Audit Committee Meeting at 6:33 pm. Motion carried 4 yes, 0 no.

The Regular Meeting of the Board of Education of Madison Central School was held on October 19, 2021 at 6:00 pm in the auditorium.

MEMBERS PRESENT: Mrs. Laura Billings
Mrs. Jessica Clark
Mr. Mike Filipovich
Mrs. Jennifer Lavoie
Mr. Jona Snyder - 7:05 pm

MEMBERS ABSENT: Mrs. Brittany Rizzo
Mrs. Jennah Turner

OTHERS PRESENT: Mr. Jason Mitchell, Superintendent
Mrs. LeeAnn Cucci, Elementary Principal
Mr. Brian Latella, Director of Curriculum
Mrs. Melanie Brouillette, Treasurer
Ms. Tracey Lewis, District Clerk

- I. Call to Order of Regular Meeting
 - a. The Regular Meeting was called to order at 6:34 pm by Mrs. Lavoie, president.
- II. Executive Session
 - a. To discuss employee compensation for completing tasks outside job title

MOTION # 1 - ENTER EXECUTIVE SESSION

ON THE MOTION of Mrs. Billings, seconded by Mrs. Clark, the Board moved to enter into Executive Session at 6:34 pm to discuss employee compensation for completing tasks outside of job title. Motion carried 4 yes, 0 no.

- III. Adjourn Executive Session and Resume Regular Meeting

MOTION # 2 - ADJOURN EXECUTIVE SESSION AND RESUME REGULAR MEETING

ON THE MOTION of Mrs. Billings, seconded by Mrs. Clark, the Board moved to adjourn Executive Session and resume the Regular Meeting at 6:57 pm. Motion carried 4 yes, 0 no.

- IV. Agenda Additions
 - a. None
- V. Consent Agenda
 - a. Approval of Agenda for This Meeting

MOTION # 3 - APPROVAL OF AGENDA

ON THE MOTION of Mr. Filipovich, seconded by Mrs. Billings, the Board moved to approve the agenda for this meeting. Motion carried 4 yes, 0 no.

- b. Approval of Minutes
 1. September 21, 2021 Regular Meeting Minutes

MOTION # 4 - APPROVAL OF MINUTES

ON THE MOTION of Mr. Filipovich, seconded by Mrs. Billings, the Board moved to approve the minutes from the September 21, 2021 Regular Meeting. Motion carried 4 yes, 0 no.

- VI. Public Forum
 - a. None

VII. Reports

a. Treasurer

1. Internal Claims Auditor's Report

MOTION # 5 - APPROVAL OF INTERNAL CLAIMS AUDITOR'S REPORT

ON THE MOTION of Mr. Filipovich, seconded by Mrs. Billings, the Board moved to approve the Internal Claims Auditor's Report. Motion carried 4 yes, 0 no.

2. Treasurer's Report dated September 30, 2021

MOTION # 6 - APPROVAL OF TREASURER'S REPORT

ON THE MOTION of Mr. Filipovich, seconded by Mrs. Billings, the Board moved to approve the September 30, 2021 Treasurer's Report. Motion carried 4 yes, 0 no.

3. Detail Warrants

MOTION # 7 - APPROVAL OF DETAIL WARRANTS

ON THE MOTION of Mr. Filipovich, seconded by Mrs. Billings, the Board moved to approve the Detail Warrants as follow: Warrant Number 9 - Fund A - 9/2/21 - 3 pages, Warrant Number 10 - Fund A - 9/17/21 - 7 pages, Warrant Number 5 - Fund C - 9/17/21 - 2 pages, Warrant Number 3 - Fund TA - 10/11/12 - 4 pages, Warrant Number 5 - Fund FA21 - 9/2/21 - 1 page, Warrant Number 1 - Fund FA22 - 9/17/21 - 1 page. Motion carried 4 yes, 0 no.

4. The Financial Status Report was provided.

5. The Quarterly Student Activities Reports for July-September 2021 were provided.

b. Superintendent – Information Items

1. COVID 19

- a. Mr. Mitchell shared with the Board that the District is in its third week of staff COVID screening and first week of student COVID screening. There have been no positive cases from this screening as of yet. Currently only 14 of 41 students who indicated interest in the screening have actually signed up in the portal to have the screening administered. Winter athletes will be screened if Madison County and the District remain in a high transmission area of New York State.
- b. Mr. Mitchell shared that the District has seen approximately 10 positive COVID-19 cases over the past two weeks and there has been no evidence of transmission within the school building. There are no plans to go fully remote at this time and this is most likely only a possibility if we had a significant staff shortage or internal transmission of COVID-19. Mr. Mitchell also stated that he is moving to a weekly communication to all members of the District via the global calling system in an effort to remain transparent, and to limit the amount of calls coming to everyone. If an immediate call is necessary, clearly that will still be sent out. He also thanked all the staff for their hard work staying on top of the contract tracing, which helps keep our students in school and the building open.

Jona Snyder arrived at 7:05 pm.

2. Mr. Mitchell discussed the upcoming National FFA Convention trip and the concerns over bus sharing amongst multiple districts. Madison students will be COVID-19 screened both before and after the trip. Five other districts have implemented the same safety measures. Only 2 districts which are sharing the bus have indicated that they will not screen their students. Madison is sending six students with one advisor and masks will be mandated while on the bus. COVID-19 protocols will also be in effect and enforced at the convention.

c. Superintendent – Approval Items

1. Approval of increase in pay rates due to minimum wage increase effective January 1, 2022

MOTION # 8 - APPROVAL OF INCREASE IN MINIMUM WAGE

ON THE MOTION of Mr. Filipovich, seconded by Mr. Snyder, the Board moved to approve the increase in minimum wage effective January 1, 2022 Motion carried 5 yes, 0 no.

2. Approval of MOA with Non-Instructional Unit

MOTION # 9 - APPROVAL OF MOA WITH NON-INSTRUCTIONAL UNIT

ON THE MOTION of Mrs. Billings, seconded by Mr. Filipovich, the Board moved to approve the MOA with the Non-Instructional Unit regarding the increase in wages for employees affected by the minimum wage increase to meet the minimum wage increase. Motion carried 5 yes, 0 no.

3. Acceptance of 2020 Annual Drinking Water Quality Report

MOTION # 10 - ACCEPTANCE OF 2020 ANNUAL DRINKING WATER QUALITY REPORT

ON THE MOTION of Mr. Snyder, seconded by Mr. Filipovich, the Board moved to approve the 2020 Annual Drinking Water Quality Report. Motion carried 5 yes, 0 no.

4. Approval to cancel outstanding checks as listed

MOTION # 11 - APPROVAL TO CANCEL OUTSTANDING CHECKS

ON THE MOTION of Mrs. Billings, seconded by Mr. Filipovich, the Board moved to approve cancelling the outstanding checks as provided. Motion carried 5 yes, 0 no.

5. Approval of combination with Morrisville Eaton for Varsity and Modified Wrestling for the 2021-22 season

MOTION # 12 - APPROVAL OF COMBINATION WITH MORRISVILLE EATON FOR WRESTLING

ON THE MOTION of Mr. Snyder, seconded by Mrs. Billings, the Board moved to approve the combination with Morrisville Eaton for Varsity and Modified Wrestling for the 2021-22 season. Motion carried 5 yes, 0 no.

6. Acceptance of 2020-21 Financial Audit

MOTION # 13 - ACCEPTANCE OF THE AUDIT

ON THE MOTION of Mr. Filipovich, seconded by Mrs. Billings, the Board moved to accept the 2020-21 Financial Audit. Motion carried 5 yes, 0 no.

VIII. Committee Reports

- a. Mr. Snyder updated the Board on the progress of the Building and Grounds Committee. Mr. Snyder indicated that there would be propositions at the upcoming May Annual Meeting for a Capital Building Project which may include updates, improvements or repairs to the roof, windows, clock system, parking lot surfaces and parking lot lighting. Other focus groups will be meeting to create other priority items. There was discussion about the need for the development of a new nurse's office and library area and the upgrade to the stage flooring. The footprint of the building cannot change, but movement and redesign can take place within the current footprint of the building.
- b. Mr. Snyder also spoke about the Negotiations Committee meeting and that Mr. Mitchell has been given full authority to move forward on behalf of the Board of Education with the beginning stages of communication with the MTA.

IX. Policy

- a. Second Readings and Approvals of:
 1. Policy #2300 entitled "Regular Board Meetings"
 2. Policy # 2400 entitled "Formulation, Adoption and Dissemination of Policy"

MOTION # 14 - APPROVAL OF POLICY

ON THE MOTION of Mrs. Clark, seconded by Mrs. Billings, the Board moved to approve the second readings of Policy # 2300 entitled "Regular Board Meetings" and Policy # 2400 entitled "Formulation, Adoption and Dissemination of Policy". Motion carried 5 yes, 0 no.

- b. Notice was given of the Superintendent's approval of Regulations due to expiration of previous form for the following regulations:
 1. Regulation # 6300.2 entitled Notice of Eligibility & Rights and Responsibilities under the Family and Medical Leave Act
 2. Regulation # 6300.3 entitled Certification of Health Care Provider for Employee's Serious Health Condition under the Family and Medical Leave Act
 3. Regulation # 6300.4 entitled Certification for Military Family Leave for Qualifying Exigency under the Family and Medical Leave Act
 4. Regulation # 6300.5 entitled Certification of Health Care Provider for Family Member's Serious Health Condition under the Family and Medical Leave Act

X. Old Business

- a. None

XI. Board of Education Discussion Items

- a. None

XII. New Business

- a. Personnel
 1. Appointments
 - a. Mary Clark - Non-Certified Substitute Teacher effective October 20, 2021, pending fingerprint clearance
 - b. John Huther - Non-Certified Substitute Teacher effective October 20, 2021
 - c. Aaron Brown - Non-Certified Substitute Teacher effective October 20, 2021
 - d. Krista Worlock - Non-Certified Substitute Teacher effective October 20, 2021

MOTION # 15 - APPROVAL OF APPOINTMENTS

ON THE MOTION of Mrs. Billings, seconded by Mrs. Clark, the Board moved to approve the appointments as follow: Mary Clark - Non Certified Substitute Teacher effective October 20, 2021, pending fingerprint clearance, John Huther - Non Certified Substitute Teacher effective October 20, 2021, Aaron Brown - Non Certified Substitute Teacher effective October 20, 2021 and Krista Worlock - Non Certified Substitute Teacher effective October 20, 2021. Motion carried 5 yes, 0 no.

2. Coaching Appointments for the Winter 2021-22 season

MOTION # 16 - APPROVAL OF COACHING APPOINTMENTS

ON THE MOTION of Mrs. Billings, seconded by Mrs. Clark, the Board moved to approve the Coaching appointments for the Winter 2021-22 season as follow:

- a. Michael Strong - Boys Varsity Basketball
- b. William Hunter - Boys JV Basketball
- c. Michael Lee - Boys Modified Basketball
- d. Payge Miller - Girls Varsity Basketball
- e. Tricia Coon - Girls Modified Basketball

Motion carried 5 yes, 0 no.

3. Retirements

- a. Lorrie Gridley - Food Service effective June 30, 2022

MOTION # 17 - ACCEPTANCE OF RETIREMENT

ON THE MOTION of Mrs. Clark, seconded by Mrs. Billings, the Board moved to accept the retirement of Lorrie Gridley as Food Service employee effective June 30, 2022, with many thanks. Motion carried 5 yes, 0 no.

4. Salary Adjustments

MOTION # 18 - APPROVAL OF SALARY ADJUSTMENTS

ON THE MOTION of Mrs. Billings, seconded by Mrs. Clark, the Board moved to approve the following salary adjustments:

- a. Bridget Idzi - from M1 with Masters, Step 20 to M3 with Masters, Step 20
b. Jessica Palmer - from M1 with Masters, Step 7 to M4 with Masters, Step 7

Motion carried 5 yes, 0 no.

5. Leave Request

MOTION # 19 - APPROVAL OF LEAVE REQUESTS

ON THE MOTION of Mrs. Billings, seconded by Mr. Snyder, the Board moved to approve the leave requests as follow:

- a. Jessica Chenel - FMLA starting Friday, October 29, 2021 though January 28, 2022 utilizing sick time and unpaid leave
b. Courtney Heim - Unpaid leave for Friday, February 18, 2022

Motion carried 5 yes, 0 no.

6. Mentor Appointments

- a. Megan Barnes for Michael Barnes with a stipend of \$100

MOTION # 20 - APPROVAL OF MENTOR

ON THE MOTION of Mrs. Billings, seconded by Mrs. Clark, the Board moved to approve Megan Barnes as a mentor to Michael Barnes with a stipend of \$100 for the 2021-22 school year. Motion carried 5 yes, 0 no.

- b. CSE/CPSE Recommendations – in official packet

MOTION # 21 - APPROVAL OF CSE/CPSE RECOMMENDATIONS

ON THE MOTION of Mrs. Billings, seconded by Mrs. Clark, the Board moved to approve the CSE/CPSE Recommendations as found in the official packet. Motion carried 5 yes, 0 no.

c. Principal / Director Reports

1. Mrs. Cucci spoke about partnering with OHM BOCES for science kits, the elementary math night scheduled for October 21, 2021 which will be held in the cafeteria from 6-7 pm, the Fall Festival which will consist of a parade of students in costumes. If the weather permits, this parade will be outside and parents will be welcome to watch the parade. If the weather does not permit, the parade will be inside and parents will not be allowed to watch. Mrs. Cucci also shared that the first grade went to Fort Rickey, the PreK went to Savicki's and the Kindergarten is going to Savicki's.
2. Mr. Latella shared that the District is providing large amounts of professional development opportunities for our staff including Special Education, Early Intervention and Curriculum Alignment along with the additional guidance from Olivia Wahl and Jody Popple. The Superintendent's Conference Day on Friday the 22nd will have a highlight on the Reading Initiative along with a Discovery Trail tour which will include a tour of the outdoor classrooms. There will also be a staff luncheon held in the pavilion at Madison Lake catered by "Cotter's Cafe", our very own cafeteria manager. Mr. Latella also addressed the District's shortage of substitute teacher staffing. The District continues to actively seek substitute teachers.

- XIII. Correspondence
 - a. The Library Media Center monthly report for September 2021 was shared.
- XIV. Question & Answer Opportunity
 - a. None
- XV. Adjournment

MOTION # 22 - ADJOURNMENT

ON THE MOTION of Mr. Snyder, seconded by Mrs. Billings, the Board moved to adjourn for the evening at 7:33 pm. Motion carried 5 yes, 0 no.

Uniform Guidance-Internal Controls

Madison Central School District

November 16, 2021

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Statement

A large portion of financial support for the Madison Central School District is derived from the Federal government. This funding is in the form of direct grants from the Departments of Education, Agriculture, and Defense as well as grants which flow through the New York State Education Department. The Federal Uniform Grant Guidance identifies the criteria that must be met in order to properly charge costs to federally funded projects.

The Madison Central School District shall adhere to all applicable cost principles governing the use of Federal grants and contracts. This policy addresses the importance of properly classifying costs, both direct and indirect, charged to grant funded projects and that proposed and actual expenditures are consistent with the grant agreement and all applicable Federal rules embodied in the Uniform Grant Guidance at 2 CFR 200 (UGG). District personnel who are responsible for administering, expending or monitoring grant funded programs should be well versed with the categories of costs that are generally allowable and unallowable.

All costs expended using Federal funds must meet the following general criteria laid forth in the UGG at 2 CFR 200, Subpart E:

- Be necessary and reasonable for the proper and efficient performance and administration of the grant program.
- Be allocable to Federal awards under the provisions of the Federal circular.
- Be authorized and not prohibited under state or local laws or regulations.
- Conform to any limitations or exclusions set forth in the principles, Federal laws, terms and conditions of the Federal award, or other governing regulations as to types or amounts of cost items.
- Be consistent with policies, regulations, and procedures that apply uniformly to both Federal awards and other activities of the District.
- Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost and also be charged to a Federal award as an indirect cost.
- Except as otherwise provided for in the Federal circular, be determined in accordance with generally accepted accounting principles and not included as a cost or used to meet cost sharing or matching requirements of any other Federal award in either the current or a prior period.
- Be net of all applicable credits.
- Be adequately documented.

The cost guidelines of the UGG must be considered any time Federal award funds are to be expended. The District may apply Federal UGG requirements to non-Federal projects. This applies, in particular, to the use of Federal Impact Aid under §7003, Elementary and Secondary Education Act of 1965, as amended. Funds received under the basic aid portion of this section of law are considered unrestricted, providing that the expenditure does not violate any of the assurances provided for during the application for the grant.

Federal regulations also require that any other District policies related to specific types of expenditures must also be followed. Examples include student incentives, travel, meals, procurement or equipment accountability.

Direct and indirect costs

Allowable and allocable costs must be appropriately classified as direct or indirect. In general, direct costs are those that can be identified specifically with a particular cost objective while indirect costs are those (a) incurred for a common or joint purpose benefiting more than one cost objective, and (b) not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. It is essential that each item of cost be treated consistently in like circumstances either as a direct or an indirect cost.

If an indirect cost rate is going to be utilized for charging indirect rates, the rate must first be approved by the applicable approving authority or not exceed the minimum level of 10%. In general, however, indirect costs will be borne by the District and not allocated to the grant.

Cost transfers

Any costs charged to a Federal award that do not meet the allowable cost criteria must be removed from the award account and charged to an account that does not require adherence to Federal UGG or other applicable guidelines. Cost transfers must be performed in accordance with the District's policy and will be approved by the Superintendent of Schools as a transfer.

Failure to adequately follow this policy and related procedures could result in questioned costs, audit findings, potential repayment of disallowed costs and discontinuance of funding. The Superintendent, school personnel and any other individuals responsible for expending grant funds are held responsible for compliance with UGG.

Responsibilities

Designated Program Office personnel and the District Treasurer are responsible for creating purchasing documents and encumbering grant funds. They should be familiar with the general cost principles embodied in the Federal UGG. Purchasing office personnel must notify the Principal when they recognize a request as an unallowable cost and will reject the requisition.

The Superintendent along with the District Treasurer must ensure that any costs charged to their award are aligned with applicable cost principles, are computed correctly, and would not create a compliance violation. The District Treasurer will collect, maintain and where applicable, submit copies of adequate documentation to support the expenditures. The District Treasurer will monitor, review and approve (or disapprove) grant expenditures at the program office level as the first level of "Approver" for non-personnel expenditures to ensure that applicable cost principles, regulations and policies are followed.

Related Policies

The following policies detail the responsibility and controls regarding purchasing and the allocation of costs to grants pursuant to Federal OMB circulars.

- 0010 Equal Opportunity and Nondiscrimination Policy
- 0020 Code of Ethics
- 1101 Records Management
- 1500 Parental Involvement in Title I Programs
- 4002 Fiscal Responsibilities
- 4200 Budget Planning
- 4302 Investments
- 4400 General Procurement Standards
- 4406 Capital Assets Accounting
- 4504 Certification of Payroll
- 4702 Use of District Credit Card
- 4704 Mileage, Meal and Expense Reimbursement
- 5301 School Lunch Program
- 5401 Computer Network Acceptable Use
- 6001 Employment, Recruitment, Selection, Appointment of Personnel
- 7002 Education of Homeless Children
- 7403 Student Contests
- 8206 Limited English Proficiency Instruction English Language Learners
- 8402 Educational Support Materials Selection

Definitions

Direct costs are expenses that are specifically associated with a particular grant program that can be directly assigned to such activities relatively easily with a high degree of accuracy. Common examples of direct costs include the GPM's salary and fringe benefits, equipment and supplies for the program, subcontracted service provider, or other materials consumed or expended in the performance of the grant.

Indirect costs are incurred for common or joint objectives and, therefore, cannot be readily and specifically identified with a particular program. They are expenses that benefit more than one grant. Common examples of indirect costs include utilities, local telephone charges, shared office supplies, administrative or secretarial salaries.

Acronyms

ACH	Automated Clearing House
CFDA	Catalog of Federal Domestic Assistance
CFR	Code of Federal Regulations
DoED (ED)	US Department of Education
EDGAR	Education Department General Administrative Regulations
EPLS	Excluded Parties List System
ESEA	Elementary and Secondary Education Act
FERPA	Family Educational Rights and Privacy Act
FMV	Full Market Value
G5	The US DoED Grant Management System
GAN	Grant Award Notice
GAAP	Generally Accepted Accounting Principles
GPM	Grant Program Manager
GSA	General Services Administration
LEP	Limited English Proficiency
MORIC	Mohawk Regional Information Center
NY GML	New York General Municipal Law
NYSED	New York State Education Department
OMB	Office of Management and Budget
PCEN	Pupils with Compensatory Educational Needs
UGG	Uniform Grant Guidance
WAWF	Wide Area Work Flow

History:

Created October 31, 2017

Reviewed and revised May 1, 2019

Reviewed and revised March 9, 2021

Revised May 21, 2021

Revised November 16, 2021

Appendix A – Financial Standards

The District maintains a proper financial management system in order to receive both direct and state-administered grants and to expend funds associated with a grant award. Fiscal controls and procedures must be in place to ensure that all financial management system requirements are met. Failure to meet a requirement may result in return of funds or termination of the award.

A. Financial Management Standards

Financial management systems standards include:

Identification

The District shall identify, in its accounts, all Federal awards received and expended and the Federal programs under which they were received. Impact Aid will be identified as such but is a general revenue. Construction aid under the Impact Aid program (§7007) must be expended in the capital fund for capital purposes. Aid for children with disabilities must be expended on those children. Federal program and award identification must include, as applicable, the CFDA title and number, Federal award identification number and year, name of the Federal agency, and, if applicable, name of the pass-through entity.

Financial Reporting

Accurate, current, and complete disclosure of the financial results of each Federal award or program must be made in accordance with the financial reporting requirements set forth in the Education Department General Administrative Regulations (EDGAR). The District must maintain records which adequately identify the source and application of funds provided for Federally-assisted activities. These records must contain information pertaining to grant or subgrant awards, authorizations, obligations, unobligated balances, assets, expenditures, income and interest and be supported by source documentation. Reports will be filed in a timely fashion on the forms directed by the state or Federal agency. These include, but are not limited to the FS-10 series, FS-25, and SF425.

Internal Controls

Effective control and accountability must be maintained for all funds, real and personal property, and other assets. The District shall safeguard all such property and must assure that it is used solely for authorized purposes. The District maintains an internal controls procedures manual which shall be followed to implement these activities. The District's internal auditor shall, from time to time, assess the effectiveness of these controls across all risk areas and shall include the controls of Federal grants and programs as part of this regular review.

B. Overview of the Financial Management/Accounting System

The District maintains a fund accounting system for financial management. This system is procured and maintained through the Mohawk Regional Information System (MORIC). The current system is nVision. This system manages fund accounting, the purchasing function, and the human resources function, including payroll. All budgets are loaded into the system after the approval by SED, transfers are made at that time for any expenses prior to the approval and transfers within accounts are authorized by the Superintendent of Schools and the District Treasurer. The District Treasurer along with the Superintendent of Schools are responsible for overseeing the entire system and its functional integration. Federal funds ("F" funds in nVision) are named in such a fashion to permit a clear delineation of the accounting for subsequent identification by CFDA title and number. Plain English names, including contract numbers if applicable, are used to track grants and targeted Federal funds.

The Treasurer and the Superintendent shall compile or cause to be compiled timely, accurate financial reports. Monthly grant reports shall include current and cumulative expenditures against project budget, with unencumbered amounts remaining identified

C. Budgeting

The Planning Phase: Meetings and Discussions

Before Receiving the Grant Award Notice (GAN): Upon notification of the availability of a grant, the Superintendent shall make an initial determination whether the District meets the minimum qualifications for the grant; whether this grant, if awarded, supplements and does not supplant any existing efforts in this area; and whether the grant is in concert with the District's educational objectives as outlined in the strategic plan. If the Superintendent determines that it is in the District's best interests to apply for a specific grant, he/she shall convene a small working group to develop a grant proposal meeting the objectives of the District and the awarding agency. In the event of grants continuing on a forward funded basis, the Director of the Office of Federal Programs shall develop a preliminary guide for the upcoming budget. Prior to filing the grant application for new awards, the Superintendent shall present the general grant concept to the Board of Education and receive its direction on filing for the grant. This direction may be in the form of informal guidance, including oral instructions.

Reviewing and Approving the Budget: The budget is developed with the Office of Federal Programs and the Superintendent once an amount is determined. The final approval of the grant budget normally resides with the awarding agency. Instructions and timelines for approval shall be followed in submitting the budget to the awarding agency. The Superintendent, in conjunction with the Treasurer, shall review the items in the budget to ensure allowability. See Appendix B for a discussion on allowability of costs. If this review determines that a cost is not allowable, then it shall be eliminated from the budget and the Principal shall be notified of this

action. Once the District Office determines that all budgeted items are allowable, the budget is approved by the Superintendent and forwarded to the awarding agency for its approval.

After Receiving the GAN: Upon receipt of notice that a new grant will be awarded, the Superintendent will prepare plans for implementation, including necessary hiring and procurement actions. In the case of continuation of forward funded grants, the Office of Federal Programs or the Treasurer will coordinate the budget with the Boces Central Business Office to ensure proper accounting for the expenditures.

Amending the Budget

The Office of Federal Programs, Treasurer, or Superintendent, as appropriate, shall prepare necessary documentation to amend any grants awarded. These amendments shall consider available carryover and shall comply with amendment provisions received in the Grant Award Notice. The Superintendent shall approve the amendments. If necessary, amendments shall be forwarded to and approved by the awarding agency.

Budget Control

On a monthly basis the Treasurer will provide the Board of Education, as well as the District administration, with a report of expenditures incurred during the month. This shall be incorporated into the monthly Treasurer's report for all District funds.

D. Accounting Records

Payroll and purchasing records for each grant, as well as application records, shall be maintained for a period of six years after the final receipts are made and the final bills are paid. Records will be maintained electronically in nVision along with the records management system in place.

E. Spending Grant Funds

The Treasurer shall oversee the accounting functions for all grants. Payroll operations will make allowable payments for personnel services. No employees shall be paid unless approved by the Board of Education. Purchasing operations shall be in accordance with the District Purchasing policy. Requisitions shall originate at the user level and be approved by the Superintendent and or Principal, before being forwarded to the Business Office for execution as a Purchase Order. Only the Purchasing Agent may commit the funds to a purchase.

Appendix B - Allowability of Cost

Expenditures must be aligned with approved budgeted items. Any changes or variations from the state or Federally approved budget and grant application need prior approval from the state or Federal government. For grants flowing through the State Education Department, variations or changes are documented on Form FS-10 or FS-10A and submitted to the controlling state authority for approval. For grants originating directly from the Federal government, changes will be submitted in a format approved by the awarding agency.

When determining how the District will spend its grant funds, the Superintendent and/or the District Business Office 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 EDGAR, 2 C.F.R. Part 3474 and 2 C.F.R. Part 200, Subpart E, which are provided in the bulleted list below. District personnel must consider these factors when making an allowability determination. Additional helpful questions to ask when making allowability determinations are located on page 13-14 of this policy.

- **Be Necessary and Reasonable for the performance of the Federal award.** District staff must consider these elements when determining the reasonableness of a cost. 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 to incur the cost was made. For example, reasonable means that sound business practices were followed, and purchases were comparable to market prices.

When determining reasonableness of a cost, consideration must be given to:

- Whether the cost is a type generally recognized as ordinary and necessary for the operation of the District or the proper and efficient performance of the Federal award.
- The restraints or requirements imposed by factors, such as: sound business practices; arm's-length bargaining; Federal, state and other laws and regulations; and terms and conditions of the Federal award.
- Market prices for comparable goods or services for the geographic area.
- Restrictions regarding product origin (e.g., "Buy American" requirements)
- Whether the individuals concerned acted with prudence in the circumstances considering their responsibilities to the District, its employees, its students, the public at large, and the Federal government.
- Whether the district significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the Federal award's cost. 2 C.F.R. §200.404

While 2 C.F.R. §200.404 does not provide specific descriptions of what satisfies the “necessary” element beyond its inclusion in the reasonableness analysis above, necessary is determined based on the needs of the program. Specifically, the expenditure must be necessary to achieve an important program objective. A key aspect in determining whether a cost is necessary is whether the district can demonstrate that the cost addresses an existing need, and can prove it. For example, the district may deem a language skills software program necessary for a limited English proficiency program.

When determining whether a cost is necessary, consideration may be given to:

- Whether the cost is needed for the proper and efficient performance of the grant program.
 - Whether the cost is identified in the approved budget or application.
 - Whether there is an educational benefit associated with the cost.
 - Whether the cost aligns with identified needs based on results and findings from a needs assessment.
 - Whether the cost addresses program goals and objectives and is based on program data.
-
- **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. 2 C.F.R. §200.405. 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. This will be documented in order to demonstrate the allocability determination.
 - **Consistent with policies and procedures that apply uniformly to both Federally financed and other activities of the District.**
 - **Conform to any limitations or exclusions set forth as cost principles 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.
 - **Adequately documented.** All expenditures must be properly documented.
 - **Be determined in accordance with general accepted accounting principles (GAAP), unless provided otherwise in the condition of the Federal award.**

- **Not 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 district relate to the Federal award, they shall be credited to the Federal award, either as a cost reduction or a cash refund, as appropriate. 2 C.F.R. §200.406. Non-cash credits (reward programs based on points, miles, etc.) shall not be considered credits (see policy 9310) and shall not be accrued to the Federal award.

As provided above, in addition to Federal guidelines, Federal rules require state- and District-level requirements and policies regarding expenditures be followed as well. Policies relating to local expenditures are listed as Related Policy above.

Selected Items of Cost

Part 200 examines the allowability of 55 specific cost items (commonly referred to as Selected Items of Cost) at 2 C.F.R. §§ 200.420-200.475. These cost items are listed in the chart below along with the citation where it is discussed whether the item is allowable. Do not assume that an item is allowable because it is specifically listed in the regulation as it may be unallowable in a specific award despite its inclusion in the selected items of cost section. The expenditure may be unallowable for a number of reasons, including: the express language of the regulation states the item is unallowable; the terms and conditions of the grant deem the item unallowable; or State/local restrictions dictate that the item is unallowable. The item may also be unallowable because it does not meet one of the cost principles, such as being reasonable because it is considered too expensive. If an item is unallowable for any of these reasons, Federal funds cannot be used to purchase it.

District personnel responsible for spending Federal grant funds and for determining allowability must be familiar with the Part 200 selected items of cost section. The District must follow these rules when charging these specific expenditures to a Federal grant. When applicable, District staff must check costs against the selected items of cost requirements to ensure the cost is allowable. In addition, State, District and program-specific rules may deem a cost as unallowable and District personnel must follow those non-Federal rules as well.

The selected item of cost addressed in Part 200 includes the following (in alphabetical order):

Item of Cost	Citation of Allowability Rule
Advertising and public relations costs	Allowable with restrictions
Advisory councils	Allowable with restrictions
Alcoholic beverages	Not allowable
Alumni/ae activities	Not specifically addressed
Audit services	Allowable with restrictions
Bad debts	Not allowable
Bonding costs	Allowable with restrictions
Collection of improper payments	Allowable
Commencement and convocation costs	Not specifically addressed
Compensation – personal services	Allowable with restrictions
Compensation – fringe benefits	Allowable with restrictions
Conferences	Allowable with restrictions
Contingency provisions	Not allowable with exceptions
Contributions and donations	Not allowable
Defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringements	Allowable with restrictions
Depreciation	Allowable with qualifications
Employee health and welfare costs	Allowable with restrictions
Entertainment costs	Not allowable with exceptions
Equipment and other capital expenditures	Based on specific requirements
Exchange rates	Allowable with restrictions
Fines, penalties, damages and other settlements	Not allowable with exception
Fund raising and investment management costs	Not allowable with exception
Gains and losses on disposition of depreciable assets	Allowable with restrictions
General costs of government	Not allowable with exceptions
Goods and services for personal use	Not allowable
Idle facilities and idle capacity	Idle facilities – not allowable with exceptions; idle capacity – allowable with restrictions
Insurance and indemnification	Allowable with restrictions
Intellectual property	Allowable with restrictions
Interest	Allowable with restrictions
Lobbying	Not allowable
Losses on other awards or contracts	Not allowable
Maintenance and repair costs	Allowable with restrictions

Materials and supplies costs, including costs of computing devices	Allowable with restrictions
Memberships, subscriptions, and professional activity costs	Allowable with restrictions, not allowable for lobbying organizations
Organization costs	Not allowable except Federal prior approval
Participant support costs	Allowable with prior approval of the Federal awarding agency
Plant and security costs	Allowable
Pre-award costs	Allowable with restrictions
Professional services costs	Allowable with restrictions
Proposal costs	Allowable with restrictions
Publication and printing costs	Allowable with restrictions
Rearrangement and reconversion costs	Allowable (ordinary and normal)
Recruiting costs	Allowable with restrictions
Relocation costs of employees	Allowable with restrictions
Rental costs of real property and equipment	Allowable with restrictions
Scholarships and student aid costs	Not addressed; refer to Federal agency awarding grant
Selling and marketing costs	Not allowable with exceptions
Specialized service facilities	Allowable with restrictions
Student activity costs	Not allowable unless specifically provided for in the Federal award
Taxes (including Value Added Tax)	Allowable with restrictions
Termination costs	Allowable with restrictions
Training and education costs	Allowable for employee development
Transportation costs	Allowable with restrictions
Travel costs	Allowable with restrictions
Trustees	Not specifically addressed, refer to Federal agency awarding agency

Likewise, it is possible for the State and/or District to put additional requirements on a specific item of cost. Under such circumstances, the stricter requirements must be met for a cost to be allowable. Accordingly, employees must consult Federal, State and District requirements when spending Federal funds. In general, district travel and procurement policy complies with state and Federal requirements. Compliance with district policy meets the intent of the uniform guidance.

In order for a cost to be allowable, the expenditure must also be allowable under the applicable program statute (e.g., ESSA of the Elementary and Secondary Education Act (ESEA), or the Carl D. Perkins Career and Technical Education Act (Perkins)), along with accompanying program regulations, non-regulatory guidance and grant award notifications.

The state and/or District rules related to some specific cost items are discussed below. All purchases of goods and services must be accomplished through the Business Office, with the Purchasing Agent acting to commit the funds. The Business Office shall coordinate personnel services procured through Federal awards, including both assignment of personnel costs to the grant and procurement of personnel services from an outside source. District employees must be aware of these State and District rules and ensure they are complying with these requirements.

Time and Effort Standards

All employees who are paid in full or in part with Federal funds must keep specific documents to demonstrate the amount of time they spent on grant activities. This includes an employee whose salary is paid with state or local funds but is used to meet a required “match” in a Federal program. These documents, known as time and effort records, are maintained in order to charge the costs of personnel compensation to Federal grants.

Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

- Be supported by a system of internal controls which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;
- Be incorporated into official records;
- Reasonably reflect total activity for which the employee is compensated, not exceeding 100% of compensated activities;
- Encompass both Federally assisted and all other activities compensated by the District on an integrated basis;
- Comply with the established accounting policies and practices of the District and Support the distribution of the employee’s salary or wages among specific activities or costs objectives.
- Be certified by the supervisor to assure that the work was in compliance with the grant or award intent.

Time and Effort Procedures

The District's time and attendance accounting procedures are based on accounting for time "lost." Specifically, the District requires that all time away from work be reported, while time on the job is generally considered as having been accomplished without providing documentation to that effect. Individuals compensated by Federal grant or award must account for the time on the job, and the portion of time spent on Federally related work, separately in order to properly meet the time and effort requirements. These records will be filed with the applicable grant to substantiate the use of time.

Helpful Questions for Determining Whether a Cost is Allowable

In addition to the cost principles and standards described above, the Office of Federal Programs or the award program manager 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:

- Is the proposed cost allowable under the relevant program?
- Is the proposed cost consistent with an approved program plan and budget?
- Is the proposed cost consistent with program specific fiscal rules?
 - For example, the District may be required to use Federal funds only to supplement the amount of funds available from non-Federal (and possibly other Federal) sources.
- Is the proposed cost consistent with specific conditions imposed on the grant (if applicable)?

As a practical matter, the Office of Federal Programs or the award program manager should also consider whether the proposed cost is consistent with the underlying needs of the program and the approved District goals and strategy. For example, program funds must benefit the appropriate population of students for which they are allocated. This means that, for instance, funds allocated under Title III of the Elementary and Secondary Education Act (ESEA) governing language instruction programs for limited English proficient (LEP) students must only be spent on LEP students and cannot be used to benefit non-LEP students. Funds should be targeted to address areas of weakness, as necessary. To make this determination, the Superintendent or the Principal should review data when making purchases to ensure that Federal funds to meet these areas of concern.

Appendix C – Cash Management

The District will comply with applicable methods and procedures for payment that minimize the time elapsing between the transfer of funds and disbursement by the District, in accordance with the Cash Management Improvement Act at 31 CFR Part 205. Generally, the District receives payment from the New York State Department of Education on a reimbursement basis. However, if the District receives an advance in Federal grant funds, the District will remit interest earned on the advanced payment quarterly to the Federal agency consistent with 2 C.F.R. § 200.305(b)(9).

According to guidance from the U.S. Department of Education (ED), when calculating the interest earned on ED 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 District.

Interest would not accrue if the District uses non-Federal funds to pay the vendor and/or employees prior to the funds being drawn down from the G5 or Wide Area Work Flow (WAWF) system, commonly known as a reimbursement.

Payment Methods

Reimbursements: The District will initially charge Federal grant expenditures to non-Federal funds.

The District Business Office will request reimbursement for actual expenditures incurred under the Federal grants at least semi-annually, and more frequently if dictated by the awarding agency. Requests for reimbursement will be filed with the Grants Finance Unit of NYSED, through G5, or through WAWF, depending on the source of the grant. The reimbursement method will dictate the required forms to substantiate the claim. All reimbursements shall be based on actual disbursements, not on obligations.

Consistent with state and Federal requirements, the District will maintain source documentation supporting the Federal expenditures (invoices, time sheets, payroll stubs, etc.) for a period of six years after the grant is closed and the final funds are received and will make such documentation available for review by NYSED upon request.

Reimbursements of actual expenditures do not require interest calculations.

Advances: To the extent the District receives advance payments of Federal grant funds, the District will strive to expend the Federal funds on allowable expenditures as expeditiously as possible. Specifically, the District attempts to expend all drawn downs of Federal funds within 72 hours of receipt. The District will hold Federal advance payments in interest-bearing accounts, unless an allowable exception applies. The District will begin to calculate interest earned on cash balances once funds are deposited into the District's account.

Interest on advances will be calculated based on interest received daily and shall be apportioned to the Federal funds in the account in direct proportion to the overall amount in the account. Total Federal grant cash balances will be calculated on cash balances per grant and applying the District's actual interest rate. The District will remit interest earned on grant funds annually to the U.S. Department of Health and Human Services Payment Management System (regardless of the Federal awarding agency for the grant) through an electronic medium using either Automated Clearing House (ACH) network or a Fedwire Funds Service payment. The District may retain up to \$500 of interest earned per year. To the maximum extent possible, use of advance payments shall be avoided. Reimbursements are the preferred means of utilizing Federal grants.

Carryover

State-Administered Grants: The District may be able to "carryover" any funds left over at the end of the initial 15 month period into the next year. These leftover funds are typically referred to as carryover funds and continue to be available for obligation for an additional 12 months. 34 C.F.R. § 76.709. Accordingly, the District may have multiple years of grant funds available under the same program at the same time. The Treasurer will track the expenditures and encumbrances and will determine the amount of available funding for carryover. The Superintendent will be kept aware of this amount and will adjust the expenditures to reflect this factor. The carryover will be reported in the monthly fiscal reports submitted to the Board of Education.

Direct Grants: Direct grants are not normally subject to carryover provisions. However, under 2 C.F.R. § 200.308, direct grantees enjoy unique authority to expand the period of availability of Federal funds. The District is authorized to extend a direct grant automatically for one 12-month period. Prior approval is not required in these circumstances; however, in order to obtain this extension, the District must provide written notice to the Federal awarding agency at least 10 calendar days before the end of the period of performance specified in the award. This one-time extension may not be exercised merely for the purpose of using unobligated balances. The Superintendent will coordinate the notice to the awarding agency and monitor the progress in obtaining the extension.

The District will seek prior approval from the Federal agency when the extension will not be contrary to Federal statute, regulation or grant conditions and:

- The terms and conditions of the Federal award prohibit the extension;
 - The extension requires additional Federal funds; or
 - The extension involves any change in the approved objectives or scope of the project.
- 2 C.F.R. § 200.308(d)(2).

Appendix D - Standards of Conduct

In accordance with 2 C.F.R. §200.112, NY GML §§ 806 and 808, and District policies 2160 and 2320, the District maintains of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts.

No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The District will disclose in writing any potential conflicts of interest to NYSED in accordance with Federal awarding agency policy.

The officers, employees, and agents of the District may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts, unless the gift is an unsolicited item of nominal value. Any gift having a value of \$75 or more, whether in the form of money, services, loan, travel, entertainment, hospitality, thing or promise, or any other form, under circumstances in which it could reasonably be inferred that the gift was intended to influence him or her in the performance of his or her official duties or was intended as a reward for any official action on his or her part shall not be accepted. However, the Board welcomes and encourages the writing of letters or notes expressing gratitude or appreciation to staff members. Gifts from children that are principally sentimental in nature, and of significant financial value, may be accepted in the spirit in which they are given.

“Officer or Employee” means an officer or employee of the District, whether paid or unpaid, including members of the Board and their appointed professional or nonprofessional staff.

“Interest” means an officer or employee shall be deemed to have an interest in the contract of (a) his spouse, minor children and dependents, except a contract of employment with the municipality which such officer or employee serves, (b) a firm, partnership or association of which such officer or employee is a member or employee, (c) a corporation of which such officer or employee is an officer, director, or employee and (d) a corporation any stock of which is owned or controlled directly or indirectly by such officer or employee."

Any employee, officer, or member of the public noting or suspecting a violation of this policy is encouraged to bring the matter to the Board or the Superintendent of Schools. Matters of this nature shall be held in confidence to the maximum extent possible pending a thorough investigation of the allegations of impropriety. Knowing or willful violation of this policy by any employee or member of the Board may result in disciplinary action up to and including dismissal.

In addition to any penalty contained in any other provision of law, any person who shall knowingly and intentionally violate any of the provisions of the Board's code of ethics and its accompanying regulation may be fined, suspended, or removed from office or employment, as the case may be, in the manner provided by law.

Any District officer or employee who has, will have, or later acquires an interest in any action, legislation, or proposed contract shall publicly disclose the nature and extent of such interest in writing to the Board of Education, except that such disclosure shall not be required for any of the exceptions listed under New York General Municipal Law §802

No District officer or employee shall, after termination of services or employment with the District, appear before any board, department, or agency of the District in relation to any case in which the individual personally participated during the period of service or employment, or which was under active consideration.

No District officer or employee shall engage in, solicit, negotiate for, or promise to accept private employment when such interests or services create a conflict with or impairs the proper discharge of official duties. This shall include entering into contingency agreements to represent clients before the Board.

Board members shall disclose, in writing, upon assuming office, any possible conflicts of interest. This shall be entered into the minutes of the Board at the reorganization meeting in July. At any time where a possible conflict arise, the Board member will also make such disclosure in writing. As an example, a board member married to the owner of a business, or acting as an officer in the business, with which the District conducts business exceeding \$750 annually, must make such disclosure. The disclosure only needs to be made once unless there is a material change to the underlying factors. By making such a notice the appearance of impropriety is mitigated and the ability to influence the District for personal gain it in full view.

Appendix E – Eligibility

The main objective of this compliance requirement is that only eligible individuals or organizations participate in Federal assistance programs. The criterion for determining eligibility will vary from program to program, but the objective that only eligible individuals or organizations participate remains consistent across all Federal programs. To comply with this objective, recipients must first assure that proper eligibility determinations are made, which means that the recipient must determine the parameters and limitations to define eligibility for a specific program in accordance with the program's purpose. Eligibility for a specific award will be announced in the award notice. Some awards are dependent on the level of enrollment of a specific class of students in a building or in the district. Examples are numbers of military children, numbers of English Language Learners, and numbers of children living at or below a specified poverty level. In making application for a grant or award, the District will ensure that it is qualified for all eligibility criteria and shall maintain evidence of the qualification for the duration of the award period and the required records holding period.

Appendix F – Equipment and Real Property Management

Equipment and real property procured through any Federally funded award shall be accounted for under District Policies 4400 – Procurement; and 4403 - Depreciation Policy. The District shall maintain an active accounting and inventory system for all items procured through Federal grants.

A. Property Classifications

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 District for financial statement purposes, or \$5,000. 2 C.F.R. § 200.33.

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 District for financial statement purposes or \$5,000, regardless of the length of its useful life. 2 C.F.R. § 200.94.

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. 2 C.F.R. § 200.20.

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

- Land, buildings (facilities), equipment, and intellectual property (including software) whether acquired by purchase, construction, manufacture, lease-purchase, exchange, or through capital leases; and
- 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). 2 C.F.R. § 200.12.

B. Inventory Procedure

Upon receipt any property classified above, the Shipping and Receiving Department or the Technology Department shall identify the equipment, inspect it for condition, ensure it matches the requirement stated on the purchase order, and shall apply asset control tags to the equipment/item. The item shall be entered into the inventory system in sufficient detail to provide a discrete identification of the item (nomenclature, serial numbers, model numbers, etc.) as well as the location where the equipment will ultimately be situated. Only after this is

accomplished will the equipment be shipped to the final destination. Receiving reports will then be signed and forwarded to the Business Office for processing and payment.

C. Inventory Records

For each equipment and computing device purchased with Federal funds, the following information is maintained:

- Serial number or other identification number;
- Source of funding for the property;
- Who holds title (this may be MORIC if they acted as purchasing agent);
- Acquisition date and cost of the property;
- Percentage of Federal participation in the project costs for the Federal award under which the property was acquired;
- Location, use and condition of the property; and
- Any ultimate disposition data including the date of disposal and sale price of the property.

Upon final disposition of the property (either at the end of useful life, sale, loss, etc.) the shipping and receiving department shall request that the Board of Education declare the item excess to the needs of the District. Once this resolution is recorded in the minutes, the Shipping and Receiving clerk may dispose of the property within the guidelines approved by the Board of Education. Any monetary value derived from the disposal of the property shall be applied as a credit to the Federal Grant, if applicable.

D. Physical Inventory

A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years. The inventory will be accomplished by the Technology Department Micro-computer Technician assigned to the specific building or by the Shipping and Receiving clerk during his annual inventory.

E. Maintenance

In accordance with 2 C.F.R. § 200.313(d)(4), the District maintains adequate maintenance procedures to ensure that property is kept in good condition. Issues arising during normal operations will be reported to the appropriate agency (Buildings and Grounds or Technology) .

F. Lost or Stolen Items

The District maintains a control system that ensures adequate safeguards are in place to prevent loss, damage, or theft of the property. Devices are assigned for use by trained personnel. Losses will be reported to the building office as soon as practicable after the loss is noticed. At that time, appropriate administrative personnel will conduct an inquiry to determine the nature and cause of the loss. If a theft is suspected, a police report will be filed (contact the School Resource Officer for processing procedures). If the property is not recovered in 60 days, it can be removed from the inventory as a loss.

G. Use of Equipment

Equipment 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 District 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.

H. Disposal of Equipment

When it is determined that original or replacement equipment acquired under a Federal award is no longer needed for the original project or program or for other activities currently or previously supported by a Federal awarding agency, the Superintendent will contact the awarding agency (or pass-through for a state-administered grant) for disposition instructions.

Generally, disposition of equipment is dependent on its fair market value (FMV) at the time of disposition. If the item has a current FMV of \$5,000 or less, it may be retained, sold, or otherwise disposed of with no further obligation to the Federal awarding agency. If the item has a current FMV of more than \$5,000, the Federal awarding agency is entitled to the Federal share

of the current market value or sales proceeds. All final decisions to excess property are reserved to the Board of Education.

If acquiring replacement equipment, the District may use the equipment to be replaced as a trade-in or sell the property and use the proceeds to offset the cost of the replacement property. Net cost will be applied to any accounts used to acquire equipment including a trade in.

Appendix G – Matching, Level of Effort and Earmarking

Matching, also referred to as “cost sharing”, is a requirement for the recipient to provide contributions or donations of a specified amount or percentage to supplement Federal assistance received. In other words, when the recipient participates in a Federal program and an operating budget is prepared, the Federal government may require the recipient to provide contributions to cover a portion of that program’s operations.

Level of effort defines particular goals or objectives the recipient must achieve with the assistance received, and includes recipient requirements for a specified level of service, specified level of expenditures for designated activities, and Federal funds to supplement and not supplant non-Federal services.

Earmarking is a requirement that specifies a limit amount or percentage of the program’s assistance that must (minimum) or may (maximum) be used for specified activities. Examples of this include limits imposed on the Federal government on the amount of Federal funds to cover administrative expenses, or a percentage requirement for total program funds provided to subrecipients. Earmarking may also be specified in relation to the types of participants covered (e.g. a limit on how many participants a recipient can provide assistance to).

Individual Federal grants may have matching or level of effort requirements associated with the grant as a condition of award. The Superintendent will determine these requirements during the application/pre-award phase of the process. These requirements will be budgeted and tracked during execution of the award. The following criteria will be met when identifying matching/level of effort/earmarking of funds by the District:

- Must be verifiable in the District’s accounting system
- Must not be included as the contribution to any other Federal award (no “double-dipping”)
- Must be necessary and reasonable for accomplishing the program objectives
- Must be allowable under cost principles previously stated in this guidance
- Must not be paid by another Federal agency or under another Federal award
- Must be provided for in the budget approved for the award by the applicable Federal Agency.

The Grant Program Director will ensure that earmark requirements are fully complied with. The Business Office will monitor this aspect and ensure that no funds are disbursed that do not meet the earmark requirements.

Appendix H – Period of Performance

The period of performance will be described in the grant award notice. All obligations must occur on or between the beginning and ending dates of the grant project. 2 C.F.R. § 200.309. This period of time is known as the period of performance. 2 C.F.R. § 200.77. The period of performance is dictated by statute. Further, certain grants have specific requirements for carryover funds that must be adhered to. The period of performance is a required data point for claiming reimbursement through G5 or WAWF. The period of performance can only be changed by the awarding agency. In instances where the budget is under executed and funding will remain at the end of the performance period, the Superintendent, or the District Treasurer will apply to the awarding agency for an extension of the time for performance. If granted, this extension will be listed on a modification to the grant award notice. On application for reimbursement, all information on award notice modifications must be annotated on the claim in order for it to be processed properly and in a timely fashion.

Appendix I – Procurement and Suspension and Debarment

This section covers compliance of laws and regulations when obtaining a good or services from a vendor, supplier, or provider. The District will comply with its established Procurement policy (Policy 4400) in all purchases made through Federal grants or awards. The fact that the source is a Federal grant/award does not relieve the District from complying with all aspects of the effective policy. The procurement requirement is established to ensure that such goods and services are obtained in an effective manner, including the prohibition of conflicts of interest, the fair selection of vendors, provide open and free competition among vendors, etc. The suspension and debarment requirement establishes that certain non-Federal entities have been prohibited from participating in or receiving Federal assistance for various reasons, including prior mismanagement of funds or previous non-compliance of laws and regulations. This prohibition may be temporary (suspension) or indefinite (debarment; until specifically allowed by the government). When performing this purchase, the District Purchasing Agent must verify that the vendor, supplier, provider or their respective principals (e.g., owners, top management, etc.) are not suspended, debarred or otherwise excluded by the Federal government. This is done by checking the Excluded Parties List System (EPLS) maintained by the General Services Administration (GSA) or by contacting the Federal agency.

The District awards contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources.

The District may not subcontract with or award subgrants to any person or company who is debarred or suspended.

Appendix J – Program Income

Program income is sometimes directly generated by the Federally funded program. This type of income includes, but is not limited to, income from fees for services performed, the use or rental of real or personal property acquired under Federal awards, the sale of commodities or items fabricated under a Federal award, license fees and royalties on patents and copyrights, and principal and interest on loans made with Federal award funds. However, it generally does not include interest on program funds (which is covered under “Cash Management”); nor does it cover rebates, credits, discounts, and refunds (covered under “Allowable Costs/Cost Principles”); nor proceeds from the sale of equipment or real property (covered under “Equipment and Real Property Management”). The uses or treatment of program income are either deducted by the Federal agency from the current program budget (e.g., the program income substitutes part of the original budget), added to the current program budget, or used to meet matching requirements.

Use of Program Income

The default method for the use of program income for the District is the deduction method. Under the deduction method, any program income is deducted from total allowable costs to determine the net allowable costs. Program income will only be used for current costs unless the District is otherwise directed by the Federal awarding agency or pass-through entity. The District may also request prior approval from the Federal awarding agency to use the addition method. Under the addition method, program income may be added to the Federal award by the Federal agency and the District. The program income must then be used for the purposes and under the conditions of the Federal award.

While the deduction method is the default method, the District always refers to the GAN prior to determining the appropriate use of program income.

Appendix K – Reporting

This section establishes that all recipients must submit reports (whether financial, performance-related, or of special nature) to the Federal government to monitor Federal assistance activities and uses. The most common reports are pre-designed by the Federal agency, are approved by OMB, and are available to all recipients and the general public. The time deadlines for submitting them vary depending on the report, and will generally be established in the initial Grant Award Notice. Furthermore, the reporting requirements (e.g., which reports must be submitted, the timing of the submission, information in the reports, etc.) may vary from recipient to recipient, although the Federal government has established several reports that apply to all recipients. Common reports include:

- SF-270 the *Request for Advance or Reimbursement*.
- SF-425 the *Federal Financial Report*.
- FS-10 the *Proposed Budget for a Federal or State Project*
- FS-10A the *Proposed Amendment for a Federal or State Project*
- FS-25 the *Request for Funds for a Federal or State Project*

Maintenance of Effort Monitoring

Procedures:

- Budget Development Monitoring
 - The District Treasurer assigned to the MOE is responsible for ensuring that MOE is maintained during the General Fund budgeting process. Any potential issues identified with proposed reductions to any of the associated MOE budget codes are discussed and resolved with the CSE Chairperson.
 - The District Treasurer reviews MOE compliance in conjunction with the final review of the General Fund Budget.
- Expenditure Monitoring
 - Quarterly during the year, the District Treasurer completes expenditure projections for the MOE budget codes to determine whether the District is on-track to maintain the required MOE compliance for the year based on current spending, encumbrances and projected salaries and benefits.
 - The District Treasurer reviews these projections with the CSE Chairperson and any potential underspending issues are addressed with the appropriate functional area staff to ensure sufficient spending occurs by yearend.
- Reporting Deadline Monitoring

- The District Treasurer assigned to MOE is responsible for gathering information regarding the MOE requirements, submission instructions, and filing deadlines from the NYSED IDEA website. The District Treasurer reviews all available information focusing on any changes in filing, deadlines, cost allowability requirements, and/or cost allocation requirements and prepared the MOE submissions.
- The District Treasurer is responsible for monitoring the due date for submission of the MOE Calculator for budget and for actuals and ensuring the accuracy and timeliness of the submissions by the applicable due dates.
- Internal Control Monitoring

Madison Central School is exempt from the Internal Control due to having an actual enrollment of less than 1,500 student in the previous school year, as reported on the Property Tax Report Card.

Reconciliation and Closeout Procedures

It is critical for charges to match the actual disbursement. Budget estimates or other distribution percentages determined before the services are performed or purchases made do not qualify as support for charges to Federal awards, but may be used for interim accounting purposes provided that the system for establishing the estimates produces reasonable approximations of the activity actually performed. Therefore, when filing final reports, all accounting must be for actual, not budgeted accounting numbers.

Record Retention

A. Retention:

The District maintains all records that fully show (1) the amount of funds under the grant or subgrant; (2) how the sub-grantee uses those funds; (3) the total cost of each project; (4) the share of the total cost of each project provided from other sources; (5) other records to facilitate an effective audit; and (6) other records to show compliance with Federal program requirements. The District also maintains records of significant project experiences and results. These records and accounts must be retained and made available for programmatic or financial audit and will be maintained for a minimum of six years after filing the final reports, unless the New York state retention period prescribes a longer retention period.

The U.S. Department of Education is authorized to recover any Federal funds misspent within 5 years before the receipt of a program determination letter. If any litigation, claim, or audit is started before the expiration of the record retention period, the records will be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.

Upon reaching the end of the retention period, records will be destroyed by shredding or, in the case of electron records, deletion with overwrite on the recorded section of the medium.

B. Access to Records

The District provides 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 District 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 District's personnel for the purpose of interview and discussion related to such documents.

C. Privacy

The District protects the privacy of the records under the Family Educational Rights and Privacy Act (FERPA). Documents subject to Freedom of Information Law requests or Freedom of Information Act requests will be reviewed for privacy concerns and properly redacted prior to release under either law. This does not apply to properly executed subpoenas or investigations by properly documented law enforcement in the conduct of official duties.

Appendix L – Subrecipient Monitoring

In the event that the District awards subgrants to other entities (also known as pass-through entities), the District shall monitor those grant subrecipients to ensure compliance with Federal, state, and local laws. Monitoring is the regular and systematic examination of all aspects associated with the administration and implementation of a program. Each program office that awards a subgrant must have its own monitoring policy. This policy must ensure that any monitoring findings are corrected. The District shall require that all subrecipients provide required reports and financial documents in sufficient detail to permit the District to make it required reports. In this manner the District will exercise a level of control. The District may also conduct site visits, regular contact, interviews, meetings and examinations of the subrecipient, as well as requiring that the subrecipient be subject to an annual single audit. The specific measures will be developed at the time the subgrant is awarded and will be followed up by the District Superintendent.

Appendix M – Special Tests and Provisions

Certain programs have unique compliance requirements—established by laws, regulations, and contract or grant agreements—that do not fit into the requirements listed above. The Superintendent must review these, normally provided in the Grant Award Notice, and ensure compliance with those requirements. The auditor must review the program’s contract, grant agreements, referenced laws, and regulations to identify unique compliance requirements. In conjunction with the Superintendent and the Treasurer, the auditor will develop audit objectives and audit procedures under this section to ensure full compliance.

**Madison Central School District
Reserves Report
June 2021**

Capital Reserve

Creation – This reserve was created on 5/21/2019.

Purpose – This reserve is used to pay for future capital improvements.

Funding Methods - The source from with the funds for said fund will be obtained as follows: (1) amounts from budgetary appropriations from time to time, and (2) unappropriated fund balance made available by the Board of Education from time to time, and (3) New York State Aid received and made available by the Board of Education from time to time, and (4) existing capital reserve funds.

Use of Reserve - Expenditure of funds from this reserve requires pre-approval by the voters.

Monitoring of Reserve – This reserve will be monitored by the District Treasurer along with the Board of Education.

Funding Level- This reserve was created with a maximum funding of up to \$500,000 plus earnings with the vote of May 21, 2019. The reserve was increased with the May 18, 2021 budget vote to an additional \$200,000 plus earnings.

6/30/2020 Actual Balance: \$303,804.16

Funds used as of 6/30/2022: \$0

Balance 6/30/2021 = \$704,574.08

Recommendation: Fund up to allowable limits from available funds June 30, 2022.

Reserve for Accrued Employee Benefits Liability – (A 867)

Creation – This reserve was created on December 13, 2005.

Purpose – The financing of retirement contributions.

Funding Methods – The source from which the funds for such Reserve Fund will be obtained is as follows: (1) surplus dollars available to the District when it closes its books every June 30, (“surplus” intended to mean the difference between revenues and expenses); (2) such amounts as may be provided therefore by budgetary appropriations or raised by a tax therefore; (3) such revenues as are not required by law to be paid into any other fund or account; and (4) such other funds as may be legally appropriated. Also accrued interest will be added to this fund.

Use of Reserve - This reserve is used when an employee separates from the District and payment of accumulated leave is required. These transactions flow through the budget via a budget revision with the offsetting revenue coming from a drawdown of this reserve. This reserve will continue to be used in this manner to make these payments.

Monitoring of Reserve – This reserve is monitored by the District Treasurer along with the Board of Education. Each year, a detailed analysis of the liability is computed and is used to support the funding of this reserve.

Funding Level – This reserve should be funded at 100% of the accrued liability for the retirement contributions.

6/30/2020 Actual Balance: \$633,281.76

Funds Used as of 6/30/2020: \$37,892.50

Balance (Prior to Restoring Funds and Accruing Interest) = \$589,745.62 – 6/30/2021

Recommendation: Restore funds when necessary to meet liability.

Reserve for Retirement Contributions – (A 827)

Creation – This reserve was created on June 30, 2006.

Purpose – This reserve is used to pay employer contribution expenses for the NYS Employees' Retirement System. Payments to the Teachers Retirement system are not allowed from this reserve.

Funding Methods – Funds have been placed in this reserve from excess fund balance.

Use of reserve - This reserve is used to pay expenses related to the employees' Retirement System, and to smooth tax levy fluctuations that result from rate changes and cost increases associated with these expenses. The district's ERS expenses have increased substantially over the last ten years.

Monitoring of Reserve – This reserve is monitored by the District Treasurer and the Board of Education.

Funding Level – The reserve balance at June 30, 2021 equals approximately 75% of the projected amount due to the retirement system.

6/30/2020 Actual Balance: \$75,107.35

Funds Used as of 6/30/2020: \$8,059.67

Balance (Prior to Restoring Funds and Accruing Interest) = \$83,167.02

Recommendation: Restore funds to defray future cost increases and levy fluctuations

Reserve for Unemployment Insurance – (A 815)

Creation – This reserve was created prior to June 1, 2003.

Purpose – This reserve is used to reimburse the State for payments made to claimants. The Unemployment Board had changed the methodology for billing school districts for unemployment. The expense will be a fluctuating rate based on payroll expenses, rather than a rate tied to actual cost.

Funding Methods – This reserve was funded entirely from excess fund balance.

Use of Reserve – The district is self-insured for Unemployment Insurance. This reserve is used to pay claims that exceed budgeted appropriations for unemployment claims and expenses. Actual expenses for unemployment vary from year to year.

Monitoring of Reserve – This reserve will be monitored by the District Treasurer along with the Board of Education to assess the potential for incurring unemployment claims.

Funding Level – This reserve was initially funded at \$40,058.52. On occasion the Board of Education deemed it necessary to increase the amount to the current level.

6/30/2020 Actual Balance: \$191,070.80

Funds Used As of 6/30/2021 : \$0

Balance (Prior to Restoring Funds and Accruing Interest) = \$196,928.26

Recommendation: Reduce current funding level due to the lack of activity in the account.

Reserve for Liability – (A 862)

Creation – This reserve was created prior to July, 2003.

Purpose – This reserve was created for potential liabilities that the district anticipated.

Funding Methods – This reserve was funded entirely from excess fund balance.

Use of Reserve – The purpose of this account is to reserve funds for the payment of any accrued employee benefit due an employee upon termination of the employee's service.

Monitoring of Reserve – This reserve is monitored by the District Treasurer along with the Board of Education.

Funding Level – This reserve was funded by excess fund balance for liabilities that occurred with the direction of the Board of Education.

6/30/2021 Actual Balance: \$446,014.97

Recommendation: Reduce current level due to the inactivity of the account.

Reserve for Tax Certiorari – (A 864)

Creation - This reserve was created in June, 2010.

Purpose – This reserve was created when the District receive a Notice of Petition from Attorney Patrick Raymond in regards to Verizon New York vs. The Assessor, for the Town of Madison, disputing the assessments for taxes. The Board of Education determined it necessary to establish this reserve. As the years went on they transferred it to the Madison Windmills and the potential dispute of the assessments. There was an agreement made in regards to the Madison Windmills and the assessment was set on the agreed amount.

Use of Reserve – The District has at this time decided that the claim is invalid and is looking to liquidate this reserve in the 2017-2018 school year.

Monitoring of Reserve – This reserve will be monitored by the District Treasurer along with the Board of Education.

Funding Level – This reserve was created with excess fund balance.

This Reserve was eliminated on 6/30/2018 as directed by the Board of Education.

6/30/2018 Actual Balance: \$0

Funds to be used: \$0

Recommendation:

The following items are not reserve accounts, but are equally as important to planning revenues for the District.

Assigned Fund Balance – Appropriated for Subsequent Years

Creation – These funds are funds available in the fund balance which have been set aside for a particular purpose, namely to reduce the tax levy required to support an ensuing years budget.

Purpose – These funds are set aside and returned to the community by lowering the required tax levy to support the district’s budget.

Funding Methods – The funds are assigned from fund balance to offset the next year’s tax levy.

Use of Funds – It is recommended that the practice of returning these funds be reduced as much as possible, as budgets permit. As we develop tighter budgets, the amount of excess funds that will be available at year–end is restricted. This makes it more difficult to guarantee that funds will be available to be returned in a subsequent year.

Monitoring of Balance – The balance and use of these funds are monitored by the District Treasurer along with the Board of Education.

Funding Level – Over time, it is recommended that the planned amount of assigned fund balance included as a revenue source in future budgets be limited.

6/30/2021 Actual Balance: \$150,000

Anticipated 6/30/2022: At this time the Board of Education is comfortable with having the current amount and they are not looking to increase or decrease the amount.

Unassigned Fund Balance

Creation – Retention of these funds are allowed by law.

Purpose – These funds are unrestricted and may be used for any valid purpose.

Funding Methods – These funds have been accumulated from excess fund balance.

Use of Funds – It is recommended that these funds not be used except for an emergent, unanticipated expense, or revenue shortfall, that cannot be handled either in the budget or with other available reserves.

Monitoring of Balance – These funds are monitored by the District Treasurer and the Board of Education.

Funding Level – The maximum legal limit is recommended (4% of the ensuing budget). Although at times the District feels that there is a need to carry more than the legal limit with cause.

6/30/2021 Actual Balance: \$1,450,576.44

Recommendation for the 6/30/2022: Maximum 4% of the 2022-2023 budget.

Reserve for Retirement Contributions – (A 828)

Creation – This reserve was created on April 23, 2019 as a sub-fund of the ERS retirement reserve fund.

Purpose – This reserve is used to pay employer contribution expenses for the NYS Teachers' Retirement System.

Funding Methods – Funds have been placed in this reserve from fund balance.

Use of reserve - This reserve is to pay expenses related to the Teachers' Retirement System, and to smooth tax levy fluctuations that result from rate changes and cost increases associated with these expenses. The district's TRS expenses have increased substantially over the last ten years.

Monitoring of Reserve – This reserve is monitored by the District Treasurer and the Board of Education.

Funding Level – The reserve balance shall not exceed 10% of the total compensation or salaries of all teachers employed by the District who are members of TRS paid during the immediately preceding fiscal year.

6/30/2020 Actual Balance: \$127,098.42

Funds Used as of 6/30/2020: \$64,325.46

Balance (Prior to Restoring Funds and Accruing Interest) = \$191,423.88

The fund is increasing as per the regulations.

Recommendation: Restore funds to defray future cost increases and levy fluctuations

Madison Central School District
Reserves Report
June 2021

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Capital Reserve

Creation – This reserve was created on 5/21/2019.

Purpose – This reserve is used to pay for future capital improvements.

Funding Methods - The source from with the funds for said fund will be obtained as follows: (1) amounts from budgetary appropriations from time to time, and (2) unappropriated fund balance made available by the Board of Education from time to time, and (3) New York State Aid received and made available by the Board of Education from time to time, and (4) existing capital reserve funds.

Use of Reserve - Expenditure of funds from this reserve requires pre-approval by the voters.

Monitoring of Reserve – This reserve will be monitored by the District Treasurer along with the Board of Education.

Funding Level- This reserve was created with a maximum funding of up to \$500,000 plus earnings with the vote of May 21, 2019. The reserve was increased with the May 18, 2021 budget vote to an additional \$200,000 plus earnings.

6/30/2020 Actual Balance: \$303,804.16

Funds used as of 6/30/2022: \$0

Balance 6/30/2021 = \$704,574.08

Recommendation: Fund up to allowable limits from available funds June 30, 2022.

Reserve for Accrued Employee Benefits Liability – (A 867)

Creation – This reserve was created on December 13, 2005.

Purpose – The financing of retirement contributions.

Funding Methods – The source from which the funds for such Reserve Fund as follows: (1) surplus dollars available to the District when it closes its books ("surplus" intended to mean the difference between revenues and expenses), amounts as may be provided therefore by budgetary appropriations or raised by therefore; (3) such revenues as are not required by law to be paid into any other fund account; and (4) such other funds as may be legally appropriated. Also accrued interest be added to this fund.

Use of Reserve – This reserve is used when an employee separates from the District and payment of accumulated leave is required. These transactions flow through the budget via a budget revision with the offsetting revenue coming from a drawdown of this reserve. This reserve will continue to be used in this manner to make these payments.

Monitoring of Reserve – This reserve is monitored by the District Treasurer along with the Board of Education. Each year, a detailed analysis of the liability is computed and is used to support the funding of this reserve.

Funding Level – This reserve should be funded at 100% of the accrued liability for the retirement contributions.

6/30/2020 Actual Balance: \$633,281.76

Funds Used as of 6/30/2020: \$37,892.50

Balance (Prior to Restoring Funds and Accruing Interest) = \$589,745.62 – 6/30/2021

Recommendation: Restore funds when necessary to meet liability.

**Madison Central School District
Reserves Report
June 2021**

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Use of Reserve - This reserve is used when an employee separates from the District and payment of accumulated leave is required. These transactions flow through the budget via a budget revision with the offsetting revenue coming from a drawdown of this reserve. This reserve will continue to be used in this manner to make these payments.

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Reserve for Retirement Contributions – (A 827)

Creation – This reserve was created on June 30, 2006.

Purpose – This reserve is used to pay employer contribution expenses for the NYS Employees' Retirement System. Payments to the Teachers Retirement system are not allowed from this reserve.

Funding Methods – Funds have been placed in this reserve from excess fund balance.

Use of reserve - This reserve is used to pay expenses related to the employees' Retirement System, and to smooth tax levy fluctuations that result from rate changes and cost increases associated with these expenses. The district's ERS expenses have increased substantially over the last ten years.

Monitoring of Reserve – This reserve is monitored by the District Treasurer and the Board of Education.

Funding Level – The reserve balance at June 30, 2021 equals approximately 75% of the projected amount due to the retirement system.

6/30/2020 Actual Balance: \$75,107.35

Funds Used as of 6/30/2020: \$8,059.67

Balance (Prior to Restoring Funds and Accruing Interest) = \$83,167.02

Recommendation: Restore funds to defray future cost increases and levy fluctuations

Reserve for Unemployment Insurance – (A 815)

Creation – This reserve was created prior to June 1, 2003.

Purpose – This reserve is used to reimburse the State for payments made to claimants. The Unemployment Board had changed the methodology for billing school districts for unemployment. The expense will be a fluctuating rate based on payroll expenses, rather than a rate tied to actual cost.

Funding Methods – This reserve was funded entirely from excess fund balance.

Use of Reserve – The district is self-insured for Unemployment Insurance. This reserve is used to pay claims that exceed budgeted appropriations for unemployment claims and expenses. Actual expenses for unemployment vary from year to year.

Monitoring of Reserve – This reserve will be monitored by the District Treasurer along with the Board of Education to assess the potential for incurring unemployment claims.

Funding Level – This reserve was initially funded at \$40,058.52. On occasion the Board of Education deemed it necessary to increase the amount to the current level.

6/30/2020 Actual Balance: \$191,070.80

Funds Used As of 6/30/2021 : \$0

Balance (Prior to Restoring Funds and Accruing Interest) = \$196,928.26

Recommendation: Reduce current funding level due to the lack of activity in the account.

Reserve for Liability – (A 862)

Creation – This reserve was created prior to July, 2003.

Purpose – This reserve was created for potential liabilities that the district anticipated.

Funding Methods – This reserve was funded entirely from excess fund balance.

Use of Reserve – The purpose of this account is to reserve funds for the payment of any accrued employee benefit due an employee upon termination of the employee’s service.

Monitoring of Reserve – This reserve is monitored by the District Treasurer along with the Board of Education.

Funding Level – This reserve was funded by excess fund balance for liabilities that occurred with the direction of the Board of Education.

6/30/2021 Actual Balance: \$446,014.97

Recommendation: Reduce current level due to the inactivity of the account.

Reserve for Tax Certiorari – (A 864)

Creation - This reserve was created in June, 2010.

Purpose – This reserve was created when the District receive a Notice of Petition from Attorney Patrick Raymond in regards to Verizon New York vs. The Assessor, for the Town of Madison, disputing the assessments for taxes. The Board of Education determined it necessary to establish this reserve. As the years went on they transferred it to the Madison Windmills and the potential dispute of the assessments. There was an agreement made in regards to the Madison Windmills and the assessment was set on the agreed amount.

Use of Reserve – The District has at this time decided that the claim is invalid and is looking to liquidate this reserve in the 2017-2018 school year.

Monitoring of Reserve – This reserve will be monitored by the District Treasurer along with the Board of Education.

Funding Level – This reserve was created with excess fund balance.

This Reserve was eliminated on 6/30/2018 as directed by the Board of Education.

6/30/2018 Actual Balance: \$0

Funds to be used: \$0

Recommendation:

The following items are not reserve accounts, but are equally as important to planning revenues for the District.

Assigned Fund Balance – Appropriated for Subsequent Years

Creation – These funds are funds available in the fund balance which have been set aside for a particular purpose, namely to reduce the tax levy required to support an ensuing years budget.

Purpose – These funds are set aside and returned to the community by lowering the required tax levy to support the district’s budget.

Funding Methods – The funds are assigned from fund balance to offset the next year’s tax levy.

Use of Funds – It is recommended that the practice of returning these funds be reduced as much as possible, as budgets permit. As we develop tighter budgets, the amount of excess funds that will be available at year–end is restricted. This makes it more difficult to guarantee that funds will be available to be returned in a subsequent year.

Monitoring of Balance – The balance and use of these funds are monitored by the District Treasurer along with the Board of Education.

Funding Level – Over time, it is recommended that the planned amount of assigned fund balance included as a revenue source in future budgets be limited.

6/30/2021 Actual Balance: \$150,000

Anticipated 6/30/2022: At this time the Board of Education is comfortable with having the current amount and they are not looking to increase or decrease the amount.

Unassigned Fund Balance

Creation – Retention of these funds are allowed by law.

Purpose – These funds are unrestricted and may be used for any valid purpose.

Funding Methods – These funds have been accumulated from excess fund balance.

Use of Funds – It is recommended that these funds not be used except for an emergent, unanticipated expense, or revenue shortfall, that cannot be handled either in the budget or with other available reserves.

Monitoring of Balance – These funds are monitored by the District Treasurer and the Board of Education.

Funding Level – The maximum legal limit is recommended (4% of the ensuing budget). Although at times the District feels that there is a need to carry more than the legal limit with cause.

6/30/2021 Actual Balance: \$1,450,576.44

Recommendation for the 6/30/2022: Maximum 4% of the 2022-2023 budget.

Reserve for Retirement Contributions – (A 828)

Creation – This reserve was created on April 23, 2019 as a sub-fund of the ERS retirement reserve fund.

Purpose – This reserve is used to pay employer contribution expenses for the NYS Teachers' Retirement System.

Funding Methods – Funds have been placed in this reserve from fund balance.

Use of reserve - This reserve is to pay expenses related to the Teachers' Retirement System, and to smooth tax levy fluctuations that result from rate changes and cost increases associated with these expenses. The district's TRS expenses have increased substantially over the last ten years.

Monitoring of Reserve – This reserve is monitored by the District Treasurer and the Board of Education.

Funding Level – The reserve balance shall not exceed 10% of the total compensation or salaries of all teachers employed by the District who are members of TRS paid during the immediately preceding fiscal year.

6/30/2020 Actual Balance: \$127,098.42

Funds Used as of 6/30/2020: \$64,325.46

Balance (Prior to Restoring Funds and Accruing Interest) = \$191,423.88

The fund is increasing as per the regulations.

Recommendation: Restore funds to defray future cost increases and levy fluctuations

To: Mr. Jason Mitchell, Superintendent

From: Mike Lee, Athletic Director

Re: Winter 2021-2022 Combinations

Date: November 12, 2021

At the upcoming Board of Education meeting, please seek approval for our combined participation in the sport of girls volleyball, hosted by Morrisville-Eaton, at both the varsity and junior varsity levels.

Thank you!