Second Reading of Policy Recommendations: The following policies were reviewed by the Policy Committee on 10/15/26, presented for first reading on 10/26/26, and are now being presented for second reading.

Edit Key:

- Edits in **green** within the policies are recommended additional language.
- Edits in **red** within the policies are recommended removed language.
- Edits highlighted in yellow within the policies are additional edits resulting from first reading; *these are reflected in policies 107.1, 703.1, and 803.4 only*.

Policy #	Title	Status
107.1	Religious Expression	New
202.5	School Board Secretary	Revised
202.6	School Board Treasurer	Revised
702.1-R2	Child Nutrition Programs Civil Rights Complaints Regulation	Revised
702.1-E1	Child Nutrition Program Notices of Discrimination	Revised
702.1-E2	Child Nutrition Programs Civil Rights Complaint Form	Revised
703.1	Technology and Data Security	Revised
801.3	Transfer of Funds	Revised
801.8	Financial Records	Revised
802.9	Debt Management	Revised
803.1-R1	Purchasing-Bidding-Suspension and Debarment of Vendors and Contractors Procedures	Revised
803.1-R2	Purchasing-Bidding-Using Federal Funds in Procurement Contracts	Revised
803.4	Public Purpose and Use of Public Funds	Revised
803.5	Federal Awards Compliance	New
803.12	Time and Effort Reporting	New
804.1	Presentation and Publication of Financial Information	Revised
805.2	Care, Maintenance, and Disposal of District Records	Revised

Policy 107.1 *New Policy*
Religious Expression

LEADERSHIP AND STAFF NOTIFICATION
It is the policy of the Linn-Mar Community School District (hereafter "district") that the superintendent [or designee] shall annually distribute the most recent version of the *Guidance on Constitutionally Protected Prayer and Religious Expression* produced by the US Department of Education, and distributed by the Iowa Department of Education, to each board member, principal, teacher (including substitute teachers and student teachers), staff member, and student through the district's website (www.Linnmar.k12.ia.us).

CONSTITUTIONALLY PROTECTED PRAYER
It is the policy of the district to allow students and staff to engage in constitutionally protected prayer within the district schools consistent with applicable statutory or case law pertaining to the *First Amendment* of the *United States Constitution.* Accordingly, no board policy will prevent, or otherwise deny participation in, constitutionally protected prayer in district schools, consistent with federal law.

GRADING STANDARDS
It is the policy of the district that religious content in student assignments will be evaluated using the same academic grading standards applied to secular work.

STUDENT ORGANIZATIONS
It is the policy of the district that religious student organizations have the same rights, access to facilities, and institutional support as secular student clubs.

PROFESSIONAL DEVELOPMENT
It is the policy of the district to offer professional development opportunities to each employee of the district regarding constitutionally protected prayer and religious expression in public elementary and secondary schools.

CONCERNS
Concerns may be directed to the district's Nondiscrimination Coordinators **at: Linn-Mar Community School District, 3556 Winslow Road, Marion, IA 52302**.

Adopted:
Related Policies: 403.10; 603.5; 603.6; 603.9; 603.9-R; 603.10
Legal Reference (Code of Iowa): § 279.89; SF2231
IASB Reference: 107

Policy 202.5
School Board Secretary

A board secretary may be appointed from employees, other than a position requiring a teaching certificate, or from the public. To finalize the appointment, the board secretary will take the oath of office during the meeting at which the individual was appointed or no later than 10 days thereafter.

It is the responsibility of the board secretary, as custodian of district records, to preserve and maintain the records and documents pertaining to the business of the board, to keep complete minutes of special and regular board meetings including closed sessions, to keep a record of the results of regular and special elections, to keep an accurate account of school funds, **to publish board proceedings and the schedule of bills allowed (including a list of claims allowed),** to sign warrants drawn on the school funds after board approval, and collect data on truant students. The board secretary may designate an individual(s) to assist with responding to and processing requests for records of the district. The board secretary will also be responsible for filing the required reports with the **Board of Directors, the** Iowa Department of Education**, and all other entities, as required. The secretary shall coordinate with the treasurer regarding financial records, financial reporting, and cash flow needs of the district.**

In the event the board secretary is unable to fulfill the responsibilities set out by the board and the law, the superintendent will assume those duties until the board secretary is able to resume the responsibility, or a new board secretary is appointed. The board secretary will give bond or be covered by an insurance policy in an amount set by the board. The cost of the bond or insurance policy will be paid by the district.

Adopted: 6/70
Reviewed: 10/11; 4/13; 9/16; 10/19; 10/22; 10/25
Revised: 8/14; 8/24; 7/25
Legal Reference (Code of Iowa): §§ 64; 279.3, .5, .7, .32-33, .35; 291.2-4, 6-8, 10-11; 299.10; 281 IAC 12.3(1)
IASB Reference: 206.03, Option 1

Policy 202.6
School Board Treasurer

It is the responsibility of the board to appoint a treasurer. The board may appoint a treasurer from its employees, other than a position requiring a teaching certificate, or from the public. To finalize the appointment, the treasurer will take the oath of office during the meeting at which the individual was appointed or no later than 10 days thereafter.

It is the responsibility of the treasurer to oversee the investment portfolio, to receive funds of the district, to pay out the funds for expenses approved by the board, to maintain accurate accounting records for each fund, to report monthly regarding the investment portfolio ~~and the status of each fund~~, and to file required reports with the appropriate state agencies and other entities. **The treasurer shall coordinate with the secretary regarding all financial records, financial reports, and cashflow needs of the district.** ~~It will also be the responsibility of the treasurer to work with the board secretary to coordinate the financial records, the financial reports, the cash flow needs, and the investment portfolio of the district.~~

If the treasurer is unable or unwilling to carry out the duties required, it is the responsibility of the business manager to carry out the duties of the treasurer until the board treasurer is able to resume the responsibility, or a new board treasurer is appointed.

The treasurer will give bond or be covered by an insurance policy in an amount set by the board. The cost of the bond or insurance policy will be paid by the district.

Adopted: 6/70
Reviewed: 4/13; 9/16; 10/19; 10/22; 10/25
Revised: 8/14; 8/24
Legal Reference (Code of Iowa): §§ 12B.10; 12C; 279.3, .5, .7, .31-33, .35; 291.2-4, .6-12, .14; 281 IAC 12.3(1)
IASB Reference: 206.04

Policy 702.1-R2
Child Nutrition Programs Civil Rights Complaints Regulation

USDA CHILD NUTRITION PROGRAMS IN IOWA
PROCEDURES FOR HANDLING A CIVIL RIGHTS COMPLAINT

1. Civil rights complaints related to the National School Lunch Program, School Breakfast Program, Afterschool Care Snack Program, Summer Food Service Program, Seamless Summer Option, or Child and Adult Care Food Program are written or verbal allegations of discrimination based on USDA protected classes of race, color, national origin, **religion,** sex, **disability,** age, **marital status, family/parental status, income derived from public assistance programs, political beliefs, or reprisal or retaliation for prior civil rights activity** ~~and disability~~.

2. Any person claiming discrimination has a right to file a complaint within 180 days of the alleged discrimination. See below for additional Iowa Civil Rights information. A civil rights complaint based on the protected classes listed in #1 above must be forwarded to the address on the nondiscrimination statement.

3. All complaints, whether written or verbal, must be accepted by the School Food Authority (SFA)/Sponsor/Organization and forwarded to the USADA at the address or link on the nondiscrimination statement within 5 calendar days of receipt. An anonymous complaint should be handled the same way as any other. Complaint forms may be developed, but their use cannot be required. If the complainant makes the allegations verbally or in a telephone conversation and is reluctant or refuses to put them in writing, the person who handles the complaint must document the description of the complaint.

4. There must be enough information to identify the agency or individual toward which the complaint is directed and indicate the possibility of a violation. Every effort should be made to obtain at least the following information:
    a. Name, address, and telephone number or other means of contacting the complainant;
    b. The specific location and name of the organization delivering the program service or benefit;
    c. The nature of the incident(s) or action(s) that led the complainant to feel there was discrimination;
    d. The basis on which the complainant feels discrimination occurred (race, color, national origin, sex, age, or disability);
    e. The names, titles, and addresses of people who may have knowledge of the discriminatory action(s); and

f. The date(s) when the alleged discriminatory action(s) occurred or, if continuing, the duration of such action(s).

5. USDA is the cognizant agency for the Child Nutrition Programs listed and, therefore, is the first contact for the ~~six~~ protected classes listed in #1 above, for complaints received within 180 days. Civil rights complaints must be submitted to the USDA Office of Civil Rights within 5 calendar days of receipt and no later than 180 days of the discriminatory act. The **email** ~~link~~ for submission of a complaint is: program.intake@usda.gov.

6. In accordance with applicable federal and/or state laws, protected classes also include **actual or potential parental, family, or marital status,** sexual orientation, ~~religion, or~~ **and** creed and complaints can be filed up to 300 days of occurrence. The address for Iowa complaints is Iowa Civil Rights Commission, 6200 Park Avenue, Suite 100, Des Moines, IA 50321-1270; phone numbers 515-281-4121 or 800-457-4416; website: https://icrc.iowa.gov/.

Adopted: 7/22
Reviewed: 2/24
Revised: 7/25
Related Policy: 702.1; 702.1-R1; 702.1-E1-E2
Legal Reference (Code of Iowa): §283A; 281 IAC 58; Bureau of Nutrition and Health, IDOE, 12/2021
IASB Reference: 710.1-R(1)

Policy Series 700 – Auxiliary Services
Nutrition Services Program

Policy 702.1-E1
Child Nutrition Program Notices of Discrimination

USDA NONDISCRIMINATION STATEMENT
In accordance with federal civil rights law and US Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its agencies, offices, and employees; and institutions participating or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, disability, age, **marital status, family/parental status, income derived from public assistance programs, political beliefs,** or reprisal or retaliation for prior civil rights activity, in any program or activity conducted of funded by the USDA **(not all bases apply to all programs)**. **Remedies and complaint filing deadlines vary by program or incident.**

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.), should contact the state or local agency **that administers the program or** ~~they applied for benefits. Individuals who are deaf, hard of hearing, or have speech disabilities may~~ contact the USDA through the ~~Federal~~ **Telecommunications** Relay Service at **711 (voice and TTY)** ~~(800) 877-8339~~. Additionally, program information may be made available in languages other than English.

To file a program complaint, complete the USDA Program Discrimination Complaint Form (AD-3027) found online at How to File a Program Discrimination Complaint and at any USDA office or write a letter addressed to the USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866)-632-9992. Submit the completed form or letter to the USDA by:

Mail: US Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue SW, Mail Stop 9410
Washington DC 20250-9410

Fax: (202)-690-7442; or

Email: program.intake@usda.gov

USDA is an equal opportunity provider, employer, and lender.

IOWA NONDISCRIMINATION STATEMENT
~~It is the policy of~~ **T**his Child Nutrition Program provider **does** not ~~to~~ discriminate in accordance with applicable federal and/or state laws **in its educational**

programs, activities, and employment practices on the basis of race, creed, color, national origin, sex, sexual orientation, disability, age **(for employment)**, ~~or~~ religion**, or actual or potential parental, family, or marital status (for programs)** ~~in its programs, activities, or employment practices as required by Iowa Code Sections 216.6, 216.7, and 216.9~~. **There is a grievance procedure for processing complaints of discrimination.** If you have questions or grievances related to compliance with this policy, **or for information about the district's grievance procedures by** this Child Nutrition Program provider, please contact the Iowa Civil Rights Commission, 6200 Park Avenue, Suite 100, Des Moines, IA 50321-1270; phone number (515)-281-4121 or (800)-457-4416; website: https://icrc.iowa.gov/.

Adopted: 7/22
Reviewed: 2/24
Revised: 7/25
Related Policy: 702.1; 702.1-R1-R2; 702.1-E2
IASB Reference: 710.01-E(1)

Policy Series 700 – Auxiliary Services
Nutrition Services Program

Policy 702.1-E2
Child Nutrition Programs Civil Rights Complaint Form

COMPLAINT CONTACT INFORMATION

Name: _____

Address, City, State, Zip: _____

County: _____ Phone: ( )_____

Email: _____

COMPLAINT INFORMATION

1. Specific name and location of entity and individual delivering the service or benefit.
   _____
   _____
   _____

2. Describe the incident or action of the alleged discrimination or give an example of the situation that has a discriminatory effect on the public, potential program participants, or current participants.
   _____
   _____
   _____
   _____
   _____

3. On what basis does the complainant feel discrimination in accordance with applicable federal and/or state laws exists (race, color, national origin, sex, **disability**, age, **marital status, family/parental status, income derived from public assistance programs, political beliefs, or reprisal ore retaliation for prior civil rights activity,** creed, sexual orientation, religion, or ~~political party affiliation~~ **actual/potential parental/ family/marital status**)?
   _____
   _____
   _____

4. List the names, titles, and business addresses of persons who may have knowledge of the alleged discriminatory action.

   _____

   _____

   _____

5. List the dates during which the alleged discriminatory actions occurred, or if continuing, the duration of such actions.

   _____

   _____

   _____

6. Date complaint received: _____

7. Person receiving complaint: _____

8. Action(s) taken:

   _____

   _____

   _____

The USDA is the cognizant agency for the Child Nutrition Programs listed and therefore is the first contact for the ~~six~~ **following** protected classes of race, color, national origin, **religion,** sex, **disability,** age, **marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity** ~~and disability~~ for complaints received within 180 days. Civil rights complaints must be submitted to the USDA Office of Civil Rights within five calendar days of receipt and no later than 180 days of the discriminatory act. The link for submission of a complaint is program.intake@usda.gov.

In accordance with applicable federal and/or state laws, **additional** protected classes also include **actual or potential parental, family, or marital status,** sexual orientation, ~~religion, or~~ **and** creed and complaints can be filed up to 300 days of occurrence. The address for Iowa complaints is Iowa Civil Rights Commission, 6200 Park Avenue, Suite 100, Des Moines, IA 50321-1270; phone numbers 515-281-4121 or 800-457-4416; website https://icrc.iowa.gov/.

This institution is an equal opportunity provider.

Adopted: 7/22
Reviewed: 2/24
Revised: 7/25
Related Policy: 702.1; 702.1-R1-R2; 702.1-E1
IASB Reference: 710.01-E(2)

Policy Series 700 – Auxiliary Services
Technology Services

Policy 703.1
Technology and Data Security

The Linn-Mar Community School District recognizes the increasingly vital role technology plays in society. ~~It is the goal of the district to embrace technology as a resource to further educate our students and better prepare students for the future.~~ It is the intent of the district to support secure data systems in the district, including security for all personally identifiable information(PII) that is stored digitally on district-maintained devices, computers, and networks. ~~Technology also has incredible potential to support increased efficiency; communication; and growth through collaboration among administration, students, staff, employees, and volunteers. However, with this growth opportunity comes increased potential for valuable, sensitive data to become public. The district takes seriously its responsibility to protect private data.~~ The purpose of this policy is to ensure the secure use and handling of all district data; computer systems; devices; and technology equipment by district students, employees, and data users.

The district **may** ~~supports the~~ use ~~of~~ third-party vendors to perform necessary education functions for the district. Utilizing third party vendors to outsource functions the district would traditionally perform provides a cost-effective means to deliver high quality educational opportunities to all students. However, it is paramount that third party vendors with access to sensitive data and personally identifiable information (PII) of district students, employees, and data users be held to the highest standards of data privacy and security.

The selection of third-party vendors shall be in accordance with appropriate law and policy. Third-party vendors with access to personally identifiable information (PII) shall meet all qualifications to be designated as a school official under the Family Educational Rights and Privacy Act (FERPA). The **superintendent [or designee] shall recommend to the board** ~~board shall ensure~~ that any approved contract with a third-party vendor will require that the vendor comply with all applicable state and federal laws, rules, or regulations regarding the privacy of personally identifiable information (PII).

It is the responsibility of the superintendent [or designee] to develop procedures for the district to enhance the security of data and the learning environment. The procedures shall address, but not be limited to, the following topics:

ACCESS CONTROL
Access control governs who may access what information within the district and the way users may access the information. ~~Increased access to secure networks and data will inevitably increase the risk of security compromise to those networks and data.~~ It is the responsibility of the superintendent [or designee] to **determine** ~~develop procedures for determining~~ which individuals will have

access to district networks, devices, and data and to what extent such access will be granted. System and network access will be granted based upon a need-to-have requirement, with the least amount of access to data and programs by the user as possible.

SECURITY MANAGEMENT

Security management addresses protections and security measures used to protect digital data. These include measures related to audits and remediation, as well as security plans for responding to, reporting, and remediating security incidents. It is the responsibility of the superintendent [or designee] to develop procedures to govern the secure creation, storage, and transmission of any sensitive data and personally identifiable information (PII). The superintendent [or designee] shall implement **appropriate** ~~network perimeter~~ controls to regulate data moving between trusted internal resources to external entities.

TECHNOLOGY AND DATA USE TRAINING

Technology and data use training addresses acceptable use best practices to safeguard data for students, employees, and staff. It is the responsibility of the superintendent [or designee] **to help ensure appropriate training** ~~to develop procedures for creating and administering a training program~~ on proper data and technology use. ~~Training shall address the proper use and security of all district owned or controlled technology, devices, media, and data. Training will be provided for all district employees with access to personally identifiable information (PII).~~

~~In furtherance of this policy, the superintendent [or designee] shall be responsible for overseeing district-wide data and technology security, to include development of standards and procedures, and adherence to the administrative procedures defined in this document.~~

Adopted: 12/18
Reviewed: 9/21; 2/24
Related Policy: 403.28; 703.1-R
Legal Reference (Code of Iowa): **279.71**; 715C
IASB Reference: 712

Policy Series 800 – Business Procedures
Fiscal Management

Policy 801.3 Transfer of Funds

A school district may transfer funds under the following circumstances:

1. When the necessity for a fund has ceased to exist, the balance may be transferred to another fund or account by board resolution. District monies received without a designated purpose may be transferred in this manner.
2. District monies received for a specific purpose or upon vote of the people may only be transferred by board resolution when the purpose for which the monies were received has been completed. Voter approval is required to transfer monies to the general fund from the capital projects fund and debt service fund.
3. If all requirements for district use of funds under the **Statewide** Preschool **Program** ~~Foundation Aid~~, Professional Development Supplement, Home School Assistance Program, Teacher Leadership Supplement, or any discontinued fund have been met and funds remain unexpended and unobligated at the end of the fiscal year, the district may transfer all or a portion of remaining funds by passage of a board resolution into the district's flexibility account in accordance with law. Before the expenditure of amounts in the flexibility account, the district shall publish notice of the time, date, and place of a public hearing on the proposed resolution approving said expenditures. The board must find and certify that the statutory requirements of each original source of funds have been met before adopting the resolution approving the expenditures. The district will present a copy of the signed board resolution to the Department of Education.
4. The district may transfer by board resolution from the general fund to the student activity fund an amount needed to purchase or refurbish protective and safety equipment required for any extracurricular interscholastic athletic contest or competition sponsored or administered by the Iowa High School Athletic Association (IHSAA) or Iowa Girls High School Athletic Union (IGHSAU).
5. If the before and after school **childcare** program exceeds the amount necessary to operate the program, the excess amount may, following a public hearing, be transferred by resolution of the board of directors of the school corporation for deposit in the general fund of the school corporation to be used for district general fund purposes. The district will present a copy of the signed board resolution to the Department of Education.
6. ~~Beginning in fiscal year 2024,~~ **U**nexpended and unobligated dollars that remain at the end of a fiscal year in addition to ongoing revenues may be transferred to the Teacher Salary Supplement (TSS) program from Professional Development Supplement (PDS), Talented and Gifted (TAG), and Teacher Leadership Supplement (TLS) without board action.

7. The district may choose to request approval from the School Budget Review Committee (SBRC) to transfer funds to make a program whole, prior to its elimination.
8. Temporary transfers (loans) of funds are permitted between funds but must be repaid to the originating fund, with interest, by October 1st following the end of the fiscal year **in which the loan was made**.

It is the responsibility of the board secretary **in conjunction with the treasurer** to make recommendations to the board regarding transfers and to provide the documentation justifying the transfer.

Adopted: 6/70
Reviewed: 10/12; 5/15; 12/18
Revised: 7/10; 12/13; 9/21; 1/22; 8/23; 1/25
Legal Reference (Code of Iowa): §§ 24.21-22; 257.10; 279.8; 279.42; 298A; 289 IAC 6
IASB Reference: 701.02

Policy Series 800 – Business Procedures
Fiscal Management

Policy 801.8 Financial Records

Financial records of the district are maintained in accordance with Generally Accepted Accounting Principles (GAAP) **and** as required or modified by law. District monies are received and expended from the appropriate fund and/or account. The funds and accounts of the district will include, but not be limited to:

GOVERNMENTAL FUND TYPE

1. General Fund: This fund is the chief operating fund of the district. It is used to account for all financial resources except those accounted for and reported in another fund.
2. Special Revenue Fund: These funds account for the proceeds of specific revenue sources other than trusts or major capital projects, that are legally restricted or committed to expenditure for specified purposes other than debt service or capital projects.
    a. Management Levy Fund
    b. Public Education and Recreation Levy Fund (PERL)
    c. Student Activity Fund
3. Capital Projects Fund: These funds are used to account for financial resources to acquire or construct major capital facilities or other capital assets (other than those of proprietary funds and trust funds) and to account for revenues from SAVE.
    a. Physical Plant and Equipment Levy Fund (PPEL)
    b. Secure and Advanced Vision for Education (SAVE)
4. Debt Service Fund: This fund is used to account for the accumulation of resources for, and the payment of, general long-term debt principal and interest.

PROPRIETARY FUND TYPE

These funds **are used for business type activities that rely on fees and user charges for services.** ~~account for operations of the district operated similar to private business for which a fee is charged to external users for goods or services, or they account for the costs of providing goods and services provided by one department to other departments on a cost reimbursement basis.~~

1. Enterprise Fund
    a. School Nutrition Fund
    b. Childcare Fund
    c. Internal Service Fund
    d. Community Education
    e. Preschool (Nonvoluntary, state)
    f. Aquatic Center Fund
    g. Student Store Fund

FIDUCIARY FUNDS
These funds are used to account for monies or assets held by the district on behalf of, or in trust for, another entity.

1. Trust
    a. Expendable Trust Funds
    b. Non-expendable Trust Funds
    c. Pension trust Funds
2. Custodial Funds

NON-FIDUCIARY SCHOLARSHIP FUND
Account Groups: These groups are the accounting records for capital assets and long-term debt.

1. General Capital Assets Account Group
2. General Long Term Debt Account Group

The board may establish other funds in accordance with Generally Accepted Accounting Principles (GAAP) and may certify other taxes to be levied for the funds as provided by state law. The status of each fund must be included in the annual report.

It is the responsibility of the superintendent in conjunction with **the treasurer and** the school business official to implement this policy and bring necessary changes in the maintenance of the district's financial records to the attention of the board.

Adopted: 3/17
Reviewed: 12/18; 1/22
Revised: 2/21; 1/25
Related Policy: 801.1
Legal Reference (Code of Iowa): §§ 291; 298; 298A; 281 IAC 98
IASB Reference: 701.03

Policy 802.9 Debt Management

DEBT LIMITS

Credit Ratings: The district seeks to maintain the highest possible credit ratings for all categories of short- and long-term debt that can be achieved without compromising the delivery of services and the achievement of adopted objectives. The district recognizes that external economic, natural, or other events may, from time to time, affect the creditworthiness of its debt. Nevertheless, the district is committed to ensuring that actions within their control are prudent.

Debt Limits: For general obligation debt, the district's outstanding debt limit shall be no more than five percent (5%) of the actual value of property within the district's boundaries, as prescribed by the Iowa constitution and statutory restrictions.

For revenue debt, the district's goal is to provide adequate debt service coverage of at least **1.25** ~~1.20~~ times the annual debt service costs.

In accordance with Iowa law, the district may not act as a conduit issuer or issue municipal securities to raise capital for revenue-generating projects where the funds generated are used by a third party ("conduit borrower") to make payments to investors.

PURPOSES AND USE OF DEBT

Capital Planning: To enhance creditworthiness and prudent financial management, the district is committed to systematic capital planning, intergovernmental cooperation, and coordination and long-term financial planning.

Capital Financing: The district may issue long-term debt for capital projects as authorized by Iowa law which include, but are not limited to, the costs of planning, design, land acquisition, buildings, permanent structures, attached fixtures or equipment, and movable pieces of equipment. Capitalized interest may be included in sizing any capital project debt issue. The types of debt instruments to be used by the district include:

a. General Obligation Bonds;
b. General Obligation Capital Loan Notes;
c. Bond Anticipation Notes;
d. Revenue Anticipation Notes;
e. School Infrastructure Sales, Services, and Use Tax Revenue Bonds; and
f. Lease Purchase Agreements, including Certificates of Participation.

Working Capital Financing: The district may issue debt for working capital for operations after cash flow analysis has determined that there is a mismatch between available cash and cash outflows. The district shall ~~strive to~~ repay working capital debt **within 13 months of issuance** ~~by the end of the fiscal year in which the debt was incurred~~. A working capital reserve may be included in sizing any working capital debt issue.

Refundings: Periodic reviews of all outstanding debt will be undertaken to determine if refunding opportunities exist. Refunding will be considered (within federal tax law restraints) if and when there is a net economic benefit of the refunding or if the refunding is otherwise in the best interests of the district, such as to release restrictive bond covenants which affect the operations and management of the district.

In general, advance refundings **(within federal tax law constraints)** for economic savings will be undertaken when a net present value savings exceeds three percent of the refunded debt can be achieved. Current refundings, which produce a new present value savings of less than three percent will be considered on a case by case basis taking into consideration bond covenants and general conditions. Refundings with negative savings will not be considered unless **it is in the best interest of the district** ~~there is a compelling public policy objective for doing so~~.

DEBT STANDARDS AND STRUCTURE

Length of Debt: Debt will be structured for the shortest period consistent with a fair allocation of costs to current and future beneficiaries or users. Long-term debt will not be issued for periods exceeding**120% of** the useful life or average useful lives of the project or projects to be financed. All debt issued will adhere to state and federal law regarding the length of time the debt may be outstanding.

Debt Structure: Debt will be structured to achieve the lowest possible net cost to the district given market conditions, the urgency of the capital project, the type of debt being issued, and the nature and type of repayment source. To the extent possible, the district will design the repayment of its overall debt to rapidly recapture its credit capacity for future use.

Generally, the district will only issue fixed-rate debt. In very limited circumstances, the district may issue variable rate debt, consistent with the limitations of Iowa law and upon a finding of the board that the use of fixed rate debt is not in the best interest of the district and a statement of the reasons for the use of variable rate debt.

All debt may be structured using discount, par, or premium coupons, and as serial or term bonds or notes, or any combination thereof, consistent with Iowa law. The district should utilize the coupon structure that produces the lowest True Interest Cost (TIC) taking into consideration the call option value of any callable maturities.

The district will strive to structure their debt in sinking fund installments for each debt issue that achieves, as nearly as practicable, level debt service within an issue or overall debt service within a particular classification of debt.

Derivatives (including, but not limited to, interest rate swaps, caps, collars, corridors, ceiling and floor agreements, forward agreements, float agreements, or other similar financing arrangements), zero-coupon or capital appreciation bonds are not allowed to be issued consistent with state law.

Decision Analysis to Issue Debt: Whenever the district is contemplating the issuance of debt, information will be developed concerning the following four categories commonly used by rating agencies assessing the district's credit worthiness, listed below.

Debt Analysis: Debt capacity analysis; purpose for which debt is proposed to be issued; debt structure; debt burden; debt history and trends; and adequacy of debt and capital planning.

Financial Analysis: Stability, diversity, and growth rates of tax or other revenue sources; trend in assessed valuation and collections; current budget trends; appraisal of past revenue and expenditures trends; history and long-term trends of revenues and expenditures; evidence of financial planning, adherence to GAAP; audit results; fund balance status and trends in operating and debt funds; financial monitoring systems and capabilities; and cash flow projections.

Governmental and Administrative Analysis: Government organization structure; location of financial responsibilities and degree of control; adequacy of basic service provision; intergovernmental cooperation/conflict and extent of duplication; and overall planning efforts.

Economic Analysis: Geographic and location advantages; population and demographic characteristics; wealth indicators; types of employment, industry, and occupation; housing characteristics; new construction; evidence of industrial decline; and trend of the economy.

DEBT ISSUANCE

Credit Enhancement: Credit enhancements (i.e., bond insurance, etc.) may be used but only when the net debt service on the debt is reduced by more than the costs of the credit enhancement.

Costs and Fees: All costs and fees related to issuing the debt will be paid out of debt proceeds and allocated across all projects receiving proceeds of the debt issue.

Method of Sale: Generally, all district debt will be sold through a competitive bidding process. Bids will be awarded on a TIC basis providing other bidding requirements are satisfied.

The district may sell debt using a negotiated process **if it is in the best interest of the district** ~~in extraordinary circumstances~~ when the complexity of the issue requires specialized expertise, when the negotiated sale would result in substantial savings in time or money, or when market conditions of district credit are unusually volatile or uncertain.

Professional Service Providers: The district will retain external bond counsel for all debt issues. All debt issued by the district will include a written opinion by bond counsel affirming that the district is authorized to issue the debt, stating that the district has met all Iowa constitutional and statutory requirements necessary for issuance and determining the debt's federal income tax status. The bond counsel retained must have comprehensive municipal debt experience and a thorough understanding of Iowa law as it relates to the issuance of the particular debt.

The district will retain **a municipal** ~~an independent financial~~ advisor. The **municipal** ~~financial~~ advisor will be responsible for structuring and preparing all offering documents for each debt issue. The **municipal** ~~financial~~ advisor retained will have comprehensive municipal debt experience, experience with diverse financial structuring and pricing of municipal securities.

The board treasurer shall have the authority to periodically select other service providers (e.g., escrow agents, verification agents, trustees, arbitrage consultants, rebate specialists, etc.) as necessary to meet legal requirements and minimize net debt costs. These services can include debt restructuring services and security or escrow purchases.

Compensation for bond counsel, **municipal** ~~financial~~ advisor, and other service providers will be as economical as possible and consistent with industry standards for the desired qualification levels.

DEBT MANAGEMENT

Investment of Debt Proceeds: The district shall invest all proceeds received from the issuance of debt separate from the district's consolidated cash pool unless otherwise specified by the authorizing bond resolution or trust indenture. Investments will be consistent with those authorized by Iowa law and the district's investment policy to maintain safety of principal and liquidity of the funds.

Arbitrage and Recordkeeping Compliance: The board treasurer shall maintain a system of recordkeeping, reporting, and compliance procedures with respect to all federal tax requirements which are currently, or may become applicable, through the lifetime of all tax-exempt or tax credit bonds.

Federal tax compliance, recordkeeping, reporting, and compliance procedures shall include, but not be limited to:

a. Post-issuance compliance procedures (including proper use of proceeds, timely expenditure of proceeds, proper use of bond financed property, yield restriction and rebate, and timely return filing);
b. Proper maintenance of records to support federal tax compliance;
c. Investments and arbitrage compliance;
d. Expenditures and assets;
e. Private business use; and
f. Designation of primary responsibilities for federal tax compliance of all bond financings.

Financial Disclosure: The district is committed to full and complete financial disclosure and to cooperating fully with rating agencies, institutional and individual investors, other levels of government, and the general public to share comprehensible and accurate financial information. The district is dedicated to meeting secondary disclosure requirements on a timely and comprehensive basis, as promulgated by the Securities and Exchange Commission.

The official statements accompanying debt issues, annual audits, and continuing disclosure statements will meet the standards articulated by the Municipal Securities Rulemaking Board (MSRB), the Government Accounting Standards Board (GASB), the Securities and Exchange Commission (SEC), Generally Accepted Accounting Principles (GAAP), and the Internal Revenue Service (IRS). The board treasurer shall be responsible for ongoing debt disclosure as required by any continuing disclosure certificate for any debt issue and to maintain compliance with disclosure standards promulgated by state and federal regulatory bodies.

Adopted: 6/99
Reviewed: 7/10; 10/12; 5/15; 12/18; 1/22
Revised: 12/13; 3/25
Related Policy: 801.4; 802.9-R1
Legal Reference (Code of Iowa): §§ 74-76; 278.1; 298; 298A
IASB Reference: 704.02

Policy 803.1-R1 Purchasing – Bidding – Suspension and Debarment of Vendors and Contractors Procedures

In connection with transactions subject to federal suspension and debarment requirements, the district is prohibited from entering into transactions with parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in federal assistance programs or activities.

When soliciting bids or otherwise preparing to enter into such a transaction, the superintendent [or designee] will use at least one of the following verification methods to ensure that any parties to the transaction are not suspended or debarred prior to committing to any sub-award, purchase, or contract.

1. Obtaining a certification of a party's compliance with the federal suspension and debarment requirements in connection with any application, bid, or proposal;
2. Requiring compliance with the federal suspension and debarment requirements as an express condition of any sub-award, purchase, or contract in question; or
3. Prior to committing to any sub-award, purchase, or contract, check the online Federal System for Award Management at https://sam.gov/reports/awards/standard to determine whether the relevant party is subject to any suspension or debarment restrictions.

2 CFR Part 200 Subpart B-General Provisions
200.113 Mandatory Disclosures

An applicant, recipient, or subrecipient of a federal award must promptly disclose whenever, in connection with the federal awards (including any activities or subawards thereunder), it has credible evidence of the commission of a violation of federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 of the US Code of a violation of the civil False Claims Act (31 USC 3729-3733). The disclosure must be made in writing to the federal agency, the agency's Office of Inspector General, and pass-through entity (if applicable). Recipients and subrecipients are also required to report matters related to recipient integrity and performance in accordance with Appendix XII of this part. ~~A non-federal entity or applicant for a federal award must disclose, in a timely manner, in writing to the federal awarding agency or pass-through entity all violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award. Non-federal entities that have received a federal award including the term and condition outlined in *Appendix XII-Award Term and Condition for Recipient Integrity and Performance Matters* are required to report certain civil, criminal, or administrative proceedings to SAM.~~ Failure to make required disclosures can result in any of the remedies described in *§200.33*~~*8*~~*9-Remedies for Non-Compliance*, including suspension or disbarment. (See also 2 CFR Part 180, 31

USC 3321, and 41 USC 2313). It is the responsibility of the superintendent to timely report to the relevant federal or pass-through agency any violations of federal criminal law involving fraud, bribery, or gratuity potentially impacting a federal grant.

Adopted: 6/70
Reviewed: 712/13; 5/15; 12/18; 1/22
Revised: 10/12; 6/24
Related Policy: 803.1, 803.1-R2
IASB Reference: 705.01-R(1)

Policy Series 800 – Business Procedures
Expenditures

Policy 803.1-R2 Purchasing – Bidding – Using Federal Funds in Procurement Contracts

In addition to the district's standard procurement and purchasing procedures, the following procedures for vendors/contractors paid with federal funds are required. When federal, state, and local requirements conflict, the most stringent requirement will be followed.

2 CFR Part 200, Subpart D Subsection §200.318(c)(1)
No district employee, officer, or agent may participate in the selection, award, and administration of contracts supported by a federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of their immediate family, their partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. District officers, employees, ~~and~~ agents**, and board members** may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, for situations where the financial interest is not substantial or the gift is an unsolicited item of nominal value, district employees must abide by all relevant board policies. Violation of this requirement may result in disciplinary action for the district employee, officer, ~~or~~ agent**, or board member**.

2 CFR Part 200, Subpart D Subsection §200.320(c~~e~~)(1-5~~4~~)
Procurement for contracts paid with federal funds may be conducted by noncompetitive (single source) proposals when one or more of the following circumstances apply: **(1) the aggregate amount of the procurement transaction does not exceed the micro-purchase threshold; (2) the procurement transaction can only be fulfilled by a single source; (3) the public exigency or emergency for the requirement will not permit a delay resulting from providing public notice of a competitive solicitation; (4) the recipient or subrecipient requests in writing to use a noncompetitive procurement method, and the federal agency or pass-through entity provides written approval; or (5) after soliciting several sources, competition is determined inadequate.** ~~(1) the item is only available from a single source; (2) public exigency or emergency will not permit the delay resulting from competitive bids; (3) the federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the non-federal entity; or (4) after solicitation of a number of sources, competition is inadequate~~.

2 CFR Part 200, Subpart D Subsection §200.321
The district will take all necessary affirmative steps to assure that minority businesses, women's business enterprises, **veteran-owned businesses,** and labor surplus area firms are used when possible. Affirmative steps must include: (1)

placing such businesses on solicitation lists; (2) soliciting such businesses whenever they are **deemed eligible as** potential sources; (3) when economically feasible, dividing contracts into **separate procurements to permit maximum participation from such businesses** ~~smaller tasks or quantities to allow participation from such businesses~~; (4) establishing delivery schedules that encourage participation by such businesses; (5) when appropriate, utilizing the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and (6) requiring the primary contractor to follow steps (1) through (5) when subcontractors are used.

The district will include the following provisions in all procurement contracts or purchase orders and include the following provisions when applicable:

2 CFR Part 200 Appendix II
(A) Contracts for more than the simplified acquisition threshold currently set at $150,000, which is the inflation adjusted amount determined by the Civilian Agency Acquisition Council and the Defense Acquisition Regulations Council (Councils) as authorized by 41 U.S.C. 1908, must address administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, and provide for such sanctions and penalties as appropriate.

(B) All contracts in excess of $10,000 must address termination for cause and for convenience by the non-federal entity including the manner by which it will be effected and the basis for settlement.

(C) Equal Employment Opportunity. Except as otherwise provided under 41 CFR Part 60, all contracts that meet the definition of "federally assisted construction contract" in 41 CFR Part 60-1.3 must include the equal opportunity clause provided under 41 CFR 60-1.4(b), in accordance with Executive Order 11246, "Equal Employment Opportunity" (30 FR 12319, 12935, 3 CFR Part, 1964-1965 Comp., p. 339), as amended by Executive Order 11375, "Amending Executive Order 11246 Relating to Equal Employment Opportunity," and implementing regulations at 41 CFR Part 60, "Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor."

(D) Davis-Bacon Act, as amended (40 U.S.C. 3141-3148). When required by federal program legislation, all prime construction contracts in excess of $2,000 awarded by non-federal entities must include a provision for compliance with the Davis-Bacon Act (40 U.S.C. 3141-3144 and 3146-3148) as supplemented by Department of Labor regulations (29 CFR Part 5, "Labor Standards Provisions Applicable to Contracts Covering Federally Financed and Assisted Construction"). In accordance with the statute, contractors must be required to pay wages to laborers and mechanics at a rate not less than the prevailing wages specified in a wage determination made by the Secretary of Labor. In addition, contractors must be required to pay wages not less than once a week. The non-federal entity must place a copy of the current prevailing wage determination issued by the Department of Labor in each solicitation. The decision to award a contract or subcontract must be conditioned upon the

acceptance of the wage determination. The non-federal entity must report all suspected or reported violations to the federal awarding agency. The contracts must also include a provision for compliance with the Copeland "Anti-Kickback" Act (40 U.S.C. 3145), as supplemented by Department of Labor regulations (29 CFR Part 3, "Contractors and Subcontractors on Public Building or Public Work Financed in Whole or in Part by Loans or Grants from the United States"). The Act provides that each contractor or subrecipient must be prohibited from inducing, by any means, any person employed in the construction, completion, or repair of public work, to give up any part of the compensation to which he or she is otherwise entitled. The non-federal entity must report all suspected or reported violations to the federal awarding agency.

(E) Contract Work Hours and Safety Standards Act (40 U.S.C. 3701-3708). Where applicable, all contracts awarded by the non-federal entity in excess of $100,000 that involve the employment of mechanics or laborers must include a provision for compliance with 40 U.S.C. 3702 and 3704, as supplemented by Department of Labor regulations (29 CFR Part 5). Under 40 U.S.C. 3702 oF the Act, each contractor must be required to compute the wages of every mechanic and laborer on the basis of a standard work week of 40 hours. Work in excess of the standard work week is permissible provided the worker is compensated at a rate of not less than one and a half times the basic rate of pay for all hours worked in excess of 40 hours in the work week. The requirements of 40 U.S.C. 3704 are applicable to construction work and provide that no laborer or mechanic must be required to work in surroundings or under working conditions which are unsanitary, hazardous, or dangerous. These requirements do not apply to the purchases of supplies or materials or articles ordinarily available on the open market, or contracts for transportation or transmission of intelligence.

(F) Rights to Inventions Made Under a Contract or Agreement. If the federal award meets the definition of "funding agreement" under 37 CFR §401.2(a) and the recipient or subrecipient wishes to enter into a contract with a small business firm or nonprofit organization regarding the substitution of parties, assignment or performance of experimental, developmental, or research work under that "funding agreement," the recipient or subrecipient must comply with the requirements of 37 CFR Part 401, "Rights to Inventions Made by Nonprofit Organizations and Small Business Firms Under Government Grants, Contracts, and Cooperative Agreements," and any implementing regulations issued by the awarding agency.

(G) Clean Air Act (42 U.S.C. 7401-7671q) and the Federal Water Pollution Control Act (33 U.S.C. 1251-1387), as amended – Contracts and subgrants of amounts in excess of $150,000 must contain a provision that requires the non-federal award to agree to comply with all applicable standards, orders, or regulations issued pursuant to the Clean Air Act (42 U.S.C. 7401-7671q) and the Federal Water Pollution Control Act as amended (33 U.S.C. 1251-1387). Violations must be reported to the federal awarding agency and the Regional Office of the Environmental Protection Agency (EPA).

(H) Debarment and Suspension (Executive Orders 12549 and 12689)-A contract award (see 2 CFR 180.220) must not be made to parties listed on the government wide exclusions in the System for Award Management (SAM), in accordance with the OMB guidelines at 2 CFR 180 that implement Executive Orders 12549 (3 CFR Part 1986 Comp., p. 189) and 12689 (3 CFR Part 1989 Comp., p. 235), "Debarment and Suspension." SAM Exclusions contains the names of parties debarred, suspended, or otherwise excluded by agencies, as well as parties declared ineligible under statutory or regulatory authority other than Executive Order 12549.

(I) Byrd Anti-Lobbying Amendment (31 U.S.C. 1352)-Contractors that apply or bid for an award exceeding $100,000 must file the required certification. Each tier certifies to the tier above that it will not and has not used federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any federal contract, grant, or any other award covered by 31 U.S.C. 1352. Each tier must also disclose any lobbying with non-federal funds that takes place in connection with obtaining any federal award. Such disclosures are forwarded from tier to tier up to the non-federal award.

(J) See §200.322 Procurement of Recovered Materials.

(K) §200.216 Prohibition on certain telecommunications and video surveillance services or equipment.

a) The district is prohibited from obligating or expending loan or grant funds to:
    1. Procure or obtain **covered telecommunications equipment or services**;
    2. Extend or renew a contract to procure or obtain **covered telecommunication equipment or services**; or
    3. Enter into a contract (or extend or renew a contract) to procure or obtain equipment~~,~~ **or** services**.** ~~or systems that uses covered telecommunications equipment or services as a substantial or essential component of any system, or as critical technology as part of any system.~~

b) As described in Public Law 115-232, Section 889, covered telecommunications equipment **or services means any of the following:**
    1. Telecommunications equipment produced by Huawei Technologies Company or ZTE Corporation (or any subsidiary or affiliate of such entities).
    2. For purpose of public safety, security of government facilities, physical security surveillance of critical infrastructure, and other national security purposes, video surveillance and

telecommunication equipment produced by Hytera Communications Corporation, Hangzhou Hikvision Digital Technology Company, or Dahua Technology Company (or any subsidiary or affiliate of such entities).

3. Telecommunications or video surveillance services provided by such entities or using such equipment.
4. Telecommunications or video surveillance equipment or services produced or provided by an entity that the Secretary of Defense, in consultation with the Director of the National Intelligence or the Director of the Federal Bureau of Investigation, reasonably believes to be an entity owned by or controlled by, or otherwise connected to, the government of a foreign country.

c) For purposes of this section, "covered telecommunications equipment or services" also includes systems that use covered telecommunications equipment or services as a substantial or essential component of any system, or as critical technology as part of any system.

d) In implementing the prohibition under Public Law 115-232, Section 889, ~~subsection (f), paragraph (l),~~ heads of executive agencies administering loan, grant, or subsidy programs shall prioritize available funding and technical support to assist affected businesses, institutions, and organizations as is reasonably necessary for those affected entities to transition from covered communications equipment and services, to procure replacement equipment and services, and to ensure that communications service to users and customers is sustained.

e) When the recipient or subrecipient accepts a loan or grant, it is certifying that it will comply with the prohibition on covered telecommunications equipment and services in this section. The recipient or subrecipient is not required to certify that funds will not be expended on covered telecommunications equipment or services beyond the certification provided upon accepting the loan or grant and those provided upon submitting payment requests and financial reports.

f) For additional information, see Public Law 115-232, Section 889.

~~g) See also §200.471.~~

(L) §200.322 Domestic preferences for procurements.

a) The recipient or subrecipient should, to the greatest extent practicable and consistent with law, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States (including but not limited to iron, aluminum, steel, cement, and other manufactured products). The requirements of this section must be

included in all subawards, contracts, and purchase orders under federal awards.

b) For purposes of this section:

1. "Produced in the United States" means, for iron and steel products, that all manufacturing processes, from the initial melting stage through the application of coatings, occurred in the United States.

2. "Manufactured products" means items and construction materials composed in whole or in part of non-ferrous concrete; glass, including optical fiber; and lumber.

c) Federal agencies providing federal financial assistance for infrastructure projects must implement the Buy America preferences set forth in 2 CFR Part 184.

Adopted: 1/22
Revised: 6/24
Related Policy: 803.1; 803.1-R1
Legal Reference: §26; 28E; 72.3; 73; 73A; 285; 297; 301; 261 IAC 54; 281 IAC 43.25
IASB Reference: 705.01-R(2)

Policy Series 800 – Business Procedures
Expenditures

Policy 803.4
Public Purpose and Use of Public Funds

The board acknowledges that expenditures and use of district resources may be needed to support the decision-making process in conducting district business, promoting more efficient time frames for conducting business, promulgating a productive working climate, improving personnel well-being and morale, and nurturing a positive learning environment. To serve these purposes, the board supports appropriate expenditures and use of district resources for attainment of the district mission and strategic goals for official district activities and business.

The district is committed to managing and spending public funds in a transparent and responsible manner. Prior to making a purchase with**, or when requesting reimbursement from**, public funds, **all school employees shall be able to accurately articulate, in a clear and concise manner, the public purpose served by such expenditure.** If the **employee is unable to do so,** ~~individual is uncomfortable doing so,~~ the purchase may not fulfill a public purpose, and additional guidance should be sought before the purchase is made. **All school employees** ~~individual~~ should be comfortable defending **their** purchase**s** or reimbursement**s** to the taxpayers in the district**.**

Individuals who have concerns about the public purpose of a purchase or reimbursement should utilize the district's internal controls policy and regulation as resources for questioning a purchase (Refer to policies 801.7 and 801.7-R). Concerns should be reported to the superintendent and/or the board president.

The superintendent**, in coordination with the treasurer,** shall develop a process for approving expenditures of public funds. The school board will review expenditures and applicable reports, as necessary, to ensure proper oversight of the use of public funds. To the extent possible, expenditures shall be pre-approved ~~by the district~~ prior to expending the funds. Purchases of food and refreshments for district staff, even within the district, **shall** ~~should~~ comply with the district's employee travel allowance policy and all other applicable policies (Refer to policies 803.10 and 803.10-R). All purchases/reimbursements shall comply with applicable laws, board policies, and district accounting requirements.

Additional guidance regarding appropriate expenditures of school funds is provided in the regulation accompanying this policy.

Adopted: 2/00
Reviewed: 7/10; 5/15; 12/18
Revised: 10/12; 12/13; 1/22; 4/25
Related Policy: 801.7; 801.7-R; 803.3; 803.3-R; 803.4-R; 803.10; 803.10-R
Legal Reference (Code of Iowa): §§ 68A.505; 279.8; 721.2; 281 IAC 98.70
Iowa Constitution, Art III, Sec 31
IASB Reference: 705.04

Policy Series 800 – Business Procedures
Expenditures

Policy 803.5 *New Policy*
Federal Awards Compliance

In accordance with federal requirements under 2 CFR Part 200, generally accepted accounting principles (GAAP) and applicable Governmental Account Standards Board (GASB) standards, the Linn-Mar Community School District shall account for and report federal awards in compliance with all applicable federal requirements governing the receipt and expenditure of federal awards. The district shall maintain the following:

Mandatory Disclosures 2 CFR 200.113: The district shall disclose violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting a federal award.

Financial Management 2 CFR Part 200.302: The district will maintain a financial management system with internal controls and transparency that identifies all federal awards received and expended and the federal programs under which they were received. Federal awards must be accurate and current, recorded in appropriate records complete with reporting and record maintenance sufficiently identifying amount, source, expenditure and application of funds. The district will compare actual expenditures to budgeted amounts regularly with effective control over and accountability of all funds, property, and assets.

Internal Controls 2 CFR Part 200.303: The district will maintain internal controls over federal awards. Internal controls shall be consistent with guidance provided in the U.S. Government Accountability Office Standards for Internal Control in the Federal Government (Green Book) and/or the COSO Internal Control Framework. These controls are designed to ensure compliance with federal statutes and regulations, safeguard funds, property, sensitive data and other assets. Internal controls monitor compliance and evaluate risks, taking prompt action when instances of noncompliance are identified. They include cybersecurity measures for electronic records.

Payment Procedures 2 CFR 200.305: Federal funds used to pay employees in full or in part must be regulated through the district's payment procedures, which include time and effort tracking. The district shall maintain written procedures for payment management in accordance with Uniform Guidance. Federal funds shall be drawn down only as needed to meet immediate cash requirements and in a manner that minimizes the time elapsing between receipt and disbursement. Compensation charged to federal awards shall be supported by records that accurately reflect the work performed.

Allowability of Costs 2 CFR 200 Subpart E 200.403 - 200.405: All costs charged to federal awards must comply with applicable cost principles. Costs shall also be accounted for in accordance with applicable GASB standards and district

accounting policies. All allowable costs must be documented and conform to federal, state, and program-specific rules.

Procurement Standards 2 CFR 200.317 – 200.327; 200.318(c)(1): The district must maintain written procurement procedures ensuring full and open competition. The district must use appropriate methods, which include required federal contract provisions and verifying contractors are not suspended or debarred. Procurement procedures shall address conflict of interest standards, methods of procurement, including micro-purchases, small purchases, sealed bids, competitive proposals, and noncompetitive procurements, as applicable under federal regulations. The district will maintain procurement records detailing method, selection and price analysis. Additionally, the district will maintain standards of conduct governing employees engaged in these procurement activities. This includes prohibiting participation in decisions where personal or financial interests exist, requiring disclosure of potential conflicts and enforcing disciplinary actions for violations.

Reporting 2 CFR 200.328 – 329: The district will submit required financial and performance reports in accordance with federal requirements. The reporting must be accurate, complete and submitted in a timely manner in accordance with the conditions of the federal award. The district shall maintain supporting documentation for all reports submitted.

Record Retention 2 CFR 200.334-337: The district shall retain records related to federal awards for a minimum of 5 years from the date of submission of the final expenditure report, unless a longer retention period is required.

Records are available for inspection and audit by authorized entities in accordance with federal requirements.

Adopted:
Legal Reference (Code of Iowa): § 257; 11; 281 IAC 97-98
IASB Reference: 705.05

Policy Series 800 – Business Procedures
Expenditures

Policy 803.12 *New Policy*
Time and Effort Reporting

The Linn-Mar Community School District shall establish and maintain a system of internal controls and supporting documentation for salaries and benefits charged, in whole or in part, to federal awards in accordance with:

- 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform Guidance")
- Applicable grant terms and conditions
- Generally Accepted Accounting Principles (GAAP)
- Governmental Accounting Standards Board (GASB) standards
- Applicable state and federal laws and regulations

The district shall maintain records that accurately reflect the work performed and support the distribution of salaries and wages charged to federal programs.

Personnel costs charged to federal awards must be:

- Reasonable and necessary for the performance of the federal award;
- Consistently treated in accordance with district policies and procedures;
- Supported by records that accurately reflect the actual work performed;
- Properly allocated to the benefiting program or cost objective; and
- Supported by a system of internal controls providing reasonable assurance that the charges are accurate, allowable, and properly documented.

Documentation supporting personnel expenses shall:

- Reflect the total activity for which the employee is compensated;
- Be incorporated into the district's official records;
- Reasonably reflect the employee's actual work activity;
- Comply with established district administrative procedures;
- Support allocations among multiple federal and non-federal funding sources, when applicable; and
- Be supported by periodic review and supervisory approval.

Employees working solely on a single federal program or cost objective may be required to complete periodic certifications confirming that the employee worked solely on that program for the applicable reporting period.

Employees working on multiple cost objectives or funding sources shall maintain appropriate time and effort documentation that reasonably reflects actual activity performed and supports salary allocations charged to each funding source.

Budget estimates or predetermined distributions may be used for interim accounting purposes provided that:

- The estimates produce reasonable approximations of actual activity;
- The district performs periodic reconciliations between budget estimates and actual work performed; and
- Any necessary adjustments are made timely.

All documentation shall be retained in accordance with the district's record retention policies and applicable federal record retention requirements, including retention for a minimum of three years following submission of the final expenditure report, unless a longer retention period is required by law, audit resolution, or grant terms.

The superintendent and/or designated school business official shall establish administrative procedures necessary to implement this policy, including:

- Documentation standards;
- Review and approval procedures;
- Internal monitoring procedures;
- Corrective actions for noncompliance; and
- Periodic reconciliation of payroll charges to federal awards.

Adopted:
Legal Reference (Code of Iowa): § 257; 11; 281 IAC 97-98
IASB Reference: 706.04

Policy 804.1 Presentation and Publication of Financial Information

The district recognizes the importance and value of fulfilling timely reporting requirements. Regularly providing updated financial information assists the school board in making informed decisions for the future financial health of the district.

Annually, after August 31st of each year and before the organizational meeting, the treasurer ~~At the annual meeting, the board treasurer~~ will give the annual report stating the **beginning balance, disbursements, revenues received, and ending balances in each district fund** ~~amount held over, received, paid out, and on hand in the general fund and all other funds~~. This report is in written form and sent to the board with the agenda for the board meeting. The board treasurer will also furnish the board with a statement from each depository showing the balance then on deposit. It is the responsibility of the board treasurer to submit this report to the board annually.

The board secretary**, in coordination with the treasurer,** will **provide a written** report to the board each month**. The report will be included in the agenda for the board meeting, showing the beginning balance,** ~~about the~~ receipts, disbursements, and **ending** balances of **each district** ~~the various~~ fund~~s~~. ~~This report will be in written form and sent to the board with the agenda for the board meeting.~~

Following board approval, **the board secretary will timely publish** each month the schedule of bills allowed by the board **and will annually publish the total salaries paid to the employees regularly employed by the district** ~~is published~~ in a newspaper **published within the district or, if none, in a newspaper of general circulation within the district.** ~~designated as the newspaper for official publication. Annually, the total salaries paid to employees regularly employed by the district will also be published in a newspaper designated as the newspaper for official publication. It is the responsibility of the board secretary to publish these reports in a timely manner.~~

Adopted: 6/70
Reviewed: 10/12; 12/13; 5/15; 12/18; 1/22
Revised: 7/10; 3/25
Legal Reference (Code of Iowa): §§ 279**; .33, .36;** 291.7; 618
IASB Reference: 707.01

Policy Series 800 – Business Procedures
Records

Policy 805.2 Care, Maintenance, and Disposal of District Records

School district records are housed in the central administration office of the district. It is the responsibility of the superintendent and board secretary as custodian of district records, or their designee, to oversee the maintenance and accuracy of the records. The following records are kept and preserved according to the schedule below:

Record	Length of Time
Board Secretary's Financial Records	Permanently
Board Treasurer's Financial Records	Permanently
School Board Election Results	Permanently
Board of Directors Open Meeting Minutes	Permanently
Recordings and Minutes of Closed Board Meetings	1 year
Individual Student's Permanent Records	Permanently
Annual Audit Reports	Permanently
Annual Budgets	Permanently
Real Property Records (e.g. Deeds, Abstracts, etc.)	Permanently
Records of Payment of Judgements Against the District	20 years
Bonds and Bond Coupons	11 years after maturity, cancellation, transfer, redemption, and/or replacement
Written Contracts	11 years
Cancelled Warrants, Check Stubs, Bank Statements, Bills, Invoices, and Related Records	5 years
School Meal Program Accounts/Records	3 years after submission of the final claim for reimbursement
Program Grants	As determined by the grant
Non-Payroll Personnel Records	7 years after leaving the district
Payroll Personnel Records	3 years after leaving the district
Payroll Records	3 years
Employment Applications	2 years
Records of complaints of sex discrimination and conduct that reasonably may constitute sex discrimination, plus all responsive records, outcomes, and training materials on the topic	7 years
District Emails	At least 1 year, unless otherwise specified by law based on the subject matter of the email
Surveillance Video Footage	30 days

In the event that any federal or state agency requires a record to be retained for a period of time longer than that listed above for audit purposes or otherwise, the record shall be retained beyond the listed period as long as is required for the resolution of the issue by the federal or state agency.

Employee records are housed in the central administration office of the district. Employee records are maintained by the superintendent, the building administrator, the employee's immediate supervisor, the human resources director, and the custodian of district records.

An inventory of the furniture, equipment, and other nonconsumable items other than real property of the district is conducted annually under the supervision of the superintendent. This report is filed with the board secretary.

The permanent and cumulative records of students currently enrolled in the district are housed in the central administration office of the attendance center where the student attends. Permanent records shall be housed in a fire resistant safe or vault or electronically with ~~a~~ secure backup**s** ~~file~~. The building administrator is responsible for keeping these records current. Permanent records of students who have graduated or are no longer enrolled in the district will be housed in an appropriately safe and secure storage area or facility and will be retained permanently. These records will be maintained by the custodian of district records. Cumulative records will be maintained for a period of at least five years after the student graduates or otherwise ends enrollment in the district. Special education records shall be maintained in accordance with applicable federal or state law.

To the extent allowed by law, the custodian of district records **or their designee** may digitize or otherwise electronically retain district records and may destroy paper copies of the records. **Necessary records related to the Child Nutrition Program must be retained in their original form during the retention period.** An electronic record which accurately reflects the information set forth in the paper record after it was first generated in its final form as an electronic record, and which remains accessible for later reference meets the same legal requirements for retention as the original paper record.

District officers, administrators, and employees are strongly encouraged to use district-provided accounts and devices to conduct all district business. If an officer, administrator, or employee conducts district business on a personal device or account, the individual is hereby notified that those constitute records of the district and must be retained in accordance with this policy. Furthermore, records of the district that exist on an individual's personal device or account may be subject to disclosure upon a Freedom of Information Act (FOIA) request.

Adopted: 6/99
Reviewed: 10/12; 12/18; 1/22
Revised: 5/15; 4/16; 8/23; 7/25
Related Policy: 403.16-16R; 505.61
Legal Reference (Code of Iowa): §§ 22.3; 22.7; 91A.6; 279.8; 291.6; 554D.114; 554D.119; 614.1(13); 281 IAC 12.3(4); 41.624
IASB Reference: 708
Mandatory Policy