

Exhibit 9

Griffin Technology Academies

Fiscal Policies & Procedures Manual

Submitted to GTA Board 6/5/2022

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I. CASH/CHECKS HANDLING POLICY

BOARD POLICY

In the course of normal school business, many activities (fundraising, field trips, lunch program, etc.) involve the receipt of cash and checks, to be deposited in the school's bank account upon receipt. All cash and checks must be deposited within seven (7) days— cash received from a fundraising event may not be retained outside of the GTA Associated Student Body bank account to hold for future fundraising projects, for example. Since the school receives cash and checks from a variety of sources for a wide range of activities, extra care must be taken at all stages of the deposit process to ensure accurate records and proper accounting controls are maintained. The specific procedures outlined below are to be kept updated and current.

1. Persons responsible for handling cash/checks

In order to maintain proper accounting controls, the Superintendent or the Director of Fiscal Services shall designate an on-site staff member (the "Cash Coordinator") to coordinate all transactions involving the deposit of cash/checks. The default Cash Coordinator will be the Director of Fiscal Services or their Designee. The Cash Coordinator will be responsible for ensuring proper documentation is in place verifying the source, amount, and itemization of amounts received, preparing and making bank deposits, and placing all items to be deposited in safekeeping prior to deposit.

2. Procedure for receiving cash/checks

- a. From Volunteer Events: For each fundraising event in which cash or checks will be collected, a Volunteer Coordinator will be designated, who will be responsible for collecting and holding all cash and checks for the purpose of the fundraising activity. The Volunteer Coordinator may be a staff member, but is not required to be so. The Volunteer Coordinator shall maintain a written record of each donation at the time the donation is made. The Volunteer Coordinator will provide a numbered receipt for all cash and check donations to the donor showing the date, amount, and nature of the donation.

After the event, or at least once weekly for on-going events, the Volunteer Coordinator shall use the written record maintained at the time of receipt to prepare a Deposit Summary, totaling the checks and cash. Copies of all checks must be attached. The total of the checks and cash listed in the Deposit Summary must match up with the written record of donations discussed in the above paragraph.

The Volunteer Coordinator will then give the deposit packet (including all cash, checks, and the Deposit Summary) to the Cash Coordinator no later than close of business on the next available business day, and both parties must verify and agree on the amounts shown in the deposit packet while in each other's presence, placing their signature on the Deposit Summary form. The Cash Coordinator then holds the funds in safekeeping until a bank deposit can be made, but in no case longer than 7 days.

After deposit, a copy of the bank deposit receipt, a copy of the Deposit Summary, and notations indicating the nature of the deposit amount, shall be faxed or sent by e-mail to the Department of Fiscal Services, with the original kept in the school office. Additional copies may be provided to authorized individuals responsible for tracking volunteer activities, as approved by the Superintendent or the Director of Fiscal Services.

- b. From Mail Received or Cash/Checks Dropped off at Office: For any cash or checks received in the mail, the Cash Coordinator or their Designee shall prepare a Deposit Summary and bank deposit receipt itemizing the amount, source, and purpose of each payment, with the Office Manager acting as verifier and second signatory on the Deposit Summary. If multiple items are received at the same time for the same purpose, they may be summarized in a single deposit packet as long as each payment is itemized as described above. The document packet should then be held in the designated office lockbox or safe until it can be deposited. For cash/checks dropped off at the front desk by hand, the person dropping off the amount shall place the cash/checks in a deposit envelope, together with a note or form detailing the name of the person and the purpose and amount of the deposit, and seal and sign the deposit envelope. The Cash Coordinator must then immediately give the deposit envelope to the Office Manager who must then place the envelope in the designated office lockbox before the end of the business day, where it will be processed along with the next batch of received mail as described above.
- c. Associated Student Body: The Associated Student Body is responsible for planning and executing a number of events and fundraisers at each of the four schools comprising GTA connected directly or indirectly with ASB (for example, clubs).

All student sales and fundraisers of various commodities must be scheduled and approved by the Superintendent or the Director of Fiscal Services before final arrangements have been made, and the event/sale is scheduled to take place. ASB funds will be supervised by the Superintendent or the Director of Fiscal Services and ASB Advisor, as well as the student elected Treasurer. Expenses and revenue will be tracked online and reported by the Treasurer at least once monthly at an ASB meeting.

ASB Roles and Responsibilities

- a. Role of the Superintendent or the Director of Fiscal Services
 - 1. School site approval of activities and fundraisers
 - 2. Supervision and support of ASB and Treasurer
 - 3. Communicate and enforce fiscal policies
 - 4. Ensuring events and fundraisers held are appropriately planned and organized
 - 5. Work with business office regarding training and resolution of any audit findings
 - 6. Report any fraud or suspected abuse of funds
- b. Role of ASB Advisor

1. Assist ASB in approving:
 - a. Activities, fundraisers & expenses
 - b. Making decisions
 - c. Maintaining records
2. Assist with creation and oversight of ASB budget
3. Review and track ASB budget
4. Supervise ASB events and sales

c. Role of ASB Treasurer (Elected Student)

1. Review ASB budget with support of ASB Advisor and Superintendent or the Director of Fiscal Services
2. Propose fundraisers, events, etc. to ASB
3. Make recommendations to ASB based on fiscal analysis
4. Report ASB revenue and expenses to ASB at least once monthly at an ASB meeting
5. Assist with oversight of ASB sales
6. Observe and participate in cash counting and reconciling procedures
7. Assist with inputting and tracking of revenue/expenses using tracking device
8. Approve ASB expenditures

4. Cash Handling

- a. A strong system of internal accounting controls is required for transactions involving cash related to ASB activities. The following must be followed by 1) all employees and 2) those students involved in ASB:
 1. All student sales will be conducted under the supervision of the Superintendent or the Director of Fiscal Services, ASB Advisor, or another staff member if expressly authorized by the Superintendent or the Director of Fiscal Services in advance.
 2. Receipts must be issued for all cash received for purchases with the exception of food sales related to a school fundraiser, car wash or similar 'consumable' transactions.
 3. Money will be physically safeguarded, secured in a cash box at point of sale, and locked in a designated lockbox or safe after being reconciled.
 4. Segregation of duties between cash handling and record keeping will be maintained.
 5. All monies received will be secured in school safe for deposit.
 6. Checks received will be immediately endorsed upon receipt.
 7. Cash should be deposited in the bank as soon as possible during a large money generating event
 8. Cash & checks should always be stored in the designated office lockbox or safe
 9. Authorizations for disbursements (i.e., purchases and payments) will not be given unless a sufficient cash balance exists.

10. Under no circumstances should funds/money be taken home for safekeeping either by students or staff, nor stored in a classroom or car trunk, nor deposited to an individual's personal bank account.
11. Cash counting and reconciling will be completed after each day's sale by assigned office staff and administrator, along with ASB treasurer when possible

5. Procedure for Storing Cash/Checks

All cash and checks must be kept in the designated office lockbox or safe for safekeeping when not under the immediate supervision of the Cash Coordinator. The designated office lockbox should be used for this purpose. Cash and checks may not under any circumstances be left in the office or volunteer area unattended. Although the frequency of deposits must be balanced with other school needs, all efforts should be made to ensure quick turnaround and deposit of checks and cash received by the school.

II. PURCHASING POLICY

BOARD POLICY

PURCHASING: All school purchases must be pre-approved. The primary persons responsible for approving all purchases shall be the Superintendent or the Director of Fiscal Services, who may designate additional individuals as purchasing approvers as needed. For purchases exceeding \$100,000 for the Superintendent or \$50,000 for the Director of Fiscal Services, Board approval is also required, as outlined in the specific procedures below. Recurring expenses such as monthly rent, copier lease payments, recurring office supplies, legal or other professional services, or other periodic payments for which overall approval has already been granted do not require individual approval.

INVOICING & RECEIPTS: All purchases must be accompanied by an invoice or receipt, depending upon the nature of the item and the purchase method. For payments made using a credit/debit card, a receipt shall be obtained and/or printed at the time of purchase. Checks may never be made out to "Cash" or "Bearer" unless accompanied by a signed statement by the Director of Fiscal Services indicating no other reasonable method was available for payment of the goods/services, and the memo of the check clearly indicates exactly what was being purchased.

CHECKBOOK, DEBIT CARDS or CREDIT CARDS: Credit card will be issued to the Superintendent, the Director of Fiscal Services and their Designees for purposes of school-related [purchases](#). Any credit card, debit card or handwritten check should only be used should the need arise as determined by the Superintendent or the Director of Fiscal Services. If a credit card is issued to another administrator these same rules shall apply. Under no conditions can credit cards be used for personal use, or for the purchase of gasoline or alcohol.

1. Procedure for approving purchases

- a. Any proposed purchase must be approved by the Superintendent or the Director of Fiscal Services, as evidenced by:
 - i. Purchase Requisition approved online through Aptafund; OR
 - ii. Other written or email evidence of approval.
- b. Documented evidence of authorized approval must be obtained prior to purchase – reimbursements will not be acceptable unless specifically exempted by the Superintendent or the Director of Fiscal Services or Board from this reimbursement policy.
- c. For purchases under \$10,000, only pre-approval by the Superintendent or the Director of Fiscal Services is necessary. The Superintendent or the Director of Fiscal Services may seek Board approval for unusual purchases of any dollar amount at his/her discretion.
- d. For purchases \$50,000 and above for the Director of Fiscal Services and \$100,000 and above for the Superintendent, Board approval is required prior to purchase. All expenditures over \$100,000 must have a second signature unless previously approved by the Board.
- e. Once the Superintendent or the Director of Fiscal Services or Designee has approved the purchase, school purchasing staff shall a) create a Purchase Order in Aptafund and deliver the signed Purchase Order to the vendor, OR b) in situations where Aptafund is infeasible (airplane tickets, etc.) purchase the item directly, in either case using the most efficient and cost-effective manner, utilizing competitive bid procedures where required by law or otherwise deemed appropriate and in the best interests of the school.
- f. If the item is purchased directly by the Superintendent or the Director of Fiscal Services, a receipt must be obtained at the time of purchase and provided to the Department of Fiscal Services as set forth in “Travel and Expense Reimbursement Policy” below.
- g. Regularly recurring expenditures exceeding \$10,000 (rent, etc.) require only initial Board approval – item must be identified as a recurring expenditure to the Board. Such recurring expenditures are otherwise exempt from Board and Superintendent or the Director of Fiscal Services pre-approval and Purchase Requisition requirements.
- h. A Warrant Report will be included in each month’s Board packet as a consent agenda item, listing all non-payroll warrants paid in the prior calendar month.

2. Invoicing & Receipt Procedure

School staff scan and file copies of all original receipts as part of the ongoing AP batch processing, retaining the original at the school as backup documentation. For businesses or individuals seeking payment, an invoice must be provided prior to payment. These invoices shall be available through Aptafund via attached documents or in the the Department of Fiscal Services shared folders

3. Procedure for contracts and agreements

All contracts or agreements, including those for ongoing services, shall be negotiated by the Superintendent or the Director of Fiscal Services to obtain such services in the most efficient and cost-effective manner and in the best interests of the school. All such agreements must clearly define the scope of services to be performed, and the price for

such services. A file shall be maintained by staff containing all documentation related to the reason for the contract/agreement as well as any research showing that the purchase is in the best interests of the school, including but not limited to any alternate bids received for the good/service. Any such agreements in excess of \$100,000, once negotiated, must be approved by the Board prior to commencement of the contract to ensure they are in the best interest of GTA and reflect reasonable market values. The Board may also recommend changes or revisions pending final approval. Any modifications or changes to existing contracts/agreements shall be made only in writing.

4. Procedure for handling invoices and vendor requests

- a. All invoices received on-site should be delivered to the the Department of Fiscal Services upon receipt. All invoices received during each week should be delivered via e-mail or via Aptafund other agreed upon electronic filing system each Friday at a minimum.
- b. If the invoice is for a smaller item and/or an immediate payment necessary for school function (building repair, locks, etc), the Superintendent or the Director of Fiscal Services or Designee may authorize on-site payment and pay for such item immediately via check from GTA's petty cash or main account. However, use of purchase orders and payment via invoice should be utilized whenever possible to ensure an accurate paper trail. Scans of hand-written checks and related invoices must be submitted to the the Department of Fiscal Services immediately.
- c. the Department of Fiscal Services shall be responsible for tracking all accounts payable and preparing warrants for payment.
- d. the Department of Fiscal Services shall process all invoices for payment prior to the vendor due date, paying all invoices via warrant.
- e. the Department of Fiscal Services shall be responsible for invoice matching in Aptafund, ensuring that the accurate final invoice total is charged against each appropriate account.
- f. School administrators are responsible for ensuring receipt of all ordered items in Aptafund or via other electronic methods, so that the the Department of Fiscal Services invoicing matching and payment can occur by the due date. Invoice matching and payment cannot occur until the item is shown as received in Aptafund, unless overridden by the Superintendent or the Director of Fiscal Services, Director of Fiscal Services or designee.

5. Receipt of Ordered Goods Procedure

All ordered goods should be shipped to GTA's main address, even during times of school closure during vacations and holidays, unless explicit instruction is provided by the Superintendent or the Director of Fiscal Services or Designee that an alternate address should be used.

When ordered goods are received by GTA, School staff must follow the following procedures:

1. Verify goods received with the packing slip, sign, date and forward to the Director of Fiscal Services.
2. The Director of Fiscal Services will enter the items as received in Aptafund to allow for invoice matching and payment when the vendor invoice is received by the

Department of Fiscal Services.

3. If any discrepancy exists between the packing slip and the goods as delivered, only the items received should be marked in Aptafund as received.
4. When invoices are received and sent to the Department of Fiscal Services, the Department of Fiscal Services will only pay for the portion of the order shown as "received" in the Aptafund system, unless specifically directed otherwise by the Superintendent or the Director of Fiscal Services or Designee.

III. BUDGETING AND CASH FLOW MANAGEMENT

BOARD POLICY

BUDGETS: Education Code section 47604.33 requires charter schools to prepare a series of annual budget reports to be submitted to the chartering authority and the county superintendent of schools of the county in which their sponsoring district is located.

Cash flow management involves tracking actual and projected revenues, expenditures, and cash receipts and disbursements to ensure that sufficient cash is available to meet all financial needs when due, and that sufficient available reserves are maintained as a contingency in the event of unforeseen financial setbacks.

GTA shall provide the following budget reports to its authorizer by the following dates:

1. On or before July 1, a Local Control Accountability Plan and a preliminary budget.
2. On or before December 15, a first interim financial report reflecting changes through Oct. 31.
3. On or before March 15, a second interim financial report reflecting changes through Jan. 31.
4. On or before September 15, a final unaudited report for the full prior year.

ENDING BALANCE: At each June 30, GTA's goal is to maintain an unrestricted available ending balance at or above 10.00% of total expenditures during the fiscal year just ending.

RUNNING CASH BALANCE: GTA's goal is to maintain a consolidated running cash balance in excess of the most recent month's total payroll, including benefits and deductions.

1. Budget Structure

GTA's annual budget includes a Statement of Activities that shows projected revenues, expenditures, and changes in fund balance for the fiscal year beginning July 1 and ending June 30 of the following year. The overall budget contains balanced sub-budgets by resource for state categoricals, special education, and other restricted monies in addition to the unrestricted general account. The budget is based on the Statement of Activities but includes notations of balance sheet activities such as asset acquisitions and debt repayment that affect the school's operations.

All annual budgets, including initial and interim budgets, shall include a multi-year projection for the current year and following two fiscal years, as well as a corresponding monthly cash flow statement that shows year-to-date and projected revenues and expenditures as well as other transactions affecting cash, plus a beginning and ending cash balance, broken out monthly.

2. Annual Budget

In February of each year, the Department of Fiscal Services will begin preparing the draft annual budget under the direction and supervision of the Superintendent or the Director of Fiscal Services, using all available data including monthly actual revenues and expenditures to date as well as planned adjustments for the coming year.

The Superintendent or the Director of Fiscal Services (with the assistance of the Department of Fiscal Services) will then revise and adjust the draft budget as directed by the Board and/or the Committee to create the Final Operating Budget for the coming fiscal year. Additional Budget Planning meetings may be scheduled if necessary to discuss any further revisions prior to finalizing the budget.

Alternatively, the Board may instead designate members of a Finance Committee that will hold a separate Budget Planning meeting in place of a meeting of the entire Board. In the case of a separate Finance Committee meeting, the results of this meeting will be presented to the Board at their next regular or special Board meeting.

Prior to July 1 of each year, the final budget will be presented to the Board for final approval. Once approved, the final budget will be submitted to the school's sponsoring entity by July 1 as required under the Education Code.

Throughout the year, the school will engage in an ongoing process to plan, implement, evaluate its Local Control Accountability Plan which will inform the budget development process.

In addition, local, state and federal restricted funds will be included in the budget development process in order to optimize the use of resources in service of the mission.

3. Interim Budgets

On or before December 15 and March 15, the Superintendent or the Director of Fiscal Services, in consultation with the Department of Fiscal Services will develop and present an updated interim annual budget to the Board for approval at a regular or special Board meeting. The interim budget shall reflect adjustments or revisions to the original budget made in response to changing financial conditions or needs of the school. The Board may elect to hold one or more Budget Planning meetings, or name a Fiscal Committee to hold such Budget Planning meetings, if deemed necessary prior to approval of each interim budget. Once approved, the First and Second Interim Budgets will be submitted to the school's sponsoring entity by December 15 and March 15, respectively, as required by law.

4. Monthly Updates

Each month beginning in October, at either the regularly scheduled or a special meeting of the Board, the Department of Fiscal Services will provide to the Board a monthly update

of year-to-date revenues and expenditures, including a comparison of budgeted vs. actual amounts and a brief explanation of significant deviations from the original budget. The Board is not required to approve these monthly updates, which are informational items only; however, the Board may elect to approve any additions, revisions, or modifications to the Annual or Interim Budgets that it deems necessary, under a separate agenda item at the same or a subsequent meeting, to allow GTA to adapt to changing financial conditions. Any such board-approved changes to the Original or Interim budgets will be used as the current operating budget by school staff from that point forward.

The Department of Fiscal Services and GTA staff will collaborate to complete additional financial reporting and compliance reports per required timelines.

IV. TRAVEL POLICY

BOARD POLICY

GTA recognizes that employees may be required to travel or incur other expenses from time to time. The purpose of this Policy is to ensure that (a) adequate cost controls are in place, (b) travel and other expenditures are appropriate, and (c) to provide a uniform and consistent approach for the timely reimbursement of authorized expenses incurred by staff. Our policy is to reimburse only reasonable and necessary expenses actually incurred by staff.

Staff time, energy and commitment to represent the school, to continue ongoing learning and to participate in the broader educational environment are appreciated. It is recognized that traveling on behalf of the organization is a privilege which can be revoked for failing to adhere to policy. In addition to managing expenses, staff are expected to share knowledge gained through presentations within two weeks of returning to school.

1. Requirements

When incurring business expenses, the expectation is that staff will:

- a. Exercise discretion and good business judgment with respect to those expenses.
- b. Report expenses, supported by required documentation, as they were actually spent.
- c. Be cost-conscious and spend money as carefully and judiciously as the individual would spend his or her own funds. This includes:
 1. Sharing transportation and lodging as appropriate with other staff
 2. Using the cost of budget hotels and airlines (eg, "Holiday Inn Express" and "Southwest Airlines") as the basis for hotel and air travel expenses

2. Initial Approval

For both single trips and ongoing travel costs, written approval (which may be in the form of an e-mail) must be given by the Superintendent or the Director of Fiscal Services prior to travel costs being incurred, and a printed copy of the written approval should be provided along with the Expense Report at the time reimbursement is requested (see below). The travel approval should contain a brief description of the travel being approved, including dates, destination, and purpose for the trip. Repeat trips may be approved in a single approval (for example, approving a weekly regional meeting).

Cost caps for various travel costs are listed later in this Policy. For reimbursement to be provided in excess of these cost caps, written pre-approval to exceed caps must be included in the approval document provided by the Superintendent or the Director of Fiscal Services. Without prior written explicit approval, no reimbursement for costs in excess of the cost caps will be provided after the fact.

3. Expense Report

Expenses will not be reimbursed unless the individual requesting reimbursement submits a written Expense Report. The Expense Report, which shall be submitted within two weeks of the completion of travel if travel expense reimbursement is requested, must include:

1. The individual's name;
2. The date, destination and purpose of the trip (should match information on the approval document);
3. An itemized list of all expenses for which reimbursement is requested;
4. If item cost exceeds cap, explicit authorization on the approval document to exceed caps.

4. Receipts

Receipts are required for all expenditures, whether billed directly to the school, paid with a school credit card, or paid by the employee for later reimbursement. No expense will be reimbursed to staff unless the individual requesting reimbursement submits with the Expense Report original receipts from each vendor showing the vendor's name, a description of the services provided, the date, and the total expenses, including tips (if applicable). A credit card printout showing only the total purchase cost and date is insufficient, except in the case of receipts such as parking garages, tolls, or other single charges that do not provide itemized receipts.

5. Organization Credit Cards

If a corporate credit card is issued to staff for travel (and other) organization-related expenses, copies of all receipts must be retained for audit purposes, although an Expense Report need not be filed if no reimbursement is requested. The monthly credit card statement is not an acceptable substitute for individual receipts. No charges may be made for non-business expenses under any circumstances even if immediately reimbursed. Failure to meet these requirements will result in loss of the credit card and employee discipline.

6. Necessity of Travel

In determining the reasonableness and necessity of travel expenses, the employee and supervisor shall consider the ways in which the school will benefit from the travel and weigh those benefits against the anticipated costs of the travel. Less expensive alternatives, such as participation by telephone or video conferencing, or the availability of local programs or training opportunities, shall be considered. However, cost is not the sole consideration – a reasonable balance should be struck between cost and convenience, with the final goal being the best combination of cost and benefit.

7. Air Travel

Air travel reservations should be made as far in advance as possible in order to take advantage of reduced fares. Economy-class should be selected. Staff may choose to upgrade school-paid fares to a higher class if paid directly by the staff member (upgrade charge cannot be on a school card or charged to the school and later reimbursed). Airline lounge passes may not be paid or reimbursed by GTA.

8. Lodging

Staff traveling on behalf of the school may be reimbursed at the single room rate for the reasonable cost of hotel accommodations at a 2-3 star “budget business” hotel such as Holiday Inn Express, Days Inn, Hampton Inn, etc. Convenience, the cost of staying in the city in which the hotel is located, safety and proximity to other venues on the individual’s itinerary shall be considered in determining reasonableness. Hotels that do not clearly meet the above criteria should be pre-approved in writing when requesting overall approval for the trip. Staff shall make use of available corporate and discount rates for hotels. Staff may choose to upgrade school-paid room charges, add incidental charges, or otherwise increase the cost of stay only if paid directly by the staff member (upgrade charge cannot be on a school card or charged to the school and later reimbursed). Room service, minibar, valet, laundry or other charges are only reimbursable by the school if other options are unavailable (for example, late check-in after the restaurant has closed but 24-hour room service or minibar snacks are available, no self-parking, etc.) and reason for the incidental charge should be written on the Expense Report. Internet charges are reimbursable if business use of the Internet is required. In-room movies and spa/gym/pool charges are not reimbursable. Alcohol purchases are not reimbursable. Latitude shall be given when reviewing hotel incidentals if a reasonable business case can be made for the charge in question. However, repeated events of charging questionable incidentals may lead to revocation of any future travel authorization.

9. Out-Of-Town Meals

Staff traveling on behalf of the school are reimbursed on a per meal basis not to exceed the following rates when they actually incur the cost of a meal. They will not be reimbursed for meals paid for or provided by others.

Breakfast:	\$ 15.00
Lunch:	\$ 25.00
Dinner:	\$ 35.00

Meal costs in excess of the above will not be reimbursed unless explicitly pre-authorized in advance. An example of this could be the cost of a banquet associated with a conference. If traveling to an expensive city or area, staff are advised to seek pre-approval of higher caps when obtaining overall trip approval.

10. Ground Transportation

Employees are expected to use the most economical ground transportation appropriate under the circumstances and should generally use the following, in this order of desirability:

Courtesy Shuttles. Many hotels have courtesy shuttles, which will take one to and from the airport at no charge. Employees should take advantage of this free service whenever possible.

Taxis/Uber/Lyft. When courtesy cars and airport shuttles are not available, a taxi or ridesharing option, such as Uber or Lyft, are often the next most economical and convenient form of transportation when the trip is for a limited time and minimal mileage is involved.

Rental Cars. Employees will be allowed to rent a car while out of town provided that the total cost is estimated to be less than the total cost of alternative methods of transportation. Gas charges to refill the car are reimbursable.

11. Personal Cars

Staff are compensated for use of their personal cars when used for business travel when pre-approved in writing by the Superintendent or the Director of Fiscal Services. Requests by staff to seek approval must be submitted and approval received prior to the planned travel. If ongoing travel pertaining to the same business is necessary, staff can seek authorization to have the travel expenses pre-approved for the duration of the fiscal year. When individuals use their personal car for such travel, including travel to and from the airport, mileage will be allowed at the currently approved IRS rate per mile.

In the case of individuals using their personal cars to take a trip over 250 miles that could be made more cheaply by air, mileage will be allowed at the currently approved rate; however, the total mileage reimbursement will not exceed the sum of the lowest available round trip coach airfare.

12. Parking/Tolls

Parking and toll expenses, including charges for hotel parking, incurred by staff traveling on organization business will be reimbursed. The costs of parking tickets, fines, car washes, etc., are the responsibility of the employee and will not be reimbursed. On-airport parking is permitted for short business trips. For extended trips, staff should use off-airport facilities.

13. Lavish/Excessive Expenditures

The school discourages expenses in any category that could be perceived as lavish or excessive, as such expenses are inappropriate for reimbursement by a charter school. This includes situations in which these options may actually be less expensive, as charter schools face considerable scrutiny on the nature as well as the cost of business-related expenses. Staff must be aware that as a public charter school, business travel is funded by taxpayer money and is expected to be functional but not extravagant. Some examples of excessive spending include (the following is not a comprehensive list):

- a. Limousine/town car service;
- b. Beach resort accommodation;
- c. Sporting/golf events;
- d. Music events/festivals/concerts;
- e. 4-star and above hotels (unless clear reasons can be shown as to why other options were unavailable);
- f. Excessive meal charges.

14. Affidavit for No Receipt

In some cases, obtaining a receipt may not be possible (i.e., toll). In that case, staff may sign an affidavit certifying that the expenditure was made and that no receipt is available.

15. Automobile Rental

All faculty, staff and students needing to rent a vehicle to perform school business must have a clear purpose and comply with the established procedures outlined below.

As soon as plans are known, staff should:

1. Complete a request for renting a car (Name, purpose, number of passengers, driver, dates, pick up and return site, drivers approved y/n, who will make the reservation)
2. GTA's Director of Fiscal Services will review the request and approve.
3. A determination will be made regarding how to pay (employee pays and is reimbursed or GTA credit card).
4. The Director of Fiscal Services or designee will work with the requester to make the reservation. The reservation should be made in the driver's name. To avoid cancellation charges, a minimum of 48 hours is requested to cancel any regular car class rental.
5. All GTA employees who rent a vehicle for GTA business should follow these procedures to minimize risk:
 - i. Only authorized GTA drivers may drive vehicles rented for GTA business. To be authorized, staff will work with the Director of Fiscal Services to be cleared (DMV record review, additional insurance requirements, clearance from the HR Coordinator).
 - ii. All drivers must be listed on the rental agreement and approved by GTA in advance.
 - iii. All drivers are required to review the auto rental contract and to follow all requirements.
 - iv. Loss damage waiver insurance (LDW) and liability protection coverage should confirm that LDW insurance is included in the rental agreement.
 - v. If using any other any rental company is used, insurance must purchase LDW insurance from the rental company.
 - vi. GTA Insurance covers the vehicle on an excess basis, and only while the vehicle is operated for GTA business. Side trips or any other personal use of the vehicle is not authorized or covered by GTA insurance, unless such side trips or personal use is within 30 miles of the area where business is being conducted and is for necessities such as obtaining food, gas, or during downtime.
 - vii. GTA business travelers should not purchase liability insurance coverage from the vehicle rental company. GTA's coverage will respond if damage or injury occurs to another party, where a GTA staff is at fault, if the accident occurs while carrying out GTA business, and if the accident is reported in a timely manner to the Director of Fiscal Services.

- viii. Under no circumstances should a rental vehicle be used to pull a trailer, nor should it be driven on unpaved roads.
- ix. Whenever possible, rental vehicles shall be two- or four-door sedans and the seating capacity of rental vehicles is not to be exceeded. Where necessary and appropriate, the rental of vans is authorized, but restricted to no more than 11 passengers.
- x. Seat belts must be worn by all occupants of a rental vehicle at all times.
- xi. The use of intoxicants and controlled substances is strictly forbidden.
- xii. Upon return, send a complete copy of the rental contract to the Director of Fiscal Services.

In the Event of an Accident

1. Do not admit liability.
2. Obtain the name of the other driver and witnesses, if possible.
3. Report the accident immediately to the local police or California Highway Patrol and the rental company so as not to void the coverage available through the loss damage waiver (LDW). Send copies of all accident reports filed to the Director of Fiscal Services.
4. Although a credit card may provide coverage for accidents when the card is used to rent a vehicle, it only insures as “excess over any other collectible insurance,” meaning that the GTA insurance would be responsible first. The credit card coverage would rarely pay a claim.

Definitions

“GTA business”: “while on assignment by or at the direction of GTA for furthering of a business interest.”

“GTA staff”: “GTA staff traveling on GTA authorized business. It excludes non-employees, students, spouses/partners, volunteers, alumni, etc.”

V. FIXED ASSETS

BOARD POLICY

In order to properly track all capitalized and non-capitalized assets, an inventory must be maintained for all items with a value of \$10,000 or more. This Inventory Record shall include the asset description, location, and ID tag/serial number, and for items exceeding \$10,000, shall reference the corresponding entry in the Fixed Asset Register for capitalized assets (see below). All inventoried items shall be tagged with a unique identification tag.

1. Fixed Asset Register

Assets with a single value of \$5,000 or more and a useful life of more than one year are considered “fixed assets,” meaning they are included as assets on the school’s balance sheet (rather than as expenses such as books and supplies) and the cost of these assets is spread out over the useful life of the asset. This process is called “capitalization,” and involves including the value of the asset on the school’s balance sheet at acquisition, and charging a portion of the item’s value as “depreciation” each year over its useful life. In order to properly account for capitalized assets, a Fixed Asset Register must be maintained for all capitalized assets, and shall include asset description, acquisition date, cost basis, depreciation expense, accumulated depreciation and useful life. the Department of Fiscal Services is responsible for maintaining the fixed asset register.

2. Procedure for Recording Inventory and Fixed Assets

When any item is acquired with a cost basis of \$5,000 or more, an entry shall be made in the Inventory Record showing asset description, location, and ID tag/serial number, and a numbered identification tag shall be affixed to the item.

When the item (or group of items) that is purchased has a useful life of one year or more and has a cost of \$5,000 or more, the item should be entered into the Inventory Record as described in the above paragraph, and three additional steps must also be taken:

- a. A notation is made in the Inventory Record that this item is a fixed asset;
- b. the Department of Fiscal Services is informed that a specific purchase meets the qualifications of a fixed asset;
- c. the Department of Fiscal Services makes an entry in the Fixed Asset Register reflecting the acquisition.

3. Annual Inventory

At the end of each fiscal year upon a date determined by the Superintendent or the Director of Fiscal Services, a comprehensive physical inventory shall be conducted of all inventoried assets of \$5,000 or more (including all fixed assets), reconciling the Inventory Record, the Fixed Asset Register, and the information in the general ledger to match the results of the physical inventory.

4. Disposal of Assets

All assets shall be disposed of as necessary consistent with GTA’s Sale and Disposal of Personal Property Policy.

VI. DEBT MANAGEMENT POLICY

BOARD POLICY

The purpose of this policy is to enhance GTA's ability to manage its debt in a fiscally conservative and prudent manner. The effects of decisions regarding types of borrowing, covenants and terms, interest rates, and payment structure directly impact the school's continuing operation. The school has thus established this Debt Management Policy to provide goals and guidelines for GTA's borrowings.

GTA's Debt Management Policy is as follows:

1. The Superintendent or the Director of Fiscal Services is responsible for administering and maintaining GTA's current obligations under direction of the Board. the Department of Fiscal Services will meet with the Superintendent or the Director of Fiscal Services and Board, as appropriate, regarding the status of GTA's existing debt and to make specific recommendations.
2. No new debt shall be incurred without approval of the Board.
3. All approved annual budgets shall include timely repayment of all outstanding debt, or include a reasonable repayment plan for such debt if timely repayment is not possible.
4. Prior to incurring any new borrowing, the Department of Fiscal Services shall prepare a financial analysis showing the effect of the borrowing on current and future operations. GTA may not borrow if a reasonable financial analysis cannot show timely repayment of all obligations including the planned borrowing.
5. GTA will seek financing options that are at the lowest interest cost and in the best interests of GTA.
6. GTA will take all practical precautions and proactive measures to avoid borrowing decisions that can negatively impact current or future operations.
7. GTA will determine the term, rates, and covenants that will best fit within the overall existing debt structure at the time any new debt is incurred.
8. GTA will explore, assess risk, and implement innovative structuring ideas when they are consistent with the above goals.
9. the Department of Fiscal Services will regularly review the loan covenants with the Superintendent and the Board to monitor status.

There are no related procedures for this policy.

VII. BANKING

BOARD POLICY

All bank accounts shall be established in the name of GTA with prior board approval of the initial authorized signers. The Board shall review and approve all changes to authorized signers and approve the continuing need for each account.

All loans or similar agreements shall be negotiated by the Superintendent or the Director of Fiscal Services to obtain such services in the most efficient and cost-effective manner, using the same procedures as described in "2. PURCHASING POLICY" above. All such agreements must clearly define all terms under which GTA will be obligated and the price for such services.

1. Reconciliations

All bank statements will be reconciled monthly by the Department of Fiscal Services.

VIII. GENERALLY ACCEPTED STANDARDS OF FISCAL MANAGEMENT

BOARD POLICY

Charter schools are required to meet generally accepted standards of fiscal management. It is now generally accepted that the primary responsibility for the fair presentation of financial statements rests with the reporting management of an organization. Accordingly, a process must be effected by a school's management and other staff and designed to provide reasonable assurance regarding the achievement and maintenance of the following standards:

1. A fiscal year budget that clearly defines achievable goals as defined in the school's charter and approved by the Board of Directors in the form of a budget resolution.
2. Accounting records should properly and accurately record and account for all cash equivalent transactions, including actual cash. Accounting information should be relevant, reliable, comparable and consistent and must be available for the preparation of reliable financial statements.
3. Demonstrated compliance with Federal and state laws/regulations, State Board of Education policies and other compliance requirements.
4. Maintenance of documentation that outlines internal controls on business practices and operation.
5. Transactions are executed in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on public funds.
6. Funds, property, and other assets are safeguarded against loss from unauthorized use or disposition.
7. Required independent audits are performed and submitted when due in a timely manner as prescribed by the California the Department of Education.
8. School should have documentation that supports its financial statements and that reflect its financial position/condition, results of operations or changes in net assets and where appropriate, cash flows for any fiscal period/year.
9. Any necessary corrective action plans on any audit findings must be filed in writing and proposed changes must be implemented in the subsequent fiscal year.

There are no related procedures for this policy.

IX. Budget Development Policy

OVERALL:

Budgeting involves preparing each annual budget and projections of future years to ensure that the school's financial resources are sufficient to cover all programmatic and operational requirements of GTA for the foreseeable future. The budget can be seen as the overall strategic financial plan.

Cash flow management involves tracking actual and projected cash receipts and disbursements to ensure that sufficient cash is available to meet all financial needs when due, and that sufficient available reserves are maintained as a contingency in the event of unforeseen financial setbacks. Cash flow management can be seen as the tactical day-to-day implementation of the overall budget plan.

An effective charter school budgeting and cash flow management policy integrates the strategic and tactical financial goals of GTA to ensure that day-to-day cash management is sufficient, annual and multi-year budget projections reflect the most accurate current forecast available, and that the Board and stakeholders receive timely, transparent, and actionable financial data to allow for informed decisions regarding any changes or updates needed to stay on track to meet the strategic and operational stated goals of GTA.

BOARD POLICY:

Education Code section 47604.33 requires charter schools to prepare a series of annual budget reports to be submitted to the charter authorizer. A copy of the Budgeting chapter from the California Charter School Accounting and Best Practices Manual is attached to this Policy, detailing the applicable budgetary compliance and reporting requirements.

GTA shall provide the following budget reports to its authorizer by the following dates:

1. On or before July 1, a preliminary budget.
2. On or before December 15, a first interim financial report reflecting changes through October 31.
3. On or before March 15, a second interim financial report reflecting changes through January 31.
4. On or before September 15, a final unaudited report for the full prior year.

CASH FLOW MANAGEMENT POLICY:

GTA's goal is to maintain an ending monthly cash balance across all bank accounts of at least 30 days cash on hand, with a minimum cash balance at all times of at least 10

days cash on hand. All budget updates must include a monthly cash flow projection with year-to-date actuals and projected amounts for remaining months of the fiscal year.

ENDING BALANCE:

At each June 30, GTA's goal is to maintain a minimum unrestricted available ending balance at or above 10.00% of total expenditures during the fiscal year just ending (excluding net investment in fixed assets and governmentally restricted funds). Annual budgets should include discussion of GTA's progress towards reaching a target goal of unrestricted available reserves of at least 15% of expenditures.

If the above Policy goals cannot be met for any reason, the Board shall approve a Corrective Action Plan detailing the reason the goal cannot be met, and the plan to return to full Policy compliance.

CURRENT PROCEDURE

Budget Structure

GTA's annual budget includes a Statement of Activities that shows projected revenues, expenditures, and changes in fund balance for the fiscal year beginning July 1 and ending June 30 of the following year. The overall budget contains balanced sub-budgets by resource for state categoricals, special education, and other restricted monies in addition to the unrestricted general account.

The above Statement of Activities shall be presented as an "Operating Budget" showing "Operating Net Revenues" that exclude depreciation expense and related non-cash activities, to allow the Board and stakeholders to analyze the financial sufficiency of the core operations of GTA.

The Operating Net Revenues shown in the Operating Budget are then adjusted to include depreciation expense, and the Adjusted GAAP Net Revenues (which are in compliance with generally accepted accounting principles) are used for all reporting to authorizers and in preparation of audited financial statements. In order to remain compliant with Education Code requiring charter schools to maintain full GAAP compliance, the unadjusted net revenues and Operating Budget are for internal use only and are not part of GTA's official financial reporting. Depreciation expense and full accrual of capitalized assets, debt, and other notations consistent with nonprofit fund accounting are an essential component of the financial records of GTA.

All annual budgets, including initial, interim and monthly updates, shall include a multi-year projection for the current year and following two fiscal years, as well as a

corresponding monthly cash flow statement that shows year-to-date and projected revenues and expenditures as well as other transactions affecting cash, plus a beginning and ending cash balance, broken out monthly.

Annual Budget

In April of each year, the school will begin preparing the draft annual budget under the direction and supervision of the Director of Fiscal Services, using all available data including monthly actual revenues and expenditures to date as well as planned adjustments for the coming year.

Prior to June 1 of each year, the Board may hold a special Budget Planning meeting specifically for budget review and planning, in which the draft budget, prepared by the Director of Fiscal Services in conjunction with the Superintendent, is presented to the Board and each area of the budget is discussed in depth by staff and Board members.

Alternatively, the Board may instead designate members of a Fiscal Committee that will hold a separate Budget Planning meeting in place of a meeting of the entire Board. In the case of a separate Fiscal Committee meeting, the results of this meeting will be presented to the Board at their next regular or special Board meeting.

The Superintendent (with the assistance of the Department of Fiscal Services) will then revise and adjust the draft budget as directed by the Board and/or the Committee to create the Final Operating Budget for the coming fiscal year. Additional Budget Planning meetings may be scheduled if necessary to discuss any further revisions prior to finalizing the budget.

Prior to July 1 of each year, the final budget will be presented to the Board for final approval. Once approved, the final budget will be submitted to GTA's sponsoring entity by July 1 as required under the Education Code.

Interim Budgets

On or before December 15 and March 15, the Director of Fiscal Services will develop and present an updated interim annual budget to the Board for approval at a regular or special Board meeting. The interim budget shall reflect adjustments or revisions to the original budget made in response to changing financial conditions or needs of the school. The Board may elect to hold one or more Budget Planning meetings, or name a Finance Committee to hold such Budget Planning meetings, if deemed necessary prior to approval of each interim budget. Once approved, the First and Second Interim Budgets will be submitted to GTA's authorizer by December 15 and March 15, respectively, as required by law.

Monthly Updates

Each month beginning in August, at either the regularly scheduled or a special meeting of the Board, the Department of Fiscal Services will provide to the Board a Monthly Financial Update of year-to-date revenues and expenditures, including a comparison of budgeted vs. actual amounts and a brief explanation of significant deviations from the original budget. The Board is not required to approve these monthly updates, which are informational items only – however, the Board may elect to approve any additions, revisions, or modifications to the Annual or Interim Budgets that it deems necessary, under a separate agenda item at the same or a subsequent meeting, to allow the school to adapt to changing financial conditions. Any such board-approved changes to the Original or Interim budgets will be used as the current operating budget by school staff from that point forward.

X. Desktop Procedures Manual

OVERALL:

The Director of Fiscal Services shall be responsible for developing and maintaining a desktop accounting procedures manual (the “Manual”) that includes copies of all Board policies related to fiscal matters, and conforms with the foregoing policies, addresses internal controls, conforms to guidance provided by the Fiscal Crisis Management Team (“FCMAT”) and Eide Bailly, implements protocols and processes to ensure GTA’s financial reporting is compliant with Generally Accepted Accounting Principles (“GAAP”), and to ensure high standards of organization, record keeping, fiscal controls, checks, and segregation of duties.

The Manual is intended to be a “living document” that is continually updated as processes and systems are improved. The manual must, at minimum, address the following:

1. New vendors must be verified for legitimacy by conducting background research.
2. Blank check stock shall be kept in a locked cabinet
3. Individuals with access to school credit cards shall not be responsible for reviewing and reconciling the credit card statement for such credit cards nor issuing checks for such statements
4. Different accounting personnel shall be responsible for adding new vendors to the system, entering invoices, printing the accounts payable checks, signing checks, and mailing the checks
5. Accounts payable invoices shall be compared to the printed checks by the signer prior to signing
6. The individual who prints accounts payable checks should not be responsible for mailing the checks after they are signed.
7. There shall be a regular schedule for printing checks
8. Bank statements and copies of canceled checks shall be reviewed by an individual independent to the accounts payable process.

9. A point of sale system shall be used to record payments
10. Checks received in the mail shall be logged upon receipt
11. Deposits shall be made as quickly as practicable
12. The individual who receives payments shall not also be the person who enters the payments into the accounting system and the cash register.
13. The individual who reconciles the cash and checks to the accounting system should not prepare the deposit.
14. The individual who opens the mail may not enter payments into the accounting system, and make the deposit.
15. Fixed asset listings shall be compared to fixed assets on an annual basis
16. Payroll shall be reviewed after it is sent for processing.
17. The individual who has the responsibility of entering new hire information and termination information, shall be different from the person responsible for changing employee compensation levels, processing payroll, and sending the payroll information to the bank.
18. Individuals shall be required to receive approval before working overtime and documentation shall be maintained regarding the same and to evidence that overtime was provided.
19. Payroll adjustments to individual accounts shall be reviewed for accuracy and completeness.
20. When Paycom processes the payroll, a text file is imported into AptaFund via the payroll specialist. This shall be reviewed before and after the posting.
21. Position control procedures and forms shall be maintained. A systematic and department-wide process to compile and maintain position control data shall be utilized.
22. Procedures to support its year-end closing processes The purchase order cutoff date for all purchases charged against the current year budget shall be June 15 of each year.
23. Separation of duties
24. Staff cross-training
25. Timely reconciliations relating to accounts payable and purchasing activities
26. Accounts receivables protocols

SALE AND DISPOSAL OF PERSONAL PROPERTY POLICY

The Board of Directors (“Board”) of Griffin Charter Academies (or the “GTA”) recognizes its fiscal responsibility to maximize the use of GTA equipment and other personal property while providing up-to-date resources that facilitate student learning and effective operations. When the Board, upon recommendation of the Superintendent or designee, declares any GTA-owned personal property unusable, obsolete, or no longer needed, the Board shall determine the estimated value of the property and shall decide whether the property will be donated, sold, or otherwise disposed of. The Board shall approve of the price and terms of any sale of GTA personal property.

The Board may dispose of GTA personal property by any of the following methods:

Private Sale

If the Board members who are in attendance at a meeting unanimously agree that the property, whether one or more items, does not exceed two thousand five hundred dollars (\$2,500) in value, the property may be sold at a private sale without advertising by any employee of GTA empowered for such purpose by the Board.

Public Sale/Auction

If the value of the property exceeds two thousand five hundred dollars (\$2,500), the Superintendent or designee may advertise for bids by posting a notice in at least three public places in the district for at least two weeks or by publishing a notice at least once a week for at least two weeks in a newspaper having a general circulation in the district and, if possible, publishing within the district. GTA shall sell the property to the highest responsible bidder or shall reject all bids.

The property may also be sold by means of a public auction conducted by GTA employees, employees of other public agencies, or by contract with a private auction firm. Notice related to the auction shall be posted or published as described above. The Board may delegate to the Superintendent or designee responsible for conducting the auction the authority to transfer the personal property to the highest responsible bidder upon completion of the auction and after payment has been received by GTA.

Property for which no qualified bid has been received may be sold, without further advertising, by the Superintendent or designee.

Donation

If the Board members who are in attendance at a meeting unanimously find that the value of the property is insufficient to defray the costs of arranging a sale, the property may be donated to a

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Adopted/Ratified: [INSERT]
Revision Date: [INSERT]

charitable organization deemed appropriate by the Board or may be disposed of in the local public dump by any employee of GTA empowered for such purpose by the Board.

Money Received

Money received from the sale of personal property shall be, at the Board's discretion, either deposited in GTA's reserve or general fund or credited to the fund from which the original purchase was made.

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