

August 21, 2018

**MEMORANDUM**

To: Ebony Cross Shields, M. Ed  
Instructional Director, Cluster 6

Pamela Preston, Principal  
Suitland Elementary School

From: Michele Winston, CPA  
Director Internal Audit

Re: Financial Audit for Period June 1, 2015 through May 31, 2018

An audit of financial records of **Suitland Elementary School** was completed for the period June 1, 2015 through May 31, 2018. The audit results indicate that the school's internal controls require significant improvement to ensure compliance with board policies. The exceptions noted are included in the attached report.

As the principal of the school, you will be responsible for preparing an action plan within **30** days, indicating steps that will be taken to ensure compliance with the Accounting Procedures Manual. Send your signed action plan to the Internal Audit Office, Sasscer Administration Building. Please note that you are required to provide your action plan using the attached Microsoft Word template and any other correspondence to the Internal Audit Office at [internal.audit@pgcps.org](mailto:internal.audit@pgcps.org). A copy of your action plan should also be forwarded to Deborah Smalls, Business Operations Technician, email address: [Deborah.smalls@pgcps.org](mailto:Deborah.smalls@pgcps.org).

Enclosure

cc: Segun Eubanks, Ed. D., Board Chair  
Monica Goldson, Ed. D., Interim Chief Executive Officer  
Carolyn Boston, Vice Chair, Board of Education  
Members, Board of Education  
J. Michael Dougherty, Director, Financial Services  
Kassandra Lassiter, Ed. D., Associate Superintendent, Elementary Schools  
Helen Coley, Ed. D, Chief, School Support and School Leadership  
Christian Rhodes, Chief of Staff  
Erica Berry Wilson, Esq., Executive Director, Board of Education  
Daniel Reagan, Internal Auditor II

# Internal Audit Report

## Suitland Elementary School Student Activity Funds

For the Period Ended May 31, 2018

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Internal Auditor's Report

We have examined the Student Activity Funds (SAF) of Suitland Elementary School for the period June 1, 2015 to May 31, 2018. Suitland Elementary School's principal is responsible for the administration of SAF. Our responsibility is to express an opinion based on our examination.

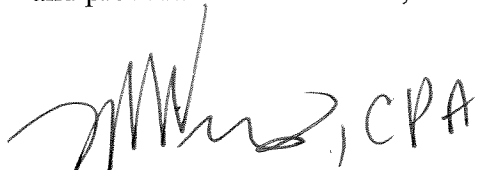
Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and Governmental Accountability Office and, accordingly, included examining, on a test basis, evidence supporting SAF, and performing such other procedures as we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

Our examination disclosed the following findings:

- *Mismanagement of Disbursements;*
- *Mismanagement of Principal-Sponsored Activities Account*
- *Mismanagement of Funds Received;*
- *Inappropriate Transfers of Funds;*
- *Year-End Monetary Transmittal Form Procedures Not Followed;*
- *Fundraiser Forms Not Completed;*
- *Voided Checks Not Properly Administered;*
- *Reconciliations Not Completed or Approved Timely;*
- *Insolvency Report Not Properly Completed;*
- *Insecure Locations for Funds Awaiting Deposit; and*
- *Management Oversight*

Individually or in aggregate, these findings resulted in a material deviation from Board of Education (BOE) Policies and Procedures and the requirements of the Accounting Procedures Manual for School Activity Funds (APM).

In our opinion, except for the deviation from the criteria described in the preceding paragraph, the SAF referred to above, was administered in compliance with BOE policies and procedures and the APM, in all material respects, for the period ended May 31, 2018.



Michele Winston, CPA  
Director, Internal Audit

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**SUMMARY**

The Internal Audit Department completed an audit of student activity funds (SAF) for Suitland Elementary School for the period June 1, 2015 to May 31, 2018. The audit was performed as part of the annual audit plan.

The audit indicated that the school's financial records and procedures are effectively managed but require improvement in certain areas to be in full compliance with the Accounting Procedures Manual for School Activity Funds (APM) and Board of Education (BOE) policies and procedures.

Detailed findings from the current audit are cited on the following pages with accompanying recommendations for corrective action.

**OBJECTIVES**

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

**SCOPE**

The audit was based on our review of selected bank statements, financial reports, available cancelled checks all voided checks and monetary transmittal form (MTF) envelopes submitted by staff for the period June 1, 2015 to May 31, 2018. Also, selected receipts, disbursements and supporting documentation were reviewed for the said period.

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**FINDINGS AND RECOMMENDATIONS**

The audit resulted in the following findings and recommendations:

**2019.01 Mismanagement of Disbursements**

The following exceptions pertaining to the management of disbursements were identified:

- A. ***Inadequate Pre-Approval:*** There were **16** instances where expenditures were not properly approved. There was no signature on the School Funds Expenditure Form (SFEF) to indicate pre-approval or approval in **10** instances. Signatures were not dated in **6** instances. Purchases were made prior to the completion of SFEFs pre-approval section on **4** occasions.
- B. ***Completion of School Funds Expenditure Forms:*** There were **16** instances where the front office staff did not indicate the amount of funds available for the relevant fund accounts on the SFEF prior to principal's pre-approval.
- C. ***Missing Items:*** There were **16** cancelled check images that could not be located for review.
- D. ***Late Payment:*** A payment for a field trip was made after the due date on the invoice in one instance.

The APM Section 4.5.3, *Cash Disbursements*, includes the following provisions:

- A. Prior to ordering or purchasing goods or services, a SFEF must be completed and signed by the principal. The form includes space for recording the amount of funds available in the relevant account prior to the principal providing pre-approval.
- B. Once received with the bank statement, images of cancelled checks are required to be maintained in a separate cancelled check file.
- C. Principals are required to review invoices and statements for past due amounts and ensure payments are made within 30 days of the invoice, or by the due date on the invoice.

Despite the previous audit recommendation, the principal and financial recordkeeping staff have not established internal controls over disbursements as a priority. The financial recordkeeping staff explained that no set process has been established to ensure payments are approved and paid timely. Some staff members communicate directly with the principal for pre-approval, while others submit SFEFs to the financial recordkeeping

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staff. Often times, SFEFs were not completed until after purchases have been made by the staff members. In the instance of the late payment, the financial recordkeeping staff and principal were not aware of the invoice until after the due date.

Further, the financial recordkeeping staff explained that cancelled check images have not been included with bank statements in all but 1 instance since July 1, 2015 and they were not aware of the requirement for cancelled checks to be maintained.

Inadequate management of disbursements constitutes non-compliance with BOE policies and procedures and increases financial risk to the school and staff. Failure to complete the SFEF properly can lead to insolvent accounts when the principal is not made aware of all disbursements being made by the school. Missing cancelled check images also compromises the audit trail needed to substantiate authorized expenditures. Finally, late payments can lead to delinquency fees or eroding relationships with vendors that could impact students' experiences.

**Recommendation:** The principal and financial recordkeeping staff should develop and document procedures to ensure disbursements are properly approved, managed and paid timely. There should be corresponding staff training on the required procedures. The principal should provide close oversight of the process during the upcoming school year.

The financial recordkeeping staff should contact the bank to have cancelled check images included with the monthly bank statements. Cancelled check images should be separately maintained by the school as required. The principal should request assistance from PGCPS Treasury Operations if necessary.

**2019.02 Mismanagement of the Principal Sponsored Activities Account**

The Principal-Sponsored Activities (PSA) fund account has not been properly managed during the audit period.

1. ***Principal Sponsored Activities Expenditures Processed from Student Accounts:*** There were **2** expenditures for staff events that were paid out of accounts with funds intended for student benefit. Staff expenditures were processed from the Special Events and Administrative Allotment accounts in these instances.
2. ***Improper Transfers:*** There were **12** transfers involving PSA fund accounts that were inappropriate.
  - a. A club fundraiser had a portion of its profit inappropriately moved to the PSA fund account in **1** instance.

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- b. Ineligible unrestricted funds were transferred to the PSA fund account in 5 instances.
- c. An inappropriate amount of an eligible fundraiser was sent to the PSA fund account (10% of revenue instead of 15% of profit).
- d. PSA funds were transferred to unrestricted accounts, either to cover fund account deficits or because of errors in processing transactions in 5 instances.

The APM, Section 9.6, *PSA for Staff*, states that discretionary expenditures incurred by the principal on behalf of school staff are grouped in the PSA accounting category. These activities must be of a professional nature that enhances staff members' job performance. If the PSA account has a deficit, faculty spending must be ceased until the existing PSA deficit is resolved. Expenditures for authorized principal-sponsored activities are restricted to the funds available from the following sources:

- 100% of Vending commission from machines located in the staff lounge
- 25% of student vending commission
- 15% of school-wide fundraiser profits, including picture commissions
- Up to 25% of senior class residual funds.

The District Notes on the SFO home screen states that Administrative Allotment (605.00) cannot be transferred to PSA (450.00), and cannot be used to purchase food, gifts, etc. for staff.

The financial recordkeeping staff has a copy of the APM but does not have intimate working knowledge of the specific requirements, such as parameters for eligible PSA transfers. The principal reviews monthly reports but does not review specific transactions to provide effective oversight.

Failure to properly manage PSA spending constitutes non-compliance with BOE policies and procedures. PSA expenditures using student fund accounts represent misuse of funds that should be available to provide positive student experiences.

There were \$2,034.00 of inappropriate transfers to the PSA fund account and \$2,189.00 of inappropriate transfers from the PSA fund account. Staff spending of \$883.00 was made out of students' accounts while \$564.30 in eligible profits from the 2017 Mid-Atlantic Fundraiser was not transferred to PSA. Due to the improper transfers occurring both to and from PSA, as well as the determination that no specific accounts were significantly diminished, there are no specific recommendations to reverse transactions.



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**Recommendation:** The principal and financial recordkeeping staff should immediately familiarize themselves with the specific restrictions for PSA and ensure that transfers and expenditures related to staff activities are properly handled in the future. When needed, assistance should be sought through the Accounting and Financial Reporting Office.

**2019.03 Mismanagement of Funds Received**

The following exceptions pertaining to the management of receipts were identified:

- A. ***Delinquent Deposits:*** There were **2** instances where deposits were made between 2 and 15 days after collection. In addition, there were **2** Monetary Transmittal Forms (MTFs) that were not dated, impacting confirmation of timely deposit.
  
- B. ***Monetary Transmittal Forms Not Properly Completed:*** There were **4** instances where the MTF was not properly completed. MTFs were not signed and dated by both the receiptee and the bookkeeper in **2** instances. Totals in Sections 1 and 2 of the MTFs did not match in **2** other instances.

The APM, Section 4.5.2.2, *Cash Receipts, Procedures* states that school staff is required to make deposit of all funds received at least every other day. However, no more than \$250.00 should be kept in the building overnight. In addition, staff members should never hold funds overnight.

The MTF states that the bookkeeper should not accept the MTF if funds in Section 2 do not match Section 1. Further, it states that the bookkeeper and receiptee must sign and date the form.

Despite the previous audit recommendation, the principal and financial recordkeeping staff have not established internal controls over receipts as a priority. The financial recordkeeping staff has competing priorities including demands from the student registration process, and as a result, MTFs are not always properly handled and deposits are not always made timely. The principal has not provided specific oversight over the process.

Mismanagement of funds received constitutes non-compliance with BOE policies and procedures and increases financial risk to the school. Untimely deposits can lead to lost or stolen funds. When Section 1 and Section 2 do not match on the MTF, there is an increased chance of improper statement of fund collected including swapping by the receiptee or the bookkeeper. (Note: No evidence of swapping was found on the two MTFs cited above)

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**Recommendation:** The principal and financial recordkeeping staff should develop and document procedures to ensure MTFs are properly completed, and funds are deposited timely. There should be corresponding staff training on the collection procedures. The principal should provide close oversight of the process during the upcoming school year.

**2019.04 Inappropriate Transfers of Funds**

Unrestricted funds were used to cover insolvencies of restricted accounts in 4 instances. Field Trip account deficits were offset using unrestricted funds in 3 of these instances.

The APM, Section 4.3, *Fund Accounts*, states that Restricted Accounts contain funds that are deposited into the SAF for a specific purpose and cannot be used for any other reason. Unrestricted Accounts are for funds collected and deposited for general use of the school. Field Trips are a restricted account, and therefore should be self-funding.

The previous audit identified that the school was over-collecting for field trips, resulting in an unnecessarily large balance in the Field Trip account. As a result, the principal and financial recordkeeping staff planned a few free and discounted field trips. However, the account was not actively monitored to identify that the balance had been depleted, and effective planning for field trip payments had to be re-established. When the account went into insolvency, the principal and financial recordkeeping staff were unaware that unrestricted funds could not be used to bring the account back to solvency unless approved by the Accounting and Financial Reporting Office.

Mismanagement of transfers constitutes non-compliance with BOE policies and procedures and increases financial risk to the school. Unrestricted funds used to cover for restricted funds represent funds no longer available for the entire student body and general needs of the school.

**Recommendation:** The principal and financial recordkeeping staff should actively monitor the Field Trip account to ensure solvency. Staff training should be conducted to establish effective field trip planning practices to ensure trips are appropriately funded.

The principal and financial recordkeeping should also familiarize themselves with the specific requirements in the APM regarding transfers and ensure that all transfers are in compliance.

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**2019.05 Year-End Monetary Transmittal Form Procedures Not Followed**

The following exceptions pertaining to year-end MTF envelopes submission were identified:

- A. There were 7 instances where MTF remittance copies (pink and/or yellow) could not be located in staff members' year-end MTF envelopes that supported transactions entered in the school's accounting system.
- B. The principal did not place her MTF remittance copies in a sealed envelope for the 2016-2017 school year.

The APM, Section 4.5.2.2, *Cash Receipts: General Policies*, requires the pink MTF remittance copies to be retained by the preparer. The white and yellow MTF remittance copies are submitted to the bookkeeper with remitted funds. After approving MTFs, the Bookkeeper returns yellow MTF remittance copies to the originator. Prior to departing the school at year-end, faculty and program managers are required to seal envelopes containing yellow and pink remittance copies of MTFs (with their signature over the seal) and submit them to the designated administrator. The bookkeeper will print the SFO "Receiptee History" Report and submit it to the designated administrator. This alerts the administrator which MTF envelope packages to expect.

The financial recordkeeping staff has not been providing a listing of all MTFs to be returned to the principal at the end of each year. As a result, the principal was not aware of whether all envelopes have been submitted. The principal was also unaware that her MTF copies had to be placed into a sealed envelope as well.

The ineffective year-end MTF process constitutes non-compliance with BOE policies and procedures and increases financial risk to the school. The audit trail for ensuring that SAF collected were subsequently remitted and deposited was compromised.

**Recommendation:** The principal and financial recordkeeping staff should familiarize themselves with the specific procedures for end-of-year MTF collection. Also, internal controls regarding year-end MTF envelopes submission must be established and documented to ensure the MTF envelopes submission process is effective.

**2019.06 Fundraiser Forms Not Completed**

Fundraiser forms documented as required during the audit period. Fundraiser Authorization Forms for the 4 club fundraisers were not completed. Fundraiser Completion Reports for 12 of the 13 fundraisers were not completed. Also, annual fundraising reports were not prepared.

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The APM, Section 7.2.2, *Fundraising Procedures*, states that club fundraisers must be formally approved by the principal using a Fundraiser Authorization Form. At the conclusion of all fundraisers, a Fundraiser Completion Report must be prepared by the sponsor. Additionally, the principal should prepare an annual report summarizing all fundraising activities concluded during the year. The data in this annual report should be available for review by parents, other interested members of the community, and include the net amount retained as profit from each fundraising activity.

Despite the previous audit recommendation, the principal and financial recordkeeping staff have not established internal controls over fundraisers as a priority. Competing priorities for the staff, such as student registration, have taken precedent. There has not been a process established to direct fundraiser sponsors to the required forms.

Failure to complete fundraiser forms constitutes non-compliance with BOE policies and procedures and increases financial risk to the school. It decreases transparency of fundraising activities and the associated profits to interested parents and community members. Further, Fundraiser Completion Reports bolster the budgeting process which can ensure optimal performance by each fundraiser.

**Recommendation:** The principal and financial recordkeeping staff should develop and document specific procedures for staff members that are organizing and completing fundraiser forms. Fundraiser Request and Authorization Forms should be completed and approved for all non-school-wide fundraisers and Completion Reports should be completed for all fundraisers. The financial recordkeeping staff should manage the process by distributing and maintaining the forms and the principal should enforce controls by holding staff members accountable. The principal should also compile an annual fundraising summary or delegate the responsibility for compiling annual reports for fundraising activities held by the school.

**2019.07 Voided Checks Not Properly Administered**

The following exceptions pertaining to the voided checks were identified:

- A. ***Lack of Approval:*** There were **9** instances where the voided check was not properly approved by the principal.
- B. ***Not Properly Recorded:*** There were **3** instances where voided checks were not properly recorded. Two checks were not recorded in SFO and the third check was still recorded as outstanding even though it was voided.

The APM, Section 4.5.3.2, *Cash Disbursements: Policies and Procedures*, states that if an error is made on the check at the time it is prepared or a check is damaged and unable

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to be used, the physical check must still be accounted for. The word "VOID" is written across the face of the check. The signature portion of the check must be cut off and destroyed. The check must also be voided in the computer to keep the empty transaction in the system. A SFEF should also be completed for the principal's approval.

The principal and financial recordkeeping staff were not aware of the specific requirements for the approval of voided checks. The financial recordkeeping staff was aware of the requirement to record voided checks but stated that competing priorities in the front office likely led to the 3 voided checks not being properly entered into SFO.

The ineffective process for voiding checks constitutes non-compliance with BOE policies and procedures and increases financial risk to the school. The lack of approval and recording of voided checks increases the risk of check fraud.

**Recommendation:** The principal and financial recordkeeping staff should familiarize themselves with the procedures for voiding checks as outlined in the APM and demonstrate compliance by approving and recording voided checks consistently.

**2019.08 Bank Reconciliations Not Completed or Approved Timely**

There were 4 instances where bank reconciliations were not properly completed.

- Bank reconciliations were not completed and approved timely in 2 instances.
- The May 2018 Bank reconciliation was not approved by the principal in 1 instance.
- The signed copy of the December 2016 Banks reconciliation was not maintained in 1 instance.

The APM, Section 5.0, *Monthly Reconciliation and Financial Reporting*, states that the bank reconciliation process should be completed by the 15<sup>th</sup> of each month, and that the completed reconciliation should be submitted to the principal every month for review and approval.

The financial recordkeeping staff stated that competing priorities, such as student registration, have taken precedent to financial management. As a result, bank reconciliations were not always completed timely. Further, a process to ensure timely principal review and approval has not been established.

Delinquent bank reconciliations constitute non-compliance with BOE policies and procedures and increases financial risk to the school. The bank reconciliation process is

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the most effective internal control to ensure that funds are properly deposited, disbursed and recorded.

**Recommendation:** The principal should ensure that the financial recordkeeping staff is designated time to administer SAF. Further, the principal should develop a specific monthly process to ensure that bank reconciliations are completed and that she reviews them timely.

**2019.09 Insolvency Report Not Properly Completed**

The financial recordkeeping staff did not accurately complete the Insolvency Report included with the May 2018 Financial Report. Unpaid bills were indicated as \$0, without a corresponding Unpaid Bills Spreadsheet.

The APM, Section 5.2, *Financial Reporting Requirements*, states that the Insolvency Report should be completed monthly and requires the bookkeeper to manually record data in order to calculate the school's solvency. The bookkeeper must manually calculate the value of unpaid bills that existed as of the end of each reporting period for both restricted and unrestricted funds to complete the report.

The principal and financial recordkeeping staff were not familiar with the specific requirements for monthly reporting in the APM. Accounting and Financial Reporting had provided the financial recordkeeping staff with a template for the Unpaid Bills Spreadsheet. However, there was lack of clarity as to how to complete the report and whether it should be incorporated into the Insolvency Report calculation.

Failure to complete the Unpaid Bills Spreadsheet can affect the school's solvency calculation on a monthly basis. Additionally, the principal and financial recordkeeping staff may be less aware of open invoices which can lead to untimely payments (See Finding 2018.02).

**Recommendation:** The principal and financial recordkeeping staff should familiarize themselves with the specific requirements for monthly reporting as outlined in the APM. They should collaboratively review open invoices during the monthly financial reporting process to ensure the Unpaid Bills Spreadsheet is completed properly and that it is incorporated into the Insolvency Report's calculation.

**2019.10 Insecure Location for Funds Awaiting Deposit**

The school has not obtained a secure drop-safe for keeping SAF awaiting deposit. Funds collected from staff are maintained in a safe that wasn't bolted to the ground and kept in a locked vault to which only the principal has access.

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The APM Section 4.5.2.2.2, *Guidelines for Bank Deposits*, states that depository safes are required for every school and that only the principal and bookkeeper can access the contents. The safe should be bolted to the floor and in a location accessible to staff which will facilitate submitting money even if the bookkeeper is unavailable. A log should be maintained where staff members record their names and dates of “drop”.

The principal and financial recordkeeping staff were not aware of the requirement for a drop-safe.

The insecure location for funds awaiting deposit constitutes non-compliance with BOE policies and procedures. Use of an unsecured safe does not adequately safeguard funds. Further, the lack of a drop safe and the financial recordkeeping staff's inability to access the safe inhibits timely remittance and deposit of funds.

**Recommendation:** The financial recordkeeping staff and principal should immediately obtain a drop-safe. The principal and one member of the financial recordkeeping staff should have access. A log should be developed to maintain a record of the date, time, remitting staff member, and amount of funds dropped into the safe.

#### **2019.11 Management Oversight**

The principal did not exercise proper oversight in the administration of the student activity funds during the current audit period. The previous audit included **5** findings which are repeated in this audit report. There are also **5** additional findings.

The APM, Section 3.2.1, *Principals*, states that the principal is the fiduciary agent for SAF. As such, responsibility for accounting, safeguarding and managing the SAF, in accordance with PGCPs policies and procedures, rest solely with the principal.

The principal has not provided adequate attention to the school's checking account to establish and implement effective financial controls. Specifically, the principal has not ensured that the financial recordkeeping staff is properly prioritizing administration of SAF. Further, the principal and financial recordkeeping staff have not familiarized themselves adequately of the specific requirements in the Accounting Procedures Manual.

Substantial financial risks currently exist at Suitland Elementary School in the absence of effective management oversight.

**Recommendation:** The principal should carefully review the policies and procedures as defined in the APM and develop internal controls to ensure compliance. The Principal should be consistently involved in the daily operations as it relates to the administration

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of the school's resources. Improvement of the internal control environment should be emphasized by focusing on these five basic principles:

- Clearly Defined Lines of Authority and Responsibility;
- Segregation of Duties;
- Maintenance of Adequate Documents and Records;
- Limited Access to Assets; and
- Independent Checks on Performance.

### **STATUS OF PRIOR AUDIT FINDINGS**

The previous audit report for Suitland Elementary School was issued for the period ending May 31, 2015. The principal and financial recordkeeping staff have been in place for the entire current audit period. The following findings were noted as a result of the last audit and the current status is indicated below.

- **Mismanagement of Funds Received** – Condition still exists. See **Finding 2019.03** regarding *Mismanagement of Funds Received*.
- **Mismanagement of Disbursements** – Condition still exists. See **Finding 2019.03** regarding *Mismanagement of Disbursements*.
- **Financial Mismanagement of Field Trips** - Condition still exists. See **Finding 2019.04** regarding *Inappropriate Transfer of Funds*.
- **Fundraiser Forms Not Completed** – Condition still exists. See **Finding 2019.06** regarding *Fundraiser Forms Not Completed*.
- **Year-End Monetary Transmittal Form Procedures Not Followed** – Condition still exists. See **Finding 2019.05** regarding *Year-End Monetary Transmittal Form Procedures Not Followed*.

### **ACKNOWLEDGEMENT**

We would like to thank the principal and staff of Suitland Elementary School for their cooperation and assistance during the audit.