

School Committee Policy Review Subcommittee
Tuesday, April 2, 2019
6:00 PM – 7:45 PM
5th Floor Conference, Town Hall

Policy Review Subcommittee members present: Mr. Glover (Chairman), Ms. Monopoli, and Ms. Schreiner-Oldham.

School Staff present: Mr. Bott, Ms. Dunn, Dr. Gittens, and Ms. Coyne.

Others present: Special Education Parent Advisory Council Co-Chair Craig Haller.

1) Approval of Minutes

On a motion of Mr. Glover and seconded by Ms. Monopoli, the Policy Review Subcommittee voted unanimously to approve the minutes of the March 18, 2019 Policy Review Subcommittee meeting.

2) Update on Proposed Changes to Public Schools of Brookline (PSB) Student Activities Fund Policy

Ms. Dunn presented a proposed revision of the PSB Student Activities Fund Policy (Attachment A). The purpose of the proposed policy is as follows:

- 1) Comply with the enactment of a state law on student activity accounts as codified in Section 47 of Chapter 71 of the General Laws of Massachusetts (MGL) passed in 1996.
- 2) Comply with Chapter 41, section 35, whereby the treasurer must take custody of all monies belonging to the city or town and must scrupulously account for those monies;
- 3) Ensure that policy and procedure govern only student activity money, and not money that is governed under another M.G.L.;
- 4) Require adequate internal control to ensure the projection of student monies; and
- 5) Require that procedures be established to support policy and provide for the segregation of duties.

If feasible, Ms. Dunn would like to have the policy in place for the fall. The administration will be preparing a manual for principals and teachers. Staff will need training in the new procedures.

Subcommittee discussion focused on how the proposed shift to a more centralized process will impact practices and accountability at the school level and whether the administration has sufficient staffing to ensure a smooth rollout. Members cautioned that we should be careful that the proposed changes do not have unintended consequences. Subcommittee members requested that the administration do the following: identify which school/PTO activities might be impacted by the proposed changes; explain how the proposed policy could change current practice for specific categories of activities, e.g., prom; and include more definitions. Once we have more clarity on potential impacts, it will be very important to get input from school staff and organizations such as PTOs.

Ms. Dunn agreed on the importance of getting input from the PTOs and others. She will follow up with Mr. Bott to discuss the plan for introducing this to PTOs and soliciting feedback. The Student Activities Accounts Policy and the Student Field Trip Policy are linked and should be reviewed/presented on the same schedule. Ms. Dunn will send

Subcommittee members Department of Elementary and Secondary Education Audit Review Guidelines.

3) Update on Proposed Changes to PSB Student Field Trip Policy

Dr. Gittens provided an update on proposed changes to the PSB Student Trip Policy. The policy will apply to day, overnight, and international trips, including exchange programs. The policy will address issues such as chaperone ratios and training, health and safety measures, equitable access, and connections to curriculum. Subcommittee members requested that Dr. Gittens prepare a general outline of the proposed policy for the next meeting to help the Subcommittee focus its review on specific sections, e.g., swimming. Subcommittee members noted that our policies are fairly general and that detailed information is typically included in the procedures/guidelines.

The meeting adjourned at 7:45 PM.

Proposed Revision

**SECTION D
FISCAL MANAGEMENT**

24. Student Activity Accounts

The purpose of this school committee policy is to

- 1) Comply with the enactment of a state law on student activity accounts as codified in Section 47 of Chapter 71 of the General Laws of Massachusetts (MGL) passed in 1996.
- 2) Comply with Chapter 41, section 35, whereby the treasurer must take custody of all monies belonging to the city or town and must scrupulously account for those monies.
- 3) Ensure that policy and procedure govern only student activity money, and not money that is governed under another M.G.L.
- 4) Require adequate internal control to ensure the projection of student monies; and
- 5) Require that procedures be established to support policy and provide for the segregation of duties

A program of co-curricular activities established by the School Committee should ensure that young people have an opportunity to take part in co-curricular and extra-classroom experiences; should provide efficient procedures for their creation, operation, and demise; and should outline a system for the safeguarding, accounting, and internal control of extra-classroom activity funds.

The School Committee authorizes the principals to receive money in connection with the conduct of authorized student organizations and legitimate co-curricular activities (field trips, plays, prom, student initiated fund raisers). The School Business Administrator shall develop operation procedures and guidelines for these accounts and conduct annual internal audits of these accounts. All funds raised for student purposes shall be deposited with the Town Treasurer as required by Chapter 41, section 35.

A student activity account shall only be used for monies raised by approved student organizations and expended by those students for their direct benefit. Funds raised or donated, which laws other than the student activities laws, such as fees, grants, govern or general-purpose donation, cannot be deposited into a student activity account. In addition, funds belonging to staff through sunshine fund or other activities unrelated to students may not be deposited as student activity funds. At no time shall accounts be used to benefit staff.

- 1) Bank accounts will be issued via the Town Treasurer at a bank with a branch in Brookline.
 - a) All accounts shall be interest bearing as allowable under banking services selected by the Town Treasurer.
 - b) All online crowdfunding sites, ticketing sites, or other online tools to collect funds on the behalf of students shall be established by and under the control of the Town Treasurer;
 - c) All monies received in conjunction with approved student activities shall be deposited into the student activity agency account.
 - d) Two Accounts shall be established:
 - i) Savings/Depository Account:
 - (1) There will be no maximum amount set for the savings/depository account.

- (2) All receipts shall be deposited with the Town Treasurer and credited against a building designated student activity savings/depository account.
 - ii) Checking Account: Each school principal will be provided with a checking account for expenditure purposes.
 - (1) The maximum a school can have in its checking account at any time for an Elementary School maximum, \$10,000; and High School maximum, \$25,000.
 - (2) No individual check or series of checks from the Student Activity Checking Accounts shall be written over \$3,000. Vendors owed more than this amount by contract or agreement shall have deposits made mid-contract/agreement payments made timely through the Town Warrant process or use the district credit card procedures. Writing multiple checks to circumvent this clause will cause the checking account to be frozen and check writing privileges to be revoked.
 - (3) Deposits into the checking account shall be made under the direction of the Town Treasurer.
- 2) Expenditures/Accounting System
 - a) The Superintendent and Town Finance Director, as assisted by the School Business Administrator, shall ensure that an accounting system for student activity funds be established in sufficient manner to facilitate basic reconciliation and control procedures.
 - b) All expenditures shall be reported and recorded under the Town's financial system and follow all other school committee policies that apply and be submitted to School Business Administrator timely;
 - c) Expenditures from the savings/depository account are encouraged since these will pass through the warrant process prior to the check being issued.
 - d) Expenditures from the checking account, while discouraged are necessary in the following circumstances: Town warrant process will not meet payment deadline, Town procurement card will not be accepted, and attendance is unknown until day of event. Documentation of checks written shall be submitted to the School Finance Office within three business days of the check being written.
 - e) Reimbursement to Employees and or volunteers via the checking account is expressly prohibited. All Reimbursements must be issued through the Town Warrant and follow Town policy, practice, and procedure.
- 3) Signature Authority
 - a) All contractual obligations on behalf of students must follow the School Committee's Authorized Signature Policy
 - b) Principals may sign checks from the checking account with an original signature. Signature stamps are not permitted.
- 4) Interest Earned: The interest earned by the Student Activity Agency Account will be retained by the fund and the School Committee will periodically allocate these funds to purposes as recommended by the School Principal. The interest earned on each student activity bank account shall remain in

the account and be recorded as a separate line item by the building principal. Said interest shall be used to cover the following expenditures without requiring further approval from the School Committee.

- (a) The cost of periodic outside audits of the accounts;
 - (b) Purchase forms and supplies related to maintaining the student activity agency account by the school;
 - (c) The cost of student(s) attending a class or school function when students are charged for such, but the Financial Assistance policy determines the family is unable to cover such expenses;
 - (d) Refreshments for parents/student activities and for volunteers who have helped support the student programs;
 - (e) Rectify a deficit student activity account balance; and
 - (f) Bookkeeper/Manager of Student Accounts.
 - (g) To reimburse the Town or pay directly for any banking fees associated with the accounts, or the acceptance of credit cards, or other online payment option that may become available.
- 5) Commissions: Any monies paid to the school , advisor, chaperone, or to a student activity organization as commissions, honorarium for speaking, or remunerations related to a student activity club, organization, or field trip belong to the students. These funds should be deposited to one or more specific student activity sub-accounts (example: yearbook, senior class), as approved by the School Committee upon the recommendation of the Principal and acceptance. At no time shall such commissions be used to benefit staff.
- a) Commissions from Student Pictures will be used to support financial assistance and in the same manner as Interest Earned.
 - b) All other commissions, honorarium for speaking, or remunerations are accepted and deposited with the student club, organization, or field trip that generated the gift. E.g. Travel Companies may provide for a “free trip/ticket” or stipend to chaperones. “Free Ticket”/Stipend value must be calculated as part of the total trip costs.
- 6) Tax Exemption: Student Activities are conducted under the umbrella of the Town’s tax exemption and expenditures made on behalf of student, are therefore tax exempt. Since student are not, in and of themselves tax exempt entities, purchase that student make on their own behalf are not tax exempt. Sales Tax on purchases that student make on their own behalf will be reimbursed at the discretion of the Town Comptroller.
- 7) Undesignated Earnings: Should a school have any undesignated earnings, the Principal must present a plan for the collection and expenditure of such monies to the School Committee for approval.
- 8) Deficit Account Balances: Individual activity accounts shall not be permitted to be in a deficit position because such a position represents a liability to other individual activities or possibly to future class accounts. In the event that a specific student activity develops a deficit balance not resulting from timing, the deficit may be resolved using one of the following remedial actions:

- a) School Committee Appropriation;
 - b) Accumulated interest earnings;
 - c) Surpluses of inactive accounts, upon approval of the School Committee;
 - d) Gift from an activity with a surplus balance, upon written approve of one or more student representatives and the School Principal; and
 - e) Any other legal means.
- 9) Reporting and Record Keeping:
- a) The School Business Administrator shall provide a Student Activity Manual to all employees upon hiring and distribute updates to all employees as necessary providing guidelines and procedures for all aspects of this policy;
 - b) Principals, faculty, and staff shall comply with this policy, and the guidelines and procedures provided in the Student Activity Manual.
 - c) Principals shall submit monthly reconciliations to the School Finance Office for all banking activity within 30 days of receipt of the monthly bank statements. The School Finance Office will reconcile all banking activity against the town financial system and submit full reconciliation package to the Town Treasurer.
 - d) The School Business Administrator shall conduct an annual internal audit of each Student Activity Account to document compliance with this policy.
- 10) The Superintendent must approve all student organizations requiring student activity accounts under each building fund.
- a) Each student account must be specific to a student organization.
 - b) Students will follow the requirements for forming a student organization under School Committee policy and the guidelines and procedures provided in the Student Activity Manual.
 - c) Students will recommend the establishment of Student Activity Accounts to the building Principal.
 - d) The Principal, in turn, will make a recommendation to the Superintendent of Schools.
 - e) The accounts must be specific to a student organization.
 - f) Discretionary or commingled accounts will not be allowed under this policy.
- 11) Graduating Class Funds and Liquidation of Activities Funds
- Funds held on behalf of graduating classes are to be held within the Student Activity Checking Account for the High School. Such funds shall be designated by the class' Year of Graduation, such as Class of 2017, etc.

Student class funds remain with the class through graduation. Once graduated, the class accounts shall remain open for 90 days. At the close of 90 days all remaining funds are liquidated and distributed as directed by a vote by the senior class officers. Absent a vote or direction, School Committee designates remaining funds will be used to support financial assistance and in the same manner as Interest Earned.

Any school organizations which do not meet at least once annually and which do not duly elect officers shall be considered inactive, and their funds shall be liquidated and divided equally among the remaining student organizations (non-class-specific funds) in the building.

All class and student organizations shall be asked to agree to the above procedure through adding a provision to their constitutions that any time their organization ceases to meet regularly and elect officers as constitutionally required, their funds may be taken over by the School Committee.