



October 19, 2018

MEMORANDUM

To: Kelvin Moore, Instructional Director
Cluster 9

Tisa Morgan, Principal
Benjamin Stoddert Middle School

From: Michele Winston, CPA, Director
Internal Audit

Re: Financial Audit for Period July 1, 2014 through June 30, 2018

An audit was completed on of the financial records of **Benjamin Stoddert Middle School** for the period July 1, 2014 through June 30, 2018. The audit indicates that the school's financial records and procedures require **significant** improvement to be in accordance with the Accounting Procedures Manual for Student Activity Funds (APM) and Board of Education policies and procedures. The exceptions noted are included in the attached report.

As the principal of the school, you will be responsible for preparing an action plan within **15** days, indicating steps that will be taken to ensure compliance with the APM. Please note that you are required to provide your action plan using the attached Microsoft word template. Please send a PDF and word version of your action plan and any other correspondence to the Internal Audit Office, Attention: Jerry Chandler, Business Analyst, email address: jerry.chandler@pgcps.org. A copy of your action plan should also be forwarded to Deborah Smalls, Business Operations Technician, email address: deborah.smalls@pgcps.org.

Enclosure

cc: Segun Eubanks, Ed.D, Board Chair
Monica Goldson, Ed. D, Interim Chief Executive Officer
Carolyn Boston, Vice Chair, Board of Education
Members, Board of Education
Erica Berry Wilson, Esq., Board Executive Director
Christian Rhodes, Chief of Staff
David Curry, Ed. D, Middle School Associate Superintendent
Helen Coley, Ed. D, Chief, School Support and Leadership
J. Michael Dougherty, Director Financial Services
Michael Herbstman, Chief Financial Officer
Lewis Robinson, Director Employee Labor Relations
Alanna Cooper, Internal Auditor II

Internal Audit Report

Benjamin Stoddert Middle School Student Activity Funds

For the Period Ended June 30, 2018

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Internal Auditor's Report

We have examined the Student Activity Funds of Benjamin Stoddert Middle School for the period July 1, 2014 through June 30, 2018. Benjamin Stoddert Middle School's principal is responsible for the administration of SAF. Our responsibility is to express an opinion based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and Governmental Accountability Office and, accordingly, included examining, on a test basis, evidence supporting SAF, and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion.

Our examination disclosed the following findings:

- *Missing Funds of \$35,813.55,*
- *Restricted Fund Account Deficits totaling (\$30,909.51),*
- *Financial Record not Retained,*
- *Mismanagement of Funds Received,*
- *Mismanagement of Disbursements,*
- *Inadequate and Untimely Financial Reporting, and*
- *Ineffective Management Oversight (Former Principal)*

Individually or in the aggregate, these findings resulted in a material deviation from Board of Education (BOE) Policies and Procedures and the requirements of the Accounting Procedures Manual for School Activity Funds (APM).

In our opinion, except for the deviations from the criteria described in the preceding paragraph, the SAF referred to above, was administered in compliance with BOE policies and procedures and the APM, in all material respects, for the period ended June 30, 2018.



Michele Winston, CPA,
Director Internal Audit

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SUMMARY

The Internal Audit department completed an audit of the student activity funds (SAF) of Benjamin Stoddert Middle School for the period July 1, 2014 through June 30, 2018. The audit was performed due to an appointment of a new principal.

The audit indicated that the school's financial records and procedures require **significant** improvement to be in accordance with the Accounting Procedures Manual for School Activity Funds (APM) and Board of Education (BOE) policies and procedures.

The recordkeeping staff was assigned to the school in March 2015. During this time she received training from the SAF Administrator on the use of School Funds Online accounting software. The SAF Administrator provided a personal SAF training session for the recordkeeping staff on April 14, 2015. Due to excessive issues identified by the Accounting Office during the June 2018 trimester review, the recordkeeping staff received subsequent one on one training from the SAF Administrator on June 13, 2018 and again on June 20, 2018.

Upon Internal Audit's arrival to the school, there were minimal records made available for the audit period under review. Internal Audit obtained some financial records from inspection of the desk of the recordkeeping staff. The recordkeeping staff informed Internal Audit that she has not read the entire Accounting Procedures Manual, but would periodically use it as a reference tool.

The current principal began tenure at the school in August 2018. During this same time frame, the former principal began tenure as principal of Crossland High School.

Detailed findings from the current audit are cited on the following pages with accompanying recommendations for corrective action.

OBJECTIVES

The objectives of the audit were to determine the effectiveness of the system of internal controls and whether the school was in compliance with the policies and procedures of the APM and the BOE. It is important to recognize that, while the audit report focused on deficiencies, it was intended to be constructive. The audit was not designed and conducted to evaluate the effectiveness of the educational programs in the school. Therefore, the absence of comments related to the educational programs should not be construed to imply that these programs are either adequate or deficient.

SCOPE

The audit was based on our review of selected bank statements, financial reports, cancelled checks and voided checks and Monetary Transmittal Form (MTF) envelopes submitted by staff for the period July 1, 2014 through June 30, 2018. Also, selected receipts, disbursements and supporting documentation

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that were available were reviewed for the said period. Certain supporting documentation was not available for review requested for the audit. (See Finding 2019.03, *Record Retention*)

FINDINGS AND RECOMMENDATIONS

The audit resulted in the following findings and recommendations:

2019.01 Missing Funds

A review of original Monetary Transmittal Form (MTF) copies and staff member's pink and yellow year end MTF remittances located during fieldwork resulted in identification of total missing funds of **\$35,813.55**. Details are as follows:

- During September 2015 through June 2018, there were **56** MTF remittances totaling **\$34,946.07** that were approved by the recordkeeping staff confirming the collection of funds for 6th through 8th grade activities - field trips, fundraisers and yearbooks. However, there was no evidence to substantiate the deposit of funds as funds could not be traced to any bank deposit record.
- During the audit, funds totaling \$228.86 were found in the desk of the recordkeeping staff. These funds were provided to the recordkeeping staff for safeguarding until a staff member was available to prepare the MTF. Subsequently, the recordkeeping staff only provided funds totaling \$197.83 to be documented on a MTF and deposited, resulting in missing funds of **\$31.03**.
- During February 2018, there were **2** MTFs that were approved by the guidance counselor to confirm funds collected for 8th grade activities totaling **\$836.45**. Reportedly, the funds were then provided to the registrar for preparation of the deposit ticket and then to former principal for deposit since the recordkeeping staff was on leave. Internal Audit was unable to trace these funds to a bank deposit.

The APM Section 4.5.2.2 (2) *Guidelines for Bank Deposits* states, bookkeepers must make deposits of all funds received at least every other day. However, no more than \$250 should be kept in the building overnight. If money is kept on-hand at the school awaiting deposit, it must be kept in a secured location. A secured location is a locked fireproof safe, to which only the Principal and Bookkeeper have access. It is important that schools establish internal controls to ensure frequent deposits occur and that schools avoid the risk of storing money in the building over a weekend or holiday. Staff members should never hold funds overnight.

APM Section 3.2, *Ownership, Authority and Responsibility* also states that the bookkeeper is responsible for accurately recording and reporting the school's financial transactions.

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APM Section 4.5.2.2 (2) *Guidelines for Bank Deposits* and (3) *Preparing Bank Deposits* states, funds collected must be deposited in the same form and denominations as received. Under no circumstance shall paychecks or personal checks be cashed out of funds on-hand awaiting deposit. Similarly, these funds should not be used to make change or pay expenses. The Bookkeeper is responsible for counting cash, verifying the total on the MTF and applicable attachments. The funds counted must agree with the MTF and the actual funds submitted. When discrepancies are noted, the Bookkeeper must immediately contact the individual who submitted the MTF. If corrections are necessary, the originator of the MTF must make the correction by drawing a line through the original entry and rewriting the correct entry next to the incorrect entry. The reason for the correction (e.g., “transposition of numbers”, arithmetical error”, etc.) must be noted on the MTF and the originator must sign the correction.

According to the recordkeeping staff, the missing funds are due to money collected and documented on MTFs for field trips which were then refunded to students due to cancellations or when the determination was made that field trips would not be sponsored by the school. Reportedly, there were other instances where money was collected, documented on MTFs and a portion of the funds were refunded to students. Details of the refunds were not recorded on the three MTF copies. Therefore, there was no documentation trail to substantiate that funds were collected and subsequently refunded as explained by recordkeeping staff.

The missing funds represent potential unavailable opportunities for students. It was noted during the audit that there were significant deficits that may have resulted from funds collected but not deposited. These deficits are detailed in *Finding 2019.02, Restricted Fund Account Deficits*.

Recommendation: Internal Audit recommends the following:

1. Employee and Labor Relations should pursue restitution and determine appropriate disciplinary action against the recordkeeping staff for funds totaling **\$34,946.07** that could not be traced to a bank deposit and for violation of BOE policy 0109, *Fraud, Waste and Abuse*.
2. Employee and Labor Relations should review the circumstances and pursue restitution and determine appropriate disciplinary action against the staff person deemed liable for funds totaling **\$836.45** that could not be traced to a bank deposit and for violating BOE policy 0109 on *Fraud, Waste and Abuse*.

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2019.02 Restricted Fund Account Deficits

The following restricted fund accounts contained deficits which aggregated to **(\$30,909.51)** as of June 30, 2018.

<u>Account #</u>	<u>Account Description</u>	<u>Amount</u>
212.20	Boys Basketball Concession	(\$306.15)
212.85	Boys Basketball Uniforms	(\$661.99)
304.00	6 th Grade Account	(\$1,953.47)
306.00	8 th Grade Account	(\$3,252.42)
318.00	Future Leaders of America	(\$51.84)
319.00	Girl Mentoring Group	(\$180.06)
402.00	Bookfair-Restricted	(\$78.18)
420.00	Field Trips	(\$2,760.40)
425.20	Library Books	(\$94.18)
450.10	PSA- Flowers	(\$884.29)
450.20	PSA- Food	(\$3,363.33)
450.30	PSA- Staff Appreciation	(\$2,336.56)
450.40	PSA- Clothing	(\$656.00)
450.50	PSA- Transfers In	(\$10,906.80)
480.00	Yearbook	(\$2,999.25)
506.00	After-School Reading Program	(\$84.98)
516.00	AVID	(\$223.81)
550.10	Guidance Field Trip	(\$115.80)
	Total	(\$30,909.51)

The Principal Sponsored Activities (PSA) fund accounts deficits totaled **(\$11,202.39)** as of the last audit (December 31, 2013). The deficit decreased to (\$10,429.03) as of June 30, 2014. The deficit increased to **(\$18,086.79)** as of June 30, 2018 under the former principal's leadership.

According to the APM Section 5.2.1, *Financial Reporting Requirements, Procedures*, the principal as the fiduciary agent for SAF, should ensure all accounts are solvent at all times.

Evidence of missing funds remitted to the recordkeeping staff in 2 of the 18 accounts (7th & 8th Grade Accounts) potentially resulted in deficit balances. Also, the recordkeeping staff erroneously thought that funds from other accounts with available balances could be used to cover PSA expenditures. SAF is not

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used efficiently when overspending occurs in restricted accounts. Students are not receiving maximum benefit from funds that should be available to them. *(This condition was also noted in the previous audit as of December 31, 2013.)*

Recommendation: The principal should contact the Accounting and Financial Reporting Office for assistance in resolving the deficits. Expenditures must only be disbursed from restricted accounts with available balances. The principal should ensure further deficits are not created and current deficits are not increased by performing review of properly completed School Funds Expenditure Forms (SFEF's) to ensure funds are available prior to approving expenditures.

2019.03 Record Retention

The following accounting records were not located and made available for review request:

- 18 School Funds Expenditure Forms and supporting documentation
- 8 Monetary Transmittal Forms, supporting documentation and corresponding deposit slips
- 18 Year End MTFs remittances (pink and yellow copies) from school staff *(not included at 2019.01. Missing Funds)*
- 9 Cancelled Checks
- 25 Voided Checks
- A Current Vending Machine Contract
- Fundraiser Forms

The APM section 6.12 *Record Retention* states that all SAF records must be retained for a period of 7 years and or until audited, including the current fiscal year. This includes, but is not limited to, financial reports, bank statements, receipts, disbursement authorities, MTFs, SFEFs, cancelled checks and contracts.

According to the recordkeeping staff, SAF records were removed from her office during cleaning and misplaced in the school. The documentation trail providing evidence that funds were collected and expended in compliance with BOE policies and procedures could not be confirmed. *(This condition was also noted in the previous audit as of December 31, 2013.)*

Recommendation: The recordkeeping staff and principal must establish a records management system that ensures appropriate filing and retrieval of financial records. Efforts should be made to provide access to all financial records when requested for audits.

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2019.04 Mismanagement of Funds Received

The following exceptions pertaining to the management of funds received were identified:

- a) ***Delinquent Deposits*** – The following exceptions regarding delinquent deposits were noted. (***This condition was also noted in the previous audit as of December 31, 2013.***)
 - During audit fieldwork, funds remitted for 8th grade activities, field trips and other school events totaling **\$333.86** were located in the desk drawers of the recordkeeping staff. Amounts up to **\$157.50** were held for up to **16 months**.
 - There were **3** uncashed checks totaling **\$711.21** dated January 2017 – March 2017 that were located during fieldwork.
 - A custodial staff member provided Internal Audit with financial records from FY 2015 and FY 2016 that included cash totaling **\$203.50**.
- b) ***Segregation of Duties*** – Receipts were reviewed detailing that the recordkeeping staff collected funds directly from students for 8th grade activities, yearbooks, field trips and candy fundraisers from May 2016 to March 2017. Several MTFs for the audit period were not provided; therefore, Internal Audit was unable to confirm whether these funds were deposited.
- c) ***Year-End Monetary Transmittal Form Envelopes*** - The year-end MTF submission process was not operating as required by procedures outlined in the APM. During FY 2017 and FY 2018, year-end MTF envelopes were submitted to the recordkeeping staff. The recordkeeping staff has access to the location where the year-end MTF envelopes were stored. (***This condition was also noted in the previous audit as of December 31, 2013.***) There were also 18 missing year-end MTF remittances (*please refer to 2019.03 above*).
- d) ***Lack of Drop Safe*** - School staff are unable to securely remit funds in the absence of the recordkeeping staff and principal. Funds collected from school staff were maintained in a safe that was not accessible to staff.

The APM provides the following guidelines regarding administration of funds received:

- a) All funds collected are required to be remitted to the recordkeeping staff on the day of collection. The recordkeeping staff is also required to make timely deposit of these funds, at least every other day. Staff members collecting funds are required to complete MTFs entirely and submit to

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the recordkeeping staff along with funds collected. The recordkeeping staff is not allowed to directly collect SAF.

- b) Prior to departing the school at year-end, staff and program managers are required to submit the pink and yellow MTF remittance copies in sealed envelopes (with their signature over the seal) to the designated administrator. Year-end MTF envelopes should be stored in a location that is inaccessible to the bookkeeper.
- c) Depository (drop) safes are required for every school. The safe should be bolted to the floor and in a location accessible to staff which will facilitate submission of funds in the recordkeeping staff's absence. A log should be maintained where staff members record their name and the date of the 'drop.' The money should be sealed in an envelope with the completed, signed MTF enclosed. On the following day, the staff member dropping off money should make sure the recordkeeping staff has a record of the deposit. Funds should never be dropped without a completed MTF.

Contributory factors in the mismanagement of funds received are as follows:

- a) The recordkeeping staff could not recall why checks were held and not deposited.
- b) Sam's Club issued cash to school staff when the actual purchase was less than the estimated amount presented via school check. School staff returned the cash to the recordkeeping staff and failed to complete a MTF.
- c) Reportedly, the recordkeeping staff was unaware that she was not permitted to collect the year-end MTF envelopes and that a drop safe was required at the school.
- d) The recordkeeping staff collected funds from students in instances where there were no other staff members available to collect funds.

There are no segregation of duties when the recordkeeping staff collects SAF from students. The audit trail for reviewing cash receipts was compromised. As a result, internal controls for ensuring all SAFs collected were subsequently deposited was weakened and the potential for loss of assets increased. The risk of theft is present when SAF are not deposited timely and adequately safeguarded.

Recommendation: The following is recommended for the principal and recordkeeping staff to properly manage funds received:

- a) The recordkeeping staff must immediately remit funds located during audit fieldwork for deposit and provide Internal Audit with a copy of the completed MTF and bank validated deposit slip.
- b) The principal must hold recordkeeping staff accountable for making prompt deposits.

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- c) The principal must review the APM to familiarize herself with the BOE policies and procedures regarding the use of a drop safe. The principal must train staff on the proper use of the drop safe and ensure it is bolted to the ground. A log must be provided with the drop safe to record each staff member's name and date of the drop.
- d) The principal and recordkeeping staff should read the APM to become familiar with the year-end MTF collection procedures. The principal should designate an administrator to this task. The assigned staff person should be held accountable for compliance. A location that the recordkeeping staff does not have access to should be established by the staff member performing the year-end MTF collection.
- e) The principal must ensure guidelines are established that prohibit the recordkeeping staff from collecting funds directly from students or parents.

2019.05 Mismanagement of Disbursements

The audit revealed the following exceptions pertaining to the management of disbursements:

- a) ***Delinquent Payments*** – There were **12** outstanding vendor invoices totaling **\$5,406.21** that were not paid by the stated due dates. The delinquencies ranged from **2** to **18** months. Included in these outstanding invoices are **4** disbursements payable from the SAF and **7** payable from Oracle Financials using the school's operating resources. According to the recordkeeping staff there was one invoice which was the responsibility of the Parent Teacher Association (PTA) which was issued to the school.
- b) ***Checks Not Entered*** - There were **3** instances where check numbers 5316, 5317 and 5337 were not entered in SFO.
- c) ***Blank Check Stock*** – The blank check stock is maintained in an unsecure area within the school.

The APM provides the following guidelines relative to the administration of cash disbursements:

- a) Invoices should be paid within 30 days of receipt or by the stated vendor due date. The principal should review invoices and statements for past due amounts and ensure that payments are made in a timely manner.
- b) The APM *Section 3.2.2 Bookkeepers/Financial Secretaries* states, the bookkeeper or financial secretary is responsible for accurately recording and reporting the school's financial transactions.
- c) Exhibit B of the APM, *Staff Responsibility for School Activity Funds* states that the recordkeeping staff must safeguard the blank check stock.

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Contributory factors in the mismanagement of disbursements are as follows:

- a) According to the recordkeeping staff, one of the invoices was the responsibility of the PTA and she was unsuccessful in making contact with the PTA president to inform her of the outstanding invoice. Recordkeeping staff were unable to explain the other delinquent invoices.
- b) The recordkeeping staff could not recall why there were checks that had not been entered in SFO and was unaware of the requirement for appropriately securing school check stock.

Vendors can assess delinquency fees or discontinue conducting business with the BOE when invoices are not paid timely. The risk of fraud is present when the check sequence cannot be confirmed and checks are not properly safeguarded.

Recommendation: The principal and recordkeeping staff must perform the following to improve the administration of disbursements:

- a) The principal must research the missing checks (*check numbers 5316, 5317 and 5337*) with the bank to ensure they were spent in accordance with allowable SAF activities. The principal should monitor the SFO check register to ensure checks are issued in numerical order.
- b) The principal must inform staff to promptly forward invoices to the recordkeeping staff for payment and alert the principal when they are contacted regarding delinquent invoices. The principal must notify the PTA president verbally and in writing of the delinquent invoice.
- c) The principal and recordkeeping staff must ensure school check stock is maintained in the school safe only.
- d) The principal should hold staff accountable for compliance.

2019.06 Financial Reporting

The following exceptions relative to financial reporting were noted:

- a) ***Financial Reports Not Completed Timely*** – There were **28** instances during the audit period where monthly financial reports were not completed timely by the recordkeeping staff.
- b) ***Insolvency Report Not Completed*** - The recordkeeping staff did not complete the *Insolvency Report* during the audit period. Unpaid bills were consistently indicated as \$0, without preparation of the Unpaid Bills Determination Spreadsheet.
- c) ***Monetary Transmittal Forms Numbers Entered Inaccurately*** – During the audit period the recordkeeping staff assigned funds received a 3- digit number in lieu of the respective MTF number when entering in SFO.

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- d) ***Approval of Funds Transfers*** - There were **8** instances where evidence of approval was not provided to substantiate funds transferred between restricted fund accounts.

The APM provides the following guidance pertaining to SAF financial reporting:

- a) Section 5.1.2, *Monthly Reconciliation & Financial Reporting Procedures*, states that the principal is responsible for receiving the bank statement unopened. After reviewing the statement and cancelled checks, the principal forwards the documents to the bookkeeper for reconciliation. The bank reconciliation should be completed by the bookkeeper within **7** days after receiving the statement from the bank. Typically this process should be completed by the 15th of each month. The completed reconciliation should be returned to the principal every month for review and approval.
- b) Section 5.2, *Financial Reporting Requirements*, states that the Insolvency Report should be completed monthly and requires the recordkeeping staff to record data to calculate the school's solvency. The recordkeeping staff must manually calculate the value of unpaid bills that existed at the end of each reporting period for both restricted and unrestricted funds to complete the report.
- c) Section 3.2.2, *Bookkeepers/Financial Secretaries*, requires the recordkeeping staff to accurately record and report the school's financial transactions.
- d) Section 4.5.4.2 *Transfers Between Restricted and Unrestricted/Net Accounts* states that transfers between restricted accounts are only authorized if reviewed and approved by the principal.

According to the recordkeeping staff, she was unaware that transfers required approval and that MTF numbers entered in SFO must match the number indicated on the MTF. The recordkeeping staff was unclear about the accurate completion of the Unpaid Bills Report and that SFO documents for transfers were required to be approved and maintained. The recordkeeping staff was customarily requested to assist in the main office and did not have dedicated time to complete financial reports timely.

The principal's ability to promptly verify the school's solvency status and identify individual financial transactions may be impacted. Students may not be receiving the maximum benefit of funds available when there is inaccurate financial reporting. Restricted funds cannot be used for unallowable activities when the principal's approval is not obtained for transfers.

Recommendation: The principal and recordkeeping staff must perform the following to improve financial reporting:

- a) The recordkeeping staff must be diligent in ensuring completion of the financial report by the 15th of every month. The principal must hold the recordkeeping staff accountable for compliance.

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- b) The principal and recordkeeping staff should collaboratively review open invoices during the monthly financial reporting process to ensure that the Unpaid Bills Determination Spreadsheet is completed properly.
- c) The Accounting and Financial Reporting Office should use the trimester reports review as an opportunity for feedback and to train bookkeepers who do not fully understand the reporting requirements.
- d) The principal must approve all fund transfer journal entries prior to processing in SFO. Evidence of this authorization must be retained.

2019.07 Management Oversight

The former principal did not administer proper oversight relative to periodic review of deposits and expenditures; financial reporting; and fiscal management. The former principal failed to implement the action plan from the prior audit as evidenced by 4 repeated findings and increases in SAF account deficits.

The principal is the fiduciary agent for the Student Activity Funds. In this role, the principal is responsible for ensuring that these funds are administered in accordance with Prince George's County Public Schools policies and procedures and spent to provide the maximum benefit possible to the students. It is also important that the principals, who are ultimately responsible for these funds, be aware that the success of the internal control system rests largely with them.

Several BOE policies and procedures as established in the Accounting Procedures Manual were not followed. This resulted in internal controls being compromised. Students are not receiving the maximum possible benefit of the resources available to them.

Recommendation: The former principal should take some time to read the APM and adopt a more hands-on approach with respect to administration of school finances. The following 5 basic principles must be incorporated into the school's policies and procedures, to achieve the internal control objectives:

- Clearly Defined Lines of Authority and Responsibility;
- Segregation of Duties;
- Maintenance of Adequate Documentation and Records;
- Limited Access to Assets, and
- Independent Checks on Performance.

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STATUS OF PRIOR AUDIT FINDINGS

The previous audit report for Benjamin Stoddert Middle School was issued for the period ended December 31, 2013. During that period, neither the recordkeeping staff nor the current principal were in their positions. The current recordkeeping staff was assigned to the school in March 2015. The current principal began on July 1, 2018. The following findings were noted as a result of that audit and the current status is indicated below.

- **Mismanagement of Funds Received** - Condition still exists. See **2019.03** regarding *Record Retention*.
- **Inadequate Internal Controls Over Check Authorization** – Unable to determine whether condition still exists due to records that could not be located.
- **Principal Sponsored Activities (PSA) Account Deficit** - Condition still exists. See **2019.02** regarding *Restricted Fund Account Deficits*.
- **Payments to Vendors for Services Rendered** – Controls appear to be working.
- **Dress Down Day as a Fundraiser**- Controls appear to be working.
- **Sales Taxes Paid on Items Purchased** – Unable to determine whether condition still exists due to records that could not be located.
- **Year-end Monetary Transmittal Forms** - Condition still exists. See **2019.03** regarding *Record Retention* and **2019.04** regarding *Mismanagement of Funds Received*.

ACKNOWLEDGEMENT

We would like to thank the principal and staff of Benjamin Stoddert Middle School for their cooperation and assistance during the audit.