



**Rainbow Dreams Early Learning Academy**

**Governing Board Meeting Minutes**

**November 20, 2025-6:15 PM**

**Location: 950 W. Lake Mead Blvd., Las Vegas, NV 89106**

**Conference Line: (1-848-220-330)**

**Conference ID: 977-5128**

**I. Call to Order and Roll Call (Action)**

The Meeting was called to order at 6:11 PM by Board Chair Anthony Pollard

Board Members Present: Vic Ross, Diamonique Robinson, Jackie Ingram , Dawanda Thomas, Savonta Manor, Dr. Anthony Pollard, Eric Cole (by phone)

Board Members Absent: Diane Pollard, Theodore Parker, Todd McGuire,

Guests: Antoinette Perez (Higgins and Associates Representative), Janice Henry, Monica Ford

A quorum was established.

**II. Adoption of the Agenda (Discussion/Action)**

Motion to Adopt Agenda By: Jackie Ingram

Seconded By: Vic Ross

Vote: X Approved  Denied  Tabled

**III. Review and Approval of Minutes (Discussion/Action)**

Meeting Minutes for: 8/27/2025 Board Meeting

Motion to Approve By: Jackie Ingram

Seconded By: DaWanda Thomas

Vote: X Approved  Denied  Tabled

**IV. Public Comments and Discussion (Discussion)**

None.

**V. Report from the Principal/Executive Director (Discussion/Possible Action)**



Summary: Overview of current business pertaining to Early Learning Academy Operations and Achievement

**1. Human Resource Committee Report (Closed Discussion/Possible Action)**

- Resignation(s)/Termination(s): 5
- New Hire(s)/Appointments: 1
- Continued recruitment efforts: Teaching Assistant positions

**2. Facilities Committee Report (Discussion/Possible Action)**

- Replacement Roof Review: Job to be finished December 31<sup>st</sup>, 2025.
- WiFi Upgrade Bids: Bids expected to be submitted by January 30<sup>th</sup> 2025.
- Building Updates: No bid yet from Murphey electricity. Centegix waiting on wifi/Infinite campus update.
- Nevada Ready! PK Updates: ECERS training to start 1/13/2026 with Children's Cabinet.
- Student Achievement: Testing window closes. 2 children awarded for perfect attendance.
- Enrollment update: Recruitment events with Lynx organization and Love on Jackson Street Event
- Site Visits: Reviewed Corrective Action plan reviewed. Desktop monitoring completed for SPED, McKinney- Vento, Foster Care Policy
- Budget – Chart of Accounts Compliance: APTA Fund purchased. Title I approved.

**VI. Committee Reports**

Summary: Inactive Board Members

**A. Board Member Removal (Discussion/Action)**

Discussion Notes: Angela Johnson removal

Motion By: DaWanda Thomas

Seconded By: Vic Ross

Vote: X Approved  Denied  Tabled

**B. Board Officers Nominations/Resignations (Discussion/Action)**



Notes/Outcome: Ms. Thomas stepped down from role as secretary. Ms. Robinson replaces her as new secretary.

Motion By: Vic Ross

Seconded By: Jackie Ingram

Vote: X Approved  Denied  Tabled

**D. Special Education Policy (Discussion/Action)**

Motion By: Vic Ross

Seconded By: DaWanda Thomas

Vote: X Approved  Denied  Tabled

**E. McKinney-Vento Review (Discussion/Action)**

Motion By: Jackie Ingram

Seconded By: Vic Ross

Vote: X Approved  Denied  Tabled

**F. Foster Care Policy Review (Discussion/Action)**

Motion By: Vic Ross

Seconded By: Dawanda Thomas

Vote: X Approved  Denied  Tabled

**G. N/A**

**H. Board Policies & Procedures, Code of Ethics, Bylaws Review (Discussion/Action)**

Notes: Policy changed per direction of SPCSA Legal Counsel.

Motion By: Vic Ross

Seconded By: Eric Cole

Vote: X Approved  Denied  Tabled

**I. Annual Independent Audit (Discussion)**



Notes: Audit completed by

**J. Financial Committee Report—Amended Budget (Discussion/Possible Action)**

1. Presentation by Higgins and Associates regarding FY26 amended charter budget with AB398 funds.

Motion By: Vic Ross

Seconded By: Jackie Ingram

Vote: X Approved  Denied  Tabled

**2. Signatory Rights (Action)**

Notes: Request by Board Secretary DaWanda Thomas to be removed from RDA Bank Account as a signatory and replaced with Antoinette Perez of Higgins and Associates.

Motion By: Vic Ross

Seconded By: Jackie Ingram

Vote: X Approved  Denied  Tabled

**VII. Unfinished/New Business (Discussion/Possible Action)**

- Next Board Meeting: February 19th at 5:00 PM

**VIII. General Discussion by Board Members (Discussion/Possible Action)**

Notes: None.

**IX. Public Comments and Discussion (Discussion)**

Comments: None

**X. Questions, Comments, Concerns (Discussion)**

Notes: None

**XI. Adjournment (Action)**



Motion to Adjourn By: Dr. Pollard

Seconded By: Vic Ross

Vote: X Approved  Denied

Adjournment Time: 7:00 PM

**Submitted By:**

A handwritten signature in black ink, appearing to be 'Vic Ross', written over a horizontal line.

Date:

3/11/2020

**Rainbow Dreams Academy Governing Board Secretary**



# RAINBOW DREAMS ACADEMY GOVERNING BOARD

Policies and Procedures Manual

Revised and approved  
03.11.2026

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## Rules of Governance

**Rainbow Dreams Academy  
Governing Body  
Rules of Governance/Articles of Incorporation**

### **Article I. Name.**

The name of this organization shall be the Rainbow Dreams Academy Governing Body.

### **Article II. Foundational Provisions**

#### **Section 1. Legal and Organizational Status**

This school is organized and operates as a public charter school pursuant to NRS Chapter 388A and as a nonprofit corporation pursuant to NRS Chapter 82. The school is a body corporate and politic, with all powers granted under Nevada law to carry out its educational mission and fulfill the terms of its charter contract.

#### **Section 2. Purpose**

The purpose of the Rainbow Dreams Academy Governing Body is to govern Rainbow Dreams Early Learning Academy (RDELA). Its areas of decision-making may include, but are not limited to, the following: budget, curriculum/instruction, personnel hiring, scheduling of school events, determination of calendar, student admission and/or enrollment policies, student conduct, community relations, fiscal management, and RDA operations. The mission and purpose of the school shall be consistent with its approved charter contract and within the framework of applicable federal and state law. The school is established to provide a high-quality, tuition-free public education, foster innovation in teaching and learning, promote equity and access for all students, and serve as a model of accountability and community engagement.

#### **Section 3. Contracts, Loans, and Deposits**

A. **Contracts** – The governing body may authorize any officer or officers, agent or agents of the school, in addition to the officers so authorized by these bylaws, to enter into any contract or execute and deliver any instrument in the name of and on behalf of the school. Such authority must be conferred by resolution of the governing body and may be general or confined to specific instances.

B. **Loans** – No loans shall be contracted on behalf of the school and no evidences of indebtedness shall be issued in its name unless authorized by a resolution of the governing body. Such authority may be general or confined to specific instances and must be consistent with state law and applicable charter school financial regulations.

C. **Deposits** – All funds of the school shall be deposited to the credit of the school in such banks, trust companies, or other depositories as the governing body may select in accordance with applicable laws, regulations, and policies.

#### **Section 4. Indemnification**

To the fullest extent permitted by law, including NRS 82.541 and other applicable provisions of Nevada law, the school shall indemnify and hold harmless any director, officer, employee, or agent of the school



who was or is involved in any legal proceeding by reason of the fact that they are or were serving in such capacity for the school, against expenses, judgments, fines, settlements, and other amounts actually and reasonably incurred in connection with such proceeding, provided that the individual acted in good faith and in a manner reasonably believed to be in or not opposed to the best interests of the school.

### **Section 5. Conflict of Interest**

The governing body shall adopt and maintain a Conflict of Interest Policy consistent with Nevada law and applicable federal requirements, including 2 CFR Part 200 (Uniform Guidance). Each director, officer, and employee shall annually disclose any potential conflicts of interest, and no person shall use their position for personal gain or to benefit relatives, friends, or business interests in a manner inconsistent with their fiduciary duty to the school

## **Article III. Membership**

### **Section 1. Representation**

In compliance with NRS 388A.320, the governing body shall consist of up to nine (9) voting members who represent the following:

- A. A member who is a teacher or other person licensed pursuant to NRS 391 or who previously held such a license and is retired, as long as their license was held in good standing.
- B. One member who 1) satisfies the qualifications of paragraph (A); or 2) is a school administrator with a license issued by another state or who previously held such a license and is retired, as long as their license was held in good standing.
- C. One parent or legal guardian of a pupil enrolled in the school who is not a teacher or an administrator at the school.
- D. Up to six members who possess knowledge and experience in one or more of the following areas: Accounting, Financial Services, Law, or Human Resources.

No more than two persons who serve on the governing body may represent the same organization or business or otherwise represent the interests of the same organization or business. No employees of the school shall serve on the governing body.

In accordance with NAC 388A.525 the majority of board members must reside in Clark County in which the Rainbow Dreams Early Learning Academy is located.

### **Section 2. Term of Office**

Each parent/guardian elected member shall serve for a two-year staggered term, or until their successor has been elected. No parent/guardian member may serve consecutive terms.

All other members shall serve for a four-year term, with no limit on reappointment, to promote continuity in leadership, institutional knowledge, and long-term strategic decision-making.

### **Appointment and Reappointment Process:**

When a member's term expires, or a vacancy arises, the governing body shall identify and consider qualified candidates who meet the statutory requirements of NRS 388A.320. Candidates may be



nominated by existing members of the governing body, recommended by the school's administration, or apply through a public application process established by the governing body.

The governing body shall review all candidates at a duly noticed public meeting in compliance with NRS 241 (Open Meeting Law), deliberate in open session, and appoint new members by majority vote of the voting members present.

### **Section 3. Termination of Membership**

Any member of the governing body may resign by filing a written resignation with the governing body.

A member may be removed by a two-thirds (2/3) vote of the total voting membership of the governing body, with notice of such intended action included in the agenda of the meeting at which the action is to take place. Grounds for removal may include, but are not limited to:

- Missing three (3) consecutive regular meetings without good cause;
- Violation of state or federal law, including NRS 241 (Open Meeting Law);
- Conduct detrimental to the integrity, mission, or effective governance of the school;
- Failure to fulfill fiduciary duties, including duties of care, loyalty, and compliance.

### **Section 4. Vacancy**

Vacancies in membership, whether due to resignation, removal, incapacity, or expiration of term without reappointment, shall be filled as follows:

**A. Parent or Teacher Representative Vacancies** – Any vacancy of a parent representative or teacher representative shall be filled by appointment by the governing body, consistent with the qualifications set forth in Section 1 of this Article.

**B. Other Board Member Vacancies** – Vacancies in any other category of board membership (e.g., individuals with expertise in accounting, finance, law, or human resources) shall be filled by appointment by the governing body through the same public process described in Section 2 above.

**C. Unexpired Terms** – Any person appointed to fill a vacancy shall serve the remainder of the unexpired term and shall be eligible for reappointment when that term expires, provided they continue to meet the qualifications for the seat.

**D. Transparency** – All appointments shall be made in an open and transparent manner, consistent with **NRS 241 (Open Meeting Law)**, with the vacancy and potential action to fill it clearly listed on the meeting agenda.

## **Article IV. Officers**



### **Section 1. Officers**

The officers of the governing body shall be elected annually and consist of a Chairperson, Vice-Chairperson, Treasurer, and Recorder, and such other officers as the governing body may deem desirable. Officers shall be elected by a majority vote of the governing body at the first regular meeting following the annual appointment or reappointment of members, and shall serve until their successors are duly elected.

### **Section 2. Chairperson**

The Chairperson shall preside at all meetings of the governing body in a fair and impartial manner, striving to promote consensus. The Chairperson shall prepare the agenda for each meeting of the governing body and provide it to the Recorder to distribute in accordance with Article V.

The Chairperson shall act as the official spokesperson of the governing body to the public and the Board of Education and approve, sign, and transmit all pertinent documents requiring action by the governing body.

The Chairperson shall also oversee that meetings of the governing body are conducted in accordance with NRS 241 (Nevada Open Meeting Law) and shall have the authority to exclude disruptive individuals from meetings of the governing body in compliance with such law.

### **Section 3. Vice-Chairperson**

The Vice-Chairperson shall perform the duties of the Chairperson in the event of the Chairperson's absence, incapacity, or resignation. The Vice-Chairperson shall assist the Chairperson in carrying out the responsibilities of that office, and shall perform such other duties as may be delegated by the governing body. If the office of Chairperson becomes vacant, the Vice-Chairperson shall assume the role of Acting Chairperson until a new Chairperson is elected by the governing body.

### **Section 4. Treasurer**

The Treasurer shall oversee the financial affairs of the governing body, including but not limited to:

- Monitoring compliance with approved budgets and financial policies;
- Ensuring accurate financial records are maintained;
- Reviewing financial statements and reports prepared by school administration or contracted financial service providers;
- Serving as the chair of any finance or audit committee, if established;
- Reporting regularly to the governing body on the financial status of the school.

The Treasurer shall not serve as the school's bookkeeper or paid financial officer but shall act in an oversight capacity to fulfill the governing body's fiduciary duty.

### **Section 5. Recorder/Secretary**

The Recorder shall be the custodian of the records of the governing body and keep the minutes of all



meetings. They shall also ensure that all notices are duly given in accordance with the provisions of these bylaws and the Nevada Open Meeting Law.

The Recorder shall maintain a register of the address, telephone number, and e-mail address of each governing body member, which shall be furnished by such members, and shall in general perform all duties incident to the office of Secretary and such other duties as may from time to time be assigned by the Chairperson or governing body.

#### **Section 6. Removal of Officers**

Any officer of the governing body may be removed from their officer position (but not from governing body membership, unless separately addressed under Article III) for failure to perform their duties, misconduct, violation of board policies, or actions inconsistent with the mission or fiduciary responsibilities of the governing body.

- **Initiation:** A motion to remove an officer may be made by any voting member of the governing body and must be listed as an action item on a properly noticed agenda in compliance with NRS 241 (Open Meeting Law).
- **Vote Threshold:** Removal shall require a two-thirds (2/3) vote of the total voting membership of the governing body.
- **Filling Vacancies:** In the event of removal, resignation, or incapacity of an officer, the governing body shall elect a replacement officer at the same or a subsequent duly noticed meeting.

### **Article V. Meetings**

#### **Section 1. Regular Meetings**

The governing body shall hold at least one regularly scheduled public meeting in Clark County during each calendar quarter.

In compliance with the Nevada Open Meeting Law, NRS Chapter 241, notice of all regular meetings, including an agenda, shall be:

1. Provided to each member of the governing body by e-mail or fax;
2. Posted on the bulletin board at the entrance to RDA;
3. Placed in the faculty boxes in the RDA offices;
4. Included in a bulletin, newsletter, or other communication distributed to RDA students;
5. Posted on the school's official website; and
6. Posted on the State of Nevada's official website pursuant to NRS 232.2175.

Such notice and agenda must be provided at least five (5) working days in advance of the meeting.



Agendas shall comply with NRS 241.020, clearly identifying the date, time, and location of the meeting, a complete list of action items, and opportunities for public comment in accordance with NRS 241.020(3)(d).

In compliance with NRS 388A.320(4), the governing body shall submit to the Department of Education and the sponsor a copy of the minutes of each meeting within 30 business days. The minutes must be approved at the next meeting of the governing body, revised as necessary, and retained as a public record in compliance with NRS 241.035, which requires written minutes and/or an audio recording of the meeting to be made available to the public.

### **Section 2. Special Meetings**

Special meetings may be called by the Chairperson or by a majority vote of the governing body.

Notice of a special meeting, including an agenda, shall comply with NRS 241.020 and must be provided at least three (3) working days in advance. Notice must be provided to each member of the governing body by e-mail or fax and posted in all locations required under Section 1, including the school's official website and the State of Nevada's official website pursuant to NRS 232.2175.

### **Section 3. Compliance with Open Meeting Law**

All meetings of the governing body shall be conducted in accordance with the Nevada Open Meeting Law, NRS Chapter 241. The governing body shall ensure transparency, accessibility, and public participation, including the provision of public comment periods as required by NRS 241.020(3)(d).

### **Article VI. Committees**

The governing body may establish and abolish standing or special committees as needed. Committee membership is open to the public, and each committee shall have both parent and teacher representation. The Principal shall be an ex-officio member of each committee. All board-established committees will operate in compliance with Open Meeting Law.

### **Article VII. Amendments**

These rules of governance may be amended by a two-thirds (2/3) vote of the total voting membership of the governing body at any regular meeting if the amendment was included in the agenda. Amendments may not be revised without the approval of the charter sponsor.

### **Article VIII. Ratification**

These amended and restated rules of governance shall be effective upon approval by two-thirds (2/3) of the total voting membership of the governing body.



## Civil Rights Policy for Rainbow Dreams Early Learning Academy

### Introduction

Rainbow Dreams Academy is committed to promoting and upholding civil rights, equality, and non-discrimination within our organization. We firmly believe that every individual should be treated with respect, fairness, and dignity, regardless of their race, color, religion, gender, national origin, age, disability, sexual orientation, or any other characteristic protected by applicable laws. This policy outlines our dedication to maintaining an inclusive and equitable environment for all children, families, employees, and stakeholders associated with our academy.

### Policy Statement

Rainbow Dreams Early Learning Academy is dedicated to fostering an inclusive and diverse community that values and respects the rights of all individuals. We commit to:

#### 1. Non-Discrimination

We will not discriminate against any individual or group based on race, color, religion, gender, national origin, age, disability, sexual orientation, or any other characteristic protected by applicable laws.

#### 2. Equal Opportunity:

We will provide equal opportunities for all children, families, employees, and stakeholders to participate fully and contribute to our learning community.

#### 3. Accessibility and Accommodation:

We will strive to provide a physically accessible environment and reasonable accommodations to ensure that everyone can engage in our programs, activities, and services.

#### 4. Education and Awareness:

We will promote education and awareness regarding civil rights and non-discrimination among our staff, children, families, and stakeholders.

#### 5. Reporting and Resolution:

We will maintain clear reporting mechanisms for any concerns related to discrimination, harassment, or violation of civil rights. All reported incidents will be promptly and thoroughly investigated, and appropriate action will be taken to address and resolve the concerns.

#### 6. Compliance with Laws:

We will comply with all applicable federal, state, and local laws and regulations related to civil rights and non-discrimination.

#### 7. Promotion of Diversity and Inclusion:



We will actively encourage diversity and inclusion within our academy, promoting an environment that reflects and respects the various backgrounds, cultures, and perspectives of our community members.

#### 8. Ongoing Evaluation and Improvement:

We will regularly evaluate our policies, practices, and procedures to identify areas for improvement and make necessary adjustments to enhance our commitment to civil rights and equality.

#### Responsibility

All employees, volunteers, and stakeholders associated with Rainbow Dreams Early Learning Academy are responsible for upholding and promoting this civil rights policy. Our leadership team will ensure compliance with this policy and take appropriate action to address any violations.

By adopting and implementing this policy, we strive to create an environment that celebrates diversity, respects individual rights, and fosters a sense of belonging for everyone at Rainbow Dreams Early Learning Academy.

This Civil Rights Policy is effective as of **9/28/23** and shall be reviewed periodically and amended as necessary to ensure its effectiveness and relevance to Rainbow Dreams Academy and its stakeholders.

Approved by the Board of Directors of Rainbow Dreams Academy on **9/28/23**.



## Conflict of Interest Policy for Rainbow Dreams Academy Governing Board

### **1. Introduction:**

This Conflict of Interest Policy ("Policy") is established to guide the conduct of members of the Governing Board ("Board") of Rainbow Dreams Academy, an Early Learning Academy located in Las Vegas, Nevada, in identifying, disclosing, managing, and resolving conflicts of interest to ensure the highest standards of integrity and ethical conduct.

### **2. Purpose:**

The purpose of this Policy is to maintain the trust and confidence of stakeholders by preventing conflicts of interest that could compromise the best interests of Rainbow Dreams Academy and its mission to provide educational equity and a high-quality education to its students.

### **3. Scope:**

This Policy applies to all members of the RDA Board including officers, committee members, and any individual or entity acting in an official capacity for or on behalf of Rainbow Dreams Early Learning Academy.

### **4. Definition of Conflict of Interest:**

A conflict of interest arises when a Board member's personal interests, financial or otherwise, could potentially influence their ability to act in the best interests of The Rainbow Dreams Academy Governing Board impartially.

### **5. Identification and Disclosure:**

- Board members are required to annually disclose any potential conflicts of interest.
- Additionally, Board members shall promptly disclose any potential conflicts of interest that arise during their term on the Board.
- The disclosures shall be made in writing and submitted to the designated officer identified in this Policy. Copies shall be provided to the Director of Compliance of Rainbow Dreams Early Learning Academy and kept on file.

### **6. Review and Evaluation:**

- The designated officer will review disclosed conflicts of interest to determine their nature and significance.



- The Board will evaluate whether a conflict of interest exists and its potential impact on Rainbow Dreams Academy.
- The Board may seek external advice or consult legal counsel to assist in the evaluation.

#### **7. Management and Mitigation:**

- If a conflict of interest is identified, the affected Board member shall abstain from participating in discussions or decisions related to the conflict.
- The Board may establish special procedures or recusals to manage conflicts and ensure that decisions are made in the best interest of the institution.

#### **8. Documentation and Transparency:**

- All conflict disclosures, evaluations, and actions taken to manage conflicts will be documented and maintained in a confidential record.
- The Board will maintain transparency by providing annual summaries of conflicts of interest, excluding any personally identifiable information, to the relevant stakeholders.

#### **9. Training and Education:**

- Board members shall receive appropriate training and education regarding conflicts of interest to ensure a clear understanding of their obligations under this Policy on an annual basis.
- Rainbow Dreams Academy will periodically review and update the training program to reflect changes in laws, regulations, or best practices.

#### **10. Sanctions and Enforcement:**

- Violations of this Policy may result in disciplinary action, including removal from the Board or other appropriate sanctions.
- The Board shall have the authority to enforce this Policy and take necessary actions to address violations.

#### **11. Confidentiality:**

- All conflict disclosures and related discussions shall be handled with utmost confidentiality to protect the privacy and reputations of the involved parties.

This Conflicts of Interest Policy is effective as of **9/28/23** and shall be reviewed periodically and amended as necessary to ensure its effectiveness and relevance to Rainbow Dreams Academy and its stakeholders.



Approved by the Board of Directors of Rainbow Dreams Academy on **9/28/23**.



# Financial Management Policy for Rainbow Dreams Early Learning Academy

## Introduction

This Financial Management Policy outlines the guidelines and procedures for the management of financial resources at Rainbow Dreams Early Learning Academy. The objective is to ensure effective financial stewardship, transparency, compliance with applicable laws and regulations, and the achievement of the Academy's goals and objectives.

## 1. Financial Governance

### 1.1 Governing Board Responsibility

The Governing Board is ultimately responsible for the financial management of the Academy. The Board will oversee financial policies, review financial reports, approve budgets, major expenditures, and financial decisions, ensuring alignment with the Academy's mission and strategic objectives.

### 1.2 Finance Committee

The Finance Committee shall be responsible for advising the Board on financial matters, reviewing financial statements, budget proposals, and financial policies, and providing recommendations for improving financial management.

## 2. Budgeting and Planning

### 2.1 Annual Budget

The Academy shall prepare an annual budget, aligning financial resources with organizational goals. The Director of Finance, in collaboration with relevant stakeholders, will develop the budget and submit it to the Governing Board for approval.

### 2.2 Budget Monitoring

Regular monitoring of budget performance against actual results shall be conducted to ensure adherence to the approved budget. Variances will be analyzed, and corrective actions will be taken if necessary.



### 3. Revenue Management

#### 3.1 Diversification of Revenue Sources

The Academy shall strive to diversify its revenue sources to reduce dependency on any single funding stream. These sources may include tuition fees, grants, donations, fundraising events, and sponsorships.

#### 3.2 Revenue Tracking

All revenue received shall be accurately recorded, tracked, and reported in the financial system, providing transparency and accountability.

### 4. Expense Management

#### 4.1 Expense Authorization and Documentation

All expenditures must be authorized in accordance with approved budget allocations and relevant policies. Proper documentation, including invoices, receipts, and approvals, must be maintained for all expenses.

#### 4.2 Expense Review and Approval

An appropriate review and approval process for expenses will be established to ensure compliance with policies, budget allocations, and the Academy's financial objectives.

### 5. Financial Reporting

#### 5.1 Regular Financial Reporting

Regular financial reports shall be prepared and provided to the Governing Board and other stakeholders. These reports will include financial statements, budget versus actuals, cash flow statements, and other relevant financial data.

#### 5.2 Transparency and Communication

The Academy shall maintain transparency by effectively communicating financial information to stakeholders, ensuring they have a clear understanding of the organization's financial health and performance.

### 6. Internal Controls and Auditing

#### 6.1 Internal Control Procedures



The Academy shall establish and maintain robust internal controls to safeguard assets, prevent fraud, and ensure the accuracy and reliability of financial records.

#### 6.2 External Audit

An independent external auditor shall be engaged annually to conduct a thorough review of the Academy's financial statements, internal controls, and compliance with applicable laws and regulations.

### 7. Compliance and Legal Obligations

#### 7.1 Compliance with Laws and Regulations

The Academy shall adhere to all relevant laws, regulations, and industry standards related to financial management and reporting.

#### 7.2 Ethical Conduct

All staff involved in financial management shall conduct themselves ethically and with integrity, ensuring compliance with the Academy's Code of Conduct and Ethics.

### Conclusion

This Financial Management Policy is essential for promoting financial discipline, accountability, and transparency at Rainbow Dreams Early Learning Academy. It will be regularly reviewed and updated to ensure its effectiveness and relevance in achieving the Academy's financial objectives.



## Gender Diverse Identities and Expressions Policy

Rainbow Dreams Early Learning Academy is committed to providing a safe, inclusive, and respectful learning environment for all students, faculty, and staff. RDELA is actively committed to embracing different identities and individuals, to guard against all discrimination in all our actions, and to promote the value of a diverse society with gender equality, however a person may identify.

### I. Definitions

- a. Classroom activities: Activities that provide education or instruction for all students, other than field trips. Nothing in this definition requires adoption of a specific curriculum.
- b. Gender Expression: The manner in which a student represents or expresses gender to others, often through behavior, clothing, hairstyles, activities, voice or mannerisms.
- c. Gender Identity: A student's understanding, outlook, feelings, and sense of being masculine, feminine, both or neither, regardless of the students' sex assigned at birth.
- d. Identity Support Team: When a child identifies as being gender diverse, a group is convened to address the individual needs of the student. The group will consist of the parent(s); the student; a school administrator or designee, including a counselor.
- e. Parent: For the purpose of this policy, a parent is defined as 1) a biological or adoptive parent; 2) legal guardian; 3) a person acting in the place of a parent with whom the child lives; 4) a person who is legally responsible for the child's welfare; or 5) an emancipated student.

### II. Identity Support Plan to Address the Rights and Needs of community members and scholars with Diverse Gender Identities or Expressions.

#### RDELA Promises to:

1. Promote a learning environment where all students and employees are treated with respect and dignity.
2. Challenge discriminatory behaviors or attitudes wherever they occur.
3. Respond swiftly and sensitively to any incidences of discrimination.
4. Provide any reasonable adjustments for people with disabilities to ensure they have access to our services and employment.



5. Ensure that self-identification and expression related observances are respected and accommodated wherever possible where the expression does not impinge on the legitimate rights of others.
6. Celebrate a diverse campus community in order to ensure fair treatment.
7. Create a gender inclusive academic program.

A. The Identity Support Plan requirements and components will be consistent with the requirements of this policy. Each Identity Support Plan for students with diverse gender identities or expressions must include the following components:

- a. Methods to ensure protection of the privacy of the student;
- b. Methods to support the appropriate engagement of the parent(s) of the student;
- c. Consideration of the rights and needs of the student for which the plan is developed, as well as the capacity of Rainbow Dreams Early Learning Academy, and the rights and needs of the student body at large, including individual requests for privacy.

B. RDELA shall take measures to ensure appropriate support of students with diverse gender identities or expressions, including, without limitation:

- a. Classroom activities shall be relevant, meaningful, and appropriate for students with diverse gender identities or expressions and do not discriminate or segregate according to gender identity or expression;
- b. Physical education, assemblies, ceremonies, and other school activities shall be appropriate for students with diverse gender identities or expressions and not discriminate or segregate according to gender identity or expression;
- c. Learning spaces are safe and conducive to learning.

### III. Addressing the Rights and Needs of Students with Diverse Gender Identities or Expressions

RDELA shall address the rights and needs of students with diverse gender identities or expressions on an individualized basis as outlined in their Identity Support Plan. RDELA shall consider the student characteristics and unique circumstances of the student.

A. RDELA shall protect the privacy of each student governed by this policy.

- a. School employees shall not disclose information that may reveal a student's gender identity or expression status:



- i. to other students;
  - ii. to the parents of other students;
  - iii. to staff members unless there is a specific need to know;
  - iv. unless legally required to do so; or
  - v. unless the parent has authorized, in writing, such disclosure.
  
- B. Names/Pronouns: Students have the right to be addressed by the name and pronoun that correspond to their gender identity or expression. The requested name shall be included in the school's Student Information System in order to inform faculty and staff of the name and pronoun to use when addressing the student.
  - a. Records:
    - i. Unofficial Records: As part of the student's Identity Support Plan, RDELA will allow a student to use their preferred name and gender on unofficial records upon receipt of written request. The unofficial records may include, but are not limited to: identification badges, classroom and rosters, certificates, programs, announcements, office summons, communications, and other school-generated unofficial records:
      - 1. Written Request received by administration: The process is initiated upon written request from a parent.
      - 2. A meeting is scheduled with a Identity Support Team to address the parent's written request to support the student's gender identity or expression.
      - 3. Outcome of Request is Determined: As a result of the Identity Support Team meeting; if agreed upon, appropriate changes may be made in the School's Student Information System.
    - ii. Official Records (including Permanent Records): RDELA is required to maintain in perpetuity mandatory permanent student records (such as transcripts ), which include the legal name of the student and the student's gender as indicated on official government issued documents such as birth certificates, passports, and identification cards/permits. The school will change a student's name and gender on official records when the name of the student is changed by court order.
  
- C. RDELA shall ensure that dress policies and uniform options are not segregated according to gender identity or expression.
- D. RDELA shall use appropriate definitions and terminology in describing the requirements, needs, and experiences of students with diverse gender identities or expressions.



E. Rainbow Dreams Early Learning Academy is in compliance with NRS 651.070: “All persons are entitled to equal enjoyment of places of public accommodation. All persons are entitled to the full and equal enjoyment of the goods, services, facilities, privileges, advantages and accommodations of any place of public accommodation, without discrimination or segregation on the ground of race, color, religion, national origin, disability, sexual orientation, sex, gender identity or expression.”

a. Restroom Access:

i. Restroom access for students with diverse gender identities or expressions may be determined on a case-by-case basis through the Identity Support Plan process, subject to any individual requests for privacy.

#### IV. Professional Development and Training

The School will provide annual professional development and training concerning the rights and needs of RDELA community members with diverse gender identities or expressions.

Training should include:

- a. Awareness of the rights and needs of students with diverse gender identities or expressions;
- b. Training in the appropriate methods of cultural competency to facilitate positive learning environments, social emotional learning skills, and appropriate relations among all students;
- c. Training concerning the needs of persons with diverse gender identities or expressions as it pertains to the prevention of discrimination, harassment, bullying, and cyber bullying;
- d. Training regarding the requirements of state laws and regulations, which require RDELA to develop an Identity Support Plan with a team led by the school administrator or administrator’s designee;
- e. Training in methods to support the appropriate engagement of the parents of student with diverse gender identities or expressions; and
- f. Training addressing the definitions and terminology in describing the requirements, needs, and experiences of persons with diverse gender identities or expressions.

#### V. Complaint Procedures

Persons (employees, students, parents, members of the public) who believe they have been discriminated against or believe they witnessed discrimination against a student because of their gender identity or expression may file a complaint with the administration via the Executive Director, Director of Compliance, or directly to the RDA Governing Board.



## Internal Controls Policy for Rainbow Dreams Early Learning Academy (Abbreviated. Please see internal controls manual for full policy).

### Introduction

This Internal Controls Policy is established to ensure the efficient and accurate financial management of Rainbow Dreams Early Learning Academy (the "Academy"). The primary objective is to maintain reliable financial records, prevent fraud or misappropriation of funds, ensure compliance with applicable laws and regulations, and enhance accountability and transparency within the organization.

#### 1. Finance Tracking System

The Finance tracking system utilized by Rainbow Dreams Early Learning Academy is QuickBooks Premier Nonprofit Edition 2023. The Finance team is responsible for ensuring accurate and up-to-date financial records are maintained in this system.

#### 2. Revenue and Expense Tracking

Revenue and expenses shall be tracked separately for each grant and funding source within the QuickBooks Premier Nonprofit Edition 2023, following established accounting principles and practices.

#### 3. Auditing

3.1 The Academy shall employ an independent external auditor, Watkins and Jackson, Bi-annually to review and assess its financial records and activities to ensure accuracy, compliance, and transparency.

3.2 CCSD performs an annual internal audit.

#### 4. Budgeting and Expenditures

##### 4.1 Budget Preparation

The RDA Accountant, in collaboration with relevant stakeholders, shall prepare an annual budget outlining revenue projections and planned expenses. This budget will be presented to the Governing Board for approval.

##### 4.2 Expenditure Tracking

All expenditures shall be tracked and documented in accordance with the approved budget. Any deviations from the budget require proper authorization and documentation.



4.3 Budget performance is reported monthly, quarterly, and annually as part of the financials.

## 5. Oversight and Approval Process

### 5.1 Governing Board Approval

All major purchases and financial decisions exceeding a predetermined threshold shall require the approval and signature of the Governing Board.

### 5.2 School Administration Oversight

The school administration shall provide oversight to ensure that financial transactions and operations adhere to established policies and procedures. Any discrepancies or concerns shall be reported to the Director of Finance and the Governing Board promptly.

## 6. Compliance Monitoring

The Director of Compliance shall be responsible for monitoring compliance with this policy and ensuring that all financial transactions are recorded accurately and in adherence to applicable laws and regulations.

This Internal Controls Policy has been reviewed and approved by the Governing Board of Rainbow Dreams Early Learning Academy on 9/28/2023.

This policy shall be regularly reviewed and updated as necessary to ensure its relevance and effectiveness in maintaining sound financial management practices at Rainbow Dreams Early Learning Academy.



## Meeting Procedures

Board meetings shall be held in accordance with NRS Chapter 388A. The Board shall conduct business in accordance with Nevada Administrative Codes (NAC), the Nevada Open Meeting Law, federal and state statutory and regulatory provisions, and current Duties, Policies and Procedures, as applicable.

### **Quorum**

A quorum will consist of the majority of the Board members.

### **Vote Needed for Exercise of Powers**

The affirmative vote of a majority of Board members will be necessary for exercising any of the Board's powers.

### **Board Member Voting**

Each member's vote on all motions will be recorded in the minutes.

### **Abstaining from Vote**

If a Board member chooses to abstain from voting, and the abstention is due to a conflict of interest, the Board members will state the reason for the abstention and such abstention will be recorded.

### **Parliamentary Procedure**

Official Board business will be transacted by motion or resolution at duly called regular or special meetings.

Except as otherwise provided by state law and/or Board policy, the rules of parliamentary procedure comprised in Robert's Rules of Order Newly Revised, "Procedure in Small Boards" as modified by the Board will govern the Board in its deliberation. Modifications will include the following: Motions will all be seconded prior to consideration for discussion by the Board and motions to close or limit debate will be acceptable.

The chair will decide all questions relative to points of order, subject to an appeal to the Board.



## Standards of Conduct

Individual Board members and the Board as a public entity must comply with the ethics laws for public officials.

- Board members shall treat other Board members, the administrator, staff and the public with dignity and courtesy and shall provide an opportunity for all parties to be heard with due respect for their opinions.
- Board members shall recognize the administrator as the chief executive officer to whom the Board has delegated administrative authority to establish regulations and oversee the implementation of Board policies.
- Board members expressing personal opinions in public shall clearly identify the opinions as personal. A Board member will respect the privacy rights of individuals when dealing with confidential information gained through association with RDELA.
- A Board member shall keep information and documents discussed in executive session confidential.
- A Board member will not post confidential information or documents about students, staff or school business online, including but not limited to, on social media.
- Board members shall treat other Board members, staff, students and the public with respect while posting online or to social media and shall adhere to Nevada Public Meetings Laws, including when communicating with other Board members via websites or other electronic means.
- A Board member is a mandatory reporter of child abuse. A Board member having reasonable cause to believe that any child with whom the Board member comes in contact with has suffered abuse or that any person with whom the Board member comes in contact with has abused a child shall immediately make a report to the local Department of Human Services (DHS) , or to law enforcement within the county where the person making the report is located at the time of contact.



## RDA Board Member Code of Ethics

### Purpose

The purpose of this Code of Ethics is to establish principles and expectations for board members of Rainbow Dreams Academy (RDA) to ensure responsible governance, ethical decision-making, and the advancement of the academy's mission.

### Commitment to Ethical Governance

As a board member of RDELA, I commit to:

1. **Act in the Best Interest of the School:** Prioritize the success, integrity, and sustainability of RDELA above personal or external interests.
2. **Maintain Confidentiality:** Respect and protect the privacy of sensitive school-related matters, including personnel, students, and financial affairs.
3. **Ensure Compliance:** Adhere to all federal, state, and local laws, including those outlined in NRS 388A and all applicable educational regulations.
4. **Uphold Transparency & Accountability:** Make decisions in a manner that is open, honest, and accountable to stakeholders.
5. **Consider myself a trustee of public education** and will do my best to protect it, conserve it, and advance it, giving to the RDELA scholars and surrounding community the educational facilities that are as complete and adequate as it is possible to provide.

I will earnestly try to interpret the needs and attitudes of the RDA/RDELA community and do my best to translate them into the education program of the school RDA/RDELA.

6.

### Professional Conduct & Responsibilities

Board members will:

1. **Support the Mission & Vision:** Work collaboratively to uphold RDELA's educational mission and goals.
2. **Respect Board Decisions:** Even if personal opinions differ, support the collective decisions made by the board.



3. **Avoid Conflicts of Interest:** Disclose and abstain from voting on any matters where personal or financial interests may be compromised. If a conflict exists, board members should **abstain from voting** and **publicly disclose** their interest to maintain transparency (NRS 281A.420).
4. **Maintain Professionalism:** Interact with fellow board members, staff, and the community with respect, integrity, and fairness. Board members are expected to act in a manner that **preserves public confidence** in the governance of RDELA.
5. **Attend & Prepare for Meetings:** Be present, engaged, and informed at all board meetings and related activities.

### **Fiduciary Responsibility**

Board members shall:

1. **Ensure Fiscal Responsibility:** Oversee the budget and financial health of the academy with due diligence.
2. **Safeguard School Assets:** Ensure responsible stewardship of school resources and funding.
3. **Follow Ethical Fundraising Practices:** Support ethical and transparent fundraising efforts that align with RDELA's mission.

### **Commitment to Equity & Inclusion**

Board members will:

1. **Champion Diversity & Inclusion:** Promote policies and practices that support equity, diversity, and inclusion for all students, staff, and families.
2. **Support a Safe & Respectful Environment:** Advocate for policies that ensure a welcoming, discrimination-free environment.

### **Prohibited Conduct**

Includes, but is not limited to:

1. Accepting gifts, services, favors, employment, engagement, emolument, or economic opportunities which would tend improperly to influence a reasonable person in his/her position to depart from the faithful and impartial discharge of his/her duties in connection with RDA/RDELA;
2. Receiving or giving unwarranted privileges, preferences, exemptions or advantages for oneself or any member of one's household, any business entity in which he/she has a financial interest or to any other person
3. Using confidential information for personal gain



4. Members must avoid decision-making where personal relationships—such as family members, business partners, or employers—may compromise objectivity (NRS 281A.065).
5. Suppressing information for pecuniary (any economic) interests;
6. Using or loaning RDA/RDELA resources for personal use, without prior approval of a supervisor where applicable
7. Improperly influencing subordinates;
8. Accepting any salary, retainer, augmentation, expense allowance or other compensation from any private source for the performance of his/her duties as an employee of RDA/RDELA.
  1. No teacher employed by RDA/RDELA shall tutor his/her students for pay in established curriculum subject matter areas during the school year unless special permission for such tutoring has been granted by the Superintendent or his/her Designee.
9. No employee of the RDA/RDELA shall use his/her knowledge or special information about pupils to solicit funds or to sell products to students or adults.
10. An RDA/RDELA employee and/or relative of an employee, within the third degree of consanguinity, shall not sell or lease goods or contract for services with RDA/RDELA as to create an employee-vendor relationship.
11. Any situation meeting the definition of employee-vendor relationship above is prohibited unless extraordinary circumstances are found to exist, as determined by the Superintendent or his/her designee.
12. Unless specifically prohibited by law, an official or employee of the RDA/RDELA is not precluded from making a bid on an RDA/RDELA contract if the contracting process is controlled by rules of open competitive bidding, the sources of supply are limited, he/she has not taken part in developing the contract plans or specifications, and he/she will not be personally involved in opening, considering, or accepting offers.
13. No board member shall use their position to secure unwarranted privileges, preferences, or compensation for themselves or others (NRS 281A.400).

#### **Disclosure**

1. No employee of RDA/RDELA may approve, disapprove, vote, abstain from voting, or otherwise act upon any matter in which he/she has a financial interest without first disclosing the full nature and extent of such interest. Such a disclosure shall be made before the time when the employee is to perform his/her duty, or concurrently with that performance.
2. If the employee is a member of any decision-making body, he/she shall make disclosure to the chairperson and other members of the body.



3. An employee shall inform his/her supervisor (i.e. Department Head, Principal) of any potential violation of this policy. The supervisor will determine if a conflict exists or if any extraordinary circumstances exist that may influence the conflict determination. An appropriate course of action shall be determined after receiving concurrence from the Chief Human Resources Officer or his/her designee.

#### **Enforcement & Accountability**

1. **Self-Assessment:** Board members shall regularly reflect on their adherence to this Code of Ethics.
2. Any alleged violations may be investigated under NRS 281A, and members may be subject to disciplinary actions or legal consequences if found in violation (NRS 281A.440).
3. **Addressing Violations:** If a board member is found to be in violation of this Code, appropriate action—including censure, removal, or other measures—may be taken by a two-thirds (2/3) majority vote of the board.
4. **Annual Acknowledgment:** All board members must review and sign this Code of Ethics annually as part of their commitment to ethical governance.

**Board Member Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_



# **Fiscal Policies and Procedures**

**for**

# **Rainbow Dreams Early Learning Academy**

Approved by \_\_\_\_\_

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## Introduction

The Fiscal Policies and Procedures Manual for Rainbow Dreams Early Learning Academy (RDELA) is designed to provide a comprehensive framework for managing the Academy's financial, operational, and administrative processes. These controls are critical for ensuring the integrity, accountability, and efficiency of our operations, while also supporting compliance with applicable laws, regulations, and best practices.

As a public charter institution, RDELA is committed to upholding the highest standards of governance and transparency. This manual outlines the policies, procedures, and safeguards that protect the Academy's assets, enhance operational effectiveness, and mitigate risks. It is intended to guide all staff, including administrators, educators, and support personnel, in their respective roles to ensure that the Academy's resources are used responsibly and ethically.

### **Purpose:**

The primary purpose of the Internal Controls Manual is to:

- **Prevent errors and fraud:** By establishing checks and balances across key processes, we reduce the risk of mismanagement and ensure accuracy in our financial reporting.
- **Ensure operational efficiency:** The controls outlined help streamline processes and ensure that resources are used in an effective and efficient manner.
- **Promote accountability and compliance:** By clearly defining roles, responsibilities, and approval procedures, we ensure adherence to internal policies and external legal requirements.

### **Scope:**

This manual applies to all aspects of the Academy's operations, including:

- Financial management (budgeting, accounting, and reporting)
- Payroll and human resources
- Procurement and vendor management
- Asset and inventory management
- Risk management and fraud prevention

### **Responsibility:**

Every employee of RDELA plays a crucial role in maintaining the internal control environment. Compliance with the policies and procedures in this manual is mandatory, and any deviation must be properly documented and authorized. Leadership and management are responsible for ensuring that controls are consistently implemented and regularly reviewed for effectiveness.

This manual is a living document that will be updated periodically to reflect changes in regulations, organizational needs, or new risks identified. It serves as a key resource for maintaining operational integrity and protecting the future of RDELA.

Management at all levels are responsible for the establishment, maintenance, and adherence to internal controls, as well as setting the appropriate “tone” for their areas. They are responsible for the appropriate use and control of the resources entrusted to them. Management is accountable to the Board of Trustees, which provides governance, guidance, and oversight. Management is also accountable to the IRS and the funding agencies of federal and private grants and contracts. Individuals, not management, can also be responsible to federal agencies. In certain cases, an individual or management may be directly liable.

### Key Internal Controls for Rainbow Dreams Early Learning Academy (RDELA)

Key internal controls are critical procedures within our operations that, when functioning properly, ensure that RDELA is achieving its key organizational objectives. These controls are essential in maintaining operational efficiency, safeguarding assets, and ensuring compliance with regulations and policies. Based on the specific processes that management aims to regulate, various controls and combinations of controls can be implemented to protect the Academy's resources and support its mission.

Below are some key controls put in place to help RDELA meet its operational and educational objectives:

- Authorization – All financial and operational transactions must be authorized by designated management personnel to ensure alignment with our policies and goals.
- Accuracy – All transactions, including payroll, vendor payments, and tuition fees, must be properly calculated and verified to ensure they are correct.
- Valuation – Proper measurement and recognition principles are applied to transactions to ensure that all assets, liabilities, and expenses are accurately reflected.
- Completeness – All valid financial and operational transactions, including student attendance and academic progress, must be fully recorded in the relevant systems.

- Classification – All transactions are categorized appropriately within financial records and other reporting systems, such as payroll, classroom supplies, and student services.
- Existence – All recorded transactions, including receipts for tuition payments and disbursements for supplies, are verified to ensure that they are valid and entered only once.
- Timeliness – Transactions and records, including student attendance and financial reports, must be entered and processed in the correct reporting period.
- Safeguard Assets – Physical and digital assets, including technology, classroom equipment, and student information, must be protected from theft, damage, or unauthorized access. Access to these assets must be restricted to authorized personnel only.
- Segregation of Duties – Responsibilities for authorizing, recording, and maintaining transactions must be appropriately divided among staff. No individual should handle a transaction or process from start to finish without oversight or collaboration, ensuring checks and balances.

The following pages outline some of the most common and most important internal control activities specific to RDELA's operations, from financial management to student services, to safeguard the Academy's integrity and resources.

## [RDELA Internal Controls Policy Snapshot](#)

### **Introduction**

This Internal Controls Policy is established to ensure the efficient and accurate financial management of Rainbow Dreams Early Learning Academy (the "Academy"). The primary objective is to maintain reliable financial records, prevent fraud or misappropriation of funds, ensure compliance with applicable laws and regulations, and enhance accountability and transparency within the organization.

### **Purpose**

The purpose of this internal control policy is to establish guidelines for ensuring the safeguarding of RDELA's assets, enhancing the accuracy and reliability of financial reporting, and promoting operational efficiency while ensuring compliance with all applicable laws and regulations.

### **Scope**

This policy applies to all employees, contractors, and volunteers of RDELA, including individuals responsible for financial and operational functions. It covers financial transactions, asset management, procurement, payroll, and reporting activities.

## **Overview**

RDELA maintains an internal control framework to ensure fiscal responsibility and compliance with federal, state, and local regulations. The internal controls include:

- **Segregation of Duties**
- **Revenue and Expense Tracking**
- **Budget and Expenditures**
- **Auditing**
- **Approval Processes**
- **Monitoring & Oversight**
- **Procurement Controls**
- **Payroll Controls**
- **Reporting and Transparency**
- **Compliance Monitoring**
- **Fraud Prevention and Response**
- **Cybersecurity Measures**
- **Annual Performance Evaluations**

### 1. Segregation of Duties

To minimize the risk of errors or fraud, no single employee should have control over all aspects of any significant financial transaction. Key duties should be separated into the following functions:

- Authorization of transactions
- Recording of transactions
- Custody of assets

- Reconciliation of accounts

Example:

The individual authorizing the purchase of goods should not be the same person responsible for approving payments or recording the transaction in the financial system.

## 2. Revenue and Expense Tracking

The Finance tracking system utilized by Rainbow Dreams Early Learning Academy is AptaFund. The Finance team is responsible for ensuring accurate and up-to-date financial records are maintained in this system.

RDELA must maintain accurate and complete records of all financial transactions and assets. Proper documentation, including receipts, invoices, contracts, and payroll records, must be maintained and stored securely for a minimum of seven (7) years.

Key Points:

- Every transaction must be supported by relevant documentation.
- All documentation should be easily accessible for internal or external audits.

Revenue and expenses shall be tracked separately for each grant and funding source following established accounting principles and practices.

## 3. Budgeting and Expenditures

### 3.1 Budget Preparation

The RDA Accountant, in collaboration with relevant stakeholders, shall prepare an annual budget outlining revenue projections and planned expenses. This budget will be presented to the Governing Board for approval.

### 3.2 Asset Management

All assets, including cash, equipment, supplies, and intellectual property, must be safeguarded against loss, theft, or misuse. Physical inventories of significant assets should be conducted at least annually, and discrepancies must be investigated promptly.

#### Cash Management:

- All cash receipts should be deposited in the bank promptly (within two business days of receipt).
- Bank accounts should be reconciled monthly by someone not involved in cash handling.

#### Property and Equipment:

- Equipment purchases should be tracked in a fixed asset register.
- Maintenance and repair of school assets must be documented and monitored.

All expenditures shall be tracked and documented in accordance with the approved budget. Any deviations from the budget require proper authorization and documentation.

3.3 Budget performance is reported monthly, quarterly, and annually as part of the financials.

## 4. Auditing

4.1 The Academy shall employ an independent external auditor, Watkins and Jackson, Bi-annually to review and assess its financial records and activities to ensure accuracy, compliance, and transparency.

4.2 Sponsor will perform an annual audit.

4.3 Quarterly reviews will be conducted by the finance team, overseen by the Principal/Executive Director.

4.4 Corrective action plans are utilized to address findings and ensure compliance.

## 5. Oversight and Approval Process

### 5.1 Governing Board Approval

All major purchases and financial decisions exceeding a predetermined threshold (\$9,999+) shall require the approval and signature of the Governing Board.

### 5.2 School Administration Oversight

The school administration shall provide oversight to ensure that financial transactions and operations adhere to established policies and procedures. Any discrepancies or concerns shall be reported to the Director of Finance and the Governing Board promptly.

All transactions must be properly authorized before they are executed. Written approvals must be obtained according to the following thresholds:

- Under \$1,000: Approval by Department Manager
- \$0.01 - \$9,999: Approval by Principal/Executive Director
- Over \$10,000: Approval RDA Governing Board

Contracts, purchases, and payroll disbursements must be reviewed and approved according to established procedures to ensure they meet budgetary and operational needs.

#### 6. Procurement Controls

Rainbow Dreams Early Learning Academy (RDELA) follows a structured procurement system to ensure the responsible use of funds and compliance with federal, state, and local regulations. The system is designed to promote fairness, transparency, cost-effectiveness, and accountability in acquiring goods and services necessary for school operations.

All procurement activities should follow competitive bidding procedures for purchases over \$10,000 to ensure the best value for goods and services. Proper vendor vetting, contract approval, and conflict-of-interest policies must be observed to maintain transparency and fairness.

#### **Key Components:**

- **Needs Assessment:** Purchases are based on documented programmatic or operational needs.
- **Vendor Selection:** Competitive procurement methods, including bids and quotes, are used to ensure fair pricing and quality.
- **Approval Process:** All purchases must be reviewed and approved by authorized personnel before commitment.
- **Cost Reasonableness:** Procurements must align with budgetary constraints and provide the best value.

- **Contract Management:** Agreements with vendors are documented, monitored, and evaluated for compliance.
- **Record-Keeping:** Proper documentation, including purchase orders, receipts, and justifications, is maintained for audit purposes.

## 7. Payroll Controls

RDELA's payroll must be processed through Paylocity, with proper oversight and authorization. Employee records must be accurate and up to date, and any changes in status, pay rates, or hours must be authorized by management.

- Overtime and additional pay must be pre-approved by the Principal/Executive Director.

Payroll reconciliations should be conducted monthly, and discrepancies addressed immediately.

## 8. Reporting and Transparency

RDELA is committed to financial transparency. Quarterly financial statements should be prepared and shared with the Board of Directors. These reports should include actual vs. budgeted spending, cash flow analysis, and detailed variance explanations.

## 9. Compliance Monitoring

The Director of Compliance shall be responsible for monitoring compliance with this policy and ensuring that all financial transactions are recorded accurately and in adherence to applicable laws and regulations. RDELA will comply with all applicable local, state, and federal regulations, including tax laws, employment laws, and education-specific financial regulations.

Monitoring includes:

- **Finance Department Oversight:** Ensures adherence to policies.
- **Training for Staff:** Regular training on financial policies and procedures.
- **Board Approval:** Fiscal policies reviewed and updated annually.

## 10. Fraud Prevention and Response

RDELA maintains a zero-tolerance policy toward fraud. Any employee found engaging in fraudulent activities will be subject to disciplinary action, up to and including termination, and may be reported to law enforcement. Employees are encouraged to report suspicious activities confidentially.

### Reporting Mechanism:

- Employees may report fraud or abuse to their direct supervisor or anonymously through the board email.

## 11. Cybersecurity Measures:

RDELA employs safeguards to protect sensitive financial data, including:

- Multi-factor authentication (MFA) for financial systems access.
- Regular security audits and vulnerability assessments.
- Encryption of financial records and restricted access to authorized personnel.
- Mandatory cybersecurity training for all staff handling financial data.
- Implementation of firewalls and intrusion detection systems to prevent unauthorized access.

## 12. Annual Performance Evaluation

Quarterly and annual review of grant performance and fiscal management, including:

- Assessment of financial controls and compliance with applicable regulations.
- Evaluation of budget adherence and spending efficiency.
- Performance benchmarking against financial goals and grant requirements.
- Staff training needs identification to improve fiscal management capabilities.
- Reporting outcomes and recommendations to the Board for continuous improvement.

### **Enforcement:**

Failure to adhere to this Internal Control Policy may result in disciplinary action, up to and including termination of employment, and legal actions where applicable.

## Allowability of Costs Policy

### General Principles

All costs charged to RDELA's funds, including federal, state, and private grants, must meet the following criteria:

- Reasonable: Costs must be necessary for the performance of the school's operations and reflect prudent financial decision-making.
- Allocable: Costs must be directly related to the program or activity benefiting from the expenditure.
- Allowable: Costs must comply with federal, state, and local laws, as well as grant-specific requirements.
- Consistently Applied: Costs must be treated consistently across all funding sources and programs.

Per Uniform Guidance (2 CFR Part 200), all costs charged to Federal awards must meet the following criteria:

- Necessary & Reasonable (§200.404) – The cost must be essential to achieving the grant's purpose and must reflect a prudent decision by a responsible organization.
- Allocable (§200.405) – The cost must be proportionately assigned to the Federal award based on the benefit received.
- Consistently Treated (§200.403(d)) – The cost must be treated uniformly across both Federal and non-Federal funding sources within the organization.
- Conformance with Federal Regulations & Terms of Award (§200.403(e)) – The cost must comply with grant-specific terms, conditions, and applicable laws.

### Allowable Costs

Allowable costs include, but are not limited to:

- Salaries and wages for employees engaged in allowable program activities.
- Employee benefits and payroll taxes related to allowable personnel.
- Instructional materials and curriculum development costs.

- Educational technology necessary for student learning.
- Professional development and training for staff.
- Rent, utilities, and facility maintenance necessary for school operations.
- Contracted services that directly support program objectives.
- Transportation costs for educational purposes.
- Parental involvement activities consistent with grant requirements.
- Audit and evaluation costs required by funding sources.

#### Unallowable Costs

- Unallowable costs include, but are not limited to:
- Entertainment, alcohol, and personal expenses.
- Fines, penalties, and legal fees unrelated to allowable program activities.
- Lobbying or political activities.
- Gifts, donations, and contributions.
- Excessive or unjustified travel expenses.
- Costs already covered by another funding source (double-dipping).
- Fundraising activities outside of approved grant budgets.
- Any expenditure not in compliance with applicable regulations.

#### Approval and Documentation

All expenditures must be approved by authorized personnel before funds are disbursed.

Adequate documentation, including invoices, receipts, and justifications, must be maintained for each transaction.

Costs must be recorded in accordance with Generally Accepted Accounting Principles (GAAP).

Federal and state grant expenditures must align with the approved budget and reporting requirements.

#### Step 1: Cost Assessment by Requesting Department

- The Principal/Executive Director or designated program staff identifies a proposed expenditure and determines if it aligns with the grant's purpose and approved budget.
- The Governing Board reviews procurement documents to ensure the expense is reasonable and necessary.

## Step 2: Compliance Review by the Director of Compliance

The Director of Compliance evaluates the proposed cost against the following criteria:

- Is the cost allowable under 2 CFR Part 200 Subpart E?
- Does the cost directly support the objectives of the Federal award?
- Has documentation been provided to justify the expense (e.g., vendor invoices, purchase requisitions, contracts, time and effort reporting)?
- Does the cost comply with any budget restrictions specified in the grant agreement?

If the cost is found to be allowable, reasonable, and allocable, it proceeds to the next step. If not, the requestor is notified of necessary modifications or justification.

## Step 3: Final Approval by Principal & Finance Office

- The Principal/Executive Director provides final approval before the expenditure is processed.
- The Finance Office (or financial service provider EMO/CMO) ensures proper coding, classification, and documentation of the expense.
- Approved costs are recorded in the financial system for tracking and audit purposes.

## Compliance and Monitoring

The Finance Department will conduct regular reviews to ensure compliance with allowability standards.

External audits may be conducted as required by funding agencies.

Non-compliance with this policy may result in corrective action, including reimbursement of unallowable expenses and disciplinary measures.

## Monitoring & Documentation Requirements

- **Periodic Budget Reviews:** The Finance Office conducts monthly budget-to-actual reviews to track expenditures and ensure compliance with allocability principles.
- **Internal Audit & Compliance Checks:** The Director of Compliance conducts quarterly compliance audits to verify cost allocations and approvals.

- **Record Retention:** All cost determinations, including justifications and approvals, are retained for at least five (5) years for audit and compliance purposes.

### **Corrective Action for Noncompliance**

If an unallowable cost is identified:

1. The Finance Office and Director of Compliance will notify the Principal and Governing Board.
2. The cost will be removed from the Federal grant and charged to non-Federal funds.
3. The organization will implement a Corrective Action Plan (CAP) to prevent recurrence.
4. Staff responsible for the expenditure will undergo training on Federal Cost Principles.

### Authorization, Approval, and Verification

Authorization is an important control activity that assures transactions are only permitted in accordance with management's directives. Authorization requires the signature or electronic approval of a transaction by someone who has approval authority. The approver should follow these guidelines:

- The approver should review any relevant supporting documentation and be satisfied that the transaction is appropriate, accurate and compliant with all applicable laws, policies, regulations, rules, and standard operating procedures.
- Any unusual items should be questioned to ensure that all necessary information is provided for justification prior to any approval. The failure of management to question what they sign and/or the "rubber stamping" of documents or transactions will circumvent the authorization controls.
- Under no circumstances should an approver tell someone else to sign the approver's name.
- In the case of electronic signatures, the approver's password should never be shared with another person.

Authorization in certain cases can be delegated; however, this delegation of authority should be on a limited "must have" basis with established parameters. Management should ensure that the conditions and terms of authorization are clearly defined, documented, and communicated.

## Travel and Per Diem Policy for Educational Purposes Only

### **Purpose**

This policy establishes guidelines for employee travel and per diem expenses incurred while attending educational conferences, ensuring compliance with Federal regulations (2 CFR Part 200.474) and maintaining fiscal accountability.

### Eligibility for Travel

Travel for educational conferences must:

- Align with the mission and goals of Rainbow Dreams Early Learning Academy (RDELA).
- Directly benefit student achievement, professional development, or program improvement.
- Be pre-approved by the Principal/Executive Director and Governing Board if funded by a Federal award.

### **Pre-Approval Requirements**

All travel must be approved at least 30 days in advance and must include:

- A Travel Authorization Request Form with estimated costs.
- Justification for attendance and expected benefits to the school.
- Verification that the conference is an allowable cost under grant funding, if applicable.

### **Allowable Travel Expenses**

The following expenses are eligible for reimbursement when pre-approved:

#### **1. Transportation**

- **Airfare:** Must be economy class and purchased at the lowest available rate. First-class or premium travel is not allowed unless medically necessary with documentation.
- **Ground Transportation:** Includes rental cars (if pre-approved), rideshare services, taxis, or public transportation.
- **Mileage Reimbursement:** For personal vehicle use, mileage will be reimbursed at the IRS standard mileage rate. Parking and tolls are reimbursable with receipts.

#### **2. Lodging**

- Hotel accommodations must be at the government rate or the lowest available rate at the conference site.
- Personal expenses (movies, mini-bar, spa services, etc.) are not reimbursable.
- Original, itemized receipts are required for reimbursement.

### **3. Per Diem (Meals & Incidentals)**

- Meal reimbursements follow the General Services Administration (GSA) per diem rates for the travel location.
- Meals provided by the conference will **not** be reimbursed.
- Alcoholic beverages are **not** reimbursable.
- Per diem covers meals and incidental expenses (tips, small travel-related fees, etc.) and does not require receipts.

### **4. Conference Registration Fees**

- Conference registration costs are fully reimbursable if pre-approved.
- Optional workshops, tours, or entertainment activities not related to professional development are not eligible for reimbursement.

### **Non-Reimbursable Expenses**

The following expenses are **not reimbursable**:

- Upgraded airline seating or change fees (unless justified and pre-approved).
- Costs for family members, guests, or non-employee travel companions.
- Personal entertainment, souvenirs, or extended stays beyond the conference.

### **Expense Reporting & Reimbursement**

1. Travelers must submit a Travel Expense Report within 10 business days after returning.
2. Itemized receipts must accompany all expenses except per diem.
3. The Finance Office will review and process reimbursements within 30 days.

### **Policy Review & Compliance**

- This policy is reviewed annually and updated to align with Federal, state, and grant requirements.
- Non-compliance with travel policies may result in denied reimbursements or disciplinary action.

## Accounting and Financial Management Policy for Rainbow Dreams Early Learning Academy

### Introduction

This Financial Management Policy outlines the guidelines and procedures for the management of financial resources at Rainbow Dreams Early Learning Academy. The objective is to ensure effective financial stewardship, transparency, compliance with applicable laws and regulations, and the achievement of the Academy's goals and objectives.

### 1. Financial Governance

#### 1.1 Governing Board Responsibility

The Governing Board is ultimately responsible for the financial management of the Academy. The Board will oversee financial policies, review financial reports, approve budgets, major expenditures, and financial decisions, ensuring alignment with the Academy's mission and strategic objectives.

#### 1.2 Finance Committee

The Finance Committee shall be responsible for advising the Board on financial matters, reviewing financial statements, budget proposals, and financial policies, and providing recommendations for improving financial management.

### 2. Budgeting and Planning

#### 2.1 Annual Budget

The Academy shall prepare an annual budget, aligning financial resources with organizational goals. The Director of Finance, in collaboration with relevant stakeholders, will develop the budget and submit it to the Governing Board for approval.

#### 2.2 Budget Monitoring

Regular monitoring of budget performance against actual results shall be conducted to ensure adherence to the approved budget. Variances will be analyzed, and corrective actions will be taken if necessary.

### 3. Revenue Management

#### 3.1 Diversification of Revenue Sources

The Academy shall strive to diversify its revenue sources to reduce dependency on any single funding stream. These sources may include tuition fees, grants, donations, fundraising events, and sponsorships.

### 3.2 Revenue Tracking

All revenue received shall be accurately recorded, tracked, and reported in the financial system, providing transparency and accountability.

## 4. Expense Management

### 4.1 Expense Authorization and Documentation

All expenditures must be authorized in accordance with approved budget allocations and relevant policies. Proper documentation, including invoices, receipts, and approvals, must be maintained for all expenses.

### 4.2 Expense Review and Approval

An appropriate review and approval process for expenses will be established to ensure compliance with policies, budget allocations, and the Academy's financial objectives.

## 5. Financial Reporting

### 5.1 Regular Financial Reporting

Regular financial reports shall be prepared and provided to the Governing Board and other stakeholders. These reports will include financial statements, budget versus actuals, cash flow statements, and other relevant financial data.

### 5.2 Transparency and Communication

The Academy shall maintain transparency by effectively communicating financial information to stakeholders, ensuring they have a clear understanding of the organization's financial health and performance.

## 6. Internal Controls and Auditing

### 6.1 Internal Control Procedures

The Academy shall establish and maintain robust internal controls to safeguard assets, prevent fraud, and ensure the accuracy and reliability of financial records.

### 6.2 External Audit

An independent external auditor shall be engaged annually to conduct a thorough review of the Academy's financial statements, internal controls, and compliance with applicable laws and regulations.

## 7. Compliance and Legal Obligations

### 7.1 Compliance with Laws and Regulations

The Academy shall adhere to all relevant laws, regulations, and industry standards related to financial management and reporting.

### 7.2 Ethical Conduct

All staff involved in financial management shall conduct themselves ethically and with integrity, ensuring compliance with the Academy's Code of Conduct and Ethics.

#### Documentation

Clear, complete, and accurate documentation, recorded in a timely manner, enhances the efficiency and effectiveness of RDELA's operations. Proper documentation ensures that processes and procedures are carried out consistently and reliably, supporting the Academy's educational and operational goals. Standardized documentation also serves as a valuable training tool by providing staff with guides and manuals to follow.

Documentation of transactions and activities should allow management to trace each action from its initiation to its completion. This ensures that the entire life cycle of a transaction or event is captured, including:

1. Initiation and Authorization– Each transaction, such as a purchase or service request, must be authorized by the appropriate management or staff member.
2. Processing – The progress of the transaction through various stages (such as approvals, processing, and implementation) must be documented.
3. Final Classification– The completed transaction should be classified and summarized in the appropriate records, such as financial statements or operational logs.

For example, the documentation for the purchase of classroom supplies would begin with the authorized purchase request, followed by the purchase order, the vendor invoice, and the final payment records. Proper documentation ensures transparency and accountability at every stage, providing a clear trail for future reference.

## **Retention Periods**

Fiscal records must be retained for the following minimum periods:

- **Financial Statements & Audit Reports:** 7 years
- **General Ledger & Journals:** 7 years
- **Bank Statements, Reconciliations, & Canceled Checks:** 7 years
- **Payroll Records (including time sheets, tax filings, and employee earnings reports):** 7 years
- **Invoices, Receipts, & Expense Reports:** 7 years
- **Grant Documentation (applications, awards, reports, and expenditure records):** 7 years after grant closure
- **Contracts & Procurement Records:** 7 years after contract completion
- **Tax Filings & Supporting Documents:** 7 years
- **Fixed Asset Records:** Life of asset plus 3 years

## **Storage & Security**

- All fiscal records must be securely stored in either electronic or physical formats.
- Physical records must be kept in a locked, fireproof cabinet with access restricted to authorized personnel.
- Electronic records must be stored on secure, backed-up servers with restricted access and cybersecurity protections in place.
- Confidential financial information must be protected against unauthorized access and maintained in compliance with applicable data privacy regulations.

## **Disposition of Records**

- Upon expiration of the retention period, records will be reviewed and disposed of in a secure manner.
- Confidential records will be shredded or permanently deleted to prevent unauthorized access.

- Records involved in ongoing audits, litigation, or investigations must not be destroyed until resolution is confirmed by legal counsel.

### **Compliance & Monitoring**

- The Finance Department is responsible for enforcing this policy and ensuring compliance.
- Annual reviews of fiscal records will be conducted to confirm adherence to retention guidelines.
- Non-compliance with this policy may result in corrective action or disciplinary measures.

### Segregation of Duties

Segregation of duties is a preventive control that aids in the timely detection of errors and irregularities in the normal course of business by providing adequate checks and balances. Functions are separated so that no one person has control over all parts of a transaction. Roles and responsibilities must be clearly defined to ensure that no one person has complete control over more than one key processing function, such as authorizing, approving, certifying, disbursing, receiving, or reconciling.

The following functions should be separated among employees:

- Custody of assets;
- Record keeping;
- Authorization; and
- Reconciliation.

Ideally, no individual employee should handle more than one of the above-noted functions in a process. For example, the same person should not maintain custody of cash AND record the deposits. The same person should not record the deposits AND perform the reconciliations. A simple way of looking at segregation of duties is to have at least “two sets of eyes” look at a transaction.

Examples of segregation of duties among employees include:

- The person who requisitions purchases should not approve purchases;
- The person who approves purchases should not reconcile monthly financial reports;
- The person who maintains accounting records and reconciles financial reports should not have custody of checks;

- The person who opens mail and prepares the list of checks received, or receives payments in person, should not make the deposit; and
- The person who opens the mail and prepares the list of checks received, or receives payments in person, should not maintain accounts receivable records.
- The person who runs payroll should not approve payroll

## **Key Personnel and Responsibilities**

The following roles are designated as responsible parties for fiscal oversight, compliance, and financial management of grant funds:

### **1. Principal/Executive Director**

- Oversees the strategic use of grant funds in alignment with educational goals and compliance requirements.
- Approves budget allocations and ensures expenditures support programmatic objectives.
- Approves payroll
- Serves as a liaison with external funding agencies and regulatory bodies.

### **2. Superintendent**

- Provides executive-level oversight and ensures fiscal policies align with the school's mission and strategic plan.
- Reviews high-level financial reports and ensures transparency in grant management.
- Coordinates with the Governing Board to approve financial policies and corrective actions.

### **3. Governing Board**

- Establishes financial policies and approves major grant expenditures.
- Conducts periodic reviews of financial statements and audit findings.
- Holds administration accountable for fiscal integrity and regulatory compliance.

### **4. Director of Compliance**

- Ensures adherence to Federal, state, and grant-specific regulations.
- Reviews and certifies time and effort reporting for personnel funded by grants.

- Conducts periodic internal audits to verify compliance with 2 CFR Part 200 requirements.
- Implements corrective action plans (CAPs) if deficiencies are identified.

## **5. Office Manager**

- Maintains financial records and documentation for expenditures.
- Maintains attendance records and time sheets.
- Processes Amazon Purchases,

## **6. Accountant**

- Reconciles budget.
- Processes purchase orders, invoices, and reimbursements in accordance with procurement policies.
- Processes payroll.
- Coordinates with financial service providers (EMO/CMO) to ensure accurate tracking and reporting of grant funds.

## **Internal Controls and Segregation of Duties**

To prevent conflicts of interest and unauthorized financial activity, the following internal controls are in place:

- **Authorization vs. Processing:**
  - The Principal/Executive Director approves budget allocations and expenditures.
  - Major expenditures must be approved through the Governing Board.
  - The Accountant or Office Manager processes purchase orders, invoices, and payments, ensuring proper documentation.
- **Financial Reporting vs. Compliance Monitoring:**
  - The Office Manager and financial service providers (EMO/CMO) prepare financial reports.
  - The Director of Compliance reviews reports to ensure accuracy and regulatory compliance.
  - The Director of Compliance is responsible for submission to the Department of Education or through Epicenter.

- **Governance Oversight vs. Daily Management:**
  - The Governing Board provides oversight and approves financial policies.
  - The Principal manages the daily administration of grant funds.
- **Reconciliation and Audits:**
  - The Office Manager maintains documentation of monthly expenditures.
  - The Accountant reconciles financial records monthly.
  - The Director of Compliance conducts internal audits and ensures grant funds are used appropriately.
  - The Governing Board and external auditors conduct annual reviews.

## Conflict of Interest Policy for Rainbow Dreams Academy Governing Board

### **1. Introduction:**

This Conflict of Interest Policy ("Policy") is established to guide the conduct of members of the Governing Board ("Board") of Rainbow Dreams Academy, an Early Learning Academy located in Las Vegas, Nevada, in identifying, disclosing, managing, and resolving conflicts of interest to ensure the highest standards of integrity and ethical conduct.

### **2. Purpose:**

The purpose of this Policy is to maintain the trust and confidence of stakeholders by preventing conflicts of interest that could compromise the best interests of Rainbow Dreams Academy and its mission to provide educational equity and a high-quality education to its students.

### **3. Scope:**

This Policy applies to all members of the RDA Board including officers, committee members, and any individual or entity acting in an official capacity for or on behalf of Rainbow Dreams Early Learning Academy.

### **4. Definition of Conflict of Interest:**

A conflict of interest arises when a Board member's personal interests, financial or otherwise, could potentially influence their ability to act in the best interests of The Rainbow Dreams Academy Governing Board impartially.

#### **5. Identification and Disclosure:**

- Board members are required to annually disclose any potential conflicts of interest.
- Additionally, Board members shall promptly disclose any potential conflicts of interest that arise during their term on the Board.
- The disclosures shall be made in writing and submitted to the designated officer identified in this Policy. Copies shall be provided to the Director of Compliance of Rainbow Dreams Early Learning Academy and kept on file.

#### **6. Review and Evaluation:**

- The designated officer will review disclosed conflicts of interest to determine their nature and significance.
- The Board will evaluate whether a conflict of interest exists and its potential impact on Rainbow Dreams Academy.
- The Board may seek external advice or consult legal counsel to assist in the evaluation.

#### **7. Management and Mitigation:**

- If a conflict of interest is identified, the affected Board member shall abstain from participating in discussions or decisions related to the conflict.
- The Board may establish special procedures or recusals to manage conflicts and ensure that decisions are made in the best interest of the institution.

#### **8. Documentation and Transparency:**

- All conflict disclosures, evaluations, and actions taken to manage conflicts will be documented and maintained in a confidential record.
- The Board will maintain transparency by providing annual summaries of conflicts of interest, excluding any personally identifiable information, to the relevant stakeholders.

#### **9. Training and Education:**

- Board members shall receive appropriate training and education regarding conflicts of interest to ensure a clear understanding of their obligations under this Policy on an annual basis.

- Rainbow Dreams Academy will periodically review and update the training program to reflect changes in laws, regulations, or best practices.

#### **10. Sanctions and Enforcement:**

- Violations of this Policy may result in disciplinary action, including removal from the Board or other appropriate sanctions.

- The Board shall have the authority to enforce this Policy and take necessary actions to address violations.

#### **11. Confidentiality:**

- All conflict disclosures and related discussions shall be handled with utmost confidentiality to protect the privacy and reputations of the involved parties.

### Physical Security at Rainbow Dreams Early Learning Academy (RDELA)

Physical and environmental security is essential to safeguarding the Academy's assets, data, and overall operational integrity. The following guidelines outline the measures in place to protect our physical space, sensitive information, and critical resources:

- **Secure Perimeter** – A secure perimeter should be established to prevent unauthorized access to critical or sensitive assets and data. The level of security should be based on the importance of the assets and information. Critical systems, including hardware and software that support administrative and educational processes, should be housed in secure areas protected from unauthorized access, fire, flooding, and other disasters.
- **Access Control** – Areas where access by unauthorized individuals is prohibited should require identification badges for staff at all times. Visitors should be escorted by authorized personnel

while on the premises. Unfamiliar persons in restricted areas should be questioned and escorted out of the facility if necessary, using security services as needed.

- Issuance of Keys and Access Badges- Keys and access badges should be strictly controlled and reviewed regularly (at least quarterly) to ensure access is granted only to individuals who need it. Access should be revoked immediately when an employee leaves the Academy or transfers to a new role. Key cards are demagnetized upon an employee's termination.
- Clear Desk Policy – To prevent unauthorized access to sensitive information, all staff should adhere to a "clear desk" policy. Important papers and electronic media should be locked in drawers or cabinets when not in use, especially during non-working hours when offices cannot be secured. Sensitive documents, including electronic records, should be stored in fire-resistant cabinets or safes.
- Mail and Print Security – Incoming and outgoing mail drops, as well as unattended printers and fax machines, should be assessed for the need for restricted or secure access to prevent unauthorized viewing of sensitive documents.
- Computer and Network Security – Unattended computers or electronic devices that provide access to Academy systems should have password protection and be set to automatically lock after periods of inactivity. Passwords should be required to regain access. Staff must also ensure that all laptops and devices removed from the Academy's premises are secured with appropriate access controls, such as encryption and password protection.
- Equipment Removal and Tracking – Any equipment removed from Academy property must be authorized and documented. An equipment tracking form should be maintained and updated regularly to ensure proper tracking of assets.
- Power and Environmental Protection – Critical systems, including information technology hardware, should have uninterruptible power supplies (UPS) and be protected from power surges. These systems should also be regularly tested. Adequate heating, ventilation, and air conditioning must be in place to maintain optimal conditions for equipment and prevent exposure to dust, water, or other environmental hazards.

- Fire Protection – Fire suppression systems, including extinguishers, should be installed to protect key areas, such as those housing critical equipment and records. These systems must be regularly inspected and tested, and personnel should be trained in their use. Fire drills and other emergency procedures should be conducted regularly with all staff.
- Cabling Protection – Data and power cables that service the building should be secured and protected from potential damage, interference, or interception to maintain continuity of operations.
- Equipment Maintenance – All assets, including information systems and classroom equipment, should be maintained according to manufacturer guidelines. Maintenance should be carried out by authorized personnel, with records kept of all repairs, servicing, and any issues.
- Antivirus and Antispyware Software – All desktop, laptop, and portable computers must have active antivirus and antispyware software installed. Access to these devices should be password-protected to ensure security.
- Off-Campus Device Security – Computers and devices used off-campus should have additional security, such as locks and password protection. Laptops and other portable devices should be encrypted to protect the data in case of loss or theft and should be kept as carry-on luggage when traveling.
- Software Licensing and Equipment Identification – All software should be properly registered to avoid licensing issues, and serial numbers for all computer hardware and other assets should be recorded.
- Disposal of Devices – Computers and other electronic devices should undergo secure data destruction before disposal or transfer. Hard drives should be wiped, and devices should be reconfigured as needed to prevent unauthorized data access.
- Responsibility – Department heads and staff supervisors are responsible for ensuring compliance with these physical security measures to protect the Academy’s assets, personnel, and sensitive information.

## Responsibility for Inventory Records

RDELA will conduct an annual inventory. Directors are responsible for performing the annual physical inventory, in accordance with the procedures outlined in this chapter. The purpose of the annual inventory is to reconcile equipment, supplies, and textbooks on hand with the inventory records on file. In addition to the annual inventory, Directors are also responsible for maintaining and updating the inventory records for his or her site throughout the year, and for removing (discarding or transferring to another DOE site or outside entity) obsolete equipment from the site.

While the primary responsibility for maintaining inventory records rests with the Director, he or she may designate appropriate staff to act as the Inventory Officer (IO). The IO is to prepare and maintain inventory records throughout the year. Individuals in a title above that of Director (such as a superintendent or an executive director) also have the responsibility to see that the records of inventory are maintained, updated at required intervals, and reported as needed.

For internal control purposes, assignment of the IO should be periodically rotated among staff at the site. Whenever any item is delivered to a site, the person responsible for accepting it verifies the receipt of the shipment and advises the IO who has the responsibility for storage, distribution and inventory control.

Copies of records related to inventory must be readily accessible for inspection and audit.

Failure to conduct and properly maintain adequate inventory will require corrective action and may result in possible disallowances by the funding source.

### Categories of Property that are Inventoried

- **Supplies-** Expendable materials such as paper, chalk, art supplies, writing implements, copier machine chemicals, etc. if stored in large quantities
- **Equipment-**Items which can be reused or which maintain their character through use. Examples of equipment that must be inventoried are computers (both laptop and desktop), tablets (such as iPads), video cameras, TV sets, tape recorders, science lab equipment, musical instruments, digital cameras, DVD players, etc.
- **Textbooks-**Published and copyrighted materials used for instruction including printed materials, audiobooks, e-books, and videotapes/DVDs used for instructional/educational purposes. This includes classroom library materials.

- **Computer Software**-Purchased, licensed software used for instructional or educational purposes.

Please note that the following items do **NOT** have to be inventoried:

- Workbooks after their initial distribution to classrooms. However, a “running” inventory should be kept of any stored undistributed workbooks;
- Furniture (except in the case of a final inventory conducted in anticipation of a program’s end or site closure);
- Supplies (either instructional or office) unless they are stored in large quantities

#### Method of Inventory

Inventory records should be in electronic format. Inventory records may be created and maintained using Microsoft Excel or Access. The computer database should be kept at one central location. However, backup copies may be kept at multiple locations if the RDA Board deems it to be advisable.

The IO at the respective site should make an entry in the inventory record as soon as the item of property is accepted at the site. The inventory record should be accessible and comprehensible to any auditors who may come to the site throughout the academic year.

Please be vigilant of the following when keeping inventory records:

- A separate entry is required for each piece of equipment purchased (including computers and other electronic devices) (Note: This does not apply to supplies, textbooks, or computer software.)
- There should be continuous updating of your inventory record, as changes occur (e.g., new inventory is purchased, inventory is distributed to staff, inventory is loaned to an individual or department, inventory is disposed of, etc.).
- A proper format should be used and complete information should be recorded for each item.
- Inventory records for each type of property (supplies, equipment, textbooks, and computer software) listing all of the items should be printed periodically as working copies. The

most recent document should be kept on file. The final version of the year, produced immediately prior to the annual inventory deadline, must be printed and then signed and dated by the Director, confirming its accuracy.

- Access to the inventory database should be limited to as few people as possible (for example, the Director and the IO) as to ensure accuracy and reduce the potential for misconduct.

## Labeling Requirements

Equipment must contain a serial number or another identifying number that must also be recorded in the inventory list. Labels, engravings or other markings on the equipment do not need to include fund source, cost, date or the other items required to be present on the full inventory list. Record internal and external serial numbers as well as any other identifying marks. You can mark items using electronic pencils or invisible markers that are visible only under special lighting. Every piece of equipment should be labeled and/or indelibly marked or otherwise permanently tagged with the words "Property of the Department of Education". Also included must be the site location and a serial number or other ID number to cross-reference the item to the inventory list. In some special situations, a vendor may not be able to engrave a piece of equipment. If so, it is suggested that the site purchase an engraving tool available at most hardware stores or acquire metallic identification tags.

## Timekeeping and Leave Best Practices at Rainbow Dreams Early Learning Academy (RDELA)

To ensure accurate and transparent timekeeping and leave management, RDELA follows these best practices:

- Annual Communication – Internal leave reporting practices should be communicated to all staff at least once a year. This helps ensure that all employees are aware of the process and their responsibilities.
- Documented Procedures – Each department should maintain written procedures outlining its timekeeping and leave reporting process. This ensures that work hours and leave reported are accurate, valid, and complete.

- Daily Time Recording for Non-Exempt Employees – Non-exempt employees (those who are subject to the Fair Labor Standards Act overtime provisions) must record their time daily to maintain accuracy and support timely payroll reporting.
- Supervisory Approval Required – All time entries submitted for payroll processing must be reviewed and approved by a supervisor. This approval is necessary to confirm that the hours worked and leave taken are accurate and appropriate.
- No Self-Approval – Employees may not approve their own time records. An independent supervisor must review and validate all time entries.
- Knowledgeable Approvers – Supervisors who approve time entries must have actual knowledge of the employee’s work schedule and activities. They must be able to confirm the accuracy of the time reported by the employee.
- Mass Time Entry – When processing mass time entries for payroll, the submitter or approver must verify that the payment has not already been submitted through a web time entry form. This prevents duplicate payments or processing errors.

## Monitoring Internal Controls for Federal Awards

This section outlines the processes and procedures for monitoring the school’s internal controls framework to ensure compliance, effectiveness, and efficiency in fiscal performance over Federal awards. Monitoring activities help identify weaknesses, mitigate risks, and ensure that Federal funds are used in accordance with applicable laws, regulations, and grant requirements.

### **Oversight and Accountability**

The Principal/Executive Director and the Finance Office are responsible for monitoring internal controls over Federal awards, with oversight from the Board of Directors. This includes ensuring:

- Compliance with 2 CFR Part 200 (Uniform Guidance) for the management of Federal funds.
- Adherence to the approved budget and grant-specific financial guidelines.
- Timely reporting and reconciliation of expenses.

### **Monitoring Procedures**

## 1. Financial Performance Reviews

- **Monthly Budget-to-Actual Analysis:** The Finance Office conducts a review comparing actual expenditures to the approved budget for each Federal grant. Any discrepancies or variances are analyzed and reported to school leadership.
- **Quarterly Financial Reports:** The Principal/Executive Director submits financial performance reports to the Board of Directors, identifying key financial trends and any concerns regarding Federal awards.
- **Annual Audits:** Independent auditors assess financial controls and compliance with Federal grant requirements. Findings are reviewed with the Board, and corrective action is taken if needed.

## 2. Compliance Monitoring

- **Grant-Specific Requirements:** The Finance Office ensures all expenditures comply with the terms and conditions of each Federal grant, including allowable costs, documentation, and procurement standards.
- **Time and Effort Reporting:** Employees whose salaries are funded by Federal grants complete required time and effort certifications to verify work aligns with grant-funded activities.
- **Subrecipient Monitoring:** If applicable, RDELA ensures that any subrecipients of Federal awards comply with fiscal and performance expectations.

## 3. Internal Controls Testing

- **Periodic Internal Reviews:** The Finance Office performs internal control assessments, including reviewing financial transactions, documentation, and approvals.
- **Segregation of Duties Verification:** Regular checks confirm that responsibilities for authorizing, recording, and reviewing transactions are appropriately segregated to prevent fraud and errors.
- **Procurement and Payment Audits:** Random sampling of purchase orders, contracts, and payments is conducted to ensure compliance with procurement policies.

## 4. Corrective Actions & Continuous Improvement

- **Identifying Issues:** If deficiencies or non-compliance issues are identified, a corrective action plan (CAP) is developed, documented, and implemented.

- **Training and Staff Development:** Staff involved in Federal grant management receive ongoing training on compliance, financial controls, and reporting requirements.
- **Policy Updates:** Internal controls are reviewed annually and updated based on audit findings, changes in Federal regulations, or organizational needs.

### **Documentation & Record Retention**

- All financial transactions, budget revisions, and compliance reports are retained for at least five (5) years in accordance with Federal and state guidelines.
- Monitoring reports, audit results, and corrective actions are documented and available for review by auditors and funding agencies upon request.

Federal Financial Management System (2 CFR §200.302)

Rainbow Dreams Early Learning Academy (RDELA) maintains an approved accounting and financial management system that meets the seven standards outlined in 2 CFR §200.302(b) to ensure accurate, complete, and reliable financial reporting.

### **Standards for Financial Management System**

RDELA's financial management system includes:

1. **Identification of Federal Awards** – Transactions are recorded with clear identification of federal awards, including Assistance Listing Number (ALN), title and number, FAIN, year, pass-through entity, and awarding agency.
2. **Accurate, Complete, and Timely Records** – Financial records are maintained to fully disclose the sources and uses of federal funds.
3. **Effective Internal Controls** – Internal controls prevent fraud, waste, and abuse. Transactions are reviewed and approved by designated personnel.
4. **Budget Controls** – Expenditures are reviewed to ensure they align with approved budgets and allowable costs.
5. **Written Procedures for Cash Management** – Federal funds are drawn only when needed and documented properly.

6. **Financial Reporting** – Reports are submitted on time, in accordance with federal and state guidelines.
7. **Timely and Accurate Accounting Records** – Transactions are recorded promptly, using the Nevada State Chart of Accounts.

## 2. Reconciliation of Award Expenditures and Revenues (2 CFR §200.302(b))

To ensure fiscal accuracy, RDELA implements the following procedures:

- **Regular Reconciliations** – Award expenditures and revenues are reconciled monthly to verify that amounts recorded in RDELA’s accounting system match State Public Charter School Authority (SPCSA) records.
- **Staff Responsibilities** –
  - **Principal/Executive Director** – Reviews reconciliation reports.
  - **Office Manager** – Performs initial transaction review and prepares reports.
  - **Director of Compliance** – Ensures reconciliations align with grant requirements.
  - **Governing Board** – Provides oversight on financial reconciliations.

## 3. Identification and Tracking of Federal Funds (2 CFR §200.302(b)(1); §200.328)

To maintain compliance with **Uniform Guidance**, RDELA ensures:

- All federal funds are separately identified and tracked in the accounting system.
- Required components (ALN, FAIN, title, awarding agency, pass-through entity, and fiscal year) are recorded accurately.
- Financial data is aligned with the Nevada State Chart of Accounts to facilitate state reporting.

## 4. Cash Management Procedures (2 CFR §200.305; §200.302(b)(6))

- All receipts of federal funds are logged promptly by the Office Manager.
- Cash drawdowns follow just-in-time principles, ensuring funds are drawn only as needed for allowable expenditures.
- The Principal approves all federal fund receipts and cash disbursements.
- Reconciliations of cash balances are conducted at least monthly.

## 5. Disbursement and Payment Controls (2 CFR §200.302(b)(6))

- Pre-numbered Checks – All disbursements, except petty cash and electronic fund transfers (EFTs), are made using pre-numbered checks.
- Supporting Documentation – Every check must have supporting documents (e.g., invoices, approvals) before submission for payment.
- Dual Authorization Requirement – All checks require two authorized signatures:
  - Principal/Executive Director
  - Governing Board Member
  - Authorized accounting personnel

## 6. Financial Reporting and Oversight (2 CFR §200.328; §200.329)

- A Statement of Financial Position is prepared quarterly and reviewed by the:
  - Charter Holder Administrator (Principal/Executive Director)
  - Governing Board
- Annual financial statements and federal expenditure reports are prepared for regulatory compliance.
- The Governing Board reviews financial statements to ensure fiscal accountability and compliance with grant requirements.

## 7. Time and Effort Reporting

### **Purpose**

To ensure that salaries and wages charged to federal grants are accurate, allowable, and properly supported, RDELA maintains a formal process for documenting the time and effort of employees whose compensation is funded in whole or in part by federal programs.

### **Policy Statement**

Employees whose salaries or wages are charged to federal awards must complete time and effort certifications that accurately reflect the work performed and demonstrate that the time charged is reasonable, necessary, and allocable to the grant program. These certifications are required to maintain compliance with 2 CFR §200.430.

### **Procedures**

## 1. Who Must Report

- Any employee whose salary is fully funded by a federal grant must certify that they worked solely on that grant's activities during the reporting period.
- Any employee whose salary is partially funded by a federal grant must maintain documentation that reflects the actual percentage of time spent on each funding source's activities.

## 2. Types of Documentation

- **Semi-Annual Certification** (for employees 100% funded by a single federal program):
  - Signed by the employee and a supervisor with first-hand knowledge.
  - States that the employee worked exclusively on the federally funded program during the reporting period.
- **Personnel Activity Reports (PARs)** (for employees funded by multiple sources):
  - Prepared monthly and account for 100% of the employee's compensated time.
  - Signed by the employee and supervisor.
  - Must reflect **actual work performed**, not budget estimates.

## 3. Submission Schedule

- **Semi-Annual Certifications:** Completed every six months (January and July).
- **PARs:** Submitted monthly, no later than the 10th of the following month.

## 4. Review and Approval

- The Executive Director review all time and effort reports for accuracy, completeness, and alignment with budget allocations.
- Any discrepancies will be addressed with the employee and supervisor immediately, and corrections documented.

## 5. Retention of Records

- Time and effort documentation will be retained for a minimum of five years from the date of submission, or longer if required by the funding agency.

## 6. Monitoring and Compliance

- The Business Office will periodically audit time and effort documentation to ensure compliance with federal rules.
- Non-compliance may result in cost disallowances, repayment of funds, and/or corrective action for the employee.

### Key Compliance Reminder

Time and effort reporting must reflect actual work performed, not projected or budgeted amounts, and should be supported by verifiable records such as calendars, schedules, or work logs when applicable.

## 8. Federal “Supplement, Not Supplant” Compliance

### Purpose

This policy ensures that all federal funds received and expended by Rainbow Dreams Early Learning Academy (RDELA) are used to supplement — and not replace — State, local, or other non-federal funds that would otherwise be made available to the intended program beneficiaries.

### Policy Statement

Federal funds must be used to provide services that are **in addition to** the regular services provided by State and/or local funds. Federal funds cannot be used to replace or supplant services that are required to be provided by State or local law, policy, or prior funding commitments.

### Procedures

#### 1. Written Justification Requirement

- All requests for purchases or services funded with federal dollars must include a written justification explaining:
  - How the cost directly supports the goals and objectives of the specific federal program.
  - Confirmation that the service or item is not otherwise provided with State or local funds.
  - Verification that the requested expenditure does not fulfill a requirement already mandated under State or local law.

## 2. Review Process

- The Federal Programs Coordinator or designee will review each request using the following checklist:
  - Is the cost allowable under the federal program guidelines?
  - Is the cost necessary and reasonable?
  - Would this service/item be provided without federal funds? If yes, federal funds may not be used.
  - Has the cost been pre-approved by the applicable grant administrator, if required?
- The review will be documented on a Supplement, Not Supplant Review Form and kept with the purchase or reimbursement request.

## 3. Approval and Documentation

- The Executive Director (or designee) will provide final approval for all federal expenditures after verifying compliance.
- Documentation will be retained for a minimum of five years or longer if required by the funding agency.

## 4. Annual Monitoring

- Federal expenditures will be reviewed annually during the internal audit process to ensure ongoing compliance with the supplement, not supplant requirement.

## 9. Travel Policy for Grant-Funded Activities

### Purpose

To establish clear guidelines and procedures for determining reasonable, necessary, and allowable travel costs for RDELA employees participating in activities supported by federal or other grant funds.

### Policy Statement

Travel costs must be:

- **Reasonable:** Reflecting what a prudent person would pay under the circumstances.
- **Necessary:** Required to fulfill the objectives of the grant program.

- **Allowable:** Compliant with applicable federal regulations, including 2 CFR Part 200, and the terms of the grant award.

## **Procedures**

### **1. Pre-Approval Requirement**

- All grant-related travel must be pre-approved in writing by the Executive Director (or designee).
- The request must include:
  - Purpose of travel and connection to the grant's objectives.
  - Dates, location, and estimated total cost (including registration, lodging, transportation, meals, and incidental expenses).
  - Funding source and budget line item.

### **2. Reasonable Cost Determination**

- Lodging and per diem rates will not exceed the federal General Services Administration (GSA) rates for the destination.
- Airfare will be purchased at the lowest available rate for economy class.
- Use of personal vehicles will be reimbursed at the current IRS standard mileage rate.

### **3. Allowable Costs**

- Registration fees for conferences, workshops, or training directly related to grant activities.
- Lodging, meals, and transportation in line with GSA limits.
- Necessary incidental expenses (e.g., baggage fees) if directly related to the approved travel.

### **4. Unallowable Costs**

- Alcoholic beverages.
- Entertainment or leisure activities not tied to the grant program.
- Travel upgrades (e.g., business class airfare) unless required for documented medical needs.

### **5. Post-Travel Documentation**

- Employees must submit a travel expense report within 10 business days of returning.
- The report must include original itemized receipts, proof of payment, and a completed Grant Travel Expense Form linking each cost to the grant objectives.

#### **6. Record Retention**

- All travel approvals, receipts, and expense reports will be retained for a minimum of five years or longer if required by the grant agency.

# Fraud Prevention Policy

## Objective:

The objective of this section is to outline the procedures and controls in place to prevent, detect, and respond to fraudulent activities within Rainbow Dreams Early Learning Academy (RDELA). Fraud prevention is critical to maintaining the integrity of our operations, safeguarding our financial resources, and ensuring compliance with legal and regulatory requirements.

## Definition of Fraud:

Fraud is any intentional act or omission designed to deceive others, resulting in financial or personal gain at the expense of the academy. It includes, but is not limited to:

- Misrepresentation or falsification of financial statements or records.
- Misappropriation of assets (theft or misuse of school funds, equipment, or resources).
- Corruption or bribery.
- Forging signatures or altering documents.
- Unauthorized manipulation of payroll or benefits.

To minimize the risk of fraudulent activity, RDELA employs the following internal controls:

### 1. Segregation of Duties:

- Key financial tasks (e.g., processing payments, approving transactions, and reconciling accounts) are divided among multiple employees to ensure that no single individual has control over all aspects of a financial transaction.

- Access to financial systems is restricted based on job responsibilities, with specific privileges assigned to ensure accountability.

### 2. Authorization and Approvals:

- All transactions, including purchases, disbursements, and payroll, must be properly authorized by the designated personnel prior to execution.

- Written approvals must be documented and maintained to provide a clear audit trail.

### 3. Documentation and Record Keeping:

- All financial transactions must be supported by appropriate documentation (e.g., invoices, receipts, contracts).
- Records must be kept in a secure, organized manner to facilitate audits and reviews.

### 4. Reconciliations:

- Monthly reconciliation of all bank and financial accounts must be conducted by a designated staff member who is not involved in processing payments.
- Any discrepancies found during reconciliation must be investigated and resolved promptly.

### 5. Asset Management:

- All physical assets, including technology, equipment, and supplies, must be tracked in an inventory system.
- Regular audits of physical assets will be conducted to ensure accuracy and identify potential misuse or misappropriation.

### 6. Vendor Management:

- Vendors must be vetted and approved through a formal process, including verification of their legitimacy.
- Payments to vendors should be monitored to ensure they align with authorized contracts and purchase orders.

## Fraud Detection and Monitoring:

### 1. Internal Audits:

- Periodic internal audits will be conducted to assess the effectiveness of internal controls and identify any areas of risk.
- Auditors will have full access to all financial records and processes to perform their duties.

### 2. Whistleblower Policy:

- A confidential reporting system will be available for employees and other stakeholders to report suspected fraud or unethical behavior without fear of retaliation.

- Reports of suspected fraud must be thoroughly investigated by designated personnel or an independent third party if necessary.

### 3. Employee Training:

- All staff members will receive training on fraud prevention, ethical conduct, and the importance of accurate financial reporting.

- Employees are expected to adhere to the highest standards of integrity and report any suspicious activities promptly.

## Response to Fraud:

### 1. Investigation:

- Upon receiving a report or suspicion of fraud, an investigation will be initiated immediately. The investigation may involve internal personnel or external professionals, depending on the nature and severity of the allegation.

### 2. Disciplinary Action:

- Any employee found to have engaged in fraudulent activity will be subject to disciplinary action, up to and including termination of employment.

- Legal action may also be pursued if warranted.

### 3. Reporting:

- Incidents of confirmed fraud will be reported to the RDA Governing Board, relevant regulatory bodies, and law enforcement as necessary.

### 4. Remediation:

- Following a fraud incident, controls and procedures will be reviewed and enhanced to prevent future occurrences.

## Accounting and Financial Management System Policy and Procedures

### Purpose

This policy establishes the financial management standards, controls, and procedures for Rainbow Dreams Early Learning Academy (RDELA) in accordance with 2 CFR §200.302, §200.303, §200.305, §200.328, and §200.329. The policy ensures accurate, timely, and compliant financial management for all school operations, including federal grant programs.

### Policy Statement

RDELA maintains an approved accounting and financial management system (AptaFund) managed by the Accountant under the oversight of the Executive Director. The system is designed to record, code, reconcile, and report all transactions in compliance with federal, state, and SPCSA requirements, including the Nevada State Chart of Accounts and the seven standards outlined in 2 CFR §200.302(b).

#### 1. Recording and Coding Transactions

All financial transactions (revenues and expenditures) will be recorded in AptaFund promptly upon receipt of documentation. Coding will follow the Nevada State Chart of Accounts and include required identifiers for federal funds. Transactions must be recorded timely, generally within five (5) business days of receipt. The Accountant is responsible for accurate coding, with review by the Executive Director or designee. The seven standards under 2 CFR §200.302(b) will be followed to ensure financial accuracy and compliance.

#### 2. Reconciliation of Expenditures and Revenues

The Accountant will reconcile all award expenditures and revenues monthly between AptaFund and SPCSA records. Reconciliations verify that revenues recorded match SPCSA disbursement records and expenditures are allowable, correctly coded, and within budget. The Executive Director reviews and signs off on monthly reconciliations. Documentation is retained for five (5) years or longer if required.

#### 3. Tracking of Federal Funds

All federal funds are separately identified and tracked within AptaFund using grant-specific codes. Each award will be recorded with: ALN, Title and Number, FAIN, Award Year, Pass-through Entity, and Federal Awarding Agency. Tracking aligns with the Nevada State Chart of Accounts.

#### 4. Separation of Duties

Staff who perform reconciliations cannot initiate, finalize, or authorize transactions. The accountant prepares reconciliations; the Executive Director or Board Treasurer reviews and approves. All disbursements require multiple approvals.

#### 5. Cash Management

All receipts are promptly logged in the Cash Receipts Log by designated staff upon receipt. Deposits are made within three (3) business days. The accountant records deposits in AptaFund and reconciles them monthly with bank statements.

#### 6. Disbursements

All disbursements (except petty cash or EFT) are made by check with supporting documentation or by ACH. Pre-numbered checks are used for fraud prevention with a minimum of two authorized signatures from appropriate staff (Principal/Governing Board Member/Authorized Accountant).

## 7. Financial Statements and Reporting

A Statement of Financial Position and other financial reports are prepared monthly by the Accountant, reviewed by the Executive Director, and presented to the Governing Board. All required fiscal reports will be submitted as required by the award terms.

### Record Retention

All accounting records, supporting documentation, reconciliations, and reports will be retained for at least five (5) years after the final expenditure report for the grant is submitted, or longer if required by law or the awarding agency.

### Responsibility

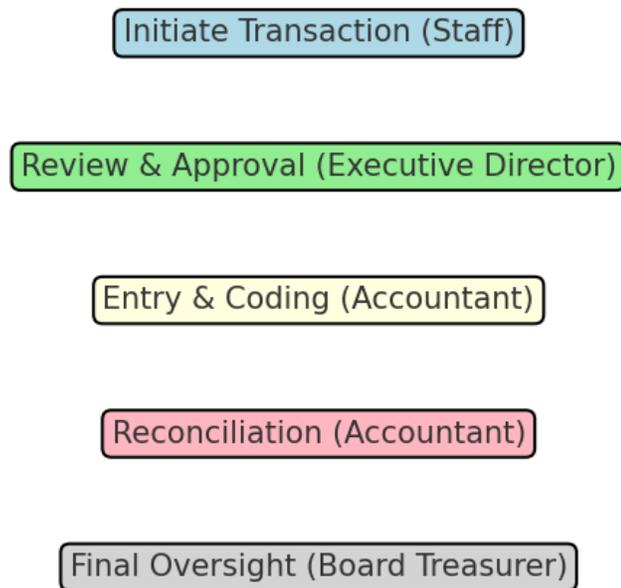
The accountant is the primary custodian of AptaFund data entry, reconciliation, and report preparation. The Executive Director is responsible for oversight, approval of disbursements, and compliance with federal and state requirements. The Board provides governance-level oversight through regular review of financial reports.

### Flowcharts

Flowchart 1: Transaction Recording & Approval Process



## Flowchart 2: Separation of Duties



## Procurement Systems

### 1. Purpose and Scope

Rainbow Dreams Early Learning Academy (RDELA) follows a structured procurement system to ensure the responsible use of funds and compliance with federal, state, and local regulations, including the Nevada Revised Statutes (NRS) Chapters 332 (Local Government Purchasing), 333 (State Purchasing), and 388G.610 (Local School Authority).

This system promotes fairness, transparency, cost-effectiveness, and accountability in acquiring goods and services necessary for school operations.

### 2. Key Principles

- **Fair Competition** – All eligible vendors have an equal opportunity to compete for RDELA business.
- **Best Value** – Award decisions balance cost, quality, reliability, and service.
- **Compliance** – All procedures follow applicable NRS requirements and RDELA Board-approved policies.
- **Documentation** – Every procurement decision is supported by clear, auditable records.

- **Ethics** – Conflicts of interest are avoided, disclosed, and documented.

### 3. Responsibilities

1. Executive Director/Principal: Provides oversight, ensures compliance, and approves all procurements above the established threshold.
2. Fiscal/Business Manager: Performs verification and reconciliation activities, maintains documentation, and ensures vendor eligibility checks.
3. Department/Program Managers: Initiate purchase requests, obtain required approvals, and ensure purchases are necessary, reasonable, and allocable.
4. Governing Board: Approves high-value contracts in accordance with board policy and applicable law.

### 4. Contractor Responsibility Verification

Rainbow Dreams Early Learning Academy (RDELA) will implement documented provisions and procedures to ensure that all contracts are awarded only to responsible contractors. The designated Procurement Officer or other assigned staff member is responsible for verifying that the contractor is neither suspended nor debarred prior to selection. Verification will be completed through the System for Award Management (SAM) at [www.SAM.gov](http://www.SAM.gov) or through other approved federal databases. This verification must be documented in procurement files before a contract is signed. No federal funds will be awarded to contractors who are identified as suspended, debarred, or otherwise excluded under 2 CFR §200.214 and §200.318.

Procedures will include:

- Documenting the verification check (e.g., printout or screenshot from SAM.gov).
- Maintaining verification records in the procurement file for a minimum of three years after contract completion.
- Re-verifying contractor eligibility for multi-year contracts prior to each contract renewal or continuation of work funded with federal dollars.

### 5. Written Standards of Conduct and Conflicts of Interest

RDELA maintains written standards of conduct governing the performance of its employees engaged in the selection, award, and administration of contracts in compliance with 2 CFR §200.318(c)(1). No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by federal funds if they have a real or apparent conflict of interest.

A conflict of interest exists when the employee, officer, agent, any member of their immediate family, their partner, or an organization that employs or is about to employ any of these parties has a financial or other interest in, or a tangible personal benefit from, a firm considered for a contract.

Employees must:

Disclose any potential conflicts of interest in writing to the Executive Director or designated ethics officer.

Refrain from soliciting or accepting gratuities, favors, or anything of monetary value from contractors or subcontractors, except when the value is nominal and allowed by law.

- Comply with disciplinary actions for violations, which may include suspension, termination, or referral to law enforcement, depending on the severity of the violation.

Annual training on the standards of conduct and conflict-of-interest policy will be provided to all employees with procurement responsibilities.

#### 6. Procurement Thresholds & Methods

Purchase Amount	Procurement Method	NRS Reference
\$0 – \$2,499	Informal purchase; single quote allowed	NRS 332.039
\$2,500 – \$9,999	At least <b>two</b> documented written quotes	NRS 332.039
\$10,000 – \$99,999	Competitive written quotes; minimum <b>three</b> bids required	NRS 332.065
\$100,000+	Formal advertised solicitation with sealed bids	NRS 332.065
Sole Source/Emergency	Written justification & administrative approval	NRS 332.115 / NRS 332.112

#### 7. Procurement Process Flow

1. Needs Assessment – Identify and document need.
2. Funding Verification – Check budget availability.
3. Vendor Sourcing – Obtain quotes/bids per threshold.
4. Bid/Quote Evaluation – Review cost, quality, and fit.
5. Approval & Documentation – Secure signatures and records.
6. Purchase Order Issuance – Send to vendor.
7. Delivery & Verification – Inspect goods/services.
8. Payment Processing – Match invoice to PO for payment.

#### 7. Required Documentation

- **Procurement Request Form**

- **Vendor Quotes/Bids** (minimum required per threshold)
- **Bid Evaluation Summary**
- **Purchase Order**
- **Signed Contract/Agreement** (if applicable)
- **Invoice & Proof of Delivery**
- **Payment Approval Documentation**

9. Templates

**A. Procurement Request Form**

Field	Details
Request Date	
Requestor Name/Department	
Description of Item/Service	
Justification for Purchase	
Estimated Cost	
Funding Source (Budget Code)	

Procurement Method (check one)  Informal  Written Quotes  Sealed Bid  Sole Source  Emergency

Attachments  Quotes  Bid Summary  Sole Source Justification

Authorized Signature

**B. Bid Evaluation Summary Form**

Vendor Name	Quote/Bid Amount	Quality Score (1-5)	Delivery Time	References/Experience	Total Score

**Recommendation:**

Winning Vendor: \_\_\_\_\_

Reason for Selection: \_\_\_\_\_

Approval Signature: \_\_\_\_\_

**C. Sole Source Justification Form**

Field	Details
Description of Goods/Services	
Vendor Name	
Reason Competitive Bidding is Not Feasible	
Unique Qualifications or Product Exclusivity	
Time Sensitivity (if applicable)	
Approval Signature	

**D. Emergency Procurement Log**

**Date Description of Emergency Items/Services Purchased Vendor Cost Approval**

**10. Procurement Internal Control Procedures**

Verification Procedures

- a. Prior to awarding a contract or purchase order, the Fiscal/Business Manager must verify that:
  - The procurement complies with competitive bidding or small purchase procedures outlined in §200.318.

- Cost or price analysis has been conducted for procurements exceeding the Simplified Acquisition Threshold.
- Vendor is not suspended or debarred per §200.214, verified through the SAM.gov Exclusions database.
- All conflict of interest provisions have been reviewed and no violations exist.
- Required documentation (quotes, bids, evaluation criteria) is complete and retained.

#### Reconciliation Procedures

b. After purchase completion, the Fiscal/Business Manager will:

- Match purchase orders to invoices and receiving reports.
- Confirm that quantities, descriptions, and prices match the original purchase documentation.
- Review and reconcile charges to the appropriate grant or funding source.
- Investigate discrepancies promptly and document resolution.
- Maintain reconciliation logs and supporting evidence for audit purposes.

#### 11. Compliance Monitoring

These procedures will be reviewed annually by the accountant in coordination with the Executive Director/Principal to ensure continued compliance with 2 CFR §200.303, §200.318, and §200.214. Updates will be presented to the Governing Board for approval.

- Annual internal audits of procurement files.
- Staff training on updated NRS and procurement best practices.
- Documentation retention per **NRS 239.080** (minimum 3 years).

#### 12. Documentation and Retention

All procurement-related verification and reconciliation records shall be retained for a minimum of three years from the date of final expenditure report submission, or longer if required by federal, state, or grant-specific terms. Documentation includes solicitation records, vendor eligibility checks, bids/quotes, purchase orders, contracts, invoices, receiving reports, reconciliation logs, and correspondence.

## Audit Resolution

Purpose & Scope:

This policy ensures timely, transparent, and compliant processing of audit findings and recommendations arising from audits required under NRS and SPCSA oversight.

Applicable Authorities:

- NRS 354.624 mandates an annual financial audit for local governments and school districts, to be submitted no later than 4 months after fiscal year end, and presented publicly within 30 days of submission.
- Audits must be conducted by a licensed CPA or registered accounting firm per NRS 354.624(1).
- SPCSA expects clean audit reports and integrates audit outcomes into its Organizational Performance Framework (OPF).

## Resolution Process:

1. Audit Receipt & Public Presentation – Receive finalized audit report, present within 30 days at Board meeting, file as required.
2. Reviewing Findings – Finance Committee reviews findings, identifies corrective actions.
3. Action Plan & Monitoring – Develop corrective action plan (CAP) and provide quarterly updates.
4. Closure & Documentation – Document final resolution and status.
5. Accountability – Maintain readiness to share resolution status with SPCSA.

### **1. Single Audit Requirement**

RDELA will conduct a Single Audit if total federal awards expended during the fiscal year equal or exceed \$1,000,000, in accordance with 2 CFR §200.501.

- The audit will be performed by an independent auditor in accordance with Generally Accepted Government Auditing Standards (GAGAS) and 2 CFR Subpart F.
- Reports will be submitted by the required deadlines:
  - February 28 to the State Public Charter School Authority (SPCSA)
  - March 31 to the Federal Audit Clearinghouse (FAC)
- Copies will also be provided to other relevant stakeholders as required.

### **2. Auditor Access to Records**

RDELA will maintain documented processes to permit auditors and other authorized officials timely access to financial records, supporting documentation, and financial statements upon request, in accordance with 2 CFR §200.332.

- Records will be organized, current, and accessible throughout the audit period.
- The accountant or designee will serve as the primary audit liaison.

### **3. Auditor Selection and Preparation Standards**

Auditors will be selected through a documented procurement process consistent with 2 CFR §200.318 and professional independence standards.

- The selection process will include evaluating qualifications, experience with charter schools, and familiarity with federal grant compliance.
- Prior to the audit, the accountant will prepare required schedules, ledgers, reconciliations, and supporting documents.

#### **4. Financial Statement and SEFA Preparation**

RDELA will prepare complete annual financial statements reflecting its financial position, results of operations or changes in net assets, and cash flows where applicable, in accordance with GAAP.

- A Schedule of Expenditures of Federal Awards (SEFA) will be prepared for the same period as the audited financial statements, in compliance with 2 CFR §200.510(b).
- The SEFA will include all required data elements, including Assistance Listing Numbers (ALNs), pass-through entity identifying numbers, and total federal expenditures.

#### **5. Audit Findings Follow-Up and Corrective Action**

RDELA will document and implement follow-up and corrective actions on all current and prior year audit findings as described in the auditor's report.

- A Summary Schedule of Audit Findings will be prepared, including both current and prior year unresolved findings.
- A Corrective Action Plan (CAP) will be prepared for each finding, including:
  1. Staff responsible (administration, finance/business staff, board members, etc.)
  2. Root cause(s) of the finding
  3. Planned corrective actions for each finding
  4. Anticipated completion date
  5. If RDELA disagrees with a finding, the CAP will include the reasons and supporting evidence.

- The CAP will be submitted to SPCSA, the FAC, and other required entities within applicable timelines.

Audit Findings Tracking Table

Finding #	Audit Finding	Severity	Root Cause	Action(s) Required	Responsible Party	Target Date	Status	Notes

Corrective Action Plan (CAP) Template

Finding #	Description	Proposed Correction	Owner	Timeline	Resources Needed	Status Update	Closure Date

## 6. Cooperative Audit Resolution

RDELA will maintain a standard process for cooperative audit resolution with auditors, SPCSA management, and other stakeholders, in compliance with 2 CFR §200.511, §200.513(c)(6), §200.516, and §200.332.

- Disputes or questions will be addressed promptly and documented in writing.
- All corrective action and resolution activities will be tracked to ensure completion within a reasonable timeline

# Inventory Management Policy

## Overview

### Purpose

This policy establishes procedures for the management, tracking, and reporting of equipment and inventory purchased with federal funds at Rainbow Dreams Early Learning Academy (RDELA). It ensures compliance with **2 CFR §200.313 and §200.314**, maintains accountability, and verifies that equipment is used for its intended purpose.

### Scope

This policy applies to all RDELA employees involved in purchasing, receiving, storing, using, or disposing of equipment and inventory funded wholly or partially with federal awards.

## Definition of Terms

**Annual Inventory:** The actual physical count of textbooks, equipment and supply items conducted once a year (in the spring) at a site. While all DOE locations must conduct an annual inventory, schools must confirm that an annual inventory was conducted by submitting an *Annual Inventory Statement*. The statement is electronically forwarded to the Charter Sponsor for review.

**Computer Software:** For inventory purposes the term is used for all purchased, licensed computer software whether used for administrative or instructional purposes.

**DOE Facility:** Any site, whether owned or leased, at which Department of Education activities take place. An annual inventory is conducted even at a leased site.

**Equipment:** Items which can be reused or which maintain their character through use. Examples may include, but are not limited to, computers (desktop and laptop), tablets (for example, iPads), video cameras, TV sets, audio recorders, science lab equipment, musical instruments, digital cameras, DVD players, etc. must also be inventoried.

**Funding Source:** Since funds are provided to purchase equipment from multiple funding sources for specific purposes, the federal or state funding source (reimbursable funds) under which the item was purchased (Quick Code) must be noted in inventory.

**Fixed Asset:** An item of equipment whose original purchase price equals or exceeds \$5,000.

**Inventory Officer (IO):** An all-inclusive term to describe the individual selected by the Director whose major responsibility is to coordinate all aspects of inventory control including, but not limited to the removal of obsolete equipment supervising and handling all records related to the physical inventory of all supplies, materials, textbooks, etc., and overseeing the receipt and removal of inventoried items. This position should be rotated periodically as a means of internal control.

**Serial Numbers:** Usually marked indelibly on items of equipment as a means of maintaining inventory and discouraging theft.

**Site:** Usually refers to a school, but it might also be a regional or central office or an alternative education site or satellite location.

**Director:** The person charged with the operation of the site in question. It may be a Director, program coordinator, or a division director.

**Storage Facility:** Any closet, room or cabinet where instructional or office supplies, equipment, and textbooks are stored for safekeeping and control.

**Supplies:** A supply item is any article which meets one or more of the following conditions: (1) is consumed in use or loses its identity through incorporation into a different unit or substance; (2) loses its shape or appearance with use; and (3) is expendable (cheaper to replace than to repair; generally purchased in object code 100 series).

**Textbooks:** For inventory purposes the term is used for all published and copyrighted materials of an educational/instructional nature. It does NOT include library books and books used for administrative, office, or reference use.

## Property and Equipment Management Policy

### Acquisition of Equipment and Inventory

- All purchases of equipment and inventory funded with federal awards must be reviewed and approved by the Executive Director or Business Manager prior to procurement.
- Purchases must comply with applicable procurement standards in 2 CFR §200.318–§200.323, including competitive bidding and cost reasonableness.
- Equipment/inventory must be necessary, allocable, and reasonable for the performance of federal award activities.
- Documentation of purchase requests, approvals, and justification for federal funding will be retained in the procurement file.

### Purchasing (2 CFR §200.313; §200.314)

Rainbow Dreams Early Learning Academy (RDELA) follows federal and state guidelines for the acquisition, use, and management of federally funded equipment and inventory.

Procedures for Equipment and Inventory Purchases:

1. **Pre-Approval Requirement** – All purchases using federal funds must be pre-approved by the Principal/Executive Director and Director of Compliance.
2. **Allowable Use Determination** – Before approval, the expenditure must be assessed for:
  - Alignment with grant objectives
  - Reasonableness, necessity, and allocability per 2 CFR §200.403
  - Compliance with the Federal Cost Principles
3. **Procurement Procedures** – Equipment purchases follow RDELA’s Procurement Policy, ensuring competitive pricing and vendor compliance with 2 CFR §200.318-§200.320.
4. **Usage Restrictions** – All purchased equipment and inventory must be used exclusively for the program or purpose for which it was funded.

## Equipment and Inventory Labeling (2 CFR §200.313(d)(1))

All equipment purchased with federal funds must be labeled and tracked in RDELA's Federal Perpetual Inventory Report.

### Labeling Requirements:

Each piece of equipment will have a permanent label with:

1. **Description of Inventory** (e.g., laptop, projector, tablet)
2. **Serial Number**
3. **Acquisition Date**
4. **Federal Funding Source**
5. **Federal Award Identification Number (FAIN)**
6. **Unit Cost**
7. **Title Holder** (RDELA or pass-through entity)
8. **Location (Room Number/Department)**
9. **Current Use and Condition** (e.g., active, needs repair, surplus)
10. **Disposition Details** (if lost, stolen, or transferred)

The Office Manager is responsible for ensuring proper labeling and maintaining the Federal Perpetual Inventory Report.

## Inventory Tracking and Physical Verification (2 CFR §200.313(d))

- A **Master Inventory Database** is maintained to record all federally funded equipment.
- **Annual Physical Inventory Checks** – Conducted each fiscal year by the Office Manager and Director of Compliance.
- **Discrepancy Review** – Any missing or unaccounted-for items will be reviewed, investigated, and documented.

## Equipment Safeguards and Loss Prevention (2 CFR §200.332; §200.313(d)(3); §200.314)

RDELA has procedures in place to prevent loss, damage, or theft of equipment and inventory.

### Security Measures:

1. **Storage and Restricted Access** – Equipment is stored in secured locations with access restricted to authorized personnel.
2. **Staff Responsibilities for Safeguarding Inventory:**
  - **Office Manager** – Maintains records and secures items.
  - **Director of Compliance** – Oversees compliance with grant requirements.
  - **Principal/Executive Director** – Provides final oversight on inventory controls.
3. **Incident Reporting and Investigation** – If equipment is lost or stolen:
  - A report is filed immediately with the Principal and Director of Compliance.
  - An internal investigation is conducted.
  - If theft is suspected, local authorities will be notified.
  - A disposition record is updated in the inventory system.

#### Equipment Disposition Procedures (2 CFR §200.313(e))

When equipment is no longer needed:

- **If valued at less than \$5,000**, it may be retained, sold, or disposed of following RDELA policy.
- **If valued over \$5,000**, prior written approval from the SPCSA or federal awarding agency is required before disposal.
- **Disposition Records** must document:
  - Sale price or disposal method
  - Approval records
  - Removal data

## REGULATIONS

### Responsibility for Inventory Records

RDELA will conduct an annual inventory. Directors are responsible for performing the annual physical inventory, in accordance with the procedures outlined in this chapter. The purpose of the annual inventory is to reconcile equipment, supplies, and textbooks on hand with the

inventory records on file. In addition to the annual inventory, Directors are also responsible for maintaining and updating the inventory records for his or her site throughout the year, and for removing (discarding or transferring to another DOE site or outside entity) obsolete equipment from the site.

While the primary responsibility for maintaining inventory records rests with the Director, he or she may designate appropriate staff to act as the Inventory Officer (IO). The IO is to prepare and maintain inventory records throughout the year. Individuals in a title above that of Director (such as a superintendent or an executive director) also have the responsibility to see that the records of inventory are maintained, updated at required intervals, and reported as needed.

For internal control purposes, assignment of the IO should be periodically rotated among staff at the site. Whenever any item is delivered to a site, the person responsible for accepting it verifies the receipt of the shipment and advises the IO who has the responsibility for storage, distribution and inventory control.

Copies of records related to inventory must be readily accessible for inspection and audit. Failure to conduct and properly maintain adequate inventory records in accordance with this chapter will require corrective action and may result in possible disallowances by the funding source.

## Retention Guidelines

The chart below details the minimum length of time that school officials must retain their records and property before they may be disposed of legally.

The purposes of the retention guidelines are to ensure that:

1. For administrative, legal and fiscal purposes, records/property is retained as long as needed;
2. State and federal record/property retention requirements are met;
3. Record/property series with enduring historical and other research value are identified and retained permanently; and

4. A documented systematic disposal approach of unneeded records/property is maintained.

#### Important Dates

- The annual inventory (physical count) of supplies stored in bulk, equipment (including computer equipment), computer software, textbooks and other copyrighted educational materials stored at a site is required to be completed by mid- to late-April of each year.
- Within 30 days of completing the inventory yet before the annual due date in April, RDELA will submit an Annual Inventory Statement to the charter sponsor.

The retention guidelines are as follows: Payable/Invoice Records	<i>Administration &amp; Accounting</i>	FY + 3 years	<i>Regular</i>
Bank Reconciliations and Related s Workpapers	<i>Administration &amp; Accounting</i>	FY + 3 years	<i>Regular</i>
Bids, Accepted: For purchases	<i>Administration, Accounting, Compliance</i>	FY + 3 years	<i>Regular</i>
Bids, Rejected: For purchases	<i>Administration, Accounting, Compliance</i>	FY + 3 years	<i>Regular</i>
Chart of Accounts: An institutional list of the accounts and their identification coding	<i>Administration &amp; Accounting</i>	FY + 3 years	<i>Regular</i>
Credit Card Receipts	<i>Administration &amp; Accounting, Office Manager</i>	FY + 3 years	<i>Secure</i>
Payable/Invoice Records	<i>Administration &amp; Accounting, Office Manager</i>	FY + 5 years	<i>Regular</i>
Bank Reconciliations and Related Workpapers	<i>Administration &amp; Finance</i>	FY + 7 years	<i>Regular</i>
Bids, Accepted: For purchases	<i>Administration, Accounting, Compliance</i>	FY + 7 years	<i>Regular</i>
Bids, Rejected: For purchases	<i>Administration, Accounting, Compliance</i>	FY + 3 years	<i>Regular</i>

#### Categories of Property that are Inventoried

All schools and DOE offices (central, field, etc.) must complete an annual inventory for the following four categories of property:

### *Supplies*

Expendable materials such as paper, chalk, art supplies, writing implements, copier machine chemicals, etc.

### *Equipment*

Items which can be reused or which maintain their character through use. Examples of equipment that must be inventoried are computers (both laptop and desktop), tablets (such as iPads), video cameras, TV sets, tape recorders, science lab equipment, musical instruments, digital cameras, DVD players, etc.

### *Textbooks*

Published and copyrighted materials used for instruction including printed materials, audiobooks, e-books, and videotapes/DVDs used for instructional/educational purposes. This includes classroom library materials.

### *Computer Software*

Purchased, licensed software used for instructional or educational purposes.

These items should be inventoried regardless of funding source. (For example, special education inventory items should be included in the inventory of the host school. Note that special education field supervisors are expected to make themselves available to help the Director, Director, or designee with this procedure.)

An inventory record is required of DOE property even if the item:

5. was purchased with reimbursable program funds;
6. was purchased with private contributions (30 for 30) and donated to the school;
7. is used at home (e.g. laptop computer)
8. is operable but not in use;
9. is inoperable, but scheduled to be replaced;
10. is on loan;

11. is currently being housed offsite
12. Was purchased through the Teacher's Choice program or any similar program.

Please note that the following items do **NOT** have to be inventoried:

13. Workbooks after their initial distribution to classrooms. However, a “running” inventory should be kept of any stored undistributed workbooks;
14. Furniture (except in the case of a final inventory conducted in anticipation of a program’s end or site closure);
15. Supplies (either instructional or office) unless they are stored in large quantities;

Disposition of damaged, obsolete or excess stock should follow the same procedures as textbooks.

#### Method of Inventory

Inventory records should be in electronic format. Inventory records may be created and maintained using Microsoft Excel or Access. The computer database should be kept at one central location. However, backup copies may be kept at multiple locations if the Director deems it to be advisable.

The IO at the respective site should make an entry in the inventory record as soon as the item of property is accepted at the site. The inventory record should be accessible and comprehensible to any auditors who may come to the site throughout the academic year.

Please be vigilant of the following when keeping inventory records:

16. A separate entry is required for each piece of equipment purchased (including computers and other electronic devices) (Note: This does not apply to supplies, textbooks, or computer software.)
17. There should be continuous updating of your inventory record, as changes occur (e.g., new inventory is purchased, inventory is distributed to staff, inventory is loaned to an individual or department, inventory is disposed of, etc.).

18. A proper format should be used and complete information should be recorded for each item.
19. Inventory records for each type of property (supplies, equipment, textbooks, and computer software) listing all of the items should be printed periodically as working copies. The most recent document should be kept on file. The final version of the year, produced immediately prior to the annual inventory deadline, must be printed and then signed and dated by the Director, confirming its accuracy. This version must be maintained on file for a period of six years as described in [section 2.2](#) above.
20. Access to the inventory database should be limited to as few people as possible (for example, the Director and the IO) as to ensure accuracy and reduce the potential for misconduct.

#### 4. PROCEDURES

- Implementing the Physical Inventory

The Director through his/her IO should designate the person(s) to be specifically responsible for the counting and reporting operation. These staff members should be given every kind of cooperation including access to the previous year's inventory and access to areas where supplies or items of equipment are housed.

An update of the inventory records should be completed by mid- to late-April of each year (the exact date will be announced annually – in advance – in Directors' Weekly).

- Inventory of Equipment

After certifying receipt of an item at the site, the IO must add this to the appropriate section of the inventory database.

##### *Labeling Requirements*

Equipment must contain a serial number or another identifying number that must also be recorded in the inventory list. Labels, engravings or other markings on the equipment do not need to include fund source, cost, date or the other items required to be present on the full inventory list. Record internal and external serial numbers as well as any other identifying marks. You can mark items using electronic pencils or invisible markers that are visible only under special lighting. Every piece of equipment should be labeled and/or indelibly marked or otherwise permanently tagged with the words "Property of the Department of Education". Also included must be the site location and a serial number or other ID number to cross-reference the item to the inventory list. In some special situations, a vendor may not be able to engrave a piece of equipment. If so, it is suggested that the site purchase an engraving tool available at most hardware stores or acquire metallic identification tags.

The purpose of labeling is to “systematically deface” the equipment. This involves making

the equipment virtually un-saleable, such as by writing or engraving the school's name in a prominent place.

**Note:** Equipment does not need to include fund source, cost, date or the other items required to be present on the full inventory list.

### *Transfers of Equipment*

When a transfer is effected (for either tax levy or reimbursable equipment), the IO at the first (original) site must create a written record of the equipment to be transferred. This record, which should include the item(s) to be transferred as well as information about the recipient, should be printed and then signed by both the IO at the donating site and a representative at the recipient site upon transfer. This record will act as a receipt. A copy should be made of the signed record; the donating site shall keep the original and the recipient site should keep the copy. Each site must update their individual school inventory records accordingly, print a copy, and attach the receipt of transfer to the inventory. All previous printed working copies of the inventory can be discarded as they are now obsolete. The original site must keep this transfer information on file per the retention guidelines found in [section 2.2](#).

- Inventory of Supplies

A supply item is any article or material that is consumed in use, loses its original identity with use, is cheaper to replace than to repair, and is too inexpensive to capitalize.

Since the supplies inventory is perpetual, a good deal of the work can be done ahead of time and a random sampling will suffice. However, a careful count must be made if there is a glaring discrepancy between inventory records and actual quantities on hand.

- Inventory of Textbooks

For the sake of consistency, the physical inventory of copyrighted teaching materials – whether printed or electronic – should be done no later than mid- to late-April of each year . Any item of which there

are fewer than ten (10) copies need not be noted. Since most of the books are in classroom use at the time of the inventory or are being stored in closets, storerooms, basements, and file cabinets throughout the school, the administrator and/or designee must count heavily on the teacher's record keeping.

Every published book has an ISBN (International Standard Book Number) that is a unique form of identification. Using this number will assure the person taking the inventory that there are no duplications or omissions.

Each ISBN requires its own record in the inventory database.

The textbook inventory database should contain the following information:

1. Title of Publication
2. ISBN Number
3. Author
4. Publisher
5. Year
6. Price
7. Quantity
8. Funding Source
9. Subject and/or Grade
10. Stored Book Room Number
11. Date Received
12. Quantity on Hand (Storeroom)
13. Date Distributed
14. Quantity Distributed
15. Recipient of Distribution (Name and/or Room Number)

16. Grade of Distribution

17. Name of Recipient

18. Date Returned

19. Quantity Returned

20. Book Condition (New, Good/Usable, or Old)

21. Date of Loss

22. Comments

The annual physical inventory of textbooks should be completed prior to implementing procedures for redistribution of excess textbooks.

o Inventory of Computer Software

Licensed computer software must also be inventoried. The inventory database should contain the following information:

1. Product Name
2. Version Number
3. Publisher
4. Year
5. Price per License
6. License Expiration Date
7. Quantity
8. Funding Source
9. Software Type (Administrative or Instructional)
10. Subject and/or Grade (if applicable)
11. Date Received
12. Quantity on Hand
13. Date Distributed
14. Recipient of Distribution (Name and/or Room Number)
15. Grade of Distribution (if applicable)
16. Comments

- Preparing the Annual Inventory

In advance of the annual inventory confirmation deadline, ensure that inventory records for each category of property ((i.e., equipment, supplies, textbooks, computer software, as applicable) are up-to-date.

Once the inventory records are updated to reflect changes from the prior year, a copy of each inventory must be printed. The Director of the school or office (e.g., the Director or executive director) must sign and date the printed copy for each inventory category, as applicable, and filed locally at the school or office. These records must be maintained for a period of six years from the date the signature was collected.

- Maintaining Inventory Records

As changes are made to your existing inventory throughout the year, the following steps must be taken immediately:

1. Complete a new database entry for any required item that is not noted in the current inventory.
2. Investigate and report any missing or stolen items per instructions in section 3.9.
3. Update inventory entries to reflect any changes in the status of the items.
4. If an item is in need of repair, enter this information into the inventory record. Make all necessary repairs immediately and update item's condition in the database. (A vendor's receipt for equipment sent for repair should be maintained in a file until the equipment is repaired and returned).
5. Designate obsolete or unusable supplies or equipment or excess textbooks for removal or destruction.

- Missing or Stolen Items

If, in comparing the current inventory results with that of previous year's, it appears that an item (supplies, equipment or textbooks) is missing, the site IO is responsible for taking the following steps:

1. Make every effort to locate the item in question.
2. Notify the Director, Director, or head of department if the item cannot be located.
3. Ensure that the inventory database reflects the loss, and a printed copy reflecting the loss is retained on file per the chart in [section 2.2](#).
4. File a report with the local police precinct. The police precinct will assign you a complaint number (Police Department Docket Number) that must be noted in the inventory database. (The date when the item was noted missing as well as the date of the last inventory should also be noted in the database)
5. If a police report is submitted, the asset will be marked as stolen.

- Storing and Securing Inventory Items

The Director is responsible for implementing the appropriate internal controls to ensure that all inventories, including desk and laptop computers, are maintained in secured storage areas. The IO (if one was designated) is directly responsible for securing the storage areas.

To ensure compliance, the following guidelines should be used to establish policy and procedures:

1. Implement local policies and procedures to prevent unauthorized visitors from entering your DOE site.
  - Effective visitor identification procedures are in place;
  - Staff and students issue a friendly challenge to unidentified visitors; and
  - Clear and obvious signs are displayed providing direction for all visitors.

2. The Technology coordinator will have the responsibility of maintaining the

secure storage areas including the main office and technology storage closet and storage carts.

3. Storage areas should be chosen for maximum security. Consider storing inventory in one or more of the following:
  - Rooms with deadbolt locks, window grills, alarms, TV cameras and additional locking mechanisms. Keys and access codes should be changed often by selected personnel only
  - Rooms that are away from items or structures that can be used as ladders to gain access
  - Vaults or safes
4. Establish sign out procedures and policies for expensive equipment that will be used by students or staff outside of the building and periodically question whether such items have been returned.
5. Portable equipment such as computers and other electronic equipment should be returned to limited access and secure storage areas during summer months and long holidays.
6. Newly delivered equipment, especially computer equipment, should be stored in a secure area if site preparation has not yet been completed.
7. Delivery of all new computers must be planned for well in advance of the end of the school term to ensure that they are not the subject of a potential theft.
8. Advise the security staff in advance of the delivery dates of computers to ensure appropriate security upon delivery.
9. Expensive pieces of equipment (such as computers) should be permanently anchored/locked into place wherever feasible and cost effective.
10. Install alarms in the storage room.
11. Secure all mice and keyboards with cable ties.

12. Post notices to the effect that all equipment has been security marked.

- Distributing Equipment and Supplies

It is suggested that the contents of the inventory database and storage sites be reviewed periodically to make sure that all supplies and equipment are being fully utilized and that items are neither over nor under stocked. To avoid deterioration and obsolescence, inventory should be stored so that the oldest items are used first. Attention should be paid to the shelf life of items such as chemicals, toners, etc.

Upon distribution of any item, the inventory database must be updated to reflect the transfer of goods.

- Conducting a Final Inventory Due to Project End or Site Closure

When a project comes to an end or a site is closed, the Director has the responsibility for conducting a final inventory. This type of inventory should include furniture, computer equipment, etc. These records should be maintained at the respective site (provided the site will continue to be used by the DOE) as well as the site where the items are being relocated.

- Disposing of Obsolete Equipment Including Computer Equipment, Textbooks, and Furniture

Effective use of school and office building space, and consideration for the safety of personnel and students, requires the disposal of obsolete equipment and materials. Removal of such equipment may free up scarce space that can otherwise be used in a more efficient manner, such as for instructional purposes.

When faced with the decision of disposing of equipment when it is determined to be of no further use to the school or administrative office, fiscal responsibility for the expenditure of taxpayer dollars should be paramount. The objective is to achieve a return value if possible, or the most economical means of disposal.

o Classifying Obsolete Equipment (Other than Computer Equipment)

The way in which obsolete equipment is disposed of is determined by the equipment’s condition and/or relevance. The Director has the responsibility and authority to make this determination. S/he may classify the equipment into one of two categories:

1. Equipment that is unrepairable or not cost effective to repair (Category A)
2. Equipment that is technologically and/or educationally inappropriate for the site (but possibly usable and appropriate for another site) or a safety hazard to the site (Category B)

There may be occasions when the Director is unable to properly “classify” a particular piece of equipment due to a lack of technical expertise (e.g., non-working piano). In this case, the Director may secure specific technical assistance from a specialist in this area. When doing so, attempt to use a contracted vendor, thereby eliminating the need for bidding. If unable to do so, bidding is required.

The process for disposing of both Category A and Category B equipment (other than computer equipment) is as follows:

<b>Unrepairable/Not Cost Effective to Repair (Category A)</b>	<b>Technologically/Educationally Inappropriate for Site OR a Safety Hazard (Category B)</b>
<b>Process in Summary:</b> Attempt to sell the items to a salvage vendor or other commercial organization/business. If unsuccessful, discard the items.	<b>Process in Summary:</b> Advertise the equipment on the DOE website and sell if possible; if not possible, donate equipment or have it recycled

<ul style="list-style-type: none"> <li>• Remove and/or scratch over all Department of Education identifying information on the equipment prior to disposal.</li> <li>• Offer the item(s) <u>for sale</u> by contacting (verbally or in writing) at least three salvage vendors or other commercial organizations/businesses that may have use for the item. Request that the vendors respond in writing with their bid for the item within 10 business days.</li> </ul> <p><b><u>If responses ARE received within 10 business days:</u></b></p> <p>When an organization or business</p>	<ol style="list-style-type: none"> <li>1) Advertise the equipment for transfer (to another DOE office or school, governmental entity, or non-profit organization) or sale (to a commercial organization or business) by completing the <i>Disposition of Obsolete Equipment</i></li> <li>2) Award advertised items according to the priorities below: <ol style="list-style-type: none"> <li>a) DOE schools/offices within your district should be given <u>first priority</u>; instructional sites should be given priority over offices.</li> </ol> </li> </ol>
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submits responses, the Director/IO makes the award to the highest bidder. Upon receipt of the item(s), the awarded vendor issues a check payable to the Department of Education. If the site is a school, the Director/IO forwards the check to his/her respective Field Support Center who in turn will forward it, along with a completed Cash Receipts form (including the appropriate OTPS codes to be credited), to the Banking and Collections Unit within the Division of Financial Operations (DFO). If the site is a central or field office, the Director/IO forwards the check directly to the Banking and Collections Unit along with a completed Cash Receipts form.

**If responses are NOT received within 10 business days:**

You may appropriately discard the item by doing the following:

- Arrange with the custodian to have the item removed to an area for regular Sanitation Department pickup.
- Complete the *Disposition of Obsolete Equipment* form Print a

- b) DOE schools/offices within your borough should be given second priority; instructional sites should be given priority over offices.
- c) Other DOE schools/offices should be given third priority; instructional sites should be given priority over offices.

**A DOE School/Office Expresses Interest in the Item(s)**

If a school/site wants the item, the Director/IO should make provision for its delivery, or the requesting school/site should make provision for the pick-up of the item within five (5) business days after the closing date of the advertisement. It is the responsibility of the recipient to inspect the equipment. Both the donor and recipient sites must make certain that all inventory records are updated to reflect the change.

**A DOE School/Office Does Not Express Interest in the Item(s)**

If no interest is expressed by schools/sites within five (5) business days after the closing of the advertisement, the Director/IO must then offer the item(s) according to the priorities below:

<p>copy of the completed form and maintain in file with annual inventory records..</p> <ul style="list-style-type: none"> <li>• Remove item(s) from inventory list.</li> </ul>	<p>d) Other governmental entities (city, state, or federal agencies) should be given <u>fourth priority</u>. The entity must pick up the item within five business days after the close of the advertisement.</p> <p><b>A Government Entity Expresses Interest in the Item(s)</b></p> <p>If a government entity wants this equipment, the Director/IO should make provision for the pick-up of the items within five (5) business days after the closing date of the advertisement. The donor school/site must make certain that all inventory records are updated to reflect the change.</p> <p><b>A Government Entity Does Not Express Interest in the Item(s)</b></p> <p>If a governmental entity does not claim the equipment, it may be offered to a salvage</p>
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	<p>vendor or other commercial organization/business <u>for sale</u> according to the below:</p> <p>e) If no salvage vendors or commercial organizations/businesses responded to the advertisement, contact at least three such entities to attempt to sell the equipment. Request that the entities respond in writing with their bid for the item within ten business days.</p> <p>f) Sell equipment to the highest bidder. Bidder must issue a check made payable to Rainbow Dreams Early Learning Academy</p> <p>g) If the site is a school, forward the check to the respective Field Support Center (FSC) who will then forward it, along with a completed Cash Receipts form including the appropriate OTPS codes to be credited, to the Banking and Collections Unit within the Division of Financial Operations. If the site is a central or field office, the check can be forwarded directly to the Banking and Collections Unit along with the form.</p>
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If no interest is expressed by a salvage vendor or other commercial

organization/business, the item can be considered to have no value and may, at the discretion of the Director/IO, be disposed of by first offering it free of charge to a non-profit community organization who may have responded to the advertisement. If the organization wants the equipment, it must pick it up at its own expense.

- 3) Obtain a receipt for the transaction from the school, office, governmental entity, non-profit, or commercial organization and retain for audit purposes.

If no interest is expressed by a non-profit community organization, discard the item according to the following instructions:

	<ul style="list-style-type: none"> <li>• Remove and/or scratch over all Department of Education identifying information on the equipment prior to disposal.</li> <li>• Arrange with the custodian to have the item removed to an area for regular Sanitation Department pickup.</li> <li>• Remove item(s) from the inventory list.</li> </ul>
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○ Disposing of Obsolete Computer Equipment

The Department of Education (DOE) is required by federal and state law to appropriately recycle computer equipment. Improper disposal can result in substantial monetary penalties.

At the DOE, disposal and recycling may only be performed by the PCS vendors, who are contracted to perform this service. Under this contract, the PCS vendor is responsible for disposal, recycling, and EPA compliance. In addition, the PCS vendors guarantee the deletion of all DOE data on obsolete machines.

Once disposal is completed, the PCS vendor will certify that the equipment was disposed of in accordance with the contract and will provide the DOE’s Asset Management System the information to reflect these changes.

○ Disposing of Obsolete Textbooks

Each school must identify the individual(s) who will be responsible for the coordination of the removal of obsolete textbooks. This individual should be the IO, but may be another curriculum-oriented person.

Obsolete textbooks are to be recycled according to the following:

- **Softcover Books and Paper:** Outdated and no longer needed softcover books

can be placed in regular paper recycling at any time.

- **Small Amounts of Hardcover Books:** Outdated and no longer needed hardcover books must have the interior pages removed from the binding. The interior pages may then be placed in regular paper recycling. The hardcover bindings should be placed in the trash.

Please coordinate with your school's custodial staff to ensure that these materials are placed in receptacles in the correct location.

Remove item(s) from the inventory list.

- Disposing of Obsolete Furniture

While schools and offices are not required to conduct an annual inventory of furniture, Directors should be familiar with the procedures to follow in the event that disposal of furniture is necessary.

The Director is the individual responsible for determining whether furniture is no longer usable and therefore should be discarded. Prior to discarding, s/he should determine if the items can be used by another school, site, other governmental organization, or sold to a salvage vendor. If the Director believes this to be true, s/he should perform the following steps:

Advertise the items for transfer :

Award advertised items according to the priorities below:

- a) DOE schools/offices within your district should be given first priority; instructional sites should be given priority over offices.
- b) DOE schools/offices within your region should be given second priority; instructional sites should be given priority over offices.
- c) Other DOE schools/offices should be given third priority; instructional sites should be given priority over offices.

*A DOE School/Office Expresses Interest in the Item(s)*

If a school/site wants the item, the Director/IO should make provision for its delivery, or

the requesting school/site should make provision for the pick-up of the item within five (5) business days after the closing date of the advertisement. It is the responsibility of the recipient to inspect the equipment. Both the donor and recipient sites must make certain that all inventory records are updated to reflect the change.



- d) Other governmental entities (city, state, or federal agencies) should be given fourth priority. The entity must pick up the item within five business days after the close of the advertisement.

*A Government Entity Expresses Interest in the Item(s)*

If a government entity wants this equipment, the Director/IO should make provision for the pick-up of the items within five (5) business days after the closing date of the advertisement. The donor school/site must make certain that all inventory records are updated to reflect the change.

*A Government Entity Does Not Express Interest in the Item(s)*

If a governmental entity does not claim the equipment, it may be offered to a salvage vendor or other commercial organization/business for sale according to the below:

- e) If no salvage vendors or commercial organizations/businesses responded to the advertisement, contact at least three such entities to attempt to sell the equipment. Request that the entities respond in writing with their bid for the item within ten business days.
- f) Sell equipment to the highest bidder. The bidder must issue a check made payable to Rainbow Dreams Early Learning Academy.

Forward the check to the respective Field Support Center (FSC) who will then forward it, along with a completed Cash Receipts form which should include the appropriate OTPS codes to be credited, to the Banking and Collections Unit within the Division of Financial Operations for deposit.



Central and field offices should send any checks they receive directly to the Banking and Collections Unit along with the completed form.

- g) If no interest is expressed by a salvage vendor or other commercial organization/business, the item can be considered to have no value and may, at the discretion of the Director/IO, be disposed of by first offering it free of charge to a non-profit community organization who may have responded to the advertisement. If the organization wants the equipment, it must pick it up at its own expense.

Obtain a receipt for the transaction from the school, office, governmental entity, non-profit, or commercial organization and retain for audit purposes.

Regardless of how the items are removed, a receipt of the transaction should be retained. If the items are transferred to another entity, moving expenses should be paid by the receiver of the items.

- o Adjusting Inventory Records after Disposal

It is also the responsibility of the Technology Coordinator to adjust inventory records to reflect the removal of the item from the site and submit the revised inventory to the Director of Compliance, Principal, and Office Manager for review and documentation.

- o Restrictions Concerning the Disposal of Obsolete Equipment



To avoid any conflict of interest or even the appearance of impropriety, obsolete equipment cannot be sold or given to Department of Education employees or their immediate families.

- Additional Notes about Disposing of Obsolete Equipment
  1. If the original cost of a piece of obsolete equipment was over \$35,000 at the time of purchase, it is considered part of the Department of Education's fixed asset inventory. The Director must notify the Division of School Facilities (DSF) for appropriate disposition instructions. The DSF must also be notified if the item to be disposed of is a motor vehicle.
  2. Circumstances may require that sites pay to have an obsolete item removed. For example, if an obsolete printing press weighing hundreds of pounds has to be removed by a commercial firm, it is an acceptable expense for the site to pay for its removal via the most cost-effective means. If this expense is expected to exceed \$250, standard bidding regulations apply.
  3. Two key forms are completed and submitted:

- *Annual Inventory Statement*

This form must be submitted no later than 30 days after the physical inventory has been taken (must be completed no later than mid- to late-April).

- *Disposition of Obsolete Equipment*

This form must be filed regardless of item classification or disposition. Keep a copy for your records.



**Records Retention**

**Purpose & Scope:**

To ensure proper retention and lawful disposal of institutional records in alignment with NRS, NAC, and SPCSA-specific requirements.

**Legal Requirements:**

- NAC 387.175 requires charter schools to retain Master Register of Enrollment and Attendance for 5 years, and Class Record Books for 2 years after school year end.
- Financial and administrative records must be retained for 3 fiscal years, with some exceptions (checks, meeting minutes).
- NRS 239.080 stipulates official records may only be destroyed per approved retention schedule.

**Records Retention Schedule Summary Table**

Record Type	Retention Period	Disposal Method	Date Reviewed	Next Review Due

**Retention Hold Log**

Record Type	Description	Start Date	Reason for Hold	Lift Date	Notes

**Rainbow Dreams Academy**  
**Balance Sheet**  
As of February 28, 2026

	Feb 28, 26
<b>ASSETS</b>	
<b>Current Assets</b>	
Checking/Savings	
101 · BoN-Operating 3281	364,143.95
<b>Total Checking/Savings</b>	364,143.95
Accounts Receivable	
153 · Accounts Receivable	252,224.54
<b>Total Accounts Receivable</b>	252,224.54
<b>Other Current Assets</b>	
181 · Prepaid Expense	32,215.94
9900 · Petty Cash	150.00
<b>Total Other Current Assets</b>	32,365.94
<b>Total Current Assets</b>	648,734.43
<b>Fixed Assets</b>	
241-1 · Equipment	259,111.13
241-2 · Leasehold Improvements	279,554.00
241-3 · Furniture & Fixtures	88,810.98
242-1 · Accumulated Depreciation	(563,299.83)
<b>Total Fixed Assets</b>	64,176.28
<b>Other Assets</b>	
191 · Security Deposits	20,000.00
192 · Deferred Outflow - Pension Cont	1,173,582.00
199-1 · ROU Asset Operating Lease	
199-2 · ROU - Accumulated Amortization	(782,114.92)
199-1 · ROU Asset Operating Lease - Other	2,842,927.00
<b>Total 199-1 · ROU Asset Operating Lease</b>	2,060,812.08
<b>Total Other Assets</b>	3,254,394.08
<b>TOTAL ASSETS</b>	<b>3,967,304.79</b>
<b>LIABILITIES &amp; EQUITY</b>	
<b>Liabilities</b>	
<b>Current Liabilities</b>	
Accounts Payable	
421 · Accounts Payable	127,556.05
<b>Total Accounts Payable</b>	127,556.05
Credit Cards	
421-1 · Bank of Nevada 4076	(352.31)
421-2 · American Express - 2003	1,769.94
<b>Total Credit Cards</b>	1,417.63
<b>Other Current Liabilities</b>	
2059 · Due to RDELA	42,600.66
451 · Other Liabilities	
Accrued Expenses	5,700.00
<b>Total 451 · Other Liabilities</b>	5,700.00
461 · Payroll Liabilities	
Accrued Payroll Liability	162,500.15
461 · Payroll Liabilities - Other	87,874.68
<b>Total 461 · Payroll Liabilities</b>	250,374.83
<b>Total Other Current Liabilities</b>	298,675.49
<b>Total Current Liabilities</b>	427,649.17
<b>Long Term Liabilities</b>	
473 · Net Pension Liability	2,137,113.00
481 · Deferred Inflows -Pension Relat	928,538.00
531 · Capital Lease Obligation - Long	
452 · ROU Lease Liability - Current	(536,189.31)
531 · Capital Lease Obligation - Long - Other	2,931,995.00
<b>Total 531 · Capital Lease Obligation - Long</b>	2,395,805.69
<b>Total Long Term Liabilities</b>	5,461,456.69
<b>Total Liabilities</b>	5,889,105.86
<b>Equity</b>	
740 · Net Assets Cap Assets	9,930.00
750 · Committed Net Position	15,477.00
760 · Net Assets	(1,841,797.17)
Net Income	(105,410.90)
<b>Total Equity</b>	(1,921,801.07)
<b>TOTAL LIABILITIES &amp; EQUITY</b>	<b>3,967,304.79</b>

**Rainbow Dreams Academy**  
**Profit & Loss**  
July 2025 through February 2026

	<u>Jul '25 - Feb 26</u>
<b>Ordinary Income/Expense</b>	
<b>Income</b>	
<b>CCSD Pass Thru Funding</b>	
4500.01 · Food Services Revenue	32,345.48
<b>Total CCSD Pass Thru Funding</b>	<u>32,345.48</u>
<b>Donations</b>	
1900.08 · Gifts - In-Kind	200,668.97
Donations - Other	114,044.07
<b>Total Donations</b>	<u>314,713.04</u>
<b>State Resources</b>	
<b>3100 · Unrestricted State Grants</b>	
3110.01 · PCFP Revenue	385,585.39
3110.02 · PCFP - English Learners	16,948.64
3110.03 · PCFP - At Risk	10,985.36
3115.01 · SPED DSA Funding	9,964.21
3115.02 · PCFP - Local Special Ed	27,089.36
<b>Total 3100 · Unrestricted State Grants</b>	<u>450,572.96</u>
<b>3200 · Restricted State Grants</b>	
3200.15 · AB398 Teacher Raises	33,873.81
3200.30 · ECILP	0.00
3200.31 · Nevada Ready State Pre-K	0.00
<b>Total 3200 · Restricted State Grants</b>	<u>33,873.81</u>
<b>Total State Resources</b>	484,446.77
4295 · Management Fee Income	41,447.70
4500 · Federal Pass-through	
639 · SPED IDEA Part B Grant	5,750.00
<b>Total 4500 · Federal Pass-through</b>	<u>5,750.00</u>
<b>Total Income</b>	<u>878,702.99</u>
<b>Gross Profit</b>	878,702.99
<b>Expense</b>	
Total 1000.00 · Instruction Expense	349,146.94
Total 2100.00 · Support Services - Student	84,168.62
Total 2200.00 · Support Services - Instruction	1,225.51
Total 2300.00 · Support Svcs - General Admin	84,287.24
Total 2400.00 · Supportive Svcs - School Admin	21,364.27
Total 2500.00 · Central Services	65,049.89
Total 2600.00 · Operations & Maint of Facility	56,973.06
Total 3100.00 · Food & Nutrit Svcs.	59,601.19
Total 5000.00 · Debt Service	257,267.90
<b>Total Expense</b>	<u>979,084.62</u>
<b>Net Ordinary Income</b>	(100,381.63)
<b>Other Income/Expense</b>	
<b>Other Expense</b>	
00.790 · 2600.Depreciation	5,029.27
<b>Total Other Expense</b>	<u>5,029.27</u>
<b>Net Other Income</b>	(5,029.27)
<b>Net Income</b>	<u><u>(105,410.90)</u></u>