

NOTICE OF INTENDED ACTION

The Board of Directors of the Mount Pleasant Community School District will take action on the following policies at its next regular board meeting.

Board Policy Series 700 - See Attached Document

Written comments may be sent to Superintendent John Henriksen, 1515 East Monroe Street, Mt. Pleasant, Iowa 52641.

Proposed

Policy 700: Purpose of Noninstructional and Business Services

Status: ADOPTED

Original Adopted Date: 03/10/2022 | **Last Revised Date:** 09/05/2024 | **Last Reviewed Date:** 09/05/2024

This series of the board policy manual is devoted to the goals and objectives for the school district's noninstructional services and business operations that assist in the delivery of the education program. These noninstructional services include, but are not limited to, transportation, the school lunch program and financial services. The board, as it deems necessary, will provide additional noninstructional services to support the education program. To the extent a group of employees has a recognized collective bargaining unit, the provisions of the master contract regarding such topics shall prevail.

It is the goal of the board to provide noninstructional services and to conduct its business operations in an efficient manner.

Cross References

Code	Description
802.07	<u>Energy Conservation</u>

Policy 701.01: Depository of Funds

Status: ADOPTED

Original Adopted Date: 03/10/2022 | **Last Revised Date:** 12/19/2023 | **Last Reviewed Date:** 12/19/2023

Each year at its annual meeting, the board will designate by resolution the name and location of the Iowa located financial depository institution or institutions to serve as the official school district depository or depositories. The board will also designate the maximum amount which may be kept on deposit in each bank. This amount will be designated the first time a new depository is identified, and will be reviewed at least once every 5 years or when an increase or additional depository is needed. The amount stated in the resolution must be for all depositories and include all of the school district's funds.

It is the responsibility of the board secretary to include the resolution in the minutes of the meeting.

Legal Reference:	Iowa Code §§ 12C.2; 279.33
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I.C. Iowa Code	Description
Iowa Code § 12C.2	<u>Deposit of Public Funds - Approval</u>
Iowa Code § 279.33	<u>Directors - Powers and Duties - Annual Settlements</u>

Cross References

Code	Description
206.03	<u>Secretary (I, II)</u>
206.04	<u>Treasurer</u>
210.01	<u>Annual Meeting</u>
702	<u>Cash in School Buildings</u>
704.01	<u>Local - State - Federal - Miscellaneous Revenue</u>

Policy 701.02: Transfer of Funds

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Revised Date: 12/19/2023 | Last Reviewed Date: 12/19/2023

When the necessity for a fund has ceased to exist, the balance may be transferred to another fund or account by board resolution. School district monies received without a designated purpose may be transferred in this manner. School district monies received for a specific purpose or upon vote of the people may only be transferred, by board resolution when the purpose for which the monies were received has been completed. Voter approval is required to transfer monies to the general fund from the capital projects fund and debt service fund.

If all requirements for district use of funds under the Preschool Foundation Aid, Professional Development Supplement, Home School Assistance Program, Teacher Leadership Supplement or any discontinued fund have been met and funds remain unexpended and unobligated at the end of the fiscal year, the district may transfer all or a portion of remaining funds by passage of a board resolution into the district's flexibility account in accordance with law. Before the expenditure of amounts in the flexibility account, the district shall publish notice of the time, date, and place of a public hearing on the proposed resolution approving said expenditures. The board must find and certify that the statutory requirements of each original source of funds have been met before adopting the resolution approving the expenditures. The district will present a copy of the signed board resolution to the Department of Education.

The District may transfer by board resolution from the general fund to the student activity fund an amount needed to purchase or refurbish protective and safety equipment required for any extracurricular interscholastic athletic contest or competition sponsored or administered by the Iowa High School Athletic Association of Iowa Girls High School Athletic Union.

If the before and after school program exceeds the amount necessary to operate the program, the excess amount may, following a public hearing, be transferred by resolution of the board of directors of the school corporation for deposit in the general fund of the school corporation to be used for school district general fund purposes. The district will present a copy of the signed board resolution to the Department of Education.

Beginning in FY 2024, unexpended and unobligated dollars that remain at the end of a fiscal year in addition to ongoing revenues may be transferred to the Teacher Salary Supplement (TSS) program from Professional Development Supplement (PDS), Talented and Gifted (TAG), and Teacher Leadership Supplement (TLS) without board action.

The district may choose to request approval from the School Budget Review Committee to transfer funds to make a program whole, prior to its elimination.

Temporary transfers (loans) of funds are permitted between funds but must be repaid to the originating fund, with interest, by Oct. 1 following the end of the fiscal year.

It is the responsibility of the board secretary to make recommendations to the board regarding transfers and to provide the documentation justifying the transfer.

Legal Reference:	Iowa Code §§ 24.21-.22; 257.10, 279.8; 279.42; 298A. 289 I.A.C. 6
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I.C. Iowa Code	Description
Iowa Code § 24	<u>Local Budgets</u>
Iowa Code § 257.10	<u>District Cost Per Pupil</u>
Iowa Code § 279.42	<u>Directors - Powers and Duties-Gifts to Schools</u>
Iowa Code § 279.8	<u>Directors - General Rules - Bonds of Employees</u>
Iowa Code § 298A	<u>School District Fund Structure</u>
I.A.C. Iowa Administrative Code	Description
289 I.A.C. 6	<u>School Budget Review - Duties and Procedures</u>

Cross References

Code	Description
701.03	<u>Financial Records</u>
704.02	<u>Debt Management</u>
704.02-R(1)	<u>Debt Management - Post-Issuance Compliance Regulation for Tax-Exempt Obligations</u>

Policy 701.04: Governmental Accounting Practices & Regulations **Status: ADOPTED**

Original Adopted Date: 03/10/2022 | Last Revised Date: 12/19/2023 | Last Reviewed Date: 12/19/2023

School district accounting practices will follow state and federal laws and regulations, generally accepted accounting principles (GAAP) and the uniform financial accounting system provided by the Iowa Department of Education. As advised by the school district's auditor, determination of liabilities and assets, prioritization of expenditures of governmental funds and provisions for accounting disclosures shall be made in accordance with governmental accounting standards.

In Governmental Accounting Standards Board (GASB) Statement No. 54, the board identifies the order of spending unrestricted resources applying the highest level of classification of fund balance - restricted, committed, assigned, and unassigned - while honoring constraints on the specific purposes for which amounts in those fund balances can be spent. A formal board action is required to establish, modify and or rescind a committed fund balance. The resolution will state the exact dollar amount. In the event, the board chooses to make changes or rescind the committed fund balance, formal board action is required.

The Board authorizes the Business Manager to assign amounts to a specific purpose in compliance with GASB 54. An 'assigned fund balance' should also be reported in the order of spending unrestricted resources, but is not restricted or committed.

Fund Balance Reporting

Financial reporting for the balances in the District's governmental funds is based on Governmental Accounting Standards Board (GASB) Statement 54, Fund Balance Reporting and Governmental Fund Types Definitions. Fund balance refers to the difference between assets and liabilities in the governmental funds balance sheets. GASB 54 established a hierarchy that is based on "the extent to which the government is bound to honor constraints on the specific purpose for which the amounts in those funds can be spent."

The governmental funds can have up to five fund balance classifications. The classifications are defined below from most to least restrictive.

Nonspendable Fund Balance includes amounts that cannot be spent because they are either not in spendable form, or legally or contractually required to be maintained intact. This includes items not expected to be converted to cash, including inventories and prepaid expenses. It may also include other property acquired for resale and the principal of a permanent fund.

Restricted Fund Balance should be reported when constraints placed on the use of resources are either externally imposed by creditors, grantors, contributors, or law or regulations of other governments; or imposed by law through constitutional provisions or enabling legislation. This includes "categorical balances."

Committed Fund Balance reflects specific purposes pursuant to constraints imposed by formal action of the board. Such constraints can only be removed or changed by board action.

Assigned Fund Balance reflects amounts that are constrained by the government's intent to be used for specific purposes but meet neither the restricted nor committed forms of constraint. Unless the amount is negative, the assigned fund balance is the residual classification for the governmental funds other than the general fund. If the amount is negative, then the residual amount is shown as unassigned.

Unassigned Fund Balance is the residual classification for the general fund only. As noted above, if a negative residual amount exists in other governmental funds then the amount is reported as unassigned.

It is the responsibility of the superintendent to develop administrative regulations implementing this policy. It is also the responsibility of the superintendent to make recommendations to the board regarding fund balance designations.

Legal Reference:	Iowa Code §§ 257.31(4); 279.8; 297.22-.25; 298A.
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I.C. Iowa Code

Iowa Code § 257.31

Iowa Code § 279.8

Iowa Code § 297

Iowa Code § 298A

Description

Finance Program - Committee

Directors - General Rules - Bonds of Employees

School Houses/Sites

School District Fund Structure

Cross References

Code

701.03

Description

Financial Records

Policy 701.05: Fiscal Management

Status: ADOPTED

Original Adopted Date: 01/26/2023 | Last Reviewed Date: 01/26/2023

The Board recognizes its fiduciary responsibility to oversee the management of school district funds in keeping with the school district vision, mission and goals. To achieve this purpose, the board may engage in learning about the financial needs, operations and requirements of the district as appropriate for the board's understanding of the district's financial position.

After the fiscal year has closed, the Superintendent or their designee will provide to the Board concise, timely, well organized financial data. The Board will exercise its oversight responsibilities by reviewing relevant PK-12 public education sector indicators to understand the financial trends of the district.

Providing the best possible educational experience for all students and meeting federal, state, and local academic goals for each student requires maximizing General Fund resources for use in the instructional program. The board may request from the School Budget Review Committee (SBRC) additional modified spending authority (MSA) where it may be available for items such as:

- Special education deficit balances
- Advances to support increasing student enrollment
- Supports for students identified as English Learners
- At risk / dropout prevention programming
- Initial staffing associated with opening new buildings or programs
- Any other lawful purpose

Any award of modified supplement amount will be levied as a cash reserve based on the recommendation of the superintendent/designee and approved by the Board of Education in keeping with the fiscal management performance measures provided for in district policy.

Legal Reference: *Iowa Code §§ 257.7, 31; 279.8*

I.C. Iowa Code

Description

Iowa Code § 257.31

Finance Program - Committee

Iowa Code § 279.8

Directors - General Rules - Bonds of Employees

Iowa Code § 257.7

Authorized Expenditures

Regulation 701.05-R(1): Fiscal Management - Financial Metrics

Status: ADOPTED

Original Adopted Date: 01/26/2023 | Last Revised Date: 10/26/2023 | Last Reviewed Date:
10/26/2023

The following relevant PK-12 public sector indicators will be provided to the Board annually to better understand the financial trends of the district. These indicators will be an accurate depiction as of June 30th of the preceding fiscal year and will depict at a minimum:

- Total revenues and expenditures by fund and major sources;
- Financial Solvency Ratio - assigned plus unassigned fund balances divided by total revenue minus AEA flow through;
- Unspent Authorized Budget - amount of maximum spending authority left at year end after deducting the general fund expenditures incurred during the year;
- Enrollment Trend - funding follows the student so it is important to understand district enrollment numbers;
- Staff costs as a percent of total general fund.

Financial Projections

Financial projections of the general fund will be prepared and updated annually. The general fund is the operating fund of the district where the majority of salaries and benefits are funded. Projections will help the board determine sustainability of the annual operating budget and help make future budgetary decisions.

The District is committed to utilizing the following financial metrics in determining district financial goals:

1. Unspent Authorized Budget Ratio: Maintain unspent authorized budget ratio within 10%-20% of Current Year Authority (CYA). The current year's projected balance will be discussed with the Board before staffing and other spending decisions are finalized for the succeeding year.
2. Solvency Ratio: Maintain an unrestricted, uncommitted general fund balance within 7%-17% of annual revenue. The current year's projected balance will be discussed with the Board before establishing the succeeding year's cash reserve levy and before staffing and other spending decisions are finalized.
 - The district will measure attainment of these goals as of June 30, but only after completion of the Certified Annual Report.

Policy 702: Cash in School Buildings

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Reviewed Date: 03/10/2022

The amount of cash that may be kept in a school building for any one day is sufficient for that day's operations.

A minimal amount of cash is kept in the central administration office at the close of the day. Excess cash is deposited in the authorized depository of the school district.

It is the responsibility of the superintendent or the superintendent's designee to develop administrative regulations to determine the amount of cash necessary for each day's operations, to establish any necessary petty cash accounts, to determine how often deposits must be made and to comply with this policy.

Legal Reference:	Iowa Code § 279.8
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I.C. Iowa Code	Description
Iowa Code § 279.8	<u>Directors - General Rules - Bonds of Employees</u>

Cross References

Code	Description
701.01	<u>Depository of Funds</u>

Policy 703.01: Budget Planning

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Revised Date: 12/19/2023 | Last Reviewed Date: 12/19/2023

Prior to certification of the budget, the board will review the projected revenues and expenditures for the school district and make adjustments where necessary to carry out the education program within the revenues projected. The budget of the school district is the authority for the expenditures of the school district for the fiscal year for which the budget was adopted and certified. It is the responsibility of the superintendent to operate the school district within the budget.

A budget for the school district is prepared annually for the board's review. The budget will include the following:

- the amount of revenues to be raised by taxation;
- the amount of revenues from sources other than taxation;
- an itemization of the amount to be spent in each fund; and,
- a comparison of the amount spent and revenue received in each fund for like purposes in the two prior fiscal years.

It is the responsibility of the Director of Finance to prepare the budget for review by the board prior to the April 30 deadline each year. The District will provide all of the information necessary for the Proposed Property Tax Statement to the Department of Management by March 15.

Mailing of Proposed Property Tax Hearing Statements is completed by the county auditor by March 20. A public hearing notice for the Proposed Property Taxes shall be published not less than 10 days and not more than 20 days prior to the date of hearing. The hearing notice is published in a newspaper designated for official publication in the school district. The hearing notice must also be posted on the district website and district social media accounts on the same day it is published in the newspaper. The hearing on the Proposed Property Tax must be a unique and separate meeting and be the only item on the agenda.

Prior to the adoption of the proposed budget by the board, the public is apprised of the proposed budget for the school district. Prior to the adoption of the proposed budget by the board, members of the school district community will have an opportunity to review and comment on the proposed budget. A public hearing for the proposed budget of the board is held each year in sufficient time to file the adopted budget no later than April 30.

The proposed budget filed by the board with the board secretary and the time and place for the public hearing on the proposed budget is published in a newspaper designated for official publication in the school district. It is the responsibility of the board secretary to publish the proposed budget and public hearing information at least 10 but no more than 20 days prior to the public hearing.

The board will adopt and certify a budget for the operation of the school district to the county auditor by April 30. It is the responsibility of the board secretary to file the adopted and certified budget with the county auditor and the Iowa Department of Management.

The board may amend the budget for the fiscal year in the event of unforeseen circumstances. The amendment procedures will follow the procedures for public review and adoption of the original budget by the board outlined in these policies.

It is the responsibility of the superintendent and the board secretary to bring any budget amendments necessary to the attention of the board to allow sufficient time to file the amendment with the county auditor no later than May 31 of each year.

Legal Reference:	Iowa Code §§ 24; 257; 279.8; 297; 298; 618.
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I.C. Iowa Code	Description
Iowa Code § 24	<u>Local Budgets</u>
Iowa Code § 257	<u>Financing School Programs</u>
Iowa Code § 279.8	<u>Directors - General Rules - Bonds of Employees</u>
Iowa Code § 297	<u>School Houses/Sites</u>
Iowa Code § 298	<u>School Taxes and Bonds</u>
Iowa Code § 618	<u>Publications and Posting of Notices</u>

Cross References

Code	Description
214	<u>Public Hearings</u>

Policy 704.01: Local - State - Federal - Miscellaneous Revenue

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Revised Date: 03/28/2024 | Last Reviewed Date: 03/28/2024

Revenues of the school district are received by the board treasurer or their designee. Other persons receiving revenues on behalf of the school district will promptly turn them over to the board treasurer or their designee.

Revenue, from whatever source, is accounted for and classified under the official accounting system of the school district. It is the responsibility of the board treasurer to deposit the revenues received by the school district in a timely manner. School district funds from all sources will not be used for private gain or political purposes.

Tuition fees received by the school district are deposited in the general fund. The tuition fees for kindergarten through twelfth grade during the regular academic school year are set by the board based upon the superintendent's recommendation in compliance with current law.

The board may charge materials fees for the use or purchase of educational materials. Educational materials fees received by the school district are deposited in the general fund.

Rental fees received by the school district for the rental of school district equipment or facilities are deposited in the general fund. It is the responsibility of the superintendent to recommend to the board a fee schedule for renting school district property.

Proceeds from the sale of real property are placed in the physical plant and equipment levy (PPEL) fund. However, following a properly noticed public hearing, the board of directors may elect to deposit proceeds from the sale of real property or buildings into any fund under the control of the school corporation. Notice for the public hearing must be published in a newspaper of general circulation within the district not less than ten and no more than twenty days prior to the proposed public hearing. Notice of the public hearing must include the date, time and location of the public hearing, and a description of the proposed action. The proceeds from the sale of other school district property are placed in the general fund.

The board may claim exemption from the law prohibiting competition with private enterprise for the following activities:

- Goods and services directly and reasonably related to the educational mission;
- Goods and services offered only to students, employees or guests which cannot be provided by private enterprise at the same or lower cost;
- Use of vehicles for charter trips offered to the public, full- or part-time, or temporary students;
- Goods and services which are not otherwise available in the quantity or quality required by the school district;
- Telecommunications other than radio or television stations;

- Sponsoring or providing facilities for fitness and recreation;
- Food service and sales;
- Sale of books, records, tapes, software, educational equipment, and supplies.
- Items displaying the emblem, mascot, or logo of the district or that otherwise promote the identity of the District and its programs if sold on district property;
- Souvenirs and programs relating to events sponsored by or at the district if sold on district property; and
- Goods, products or professional services which are produced, created or sold incidental to the district's teaching, research, and extension missions.

It is the responsibility of the superintendent to bring to the board's attention additional sources of revenue for the school district.

Legal Reference:	Iowa Code §§ 12C; 23A; 24.9; 257.2; 279.8; 41; 282.2, .6, .24; 291.12, 297.9-.12, .22; 301.1.
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I.C. Iowa Code	Description
Iowa Code § 12C	<u>Deposit of Public Funds</u>
Iowa Code § 23A	<u>Noncompetition by Government</u>
Iowa Code § 24.9	<u>Notice of Hearings</u>
Iowa Code § 257.2	<u>Finance Programs Definitions</u>
Iowa Code § 279.8	<u>Directors - General Rules - Bonds of Employees</u>
Iowa Code § 282.2	<u>Attendance and Tuition - Offsetting Taxes</u>
Iowa Code § 282.24	<u>Attendance and Tuition - Fees</u>
Iowa Code § 282.6	<u>Attendance and Tuition - Tuition</u>
Iowa Code § 291.12	<u>Board Officers - Duties of Treasurer</u>
Iowa Code § 297	<u>School Houses/Sites</u>
Iowa Code § 301.1	<u>Textbooks - Adoption, Purchase, Sale</u>
Iowa Code § 279.41	<u>Schoolhouses and Sites Sold</u>

Cross References

Code	Description
701.01	<u>Depository of Funds</u>
705.04	<u>Expenditures for a Public Purpose</u>

Policy 704.02: Debt Management

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Revised Date: 03/22/2022 | Last Reviewed Date:
03/22/2022

DEBT LIMITS

Credit Ratings

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

Debt Limits

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

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

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

PURPOSES AND USES OF DEBT

Capital Planning

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

Capital Financing

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

- General Obligation Bonds
- General Obligation Capital Loan Notes
- Bond Anticipation Notes
- Revenue Anticipation Notes
- School Infrastructure Sales, Services and Use Tax Revenue Bonds
- Lease Purchase Agreements, including Certificates of Participation

Working Capital Financing

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

Refundings

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

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

DEBT STANDARDS AND STRUCTURE

Length of Debt

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

Debt Structure

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

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

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

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

Derivatives (including, but not limited to, interest rate swaps, caps, collars, corridors, ceiling and floor agreements, forward agreements, float agreements, or other similar financing arrangements),

zero-coupon or capital appreciation bonds are not allowed to be issued consistent with State law.

Decision Analysis to Issue Debt

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

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

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

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

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

DEBT ISSUANCE

Credit Enhancement

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

Costs and Fees

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

Method of Sale

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

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

Professional Service Providers

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

understanding of Iowa law as it relates to the issuance of the particular debt.

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

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

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

DEBT MANAGEMENT

Investment of Debt Proceeds

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

Arbitrage and Record Keeping Compliance

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

Federal tax compliance, record-keeping, reporting and compliance procedures shall include but not be limited to:

1. post-issuance compliance procedures (including proper use of proceeds, timely expenditure of proceeds, proper use of bond financed property, yield restriction and rebate, and timely return filing);
2. proper maintenance of records to support federal tax compliance;
3. investments and arbitrage compliance;
4. expenditures and assets;
5. private business use; and
6. designation of primary responsibilities for federal tax compliance of all bond financings.

Financial Disclosure

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

The Official Statements accompanying debt issues, Annual Audits, and Continuing Disclosure statements will meet the standards articulated by the Municipal Securities Rulemaking Board (MSRB), the Government Accounting Standards Board (GASB), the Securities and Exchange

Commission (SEC), Generally Accepted Accounting Principles (GAAP) and the Internal Revenue Service (IRS). The treasurer shall be responsible for ongoing debt disclosure as required by any Continuing Disclosure Certificate for any debt issue and for maintaining compliance with disclosure standards promulgated by state and federal regulatory bodies

Legal Reference:	Iowa Code §§ 74-76; 278.1; 298; 298A.
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I.C. Iowa Code	Description
Iowa Code § 278.1	<u>Power of Electors</u>
Iowa Code § 298	<u>School Taxes and Bonds</u>
Iowa Code § 298A	<u>School District Fund Structure</u>
Iowa Code § 74	<u>Public Obligation Warrants</u>
Iowa Code § 75	<u>Sale of Public Bonds</u>
Iowa Code § 76	<u>Public Bonds and Debt Obligations</u>

Cross References

Code	Description
701.02	<u>Transfer of Funds</u>

Regulation 704.02-R(1): Debt Management - Post-Issuance Compliance Status: ADOPTED
Regulation for Tax-Exempt Obligations

Original Adopted Date: 03/10/2022 | Last Reviewed Date: 03/10/2022

1. Role of Compliance Coordinator/Board Treasurer

The board treasurer shall:

- a. Be responsible for monitoring post-issuance compliance;
- b. Maintain a copy of the transcript of proceedings or minutes in connection with the issuance of any tax-exempt obligations and obtain records that are necessary to meet the requirements of this regulation;
- c. Consult with bond counsel, a rebate consultant, financial advisor, IRS publications and such other resources as are necessary to understand and meet the requirements of this regulation;
- d. Seek out training and education to be implemented upon the occurrence of new developments in the area and upon the hiring of new personnel to implement this regulation.

2. Financing Transcripts' Filing and Retention

The board treasurer shall confirm the proper filing of an IRS 8038 Series return and maintain a transcript of proceedings and minutes for all tax-exempt obligations issued by the school district including, but not limited to, all tax-exempt bonds, notes and lease-purchase contracts. Each transcript shall be maintained until 11 years after the tax-exempt obligation documents have been retired. The transcript shall include, at a minimum:

- a. Form 8038;
- b. Minutes, resolutions and certificates;
- c. Certifications of issue price from the underwriter;
- d. Formal elections required by the IRS;
- e. Trustee statements;
- f. Records of refunded bonds, if applicable;
- g. Correspondence relating to bond financings; and
- h. Reports of any IRS examinations for bond financings.

3. Proper Use of Proceeds

The board treasurer shall review the resolution authorizing issuance for each tax-exempt obligation issued by the school district and the school district shall:

- a. Obtain a computation of the yield on such issue from the school district's financial advisor;
- b. Create a separate Project Fund (with as many sub-funds as shall be necessary to allocate proceeds among the projects being funded by the issue) into which the proceeds of issue shall be deposited;

- c. Review all requisitions, draw schedules, draw requests, invoices and bills requesting payment from the Project Fund;
- d. Determine whether payment from the Project Fund is appropriate and, if so, make payment from the Project Fund (and appropriate sub-fund, if applicable);
- e. Maintain records of the payment requests and corresponding records showing payment;
- f. Maintain records showing the earnings on, and investment of, the Project Fund;
- g. Ensure that all investments acquired with proceeds are purchased at fair market value;
- h. Identify bond proceeds or applicable debt service allocations that must be invested with a yield-restriction and monitor the investments of any yield-restricted funds to ensure that the yield on such investments do not exceed the yield to which such investments are restricted;
- i. Maintain records related to any investment contracts, credit enhancement transactions and the bidding of financial products related to the proceeds.

4. Timely Expenditure and Arbitrage/Rebate Compliance

The board treasurer shall review the Tax-Exemption Certificate (or equivalent) for each tax-exempt obligation issued by the school district and the expenditure records provided in Section 2 of this regulation, above and shall:

- a. Monitor and ensure that proceeds of each such issue are spent within the temporary period set forth in such certificate;
- b. Monitor and ensure that the proceeds are spent in accordance with one or more of the applicable exceptions to rebate as set forth in such certificate if the school district does not meet the "small issuer" exception for said obligation;
- c. Not less than 60 days prior to a required expenditure date, confer with bond counsel and a rebate consultant, if the school district will fail to meet the applicable temporary period or rebate exception expenditure requirements of the Tax-Exemption Certificate. In the event the school district fails to meet a temporary period or rebate exception:
 - 1. Procure a timely computation of any rebate liability and, if rebate is due, file a Form 8038-T and arrange for payment of such rebate liability;
 - 2. Arrange for timely computation and payment of yield reduction payments (as such term is defined in the Code and Treasury Regulations), if applicable.

5. Proper Use of Bond Financed Assets

The board treasurer shall:

- a. Maintain appropriate records and a list of all bond financed assets. Such records shall include the actual amount of proceeds (including investment earnings) spent on each of the bond financed assets;
- b. Monitor and confer with bond counsel with respect to all proposed bond financed assets;
 - 1. management contracts;
 - 2. service agreements;
 - 3. research contracts;
 - 4. naming rights contracts;
 - 5. leases or sub-leases;
 - 6. joint venture, limited liability or partnership arrangements;
 - 7. sale of property; or
 - 8. any other change in use of such asset.

- c. Maintain a copy of the proposed agreement, contract, lease or arrangement, together with the response by bond counsel with respect to said proposal for at least three years after retirement of all tax-exempt obligations issued to fund all or any portion of bond financed assets; and
- d. Contact bond counsel and ensure timely remedial action under IRS Regulation Sections 1.141-12 in the event the school district takes an action with respect to a bond financed asset, which causes the private business tests or private loan financing test to be met.

6. General Project Records

For each project financed with tax-exempt obligations, the board treasurer shall maintain, until three years after retirement of the tax-exempt obligations or obligations issued to refund those obligations, the following:

- a. Appraisals, demand surveys or feasibility studies;
- b. Applications, approvals and other documentation of grants;
- c. Depreciation schedules;
- d. Contracts respecting the project.

7. Advance Refundings

The board treasurer shall be responsible for the following current, post issuance and record retention procedures with respect to advance refunding bonds. The board treasurer shall:

- a. Identify and select bonds to be advance refunded with advice from internal financial personnel and a financial advisor;
- b. Identify, with advice from the financial advisor and bond counsel, any possible federal tax compliance issues prior to structuring any advance refunding;
- c. Review the structure with the input of the financial advisor and bond counsel, of advance refunding issues prior to the issuance to ensure;
 - 1. that the proposed refunding is permitted pursuant to applicable federal tax requirements if there has been a prior refunding of the original bond issue;
 - 2. that the proposed issuance complies with federal income tax requirements which might impose restrictions on the redemption date of the refunded bonds;
 - 3. that the proposed issuance complies with federal income tax requirements which allow for the proceeds and replacement proceeds of an issue to be invested temporarily in higher yielding investments without causing the advance refunding bonds to become "arbitrage bonds"; and
 - 4. that the proposed issuance will not result in the issuer's exploitation of the difference between tax exempt and taxable interest rates to obtain a financial advantage nor overburden the tax exempt market in a way that might be considered an abusive transaction for federal tax purposes;
- d. Collect and review data related to arbitrage yield restriction and rebate requirements for advance refunding bonds. To ensure such compliance, the board treasurer shall engage a rebate consultant to prepare a verification report in connection with the advance refunding issuance. Said report shall ensure said requirements are satisfied;
- e. Whenever possible, purchase State and Local Government Series (SLGS) to size each advance refunding escrow. The financial advisor shall be included in the process of subscribing SLGS. To the extent SLGS are not available for purchase, the Board treasurer shall, in consultation with bond counsel and the financial advisor, comply with IRS regulations;

- f. Ensure, after input from bond counsel, compliance with any bidding requirements set forth by the IRS regulations to the extent as issuer elects to the purchase of a guaranteed investment contract;
- g. In determining the issue price for any advance refunding issuance, obtain and retain issue price certification by the purchasing underwriter at closing;
- h. After the issuance of an advance refunding issue, ensure timely identification of violations of any federal tax requirements and engage bond counsel in attempt to remediate same in accordance with IRS regulations.

8. Continuing Disclosure

The board treasurer shall assure compliance with each continuing disclosure certificate and annually, per continuing disclosure agreements, file audited annual financial statements and other information required by each continuing disclosure agreement. The board treasurer will monitor material events as described in each continuing disclosure agreement and assure compliance with material event disclosure. Events to be reported shall be reported promptly, but in no event not later than 10 business days after the day of the occurrence of the event. Currently, such notice shall be given in the event of:

- a. Principal and interest payment delinquencies;
- b. Non-payment related defaults, if material;
- c. Unscheduled draws on debt service reserves reflecting financial difficulties;
- d. Unscheduled draws on credit enhancements relating to the bonds reflecting financial difficulties;
- e. Substitution of credit or liquidity providers, or their failure to perform;
- f. Adverse tax opinions, the issuance by the Internal Revenue Service of proposed or final determinations of taxability, Notices of Proposed Issue (IRS Form 5701-TEB), or other material notices, or determinations with respect to the tax-exempt status of the bonds, or material events affecting the tax-exempt status of the bonds;
- g. Modifications to rights of Holders of the Bonds, if material;
- h. Bond calls (excluding sinking fund mandatory redemptions), if material and tender offers;
- i. Defeasances of the bonds;
- j. Release, substitution, or sale of property securing repayment of the bonds, if material;
- k. Rating changes on the bonds;
- l. Bankruptcy, insolvency, receivership or similar event of the Issuer;
- m. The consummation of a merger, consolidation, or acquisition involving the Issuer or the sale of all or substantially all of the assets of the Issuer, other than in the ordinary course of business, the entry into a definitive agreement to undertake such an action or the termination of a definitive agreement relating to any such actions, other than pursuant to its terms, if material; and
- n. Appointment of a successor or additional trustee or the change of name of a trustee, if material.

I.C. Iowa Code
Iowa Code § 278.1

Description
Power of Electors

Iowa Code § 298

School Taxes and Bonds

Policy 704.03: Investments

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Reviewed Date: 03/10/2022

School district funds in excess of current needs are invested in compliance with this policy. The goals of the school district's investment portfolio in order of priority are:

- To provide safety of the principal;
- To maintain the necessary liquidity to match expected liabilities; and
- To obtain a reasonable rate of return.

In making investments, the school district will exercise the care, skill, prudence and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use to meet the goals of the investment program.

School district funds are monies of the school district, including operating funds. "Operating funds" of the school district are funds which are reasonably expected to be used during a current budget year or within fifteen months of receipt. When investing operating funds, the investments must mature within three hundred and ninety-seven days or less. If, during the current budget year an amount of public funds will exceed operating funds by at least thirty-three percent, the amount of public funds that exceed operating funds by greater than thirty-three percent may be invested in certificates of deposit at federally insured depository institutions which mature within sixty-three months or less, in accordance with state and federal laws. When investing funds other than operating funds, the investments must mature according to the need for the funds.

The board authorizes the treasurer to invest funds in excess of current needs in the following investments.

- Interest bearing savings, money market, and checking accounts at the school district's authorized depositories;
- Iowa Schools Joint Investment Trust Program (ISJIT); and,
- Certificates of deposit and other evidences of deposit at federally insured Iowa depository institutions.

It is the responsibility of the treasurer to oversee the investment portfolio in compliance with this policy and the law.

The treasurer is responsible for reporting to and reviewing with the board at its regular meetings the investment portfolio's performance, transaction activity and current investments.

It is the responsibility of the superintendent to deliver a copy of this policy to the school district's depositories, auditor and outside persons doing investment business with the school district.

It will also be the responsibility of the superintendent, in conjunction with the treasurer, to develop a system of investment practices and internal controls over the investment practices. The

investment practices are designed to prevent losses, to document the officers' and employees' responsibility for elements of the investment process and address the capability of the management.

Legal Reference:	Iowa Code §§ 11.2, .6; 12.62; 12B.10; 10A; 12C; 22.1, .14; 28E.2; 257; 279.29; 283A; 285; 502.701; 633.123.
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I.C. Iowa Code	Description
Iowa Code § 11.2	<u>Annual Settlements</u>
Iowa Code § 11.6	<u>Audits of Governmental Subdivisions</u>
Iowa Code § 12.62	<u>Treasurer of State - Investments</u>
Iowa Code § 12B.10	<u>Public Funds Investment Standards</u>
Iowa Code § 12C	<u>Deposit of Public Funds</u>
Iowa Code § 22	<u>Open Records</u>
Iowa Code § 257	<u>Financing School Programs</u>
Iowa Code § 279	<u>Directors - Powers and Duties</u>
Iowa Code § 283A	<u>School Meal Programs</u>
Iowa Code § 285	<u>Transportation Aid</u>
Iowa Code § 28E.2	<u>Joint Exercise of Governmental Powers - Definitions</u>
Iowa Code § 502.701	<u>Uniform Securities Act - Public Joint Investment Trusts</u>
Iowa Code § 633.123	<u>Probate Code - Prudent Investments</u>
Iowa Code § 12B.10A	<u>Public Investment Maturity and Procedural Limitations</u>

Cross References

Code	Description
206.03	<u>Secretary (I, II)</u>
206.04	<u>Treasurer</u>

Policy 704.04: Gifts - Grants - Bequests

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Reviewed Date: 03/10/2022

The board believes gifts, grants, and bequests to the school district may be accepted when they will further the interests of the school district. The board will have sole authority to determine whether the gift furthers the interests of the school district.

Gifts, grants, and bequests accepted on behalf of the school district become the property of the school district. Gifts, grants, and bequests are administered in accordance with terms, if any, agreed to by the board.

Legal Reference:	Iowa Code §§ 279.42; 565.6.
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I.C. Iowa Code	Description
Iowa Code § 279.42	<u>Directors - Powers and Duties-Gifts to Schools</u>
Iowa Code § 565.6	<u>Gifts to Governmental Bodies</u>

Cross References

Code	Description
217	<u>Gifts to Board of Directors</u>
402.04	<u>Gifts to Employees</u>
508.01	<u>Class or Student Group Gifts</u>
704.06	<u>Fundraising Within the District</u>
704.06-R(1)	<u>Fundraising Within the District - Regulation</u>

Policy 704.05: Student Activities Fund

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Reviewed Date: 03/10/2022

Revenue raised by students or from student activities is deposited and accounted for in the student activities fund. This revenue is the property of and is under the financial control of the board.

Whether such revenue is collected from student contributions, club dues, and special activities or result from admissions to special events or from other fund-raising activities, all funds will be under the jurisdiction of the board and under the specific control of the superintendent's designee. They will be deposited in a designated depository and will be disbursed and accounted for in accordance with instructions issued by the superintendent.

It is the responsibility of the board secretary to keep student activity accounts up-to-date and complete.

Any unencumbered class or activity account balances will automatically revert to the activity fund when a class graduates or an activity is discontinued.

Legal Reference:	Iowa Code § 279.8
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I.C. Iowa Code
Iowa Code § 279.8

Description
Directors - General Rules - Bonds of Employees

Cross References

Code
705.04
705.04-R(1)

Description
Expenditures for a Public Purpose
Expenditures for a Public Purpose - Use of Public Funds
Regulation

Policy 704.06: Fundraising Within the District

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Revised Date: 03/28/2024 | Last Reviewed Date: 03/28/2024

Fundraising can foster a sense of community and pride in the school district through group efforts to accomplish a common goal. The school board believes fundraising campaigns can further the interests of the district. Care must be taken to help ensure fundraising efforts are done properly and safely to benefit the school community. The school board is responsible for approving all district affiliated and student fundraising. Any person or entity acting on behalf of the district and wishing to conduct a fundraising campaign for the benefit of the district shall begin the process by seeking prior approval from the board or its designee. Any fundraising efforts conducted using the district's resources, name, logos, symbols, or imagery will be conducted in accordance with all policies, regulations and rules for fundraising within the district.

District Affiliated Fundraising

There are times when the school board may decide to engage in district-affiliated fundraising efforts to benefit the school district. All district affiliated fundraising efforts will fulfill a public purpose and will not benefit only one single individual or family, except in unique circumstances pre-approved by the school board. The use of district owned resources to conduct fundraising efforts will be in accordance with all applicable laws and regulations and other relevant district policies and procedures.

Money or items raised by any district affiliated fundraising campaign will be the property of the district only upon acceptance by the board and will be used only in accordance with the terms for which they were given, as agreed to by the board.

Student Fundraising

Students may raise funds for school-sponsored events with the permission of the school board. The school board delegates to the Superintendent the authority to approve routine student fundraising as deemed appropriate. Collection boxes for school fund raising must have prior approval from the school board or its designee before being placed on school property. All funds generated from district-sponsored student fundraising will be placed in the district's student activity fund. The Superintendent will develop necessary regulations to ensure the safety and equity of student fundraising efforts.

Legal Reference:	<i>Senior Class of Pekin High School v. Tharp</i> , 154 N.W.2d 874 (Iowa 1967). Iowa Code §§ 279.8; 279.42; 565.6.
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Policy 705.01: Purchasing – Bidding

Status: ADOPTED

Original Adopted Date: 01/26/2023 | Last Reviewed Date: 01/26/2023

The board supports economic development in Iowa, particularly in the school district community. As permitted by law, purchasing preference will be given to Iowa goods and services from locally-owned businesses located within the school district or Iowa based companies if the cost and other considerations are relatively equal and meet the required specifications. However, when spending federal Child Nutrition Funds, geographical preference is allowed only for unprocessed agricultural food items as a part of response evaluation. Other statutory purchasing preferences will be applied as provided by law, including goals and reporting with regard to procurement from certified targeted small businesses, minority-owned businesses, and female-owned businesses.

Goods and Services

The board shall enter into goods and services contract(s) as the board deems to be in the best interest of the school district. It shall be the responsibility of the superintendent to approve purchases, except those requiring board approval as described below or as provided by in law. The superintendent may coordinate and combine purchases with other governmental bodies to take advantage of volume price breaks. Joint purchases with other political subdivisions will be considered in the purchase of equipment, accessories, or attachments with an estimated cost of \$50,000 or more.

Purchases for goods and services shall conform to the following:

- The superintendent shall have the authority to authorize purchases without prior board approval and without competitive request for proposals, quotations, or bids for goods and services up to \$25,000
- For goods and services costing at least \$25,001 and up to \$100,000 the superintendent shall receive proposals, quotations, or bids for the goods and services to be purchased prior to board approval. The quotation process may be informal, and include written or unwritten quotations.
- For goods and services exceeding, \$100,000 the competitive request for proposal (RFP) or competitive bid process shall be used and received prior to board approval. RFPs and bids are formal, written submissions via sealed process.

In the event that only one quotation or bid is submitted, the board may proceed if the quotation or bid meets the contract award specifications.

The contract award may be based on several cost considerations including, but not limited to the following:

- The cost of the goods and services being purchased;
- Availability of service and/or repair;
- The targeted small business procurement goal and other statutory purchasing preferences; and
- Other factors deemed relevant by the board.

The board may elect to exempt certain professional services contracts from the thresholds and procedures outlined above.

The thresholds and procedures related to purchases of goods and services do not apply to public improvement projects.

Public Improvements

The board shall enter into public improvement contract(s) as the board deems to be in the best interest of the school district. 'Public improvement' means "a building or construction work which is constructed under the control of a governmental entity and for which either of the following applies: (1) has been paid for in whole or in part with funds of the governmental entity; (2) a commitment has been made prior to construction by the governmental entity to pay for the building or construction work in whole or in part with funds of the governmental entity. This includes a building or improvement constructed or operated jointly with any public or private agency."

The district shall follow all requirements, timelines, and processes detailed in Iowa law related to public improvement projects. The thresholds regarding when competitive bidding or competitive quotations is required will be followed. Competitive bidding is required for public improvement contracts exceeding the minimum threshold stated in law. Competitive quotations are required for public improvement projects that exceed the minimum threshold amount stated in law, but do not exceed the minimum set for competitive bidding. The board shall approve competitive bids and competitive quotes. If the total cost of the public improvement does not warrant either competitive bidding or competitive quotations, the district may nevertheless proceed with either of these processes, if it so chooses.

The award of all contracts for the public improvement shall be awarded to the lowest responsive, responsible bidder. In the event of an emergency requiring repairs to a school district facility that exceed bidding and quotation thresholds, please refer to policy 802.03 - Emergency Repairs.

The district shall comply with all federal and state laws and regulations required for procurement, including the selection and evaluation of contractors. The superintendent or designee is responsible for developing an administrative process to implement this policy, including, but not limited to, procedures related to suspension and debarment for transactions subject to those requirements.

This is a mandatory policy.

NOTE: While Iowa law dictates threshold amounts for quotes and bids for public improvement projects, there is no such requirement for goods and services. The district has discretion in this area to set the amounts required for the purchasing process.

**Regulation 705.01-R(1): Purchasing – Bidding - Suspension and
Debarment of Vendors and Contractors Procedure**

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Reviewed Date: 03/10/2022

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

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

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

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

A non-Federal entity or applicant for a Federal award must disclose, in a timely manner, in writing to the Federal awarding agency or pass-through entity all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Non-Federal entities that have received a Federal award including the term and condition outlined in Appendix XII—Award Term and Condition for Recipient Integrity and Performance Matters are required to report certain civil, criminal, or administrative proceedings to SAM. Failure to make required disclosures can result in any of the remedies described in §200.338 Remedies for noncompliance, including suspension or debarment. (See also 2 CFR part 180, 31 U.S.C. 3321, and 41 U.S.C. 2313.) It is the responsibility of the Superintendent to timely report to the relevant federal or pass through agency any violations of federal criminal law involving fraud, bribery or gratuity potentially impacting a federal grant.

I.C. Iowa Code
Iowa Code § 26

Description
[Bidding](#)

Iowa Code § 285

[Transportation Aid](#)

Regulation 705.01-R(2): Purchasing – Bidding - Using Federal Funds in Procurement Contracts **Status: ADOPTED**

Original Adopted Date: 01/26/2023 | Last Reviewed Date: 01/26/2023

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

2 CFR Part 200, Subpart D Subsection §200.318 (c)(1)

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

2 CFR Part 200, Subpart D Subsection §200.320 (e)(1-4)

Procurement for contracts paid with federal funds may be conducted by noncompetitive (single source) proposals when one or more of the following circumstances apply: (1) the item is only available from a single source; (2) public exigency or emergency will not permit the delay resulting from competitive bids; (3) the Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the non-Federal entity; or (4) after solicitation of a number of sources, competition is inadequate.

2 CFR Part 200, Subpart D Subsection §200.321

The District will take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible. Affirmative steps must include: (1) placing such businesses on solicitation lists; (2) soliciting such businesses whenever they are potential sources; (3) when economically feasible, dividing contracts into smaller tasks or quantities to allow participation from such businesses; (4) establishing delivery schedules that encourage participation by such businesses; (5) when appropriate, utilizing the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and (6) requiring the primary contractor to follow steps (1) through (5) when subcontractors are used.

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

2 CFR Part 200 Appendix II

(A) Contracts for more than the simplified acquisition threshold currently set at \$150,000, which is

the inflation adjusted amount determined by the Civilian Agency Acquisition Council and the Defense Acquisition Regulations Council (Councils) as authorized by 41 U.S.C. 1908, must address administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, and provide for such sanctions and penalties as appropriate.

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

(C) Equal Employment Opportunity. Except as otherwise provided under 41 CFR Part 60, all contracts that meet the definition of "federally assisted construction contract" in 41 CFR Part 60-1.3 must include the equal opportunity clause provided under 41 CFR 60-1.4(b), in accordance with Executive Order 11246, "Equal

Employment Opportunity" (30 FR 12319, 12935, 3 CFR Part, 1964-1965 Comp., p. 339), as amended by Executive Order 11375, "Amending Executive Order 11246 Relating to Equal Employment Opportunity," and implementing regulations at 41 CFR part 60, "Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor."

(D) Davis-Bacon Act, as amended (40 U.S.C. 3141-3148). When required by Federal program legislation, all prime construction contracts in excess of \$2,000 awarded by non-Federal entities must include a provision for compliance with the Davis-Bacon Act (40 U.S.C. 3141-3144, and 3146-3148) as supplemented by Department of Labor regulations (29 CFR Part 5, "Labor Standards Provisions Applicable to Contracts Covering Federally Financed and Assisted Construction"). In accordance with the statute, contractors must be required to pay wages to laborers and mechanics at a rate not less than the prevailing wages specified in a wage determination made by the Secretary of Labor. In addition, contractors must be required to pay wages not less than once a week. The non-Federal entity must place a copy of the current prevailing wage determination issued by the Department of Labor in each solicitation. The decision to award a contract or subcontract must be conditioned upon the acceptance of the wage determination. The non-Federal entity must report all suspected or reported violations to the Federal awarding agency. The contracts must also include a provision for compliance with the Copeland "Anti-Kickback" Act (40 U.S.C. 3145), as supplemented by Department of Labor regulations (29 CFR Part 3, "Contractors and Subcontractors on Public Building or Public Work Financed in Whole or in Part by Loans or Grants from the United States"). The Act provides that each contractor or subrecipient must be prohibited from inducing, by any means, any person employed in the construction, completion, or repair of public work, to give up any part of the compensation to which he or she is otherwise entitled. The non-Federal entity must report all suspected or reported violations to the Federal awarding agency.

(E) Contract Work Hours and Safety Standards Act (40 U.S.C. 3701-3708). Where applicable, all contracts awarded by the non-Federal entity in excess of \$100,000 that involve the employment of mechanics or laborers must include a provision for compliance with 40 U.S.C. 3702 and 3704, as supplemented by Department of Labor regulations (29 CFR Part 5). Under 40 U.S.C. 3702 of the Act, each contractor must be required to compute the wages of every mechanic and laborer on the basis of a standard work week of 40 hours. Work in excess of the standard work week is permissible provided that the worker is compensated at a rate of not less than one and a half times the basic rate of pay for all hours worked in excess of 40 hours in the work week. The requirements of 40 U.S.C. 3704 are applicable to construction work and provide that no laborer or mechanic must be

required to work in surroundings or under working conditions which are unsanitary, hazardous or dangerous. These requirements do not apply to the purchases of supplies or materials or articles ordinarily available on the open market, or contracts for transportation or transmission of intelligence.

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

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

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

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

(J) See §200.322 Procurement of recovered materials.

§200.216 Prohibition on certain telecommunications and video surveillance services or equipment

(a) The district is prohibited from obligating or expending loan or grant funds to:

1. Procure or obtain;
2. Extend or renew a contract to procure or obtain; or
3. Enter into a contract (or extend or renew a contract) to procure or obtain equipment, services, or systems that uses covered telecommunications equipment or services as a substantial or essential component of any system, or as critical technology as part of any

system. As described in Public law 115-232, section 889, covered telecommunications equipment is telecommunications equipment produced by Huawei Technologies Company or ZTE Corporation (or any subsidiary or affiliate of such entities).

i. For purpose of public safety, security of government facilities, physical security surveillance of critical infrastructure, and other national security purposes, video surveillance and telecommunication equipment produced by Hytera Communications Corporation, Hangzhou Hikvision Digital Technology Company, or Dahua Technology Company (or any subsidiary or affiliate of such entities).

ii. Telecommunications or video surveillance services provided by such entities or using such equipment.

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

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

(c) See Public Law 115-232, section 889 for additional information.

(d) See also §200.471.

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I.C. Iowa Code

Iowa Code § 26

Description

Bidding

Iowa Code § 285

Transportation Aid

Iowa Code § 28E

Joint Exercise of Government Power

Iowa Code § 297

School Houses/Sites

Iowa Code § 301

Textbooks

Iowa Code § 73A

Public Contracts and Bonds

Iowa Code § 72.3

Divulging Contents of Sealed Bids

Iowa Code § 73

Preferences

I.A.C. Iowa Administrative Code

Description

261 I.A.C. 54

Economical Development - Iowa TSB Program

281 I.A.C. 43.25

Transportation - Purchasing

Policy 705.02: Credit and Procurement Cards

Status: ADOPTED

Original Adopted Date: 03/10/2022 | **Last Revised Date:** 04/20/2023 | **Last Reviewed Date:** 04/20/2023

Employees may use school district credit cards and/or procurement cards (p-cards) for the actual and necessary expenses incurred in the performance of work-related duties. Actual and necessary expenses incurred in the performance of work-related duties include, but are not limited to travel expenses related to professional development or fulfillment of required job duties, fuel for school district transportation vehicles used for transporting students to and from school and for school-sponsored events, payment of claims related to professional development of the board and employees, and other expenses required by employees and the board in the performance of their duties.

Employees and officers using a school district credit or procurement card must submit a detailed, itemized receipt in addition to a credit or procurement card receipt indicating the date, purpose and nature of the expense for each claim item. Failure to provide a proper receipt will make the employee responsible for expenses incurred. Those expenses are reimbursed to the school district no later than ten working days following use of the school district's credit or procurement card. In exceptional circumstances, the superintendent or board may allow a claim without proper receipt. Written documentation explaining the exceptional circumstances is maintained as part of the school district's record of the claim.

The school district may maintain a school district credit or procurement card for actual and necessary expenses incurred by employees and officers in the performance of their duties. The superintendent may maintain a school district credit or procurement card for actual and necessary expenses incurred in the performance of the superintendent's duties. The transportation director may maintain a school district credit or procurement card for fueling school district transportation vehicles in accordance with board policy.

It is the responsibility of the superintendent to determine whether the school district credit or procurement card use is for appropriate school business. It is the responsibility of the board to determine through the audit and approval process of the board whether the school district credit or procurement card used by the superintendent and the board is for appropriate school business.

The superintendent is responsible for developing administrative regulations regarding actual and necessary expenses and use of a school district credit or procurement card. The administrative regulations will include the appropriate forms to be filed for obtaining a credit or procurement card.

NOTE: This is a mandatory policy.

Policy 705.03: Payment for Goods and Services

Status: ADOPTED

Original Adopted Date: 03/10/2022 | **Last Reviewed Date:** 03/10/2022

The board authorizes the issuance payment of claims against the school district for goods and services. The board will allow the payment after the goods and services have been received and accepted in compliance with board policy.

The secretary will determine to the secretary's satisfaction that the claims presented to the board are in order and are legitimate expenses of the school district. It is the responsibility of the secretary to bring claims to the board.

The board president and board secretary may sign warrants by use of a signature plate or rubber stamp. If the board president is unavailable to personally sign warrants, the vice president may sign warrants on behalf of the president.

It is the responsibility of the superintendent to develop the administrative regulations regarding this policy.

Legal Reference:	<i>Love v. City of Des Moines</i> , 210 Iowa 90, 230 N.W. 373 (1930). Iowa Code §§ 279.8, .29, .30, .36; 291.12; 721.2(5). 281 I.A.C. 12.3(1).
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I.C. Iowa Code	Description
Iowa Code § 279	<u>Directors - Powers and Duties</u>
Iowa Code § 291.12	<u>Board Officers - Duties of Treasurer</u>
Iowa Code § 721.2	<u>Misconduct in Office - Nonfelonious</u>
I.A.C. Iowa Administrative Code	Description
281 I.A.C. 12.3	<u>Administration</u>
Case Law	Description
Love v. City of Des Moines	210 Iowa 90, 230 N.W. 373 (1930)

Cross References

Code	Description
705.04	<u>Expenditures for a Public Purpose</u>

Policy 705.03: Payment for Goods and Services

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Reviewed Date: 03/10/2022

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I.C. Iowa Code	Description
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Iowa Code § 291.12	<u>Board Officers - Duties of Treasurer</u>
Iowa Code § 721.2	<u>Misconduct in Office - Nonfelonius</u>
I.A.C. Iowa Administrative Code	Description
281 I.A.C. 12.3	<u>Administration</u>
Case Law	Description
Love v. City of Des Moines	210 Iowa 90, 230 N.W. 373 (1930)

Cross References

Code	Description
705.04	<u>Expenditures for a Public Purpose</u>

IASB Policy Reference Manual
IASB Policy Management Console

Policy 705.04: Expenditures for a Public Purpose

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Reviewed Date: 03/10/2022

The board recognizes that school district funds are public funds, and as such, should be used to further a public purpose and the overall educational mission of the school community. The district is committed to managing and spending public funds in a transparent and responsible manner. Prior to making a purchase with public funds, an individual should be comfortable defending the purchase/reimbursement to the taxpayers in the district. If the individual is uncomfortable doing so, the purchase may not fulfill a public purpose and additional guidance should be sought before the purchase is made.

Individuals who have concerns about the public purpose of a purchase or reimbursement should utilize the district's *Internal Controls* policy and regulation as a resource for questioning a purchase. Concerns should be reported to the superintendent and/or the board president.

The superintendent shall develop a process for approving expenditures of public funds. The board will review expenditures and applicable reports as necessary to ensure proper oversight of the use of public funds. To the extent possible, expenditures shall be pre-approved by the district prior to expending the funds. Purchases of food and refreshment for district staff, even within district, should comply with the district's *Employee Travel Compensation* policy, and all other applicable policies. All purchases/reimbursements shall comply with applicable laws, board policies and district accounting requirements.

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

Legal Reference:	Iowa Constitution Art. III, sec. 31; Iowa Code §§ 68A.505; 279.8; 721.2. 281 I.A.C. 98.70
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I.C. Iowa Code	Description
Iowa Code § 279.8	<u>Directors - General Rules - Bonds of Employees</u>
Iowa Code § 68A.505	<u>Campaign Finance - Use of Public Money</u>
Iowa Code § 721.2	<u>Misconduct in Office - Nonfelonious</u>
Iowa Constitution	<u>Iowa Constitution</u>
I.A.C. Iowa Administrative Code	Description

Regulation 705.04-R(1): Expenditures for a Public Purpose - Use of Public Funds Regulation Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Reviewed Date: 03/10/2022

The following is a list of examples organized by activity for what is allowable, or not allowable as a purchase/reimbursement using public funds. This regulation is intended as guidance and there may be situations that are not listed here. Any questions regarding the appropriateness of an expenditure should be submitted to administration prior to expending funds.

Reimbursements to an Individual

- **Use of Credit/Procurement Card:** All purchases through a district-owned credit or procurement card shall be pre-approved and comply with the district's policy 705.02 - *Credit and Procurement Cards*.
- **Mileage:** Individuals who are required to travel (other than to and from work) as part of fulfilling their job duties to the district shall be reimbursed for mileage costs in accordance with the requirements stated in the district's *Employee Travel Compensation* policy.
- **Travel accommodations:** Employees who are required to travel and stay overnight as part of fulfilling their job duties to the district shall be reimbursed for costs in accordance with the requirements stated in the district's *Employee Travel Compensation* policy.
- **Alcohol:** Alcohol is a personal expense and is never allowable for purchase or reimbursement using public funds.
- **Food/Refreshments:** The superintendent may determine that the serving of food or refreshments is appropriate for selected occasions.
- **Apparel/Personal Items:** Apparel and personal items including, but not limited to items such as t-shirts, hats, mugs, etc. provide personal benefit to individuals and are a personal expense. These items shall not be purchased or reimbursed with public funds.
- **Gifts:** Gift cards or gifts given to individuals are personal expenses and public funds should not be used (except for recognition/staff retirement, listed below) for these purposes. Voluntary collections from staff would be an acceptable way of purchasing gifts.
- **Retirement and Recognition Gifts:** Recognizing an employee or volunteer's years of dedication to educating the community and commitment to the district serves a public purpose by honoring individuals with a token gift, or honorarium, in recognition of their service. The same is true for individual awards, mementos, or items purchased in recognition of employee service to the district. These purchases may use public funds, provided the expenditures are modest and approved by the superintendent.
- **Honoraria:** District employees may at times receive an honorarium from an outside source as compensation for the employee's time devoted to preparing and delivering a presentation within the scope of their professional field. Honorariums may only be accepted by employees when the employee has used their personal time outside of their work for the

district to prepare and deliver the presentation. If the employee uses district time or resources to prepare or deliver a presentation, any honorarium shall be given to the district.

- Break Room Supplies: Microwaves, refrigerators, coffee pots and other similar equipment and supply items may be purchased with public funds for use in public reception areas and employee break rooms.

Staff Receptions

- Staff appreciation meals to recognize employee contributions and to promote communication and positive culture is allowable as a public expense.
- Hosting a group reception to honor all employees retiring from the district in a given school year is allowable as a public expense. Hosting a retirement reception provides a direct benefit to the community as an opportunity for the community to attend and honor the retiring employees' years of dedication and service to the district.

School/ Student Activity Banquets

- School/student activity banquets are typically a personal expense and will not be purchased or reimbursed with public funds unless the public purpose is submitted for review and pre-approved by the superintendent.

Memorial Gifts

- Memorial flowers to convey sympathy or congratulations are allowable as a public expense if they have been approved by the superintendent.
- Memorial gifts of any sort other than flowers and a card are a personal expense.

Student Incentives

- It is within the discretion of the building principal to authorize the purchase of awards holding a nominal value to commemorate the achievements of a student or group of students. These awards should be designed to reward behavior and values that exemplify the educational and community mission of the district. Awards should not be gift cards or other monetary awards.
- Flowers and decorations for school dances held as part of the district's student activity program are an allowable expense paid out of the student activity fund, provided the purchases are approved by the building principal.

Meetings

- To the extent possible, meetings which span normal meal times should be avoided.
- Meetings of the district's board of directors and board committees are made up of individuals who volunteer a large amount of their personal time to serve the needs of the school community. These meetings are also scheduled at time most convenient for the public, and often span normal meal hours. Food and refreshment purchased for board members is an acceptable use of public funds. The service of these unpaid volunteers directly benefits the entire school community. The superintendent has discretion to purchase/reimburse reasonable expenses for providing food and refreshment to these unpaid volunteers during these meetings.

Some expenditures will be considered personal expenses regardless of the context. These include purchase or reimbursement of alcohol, and personal items not included as retirement or memorial gifts listed above.

I.C. Iowa Code	Description
Iowa Code § 279.8	<u>Directors - General Rules - Bonds of Employees</u>
Iowa Code § 68A.505	<u>Campaign Finance - Use of Public Money</u>
Iowa Code § 721.2	<u>Misconduct in Office - Nonfelonius</u>
Iowa Constitution	<u>Iowa Constitution</u>
I.A.C. Iowa Administrative Code	Description
281 I.A.C. 98	<u>Education - Categorical Funding</u>
Iowa Constitution	Description
Iowa Constitution	Art. III, § 31
Cross References	
Code	Description
401.07	<u>Employee Travel Compensation</u>
704.01	<u>Local - State - Federal - Miscellaneous Revenue</u>
704.05	<u>Student Activities Fund</u>
705.01	<u>Purchasing – Bidding</u>
705.01-R(1)	<u>Purchasing – Bidding - Suspension and Debarment of Vendors and Contractors Procedure</u>
705.01-R(2)	<u>Purchasing – Bidding - Using Federal Funds in Procurement Contracts</u>
705.03	<u>Payment for Goods and Services</u>
707.05	<u>Internal Controls</u>
707.05-R(1)	<u>Internal Controls - Procedures</u>
905.01	<u>Community Use of School District Buildings & Sites & Equipment</u>
905.01-R(1)	<u>Community Use of School District Buildings & Sites & Equipment - Regulation</u>
905.01-R(2)	<u>Community Use of School District Buildings & Sites & Equipment - Fees Schedule</u>

Policy 706.01: Payroll Periods

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Revised Date: 03/28/2024 | Last Reviewed Date:
03/28/2024

The payroll period for the school district is monthly. Employees are paid on the 20th day of each month. If this day is a holiday, recess, or weekend, the payroll is paid on the last working day prior to the holiday, recess or weekend.

It is the responsibility of the board secretary to issue payroll to employees in compliance with this policy.

Legal Reference:	Iowa Code §§ 91A.
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I.C. Iowa Code
Iowa Code § 91A

Description
Wage Payment Collection

Cross References

Code
706.02

Description
Payroll Deductions

Policy 706.02: Payroll Deductions

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Revised Date: 03/28/2024 | Last Reviewed Date: 03/28/2024

Ease of administration is the primary consideration for payroll deductions, other than those required by law. Payroll deductions are made for federal income tax withholdings, Iowa income tax withholdings, federal insurance contributions, and the Iowa Public Employees' Retirement System (IPERS). In addition, any employee may elect to have payments withheld for district related and mutually agreed upon group insurance coverage and/or tax-sheltered annuity programs.

Written requests for the purchase of or a change in tax-sheltered annuities shall be on file in the payroll department thirty (30) days prior to the desired effective date. Requests for reductions in gross wages for contributions to tax-sheltered annuities shall conform to the standards of Internal Revenue Service, and all other governing and regulatory agencies in effect at the time of the request. Deductions for tax-sheltered annuities may be revoked thirty (30) days after receiving a written request from the employee.

The district may deduct wages as required or allowed by state or federal law or by order of the court of competent jurisdiction.

It is the responsibility of the superintendent or superintendent's designee to determine which additional payroll deductions will be allowed.

Payroll deduction requirements stated in the employee handbook, if any, will be followed.

Legal Reference:	Iowa Code §§ 91A.2(4), .3; 294.8-.9, .16.
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I.C. Iowa Code	Description
Iowa Code § 294	<u>Teachers</u>
Iowa Code § 91A.2	<u>Wage Payment Collection - Definitions</u>
Iowa Code § 91A.3	<u>Wage Payment Collection - Mode of Payment</u>

Cross References

Code	Description
406.05	<u>Licensed Employee Group Insurance Benefits (I, II)</u>
406.06	<u>Licensed Employee Tax Shelter Program</u>

Policy 706.03: Reduction in Employee Pay

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Reviewed Date: 03/10/2022

The district provides leaves of absences to allow employees to be absent from work to attend to important matters outside of the workplace. As public employers, school districts are expected to record and monitor the work that employees perform and to conform to principles of public accountability in their compensation practices.

Consistent with principles of public accountability, it is the policy of the district that, when an employee is absent from work for less than one work day and the employee does not use accrued leave for such absence, the employee's pay will be reduced or the employee will be placed on leave without pay if:

- the employee has not sought permission to use paid leave for this partial-day absence,
- the employee has sought permission to use paid leave for this partial-day absence and permission has been denied,
- the employee's accrued paid leave has been exhausted, or,
- the employee chooses to use leave without pay.

In each case in which an employee is absent from work for part of a work day, a deduction from compensation will be made or the employee will be placed on leave without pay for a period of time which is equal to the employee's absence from the employee's regularly scheduled hours of work on that day.

NOTE: *This is a mandatory policy.*

Legal Reference:	29 U.S.C. Sec. 2 13(a) 29 C.F.R. Part 541
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U.S.C. - United States Code

29 U.S.C. Sec. 2 13(a)

Description

Labor - Fair Labor Standards

C.F.R. - Code of Federal Regulations

29 C.F.R. Pt. 541

Description

Labor - Exemptions

Cross References

Code

Description

IASB Policy Reference Manual
IASB Policy Management Console

Policy 707.01: Presentation and Publication of Financial Information **Status: ADOPTED**

Original Adopted Date: 03/10/2022 | Last Revised Date: 03/28/2024 | Last Reviewed Date: 03/28/2024

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

At the annual meeting, the treasurer will give the annual report stating the amount held over, received, paid out, and on hand in the general and all other funds. This report is in written form and sent to the board with the agenda for the board meeting. The treasurer will also furnish the board with a statement from each depository showing the balance then on deposit. It is the responsibility of the treasurer to submit this report to the board annually.

The board secretary will report to the board each month about the receipts, disbursements and balances of the various funds. This report will be in written form and sent to the board with the agenda for the board meeting.

Following board approval, each month the schedule of bills allowed by the board is published in a newspaper designated as a newspaper for official publication. Annually, the total salaries paid to employees regularly employed by the school district will also be published in a newspaper designated as a newspaper for official publication. It is the responsibility of the board secretary to publish these reports in a timely manner.

Legal Reference:	Iowa Code §§ 279; 291.7; 618
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I.C. Iowa Code	Description
Iowa Code § 279	<u>Directors - Powers and Duties</u>
Iowa Code § 279.8	<u>Directors - General Rules - Bonds of Employees</u>
Iowa Code § 291.7	<u>Board Officers - Monthly Statements</u>
Iowa Code § 618	<u>Publications and Posting of Notices</u>

Cross References

Code	Description
206.03	<u>Secretary (I, II)</u>

IASB Policy Reference Manual
IASB Policy Management Console

Policy 707.04: Audit

Status: ADOPTED

Original Adopted Date: 03/10/2022 | **Last Revised Date:** 03/28/2024 | **Last Reviewed Date:** 03/28/2024

In accordance with state law, to review the funds and accounts of the school district, the board will employ an independent auditor certified in the state of Iowa to perform an annual audit of the financial affairs of the school district. The superintendent or designee will use a request for proposal procedure in selecting an auditor. The administration will cooperate with the auditors. Annual audit reports will be filed with the State Auditor and remain on file as permanent records of the school district.

This is a mandatory policy.

Legal Reference:	Iowa Code § 11.6
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I.C. Iowa Code
Iowa Code § 11.6

Description
Audits of Governmental Subdivisions

Policy 707.05: Internal Controls

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Reviewed Date: 03/10/2022

The board expects all board members, employees, volunteers, consultants, vendors, contractors, students and other parties maintaining any relationship with the school district to act with integrity, due diligence, and in accordance with all laws in their duties involving the school district's resources. The board is entrusted with public dollars and no one connected with the school district should do anything to erode that trust.

Internal controls are used to help ensure the integrity of district financial and accounting information. Adherence to district-established internal control procedures is the responsibility of all employees of the school district. The superintendent, business manager and board secretary shall be responsible for developing internal controls designed to prevent and detect fraud, financial impropriety, or fiscal irregularities within the school district subject to review and approval by the board. Administrators shall be alert for any indication of fraud, financial impropriety, or irregularity within the administrator's area of responsibility.

Any employee who suspects fraud, impropriety, or irregularity shall report their suspicions immediately to his/her immediate supervisor, and/or the superintendent, and/or the board president. The superintendent shall have primary responsibility for any necessary investigations and shall coordinate investigative efforts with the board's legal counsel, auditing firm, the Auditor of State's office and other internal or external departments and agencies, including law enforcement officials, as the superintendent may deem appropriate.

Employees bringing forth a legitimate concern about a potential impropriety will not be retaliated against and those who do retaliate against such an employee will be subject to disciplinary action up to, and including, discharge.

In the event the concern or complaint involves the superintendent, the concern shall be brought to the attention of the board president or vice-president, who shall be empowered to contact the board's legal counsel, Auditor of State's office, insurance agent, auditing firm, and any other agency to investigate the concern or complaint.

The superintendent or board president shall ensure the Auditor of State's office is notified as required by law of any suspected embezzlement, theft or other financial irregularity pursuant to Iowa law. The superintendent and/or board president in coordination with the Auditor of State's office, will determine whether to conduct a complete or partial audit. The superintendent is authorized to order a complete forensic audit if, in the superintendent's judgment, such an audit would be useful and beneficial to the school district. In the event there is an investigation, records will be maintained for use in the investigation. Individuals found to have altered or destroyed records will be subject to disciplinary action, up to and including termination.

This is a mandatory policy.

Regulation 707.05-R(1): Internal Controls - Procedures

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Reviewed Date: 03/10/2022

Fraud, financial improprieties, or fiscal irregularities include, but are not limited to:

- Forgery or unauthorized alteration of any document or account belonging to the district.
- Forgery or unauthorized alteration of a check, bank draft, or any other financial document.
- Misappropriation of funds, securities, supplies, or other assets.
- Impropriety in the handling of money or reporting of financial transactions.
- Profiteering because of "insider" information of district information or activities.
- Disclosing confidential and/or proprietary information to outside parties.
- Accepting or seeking anything of material value, other than items used in the normal course of advertising, from contractors, vendors, or persons providing services to the district.
- Destroying, removing, or inappropriately using district records, furniture, fixtures, or equipment.
- Failing to provide financial records to authorized state or local entities.
- Failure to cooperate fully with any financial auditors, investigators or law enforcement.
- Any other dishonest or fraudulent act involving district monies or resources.
- Acting for purposes of personal financial gain, rather than in the best interest of the district.
- Providing false, inaccurate or misleading financial information to district administrators or the board of directors.

The superintendent shall notify the State Auditor's office of any suspected fraud, embezzlement or financial irregularities as required by law. The district will comply with all investigation procedures and scope as directed by the State Auditor's office. All employees involved in the investigation shall be advised to keep information about the investigation confidential. The superintendent may engage qualified independent auditors to assist in the investigation.

If an investigation substantiates the occurrence of a fraudulent activity, the superintendent, or board president if the investigation centers on the superintendent, shall issue a report to the board and appropriate personnel. The results of the investigation shall not be disclosed to or discussed with anyone other than those individuals with a legitimate right to know until the results are made public.

I.C. Iowa Code

Iowa Code § 279.8

Description

Directors - General Rules - Bonds of Employees

Iowa Code § 11

Auditor of State

Cross References

Code

401.12

Description

Employee Use of Cell Phones

IASB Policy Reference Manual
IASB Policy Management Console

Policy 708: Care, Maintenance and Disposal of School District Records Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Revised Date: 09/25/2025 | Last Reviewed Date: 09/25/2025

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

Secretary's financial records	Permanently
Treasurer's financial records	Permanently
Open meeting minutes of the Board of Directors	Permanently
Annual audit reports	Permanently
Annual budget	Permanently
Permanent record of individual pupil	Permanently
School election results	Permanently
Real property records (e.g., deeds, abstracts)	Permanently
Records of payment of judgments against the school district	20 years
Bonds and bond coupons	11 years after maturity, cancellation, transfer, redemption, and/or replacement
Written contracts	11 years
Cancelled warrants, check stubs, bank statements, bills, invoices, and related record	5 years
Recordings and minutes of closed meetings	1 year

Program grants	As determined by the grant
Nonpayroll personnel records	7 years after leaving district
Payroll personnel records	3 years after leaving the district
Employment applications	2 years
Payroll records	3 years
School meal programs accounts/records	3 years after submission of the final claim for reimbursement
Records of complaints of sex discrimination, and conduct that reasonably may constitute sex discrimination, plus all responsive records and outcomes and training materials on this topic	7 years

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

Employees' records are housed in the central administration office of the school district. The employees' records are maintained by the superintendent, the building administrator, the employee's immediate supervisor, and the custodian of district records.

The permanent and cumulative records of students currently enrolled in the school district are housed in the central administration office of the attendance center where the student attends. Permanent records shall be housed in a fire resistant safe or vault or electronically with a secure backup file. The building administrator is responsible for keeping these records current. Permanent records of students who have graduated or are no longer enrolled in the school district are housed in the central administration office and will be retained permanently. These records will be maintained by the custodian of district records. Special education records shall be maintained in accordance with law.

The custodian of district records or their designee may digitize or otherwise electronically retain school district records and may destroy paper copies of the records. An electronic record which accurately reflects the information set forth in the paper record after it was first generated in its final form as an electronic record, and which remains accessible for later reference meets the same legal requirements for retention as the original paper record.

This is a mandatory policy.

Legal Reference:	7 C.F.R. § 210.23(c). 34 C.F.R. 106.8 Iowa Code §§ 22.3; 22.7; 91A.6; 279.8; 291.6; 554D.114; 554D.119; 614.1(13). 281 I.A.C. 12.3(4); 41.624. <u>City of Sioux City v. Greater Sioux City Press Club</u> , 421 N.W.2d 895 (Iowa 1988).
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I.C. Iowa Code

Iowa Code § 22.3

Description

Open Records - Supervision

Iowa Code § 22.7

Confidential Records

Iowa Code § 279.8

Directors - General Rules - Bonds of Employees

Iowa Code § 291.6

Board Officers - Duties of Secretary

Iowa Code § 554D.114

Records - Electronic - Retention

Iowa Code § 554D.119

Records - Electronic - Creation, Retention

Iowa Code § 614.1

Limitations of Action - Period

Iowa Code § 91A.6

Wage Payment Collection - Notice and Recordkeeping

I.A.C. Iowa Administrative Code

281 I.A.C. 12.3

Description

Administration

281 I.A.C. 41.624

Special Education - Information Procedures

C.F.R. - Code of Federal Regulations

34 C.F.R. 106.8

Description

Designation of Coordinator, dissemination of policy, and adoption of grievance procedures

Case Law

City of Sioux City v. Greater SC Press Club

Description

421 N.W.2d 895 (Iowa 1988)

Cross References**Code**

206.03

Description

Secretary (I, II)

215

Board of Directors' Records

215-E(1)

Board of Directors' Records - Board Meeting Minutes

Policy 709: Insurance Program

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Reviewed Date: 03/10/2022

The board will maintain a comprehensive insurance program to provide adequate coverage against major types of risk, loss, or damage, as well as legal liability. The board will purchase insurance at replacement values, when possible, after reviewing the costs and availability of such insurance. The comprehensive insurance program is reviewed once every three years. Insurance will only be purchased through legally licensed Iowa insurance agents.

The school district will assume the risk of property damage, legal liability, and dishonesty in cases in which the exposure is so small or dispersed that a loss does not significantly affect the operation of the education program or financial condition of the school district.

The board may retain a private organization for capital assets management services.

Administration of the insurance program, making recommendations for additional insurance coverage, placing the insurance coverage and loss prevention activities is the responsibility of the superintendent.

Legal Reference:	Iowa Code §§ 20.9; 85.2; 279.12, .28; 285.5(6), .10(6); 296.7; 298A; 517A.1; 670.7.
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I.C. Iowa Code	Description
Iowa Code § 20.9	<u>Collective Bargaining - Scope of Negotiations</u>
Iowa Code § 279.12	<u>Directors - Powers and Duties - teachers-insurance-leave</u>
Iowa Code § 285.10	<u>Transportation Aid - Powers and Duties of Local Boards</u>
Iowa Code § 285.5	<u>Transportation Aid - Contracts</u>
Iowa Code § 296.7	<u>Indebtedness of Schools Corporations - Tax Levies</u>
Iowa Code § 298A	<u>School District Fund Structure</u>
Iowa Code § 517A.1	<u>Liability Insurance - Authority to Purchase</u>
Iowa Code § 279.28	<u>Insurance-Supplies-Textbooks</u>
Iowa code § 670.7	<u>Insurance</u>
Iowa Code § 85.2	<u>Public Employees - Chapter Compulsory</u>

Policy 710.01: School Nutrition Program

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Revised Date: 06/18/2024 | Last Reviewed Date: 06/18/2024

The school district will operate a school nutrition program in each attendance center. The school nutrition program will include meals through participation in the National School Lunch Program. Students may bring their lunches from home and purchase milk and other incidental items.

School nutrition program facilities are provided to serve students and employees when school is in session and during school-related activities. They may also be used under the supervision of the Food Service Director for food service to employee groups, parent-teacher meetings, civic organizations meeting for the purpose of better understanding the schools, and senior citizens in accordance with law and board policy.

The school nutrition program is operated on a nonprofit basis. The revenues of the school nutrition program will be used only for the operation or improvement of such programs. Supplies of the school nutrition program will only be used for the school nutrition program.

The board will set, and annually review, the prices for school nutrition programs. It is the responsibility of the superintendent to make a recommendation regarding the prices of the school nutrition programs, in accordance with federal and state law.

It is the responsibility of the Food Service Director to administer the program and to cooperate with the superintendent and appropriate personnel for the proper functioning of the school nutrition program.

The district shall comply with all federal and state laws and regulations required for procurement, including the selection and evaluation of contractors. The superintendent or designee is responsible for developing an administrative process to implement this policy, including, but not limited to, procedures related to suspension and debarment for transactions subject to those requirements and prohibitions on purchasing food products misbranded as meat or egg products, or cultivated-protein food products in accordance with applicable laws.

NOTE: This is a mandatory policy.

Legal Reference:	42 U.S.C. §§ 1751 et seq., 7 C.F.R. Pt. 210 et seq., Iowa Code ch. 283A, 281 I.A.C. 58.
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Regulation 710.01-R(1): School Nutrition Program - School Nutrition Program Civil Rights Complaints Procedure **Status: ADOPTED**

Original Adopted Date: 05/05/2022 | Last Revised Date: 03/03/2026 | Last Reviewed Date: 03/03/2026

USDA Child Nutrition Programs in Iowa

Procedures for Handling a Civil Rights Complaint

1. Civil rights complaints related to the National School Lunch Program, School Breakfast Program, Afterschool Care Snack Program, Summer Food Service Program, Seamless Summer Option, or Child and Adult Care Food Program are written or verbal allegations of discrimination based on USDA protected classes of race, color, national origin, religion, sex, disability, age, marital status, family/parental status, income derived from public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity. .
2. Any person claiming discrimination has a right to file a complaint within 180 days of the alleged discrimination. See below for additional Iowa Civil Rights information. A civil rights complaint based on the protected classes listed in #1 above must be forwarded to the address on the nondiscrimination statement.
3. All complaints, whether written or verbal, must be accepted by the School Food Authority (SFA)/Sponsor/Organization and forwarded to USDA at the address or link on the nondiscrimination statement within 5 calendar days of receipt. An anonymous complaint should be handled the same way as any other. Complaint forms may be developed, but their use cannot be required. If the complainant makes the allegations verbally or in a telephone conversation and is reluctant or refuses to put them in writing, the person who handles the complaint must document the description of the complaint.
4. There must be enough information to identify the agency or individual toward which the complaint is directed and indicate the possibility of a violation. Every effort should be made to obtain at least the following information:
 - Name, address and telephone number or other means of contacting the complainant;
 - The specific location and name of the organization delivering the program service or benefit;
 - The nature of the incident(s) or action(s) that led the complainant to feel there was discrimination;
 - The basis on which the complainant feels discrimination occurred (race, color, national origin, sex, age, or disability);
 - The names, titles, and addresses of people who may have knowledge of the discriminatory action(s); and
 - The date(s) when the alleged discriminatory action(s) occurred or, if continuing, the duration of such action(s).

USDA is the cognizant agency for the Child Nutrition Programs listed and therefore is the first contact for the protected classes listed in #1 above, for complaints received within 180 days. Civil rights complaints must be submitted to the USDA Office of Civil Rights within five calendar days of

receipt and no later than 180 days of the discriminatory act. The email for submission of a complaint is: program.intake@usda.gov

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

Bureau of Nutrition and Health, IDOE, 12/2021

I.C. Iowa Code

Iowa Code § 283A

Description

School Meal Programs

I.A.C. Iowa Administrative Code

281 I.A.C. 58

Description

Education - Breakfast and Lunch Program

U.S.C. - United States Code

42 U.S.C. §§ 1751

Description

Public Health - School Lunch Program

Cross References**Code**

710.02

Description

Free or Reduced Cost Meals Eligibility

710.03

Vending Machines

710.04

Meal Charges

SCHOOL NUTRITION PROGRAM NOTICES OF NONDISCRIMINATION

USDA Nondiscrimination Statement

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

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the State or local Agency that administers the program or contact USDA through the Telecommunications Relay Service at 711 (voice and TTY). Additionally, program information may be made available in languages other than English.

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

Mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW, Mail Stop 9410
Washington, D.C. 20250-9410;

Fax: (202) 690-7442; or

Email: program.intake@usda.gov

USDA is an equal opportunity provider, employer, and lender

Iowa Nondiscrimination Statement

This CNP provider does not discriminate in its educational programs, activities and employment practices on the basis of race, color, national origin, sex, disability, religion, creed, sexual orientation, age (for employment), actual or potential parental, family, or marital status (for programs). There is a grievance procedure for processing complaints of discrimination. If you have questions or grievances related to compliance with this policy or for information about the district's grievance procedures, by this CNP Provider, please contact the Iowa Civil Rights Commission, 6200 Park Avenue, Suite 100, Des Moines, IA 50321-1270; phone number 515-281-4121 or 800-457-4416; website: <https://icrc.iowa.gov/>.

CHILD NUTRITION PROGRAMS CIVIL RIGHTS COMPLAINT FORM

Complaint Contact Information:

Name: _____

Street Address, City, State, Zip: _____

County: _____ Area Code/Phone: _____

Email Address: _____

Complaint Information:

1. Specific name and location of the entity and individual delivering the service or benefit:
2. Describe the incident or action of the alleged discrimination or give an example of the situation that has a discriminatory effect on the public, potential program participants, or current participants:
3. On what basis does the complainant feel discrimination exists (race, color, national origin, sex, disability, age, , marital status, family/parental status, income derived from public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, creed, sexual orientation, religion, , actual/potential parental/family/marital status)?
4. List the names, titles, and business addresses of persons who may have knowledge of the alleged discriminatory action:
5. List the date(s) during which the alleged discriminatory actions occurred, or if continuing, the duration of such actions: _____
6. Date complaint received: _____
7. Person receiving complaint: _____
8. Action(s) taken:

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

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

Policy 710.02: Free or Reduced Cost Meals Eligibility

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Reviewed Date: 03/10/2022

Students enrolled and attending school in the school district who meet USDA eligibility guidelines will be provided the school nutrition program services at no cost or at a reduced price. The school district shall make reasonable efforts to prevent the overt identification of students who are eligible for free and reduced price meals.

The district shall at least twice annually notify all families of the availability, eligibility criteria, and application procedures for free or reduced price meals in accordance with state and federal law.

It is the responsibility of the Food Service Director to determine the eligibility of students for free or reduced price school nutrition programs, in accordance with criteria established by state and federal law. If school personnel have knowledge of a student who is in need of free or reduced-price meals, school personnel shall contact the Food Service Director.

If a student owes money for five or more meals, the Food Service Administrative Assistant may contact the student's parent or guardian to provide information regarding the application for free or reduced price meals. The school is encouraged to provide reimbursable meals to students who request reimbursable meals unless the students' parent or guardian has specifically provided written direction to the school to withhold a meal from the student.

Employees will be required to pay for meals consumed.

It is the responsibility of the superintendent to develop administrative regulations for implementing this policy.

This is a mandatory policy.

Legal Reference:	42 U.S.C. §§ 1751 et seq.. 7 C.F.R. §§ 210 et seq.. Iowa Code § 283A. 281 I.A.C. 58.
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I.C. Iowa Code

Iowa Code § 283A

Description

School Meal Programs

I.A.C. Iowa Administrative Code

281 I.A.C. 58

Description

Education - Breakfast and Lunch Program

Policy 710.03: Vending Machines

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Reviewed Date: 03/10/2022

Food served or purchased by students during the school day and food served or purchased for other than special circumstances is approved by the superintendent. Vending machines in the school building are the responsibility of the building principal. Purchases from the vending machines, will reflect the guidelines in the Wellness policy 507.09.

It is the responsibility of the superintendent to develop administrative regulations for the use of vending machines and other sales of food to students.

This is a mandatory policy.

Legal Reference:	42 U.S.C. §§ 1751 <i>et seq.</i> 7 C.F.R. Pt. 210 <i>et seq.</i> Iowa Code ch. 283A 281 I.A.C. 58.
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I.C. Iowa Code

Iowa Code § 283A

Description

School Meal Programs

I.A.C. Iowa Administrative Code

281 I.A.C. 58

Description

Education - Breakfast and Lunch Program

U.S.C. - United States Code

42 U.S.C. §§ 1751

Description

Public Health - School Lunch Program

Cross References

Code

710.01

Description

School Nutrition Program

710.01-R(1)

School Nutrition Program - School Nutrition Program
Civil Rights Complaints Procedure

710.01-E(1)

School Nutrition Program - School Nutrition Program
Notices of Nondiscrimination

710.01-E(2)

School Nutrition Program - Child Nutrition Programs
Civil Rights Complaint Form

Policy 710.04: Meal Charges

Status: ADOPTED

Original Adopted Date: 03/10/2022 | **Last Reviewed Date:** 03/10/2022

In accordance with state and federal law, the Community School District adopts the following policy to ensure school district employees, families, and students have a shared understanding of expectations regarding meal charges. The policy seeks to allow students to receive the nutrition they need to stay focused during the school day, prevent the overt identification of students with insufficient funds to pay for school meals, and maintain the financial integrity of the nonprofit school nutrition program.

Payment of Meals

All meal purchases are to be prepaid before meal service begins. Deposits can be made online or money can be brought to any building office for deposit. Students who do not have sufficient funds shall not be allowed to charge non-reimbursable meals or ala carte items until additional money is deposited in the student account.

Students who qualify for free meals shall never be denied a reimbursable meal, even if they have accrued a negative balance from previous purchases. Schools are encouraged to provide a reimbursable meal to students with outstanding meal charge debt. If an alternate meal is provided, the meal must be the same meal presented in the same manner to any student requesting an alternate meal.

Negative Account Balances

The school district will make reasonable efforts to notify families when meal account balances are low. Additionally, the school district will make reasonable efforts to collect unpaid meal charges classified as delinquent debt. The school district will coordinate communications with the student's parent or guardian to resolve the matter of unpaid charges. Parents or guardians will be notified of an outstanding negative balance. Parents or guardians will be notified by email, phone or letter. Negative balances of more than \$50.00 will be turned over to the superintendent or superintendent's designee for collection. Options may include: collection agencies, small claims court, or any other legal method permitted by law.

Unpaid Student Meals Account

The district will establish an unpaid student meals account in a school nutrition fund. Funds from private sources and funds from the district flexibility account may be deposited into the unpaid school meals account in accordance with law. Funds deposited into this account shall be used only to pay individual student meal debt.

Communication of the Policy

The policy and supporting information regarding meal charges shall be provided in writing to:

- All households at or before the start of each school year;
- Students and families who transfer into the district, at time of transfer; and

- All staff responsible for enforcing any aspect of the policy.

Records of how and when the policy and supporting information was communicated to households and staff will be retained.

It is the responsibility of the superintendent to develop an administrative regulation for implementing this policy.

This is a mandatory policy.

Legal Reference:	42 U.S.C. §§ 1751 et seq. 7 C.F.R. §§ 210 et seq. U.S. DEP'T OF AGRIC., SP 46-2016, UNPAID MEAL CHARGES: LOCAL MEAL CHARGE POLICIES (2016). U.S. DEP'T OF AGRIC., SP 47-2016, UNPAID MEAL CHARGES: CLARIFICATION ON COLLECTION OF DELINQUENT MEAL PAYMENTS (2016). U.S. DEP'T OF AGRIC., SP 57-2016, UNPAID MEAL CHARGES: GUIDANCE AND Q&A (2016). Iowa Code 283A. 281 I.A.C. 58.
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I.C. Iowa Code

Iowa Code § 283A

Description

School Meal Programs

I.A.C. Iowa Administrative Code

281 I.A.C. 58

Description

Education - Breakfast and Lunch Program

U.S.C. - United States Code

42 U.S.C. §§ 1751

Description

Public Health - School Lunch Program

Cross References

Code

710.01

Description

School Nutrition Program

710.01-R(1)

School Nutrition Program - School Nutrition Program
Civil Rights Complaints Procedure

710.01-E(1)

School Nutrition Program - School Nutrition Program
Notices of Nondiscrimination

710.01-E(2)

School Nutrition Program - Child Nutrition Programs
Civil Rights Complaint Form

Policy 711.01: Student School Transportation Eligibility

Status: ADOPTED

Original Adopted Date: 03/10/2022 | **Last Reviewed Date:** 03/10/2022

Elementary and middle school students living more than two miles from their designated school attendance centers and high school students living more than three miles from their designated attendance centers are entitled to transportation to and from their attendance center at the expense of the school district.

Transportation of students who require special education services will generally be provided as for other students, when appropriate. Specialized transportation of a student to and from a special education instructional service is a function of that service and, therefore, an appropriate expenditure of special education instructional funds generated through the weighting plan.

Transportation of a student to and from a special education support service is a function of that service, and is specified in the individualized education program (IEP) or the individualized family service plan (IFSP). When the IEP or IFSP team determines that unique transportation arrangements are required and the arrangements are specified in the IEP or IFSP, the school district will provide one or more of the following transportation arrangements for instructional services and the AEA for support services:

- Transportation from the student's residence to the location of the special education and back to the student's residence, or child care placement for students below the age of six.
- Special assistance or adaptations in getting the student to and from and on and off the vehicle, en route to and from the special education.
- Reimbursement of the actual costs of transportation when by mutual agreement the parents provide transportation for the student to and from the special education.

The school district is not required to provide reimbursement to parents who elect to provide transportation in lieu of agency-provided transportation.

A student may be required, at the board's discretion, to meet a school vehicle without reimbursement up to three-fourths of a mile. The board may require the parent to transport their children up to two miles to connect with school bus vehicles at the expense of the school district when conditions deem it advisable. It is within the discretion of the board to determine such conditions. Parents of students who live where transportation by bus is impracticable or unavailable may be required to furnish transportation to and from the designated attendance center at the expense of the school district. Parents, who transport their children at the expense of the school district, are reimbursed at the rate per mile set by the state.

Transportation arrangements made by agreement with a neighboring school district will follow the terms of the agreement. Students, who choose to attend a school in a school district other than their resident school district, will provide transportation to and from the school at their own expense.

Policy 711.02: Student Conduct On School Transportation

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Reviewed Date: 03/10/2022

Students utilizing school transportation will conduct themselves in an orderly manner fitting to their age level and maturity with mutual respect and consideration for the rights of the school vehicle driver and the other passengers. Students who fail to behave in an orderly manner will be subject to disciplinary measures.

The driver will have the authority to maintain order on the school vehicle. It is the responsibility of the driver to report misconduct to the building administrator.

The board supports the use of recording devices on school buses used for transportation to and from school as well as for field trips, curricular or extracurricular events. The recording devices will be used to monitor student behavior and may be used as evidence in a student disciplinary proceeding. The recordings are student records subject to school district confidentiality, board policy and administrative regulations.

It is the responsibility of the superintendent, in conjunction with the building principal, to develop administrative regulations regarding student conduct and discipline when utilizing school district transportation.

Legal Reference:	Iowa Code §§ 279.8; 285; 321.
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I.C. Iowa Code	Description
Iowa Code § 279.8	<u>Directors - General Rules - Bonds of Employees</u>
Iowa Code § 285	<u>Transportation Aid</u>
Iowa Code § 321	<u>Motor Vehicles</u>

Cross References	
Code	Description
804.06	<u>Use of Recording Devices on School Property</u>
804.06-R(1)	<u>Use of Recording Devices on School Property - Use of District Owned Recording Devices Regulation</u>

Policy 711.06: Transportation of Nonschool Groups (I & II)

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Reviewed Date: 03/10/2022

School district vehicles may be available to local nonprofit entities which promote cultural, educational, civic, community, or recreational activities for transporting to and from nonschool-sponsored activities within the state as long as the transportation does not interfere with or disrupt the education program of the school district and does not interfere with or delay the transportation of students. The local nonprofit entity must pay the cost of using the school district vehicle as determined by the superintendent.

Legal Reference:	Iowa Code §§ 285.1(21), .10(9), (10). 281 I.A.C. 41.412; 43.10.
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I.C. Iowa Code

Iowa Code § 285.1

Description

Transportation Aid - Entitlement

Iowa Code § 285.10

Transportation Aid - Powers and Duties of Local Boards

I.A.C. Iowa Administrative Code

281 I.A.C. 41.412

Description

Special Education - Transportation

281 I.A.C. 43.10

Transportation - Permitted Uses

Cross References

Code

900

Description

Principles and Objectives for Community Relations

Policy 711.08: Transportation in Inclement Weather

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Reviewed Date: 03/10/2022

School district buses will not operate when weather conditions due to fog, rain, snow or other natural elements make it unsafe to do so. Because weather conditions may vary around the school district and may change quickly, the best judgment possible will be used with the information available.

The final judgment as to when conditions are unsafe to operate will be made by the superintendent. The superintendent will be assisted by the actual "on location" reports of the drivers.

When school is cancelled because of weather anywhere in the school district, all schools will be closed.

When weather conditions deteriorate during the day after school has begun, cancellation notices will be announced by commercial radio. Students will be returned to their regular drop-off sites unless weather conditions prevent it. In that case, students will be kept at or returned to school until they are picked up by the parents.

Note: This is a mandatory policy.

Legal Reference:	Iowa Code § 279.8
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I.C. Iowa Code

Iowa Code § 279.8

Description

Directors - General Rules - Bonds of Employees

Cross References

Code

601.02

Description

School Day

Policy 711.10: School Bus Passenger Restraints

Status: ADOPTED

Original Adopted Date: 03/10/2022 | Last Reviewed Date: 03/10/2022

The district shall utilize three-point lap-shoulder belts on district school buses as required by state law. All three-point lap-shoulder belts available on district buses will be used by passengers when the vehicle is in any non-stationary gear.

This is a mandatory policy.

Legal Reference:	281 I.A.C. 43.10(6)
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I.A.C. Iowa Administrative Code

281 I.A.C. 43.10

Description

Transportation - Permitted Uses

Cross References

Code

711.07

Description

School Bus Safety Instruction

Policy 713: Responsible Technology Use & Social Networking

Status: ADOPTED

Original Adopted Date: 03/09/2022 | Last Revised Date: 12/19/2023 | Last Reviewed Date: 12/19/2023

Computers, electronic devices and other technology are powerful and valuable education and research tools and, as such, are an important part of the instructional program. In addition, the school district depends upon technology as an integral part of administering and managing the schools' resources, including the compilation of data and recordkeeping for personnel, students, finances, supplies and materials. This policy outlines the board's expectations in regard to these different aspects of the school district's technology resources. Students, staff and volunteers must conduct themselves in a manner that does not disrupt the educational process and failure to do so may result in discipline, up to and including student discipline under all relevant district policies and discharge for employees.

General Provisions

The superintendent is responsible for designating a Director of Technology who will oversee the use of school district technology resources. The Director of Technology will prepare in-service programs for the training and development of school district staff and relevant volunteers in technology skills, appropriate use of district technology and for the incorporation of technology use in subject areas.

The superintendent, working with appropriate staff, shall establish regulations governing the use and security of the school district's technology resources. The school district will make every reasonable effort to maintain the security of the district networks and devices. All users of the school district's technology resources, including students, staff and volunteers, shall comply with this policy and regulation, as well as others impacting the use of school equipment and facilities. Failure to comply may result in disciplinary action, up to and including discharge or expulsion, as well as suspension and/or revocation of technology access privileges.

Usage of the school district's technology resources is a privilege, not a right, and that use entails responsibility. District-owned technology and district-maintained Internet-based collaboration software social media and e-mail accounts are the property of the school district. Therefore, users of the school district's network must not expect, nor does the school district guarantee, privacy for use of the school district's network websites visited. The school district reserves the right to access and view any material stored on school district equipment, within district-owned software or any material used in conjunction with the school district's network.

The superintendent, working with the appropriate staff, shall establish procedures governing management of technology records in order to exercise appropriate control over technology records, including financial, personnel and student information. The procedures will address at a minimum:

- passwords,
- system administration,
- separation of duties,
- remote access,
- data back-up (including archiving of e-mail),
- record retention, and
- disaster recovery plans.

Social Networking or Other External Web Sites

For purposes of this policy, any website, other than the school district website or school-school district sanctioned websites, are considered external websites. Employees and volunteers shall not post confidential or proprietary information, including photographic images, about the school district, its employees, students, agents or others on any external website without prior written consent of the superintendent. Employees and volunteers shall adhere to all applicable privacy and confidentiality policies adopted by the school district when on external websites. Employees, students and volunteers shall not use the school district logos, images, iconography, etc. on external websites unless authorized in advance by school administration. Employees shall not use school district time or property on external sites that are not in direct relation to the employee's job duties. Employees, students and volunteers need to realize that the internet is not a closed system and anything posted on an external site may be viewed by others. Employees, students and volunteers who don't want school administrators to know their personal information, should refrain from sharing it on the internet. Employees and volunteers should not connect with students via external websites without consent of the building level administrator.

Employees and volunteers who wish to connect with students through an Internet-based software application that is not District-approved must first obtain the prior written consent of the building administrator. At all times, no less than two licensed employees must have access to all accounts and interactions on the software application. Employees and volunteers who would like to start a social media site for school district-sanctioned activities should obtain prior written consent from the superintendent.

It is the responsibility of the superintendent to develop administrative regulations implementing this policy.

Legal Reference:	Iowa Code § 279.8, 282 I.A.C. 25, 26.
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I.C. Iowa Code

Iowa Code § 279.8

Description

Directors - General Rules - Bonds of Employees

I.A.C. Iowa Administrative Code

282 I.A.C. 25

Description

Educational Examiners - Code of Professional Conduct

Regulation 713-R(1): Responsible Technology Use & Social Networking Status: ADOPTED
- Regulation

Original Adopted Date: 03/09/2022 | Last Revised Date: 12/19/2023 | Last Reviewed Date:
12/19/2023

General

The following rules and regulations govern the use of the school district's network systems, employee access to the internet, and management of digital records:

- Employees will be issued a school district e-mail account. Passwords must be changed periodically.
- Each individual in whose name an access account is issued is responsible at all times for its proper use.
- Employees are expected to review their e-mail regularly and shall reply promptly to inquiries with information that the employee can reasonably be expected to provide.
- Communications with parents and/or students must be made on a school district computer, unless in the case of an emergency.
- Employees may access the internet for education-related and/or work-related activities.
- Employees shall refrain from using technology resources for personal use, including access to social networking sites.
- Use of the school district technology and school e-mail address is a public record. Employees cannot have an expectation of privacy in the use of the school district's network and technology.
- Use of technology resources in ways that violate the acceptable use and conduct regulation, outlined below, will be subject to discipline, up to and including discharge.
- Use of the school district's network is a privilege, not a right. Inappropriate use may result in the suspension or revocation of that privilege.
- Off-site access to the school district network will be determined by the superintendent in conjunction with appropriate personnel.
- All network users are expected to abide by the generally accepted rules of network etiquette. This includes being polite and using only appropriate language. Abusive language, vulgarities and swear words are all inappropriate.
- Network users identifying a security problem on the school district's network must notify appropriate staff. Any network user identified as a security risk or having a history of violations of school district technology use guidelines may be denied access to the school district's network.
- Employees are representatives of the district at all times and must model appropriate character, both on and off the worksite. This applies to material posted with personal devices and on personal websites and/or social media accounts. Posted messages or pictures which diminish the professionalism or discredit the capacity to maintain respect of students and parents may result in disciplinary action up to and including termination if the content posted is found to be disruptive to the educational environment and adversely impacts the employee's ability to effectively serve as a role model or perform his/her job duties for the district. The type of material that would affect an employee's ability to serve as an appropriate role model includes, but is not limited to, text or depictions involving hate speech, nudity, obscenity, vulgarity or sexually explicit content. Employee communications with students should be limited as appropriate. If there is any uncertainty, employees should consult their building administrator.

Prohibited Activity and Uses

The following is a list of prohibited activity for all employees concerning use of the school district's network. Any violation of these prohibitions may result in discipline, up to and including discharge, or other appropriate penalty, including suspension or revocation of a user's access to the network.

- Using the network for commercial activity, including advertising, or personal gain.
- Infringing on any copyrights or other intellectual property rights, including copying, installing, receiving, transmitting or making available any copyrighted software on the school district network. See Policy 605.07, *Use of Information Resources* for more information.
- Using the network to receive, transmit or make available to others obscene, offensive, or sexually explicit material
- Using the network to receive, transmit or make available to others messages that are racist, sexist, and abusive or harassing to others.
- Use of another's account or password.
- Attempting to read, delete, copy or modify the electronic mail (e-mail) of other system users.
- Forging or attempting to forge e-mail messages.
- Engaging in vandalism. Vandalism is defined as any malicious attempt to harm or destroy school district equipment or materials, data of another user of the school district's network or of any of the entities or other networks that are connected to the Internet. This includes, but is not limited to, creating and/or placing a virus on the network.
- Using the network to send anonymous messages or files.
- Revealing the personal address, telephone number or other personal information of oneself or another person.
- Intentionally disrupting network traffic or crashing the network and connected systems.
- Installing personal software or using personal technology on the school district's technology and/or network without the permission of the Director of Technology
- Using the network in a fashion inconsistent with directions from teachers and other staff and generally accepted network etiquette.

Other Technology Issues

Employees should contact students and their parents through the school district's technology or phone system unless in the case of an emergency or with prior consent of the principal. Employees should not release their cell phone number, personal e-mail address, etc. to students or their parents.

I.C. Iowa Code

Iowa Code § 279.8

Description

Directors - General Rules - Bonds of Employees

I.A.C. Iowa Administrative Code

282 I.A.C. 25

Description

Educational Examiners - Code of Professional Conduct

282 I.A.C. 26

Educational Examiners - Code of Rights and Responsibilities

Cross References

Code

Description