

Michigan School Business Officials

Cash Management

February 16, 2023



MSBO Managing You Districts Funds

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February 16, 2023

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PFM Asset Management LLC

NOT FDIC INSURED: NO BANK GUARANTEE: MAY LOSE VALUE

Agenda

- I. Cash Management: Big Picture
- II. School Cash Management
- III. School Code Permissible Investments
- IV. Cash Flow Analysis How Much, How Long
- V. Case Study: Cash Management In Practice
- VI. Current Market Conditions
- VII. Investment Strategy Considerations
- VIII. Appendix: Investments Defined

Cash Management: Big Picture

Cash Management

Cash Management

DEFINATION

Cash management may be defined as all activities undertaken to ensure maximum cash availability and maximum investment yield on a government's idle cash. Cash management is concerned with the efficient management of cash from the time revenue is earned to the time a check or disbursement clears the bank.

BASIC ELEMENTS

Cash mobilization: get the cash in as quickly as possible.

Controlled disbursement: release cash at the last possible moment.

Investment program: make the cash work in the meantime.



ASBO Best Practices – Cash Management & Investing

The school business official understands and demonstrates the ability to:

Select professional advisors/contractors such as bond counsel, rating agencies, financial advisors, and underwriters.

Use lease purchasing and partner with other jurisdictions such as municipalities, counties, and other school districts.

Develop/recommend investment policies for the governing board to include investment objectives such as maximizing investment income and preserving the investment principal.

Develop specifications for the selection of banking and other financial services.

Apply the concept of compensating balances.

Comprehend procedures and legal constraints for cash collection and disbursement.

Calculate the yields and understand the risks of various investment options legally available to a school district.



ASBO Best Practices – Cash Management & Investing

The school business official understands and demonstrates the ability to:

Apply various methods of cash forecasting.

Apply appropriate types of short-term debt financing instruments available to school districts.

Analyze monthly internal transfers and loans.

Analyze the legal constraints and methods of issuing long-term general obligation bonds, including the bond rating process and the role of the bonding attorney and rating services.

Analyze the implication of arbitrage rules that may apply to the issuance of long-term general obligation bonds; provide for arbitrage payable when appropriate.

Prepare a cash flow analysis, including a fund balance report, for the board of education.

Review accrued receivables and understand permitted collection processes.



Cash Management & Investment Objectives

Safety

Protect principal

High quality investments

Liquidity

Provide necessary liquidity to cover both ongoing and unexpected cash needs

Cash flow analysis

Return

Provide necessary recognizing need for safety and liquidity, and subject to restrictions specified by the state statutes and the local governing body

- Compliance with legal restrictions / regulations
- Accountability and Transparency
- Stability (Limited Volatility)
- Simplicity



Internal Control Objectives



To provide reliable data for management.

Transactions that represent economic events are recorded in accordance with prescribed procedures in the right accounts in the correct amounts on a timely basis.



To safeguard assets and records.

Access to assets and related documentation should be restricted to authorized personnel. Furthermore, the accounting records are maintained so that they continue to reflect the operation of the government.



To establish accountability.

Responsibility for assets and other resources should be well defined. Timely verification and follow-up procedures are essential.



To promote operational efficiency.

Internal controls should reduce unnecessary duplication of effort and deter inefficient use of government resources.



To facilitate financial reports.

The system should assure that transactions are recorded to permit preparation of financial statements in conformity with generally accepted accounting principles (GAAP).

School Cash Management

Cash Flow Analysis

- Cash flow analysis is the estimate of cash receipts and disbursements during a given period; this management tool provides direction for:
 - Determining cash balances needed to meet obligations
 - Estimating timing for borrowing needs
 - Ability to invest funds when cash flow permits
 - Matching short-term investments with expected cash outflows
 - Avoid the need to liquidate investments prior to maturity



Types of Cash

Cash & Cash Equivalents:

Example: Checking Account, Short Term Investment Accounts

Restricted Cash and Cash Equivalents:

 Example: Bond Proceeds to be used for capital projects of the District, or Voted Debt Service

Deposits & Investments:

- Research Board Policy
- Consult your legal counsel

District's Board Policies and the Business Office Procedures

- What is your District's Investment Policy?
- Depository of Funds Policy?
- Who are your Authorized Signors?
- Does your District have an ACH Policy?
- Internal Controls are imperative!

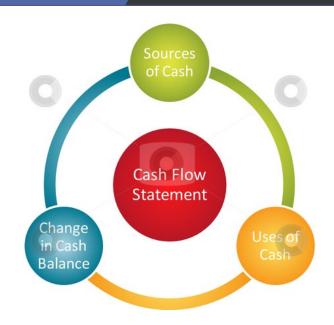
Cash Flow

Preparing a Cash Flow

- Doesn't need to be complex can use excel
- Gather your information first
- Determine weekly, monthly, etc.
- Usually Largest: General Fund
- Involve your <u>accounts payable and payroll staff</u>

Cash Flow Spreadsheets

- Monthly?
- Weekly?
- Combined? (or even daily)







Knowing Your Cash Flows

- Understanding your liquidity needs is vital
 - There can be opportunity costs to excess and insufficient liquidity
- Cash flow analyses can increase earnings potential
- Historical analysis
 - Stability of school district
 - Reliability of historical data
- Projections
 - Student enrollment
 - Educational programs
 - Outsourcing
 - Payroll cycle
 - Revenue stream



Benefits of Cash Flow Forecast

- Plans for liquidity
- Can increase investment income / decrease interest expense
 - Amounts available for investment
 - Period of time to hold the investment
 - Assists with investment strategies
- Forecasts problems: trend lines
 - Revenues not being collected properly
 - Expenditures exceed budget



Cash Flow Timing Considerations

- State Aid is paid on the 20th of each month (except September)
 - No State Aid paid in September
 - Be careful for the three pay month
 - Some districts have successfully transferred to bi-monthly payroll making sure second pay of the month is after the state aid (15th & 30th)
 - Be sure to look at weekly balance to determine your cash low points
- Property tax collections
 - When are your operating taxes collected? (100% summer tax collections solves a lot of cash flow issues)
 - Funds collected at the beginning of the school year to eliminate / prevent state aid borrowing;
 improves timing of cash receipts
 - A substantial amount of tax collections are usually received by September 15th, making it easier to cover expenses during the month when no state aid is received

4 Large Sources of Cash In-Flows

- State Aid Payments
 - 11 payments only October to August
- Tax Collections
 - General Fund &/or Debt
- Federal Grants
- State Grants



Large Sources of Cash Out-Flows

- Payrolls: (Gross cost) General Fund, Food Service, Community Service
- ORS (MPSERS)
- 147 C Payments Usually start in November
- Health Insurance Use gross cost -100% is paid
- Debt & Loan Payments:
 - Buses, Leases, Non-voted Bonds, Equipment
- Daily Operations: Utilities, teaching supplies, bus fuel, property & liability, legal, audit

Cash Flow Projection

		July		August		Sept.		Oct.		Nov.	T	Dec.
	Fri		Fri	Amount	Fri	Amount	Fri		Fri		Fri	Amount
	• • •	Amount		Amount	· · ·	Amount		Amount		Amount		Amount
Beginning Cash/Investments		6,194,053.00		6,170,338.74		4,942,118.09		2,676,726.01		5,983,503.27		4,583,228.10
Receipts:	20	3,548,342.35	20	3,548,342.35			22	3,521,385.60	20	3,521,385.60	20	3,521,385.60
Taxes received		258,810.18		752,265.03		1,165,747.11		3,965,959.12		2,160.76		278,704.69
Date/Loan received-No Set Asides	3											
Set Asides												
Miscellaneous Income		287,184.63		690,260.77		597,194.02		161,009.09		309,246.41		166,306.92
Interfund												
TOTAL RECEIPTS		4,094,337.16		4,990,868.15		1,762,941.13		7,648,353.80		3,832,792.78		3,966,397.21
Expenditures												
Payroll (Wage/Tax/ORS/TSA)												
	6	1,785,623.96	8	1,355,115.31	7	1,397,783.88	8	1,679,358.38	8	1,616,932.68	7	1,593,708.34
	23	1,605,115.31	23	1,305,342.57	21	1,853,870.33	23	1,685,246.82	23	2,384,571.13	21	2,022,946.79
Other Invoices			3	394,303.70	7	58,276.60	5	138,039.61	2	98,573.19		
	6	185,108.75	10	359,261.28	14	12,114.10	12	299,936.04	9	481,647.59	7	317,774.03
	13	355,809.47	17	130,251.19	21	584,240.62	19	15,085.28	16	283,092.08	14	197,692.56
	20	53,994.60	24	77,021.23	28	122,047.69	26	450,504.84	23	255,280.98	21	49,024.43
	27	32,071.24	31						30	111,528.40	28	37,325.42
Misc -Srv fee, Non PR ACH, Sales tax												
INS Employee Contributions				60,646.98				73,405.57		1,441.90		
Date/Loan Payment (Debt)												
Date/Loan Payment (State Aid)		100,328.08	22	2,537,146.53								
Miscellaneous Invoices												
TOTAL EXPENDED		4,118,051.42		6,219,088.80		4,028,333.21		4,341,576.54		5,233,067.95		4,218,471.58
Ending Cash/Investments		6,170,338.74		4,942,118.09		2,676,726.01		5,983,503.27		4,583,228.10		4,331,153.73
TOTAL 18/19 STATE AID		38,789,155.00										
TOTAL 18/19 TAX RECEIPTS		7,894,646.00										
TOTAL 18/19 OTHER INCOME		5,373,059.00										
TOTAL 18/19 OTHER FIN SOURCE		70,000.00										
TOTOL 18/19 INTERFUND		.,,										
TOTAL 18/19 P/R/FICA/RET		41,177,902.00										
TOTAL 18/19 OTHER		10.923.448.00										



Typical Operational Borrowing Options

State Aid Note:

- Most common
 - Set asides decisions
- The district must show a cash flow deficit to issue a state aid note
- Borrowing levels continue to decline as a percent of state aid
- Timing is critical
- Tax Anticipation Note:
 - Similar to state aid notes, but pledges tax revenues instead of state aid
 - · Not as common for local school districts
- Line of Credit:
 - Potentially less appealing to school districts due to Treasury approvals required, even if it is qualified
 - Costs
 - Additional filings for each draw down



"If I knew how I could pay it back I could save it up in the first place."

Considerations For Reducing/Eliminating Need to Borrow

- Summer Tax Collections
 - 100% Operating tax from two largest municipalities
- Switch from 26 pays to 24 pays
- Corporate purchase card
 - Vendors paid via credit; delay of cash leaving bank account

(added benefit – REBATE!)

School Code – Permissible Investments

Revised School Code Section 1221

Treasurer shall deposit funds in a "financial institution" or "joint investment authorized by Section 1223" and as designated by the board of education

Financial institution" is defined as:

- State or national chartered bank
- State or federally chartered savings and loan association
- Savings bank
- Credit union whose deposits are insured by an agency of the U.S. government

Must maintain a principal office or **branch office located in this state** under the laws of the state of Michigan or U.S.

Be an eligible depository for state funds as well







Revised School Code Section 1223: Permitted Investments

Code	Sector	Maximum Maturity	Minimum Credit
a)	U.S. Treasuries	No Limit	n/a
b)	Certificates of Deposit	No Limit	n/a
c)	Commercial Paper	270 days	Rated Prime
d)	Government Agencies or Instrumentalities	No Limit	n/a
e)	Repurchase Agreements*	No Limit	n/a
f)	Bankers' Acceptances	No Limit	n/a
g)	Mutual Funds**	No Limit	n/a
h)	Investment Pools**	No Limit	n/a
i)	CDAR's – Michigan Bank	No Limit	FDIC
a)	Obligations of the State of Michigan	5 years	n/a



Allowable Bank Accounts and FDIC Insurance

School Code allows for deposits into checking, NOW, savings, money market, CD's, and CDARs



Bank Account Type	In State (bank is located in the same state as the public entity)	Out of State (bank is located outside of the state of the public entity)
Demand Deposit including NIBTA and Interest Bearing Transaction Accounts	\$250,000	Not separated
Time & Savings including Negotiable Order of Withdrawal (NOW) and Money Market accounts	\$250,000	Not separated
Total	\$500,000	\$250,000

"Public entities can only invest in banks that have a physical place of deposit in the state of Michigan"



Cash Flow Analysis:

How much for how long

Cash Flow Timing Considerations

State Aid

- State aid is paid on the 20th of each month (except September)
 - Be careful for the three pay month
 - Some districts have successfully transferred to bi-monthly payroll making sure second pay of the month is after the state aid (15th & 30th)
 - Be sure to look at weekly balance to determine your cash low points

Property tax collections

- When are your operating taxes collected? (100% summer tax collections solves a lot of cash flow issues)
 - ➤ Funds collected at the beginning of the school year to eliminate / prevent state aid borrowing; improves timing of cash receipts
 - ➤ A substantial amount of tax collections are usually received by September 15th, making it easier to cover expenses during the month when no state aid is received

Focus on Big Ticket Items



Most of cash flow (80%) can be captured in major line items:



Material Inflows:

State Aid
Tax Collection
Grants



Material Outflows:

Payroll
Benefits / ORS
Capital Expenditures

Weekly Cash Flows - Example

	Week of 07/01/2019	V	Veek of 07/08/2019	We	eek of 07/15/2019	Week of 07/22/2019
	07/05/2019		07/12/2019		07/19/2019	07/26/2019
Balance Fwd.	\$ 202,587	\$	1,495	\$	300,086	\$ 258,256
Revenues						
Local Revenue(Taxes)	\$ -	\$	119	\$	-	\$ -
Local Revenues (Miscellaneous)	\$ 19	\$	49,442	\$	-	\$ -
Local Revenues (Athletic Related)	\$ -	\$	-	\$	-	\$ -
Payschool Deposits	\$ -	\$	-	\$	-	\$ -
State Aid (300's)	\$ -	\$	-	\$	-	\$ 1,367,763
Federal(Title/IDEA/)-(400's)	\$ -	\$	-	\$	53,148	\$ -
Payments from Other Schools (500's)	\$ 33,360	\$	13,675	\$	-	\$ 40,080
Transfers In (600's) including Food Service	\$ -	\$	2,292	\$	-	\$ 7,655
Wire Transfer	\$ -	\$	800,000	\$	-	\$ -
Loan Proceeds		\$	-	\$	-	\$ -
Total	\$ 33,379	\$	865,528	\$	53,148	\$ 1,415,498
<u>Expenditures</u>						
Payroll	\$ -	\$	295,211	\$	-	\$ 312,628
Board Bills	\$ -	\$	256,809	\$	90,354	\$ 236,811
EDUSTAFF/xxx - ACH	\$ -	\$	-	\$	-	\$ -
xxxx - ACH	\$ -	\$	-	\$	-	\$ -
xxxx Wires	\$ -	\$	13,551	\$	-	\$ 13,324
xxxx ACH (projection is ER only)	\$ 233,271	\$	-	\$	4,122	\$ -
xxxxxxxxxx/ach	\$ 1,200	\$	-	\$	-	\$ 636
Health Equity	\$ -	\$	1,365	\$	-	\$ 1,175
Purchase cards (Huntington)	\$ -	\$	-	\$	-	\$ 108
Other/Bank Fees/ArbiterPay	\$ -	\$	-	\$	503	\$ -
Loan Payback/Wire Transfer	\$ -	\$	-	\$	-	\$ 900,000
Total	\$ 234,471	\$	566,936	\$	94,978	\$ 1,464,682
Cash Balance	\$ 1,494.96	\$ 3	300,086.45	\$ 2	258,256.41	\$ 209,072.66

Case Study:

Cash Management in Practice

It Starts with Banking

Banking To Do

Samples

SAFETY

Understand Bank Financials

Deposit ASAP

Streamline Collection Process

Disbursement Trickle

Spread payables run (bi-monthly)

Control Costs

Regular review of analysis

Automate

Utilize bank services for efficiency

Earn ECR / Interest

Use LGIP / TERM

Relationship

Develop relationship with advisor



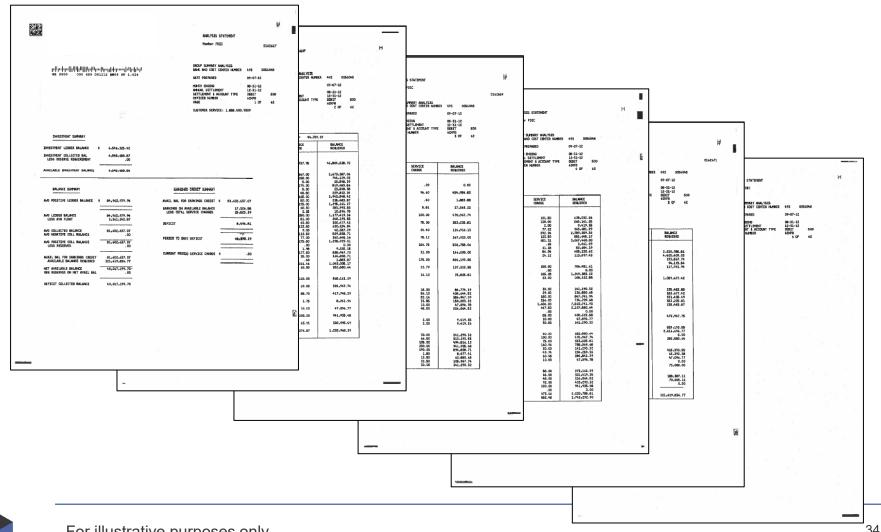
Banking Math

Banks make most of their income through spread

Loan Rate – Deposit Rate = Spread

- Interest Spread was compressed when Fed Funds went to 0%. Deposit rates bottomed at 0% while loan rates continued spiral down = compression
- Banks focused on service fees and ancillary revenue areas (brokerage, wealth management, etc.) to bolster revenues
- The Overnight Fed Funds rate was reduced to 0% to 0.25% in 2020 and 2021. The Fed has increased rates to 4.5% 4.75% in 2022 and 2023. Banks can be slower to respond rising market rates with paying higher interest rates.

How Banks Invoice Fees? Account Analysis Statements



Earnings Credit Rates/Compensating Balances

- Earnings Credit Rates (ECRs) are credits offered by a bank to offset service charges.
 - Credits typically are only good for paying bank fees and
 - Unused credits expire eventually
- Historically, the rate paid was often pegged to the U.S. Treasury bill rate.
- During the financial crisis, banks moved from pegs to bank-managed rates.



What to Watch For in Your Compensating Balances

- Some banks set aside a 10% reserve.
 - This reduces the amount they pay you a credit on.
- Banks that charge FDIC assessments typically apply it on the <u>ledger balance</u> (a higher amount).
 - They are charging you for balances that are not yet available to you in the account
- Earnings Credit paid on the <u>collected balance</u> (a lower amount).
 - They are paying you only for the balances that are available in the account

What to look for?













Deposit Assessment

Deposit Coverage



Sample Analysis Statement

FDIC-like charges are typically included in line item portion of monthly analysis statement

Service	Unit		Service
Description	<u>Price</u>	Volume	Charges
RECOUPMENT MONTHLY IB	0.12750	1,500.13	191.27
RECOUPMENT MONTHLY	0.12750	28,371.73	3,617.40
BALANCE & COMPENSATION INFORMATION			3,808.67
CONT DISB CREDITS POSTED	0.35000	36.00	12.60
DESKTOP DEPOSIT-DEPOSIT CREDITED	0.35000	75.00	26.25
ACCOUNT MAINTENANCE W/ CHK RETURN	4.80000	5.00	24.00
ZERO BALANCE MASTER ACCOUNT MAINT	9.45000	1.00	9.45
ACCT MAINTENANCE	4.80000	4.00	19.20
ACCT MAINTENANCE CHEXSTOR-PLUS	4.80000	1.00	4.80
ZERO BALANCE MONTHLY BASE	6.75000	7.00	47.25
DEBITS POSTED	0.04000	765.00	30.60
GENERAL ACCOUNT SERVICES			174.15



Bank Charges Can Significantly Reduce the Benefit of the ECR

No Reserve Requirement or FDIC			Reserve Requirement and FDIC Assessed		
Earnings Credit on Compensating Balance			Earnings Credit on Compensating Balance		
Total Collected Balance		\$25,000,000	Total Collected Balance		\$25,000,000
Less Reserve Requirement	0%	\$0	Less Reserve Requirement	10%	\$2,500,000
Available Balance		\$25,000,000	Available Balance		\$22,500,000
Earnings Credit	0.25% \$25,000,000 * 0.25 * 31/365	\$5,308	Earnings Credit	0.25% \$22,500,000 * 0.25 * 31/365	\$4,777
Less FDIC Assessment	0% \$0/(\$25,000,000 * (31/365)	\$0	Less FDIC Assessment	0.10% \$2,123/(\$25,000,000 * (31/365)	\$2,123
Net Earnings Credit	0.25% on Collected Balance	\$5,308	Net Earnings Credit	0.125% on Collected Balance	\$2,654

For illustrative purposes only.

Low Interest Environment Leads to Negative Earnings

Investable Balance Receives An Earnings Credit Of 0.350000%

```
Total Required Balance
                                                                                        16,262,590.18
Additional Balance Required
                                                                                         2,447,172.39
      Earnings Credit Allowance
                                               3,974.30
    - Less Actual Analyzed Charges
                                               4,678.28
                                                (703.98)
      Net Position
Analyzed Results Transferred In
                                                             (635.18)
Total Analyzed Result
                                                             (635.18)
Charge posted to account (016) 2801883
                                                           on 06/10/20
                                                                                   635.18
$1.00 Of Unit Price Is Equal To 3,476.19 Of Composite Balance
```

- Despite having balances of nearly \$14 million, pay bank \$704 for May. On an annualized basis, client pays \$8,450 to bank for maintaining \$14 million on deposit.
- The higher the balance the higher the monthly fee due to "Deposit Charge".
 Paying just for keeping money at bank.

Banking Optimization

Strategies to Reduce Fees / Increase Efficiency

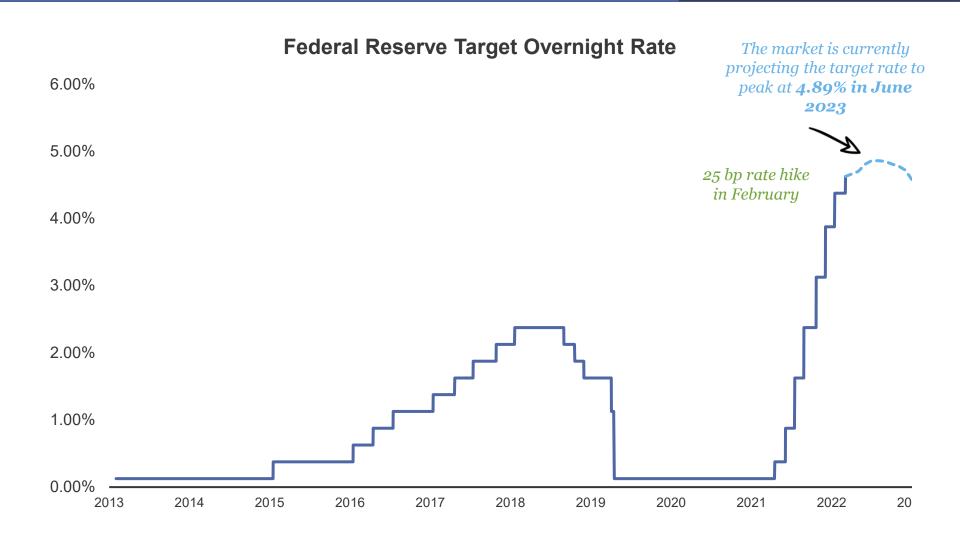
- Reduce bank balances to minimize "Deposit Charge".
- Utilize Local Government Investment Pool as State Aid Depository move money to bank as needed to cover payroll and payables.
- Based on Cash flows, invest available funds in longer term investments seeking to increase yield

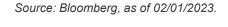
Utilize Bank for what they do best – transactions and data

- Look for opportunities to become more efficient / enhance internal controls through bank services (positive pay, reconciliation services, data exports, etc.)
- Evaluate usage of banking services to determine which services could be eliminated or replaced with more inexpensive services
- Review bank analysis statement with banker at least annually to eliminate unnecessary services and unnecessary charges.

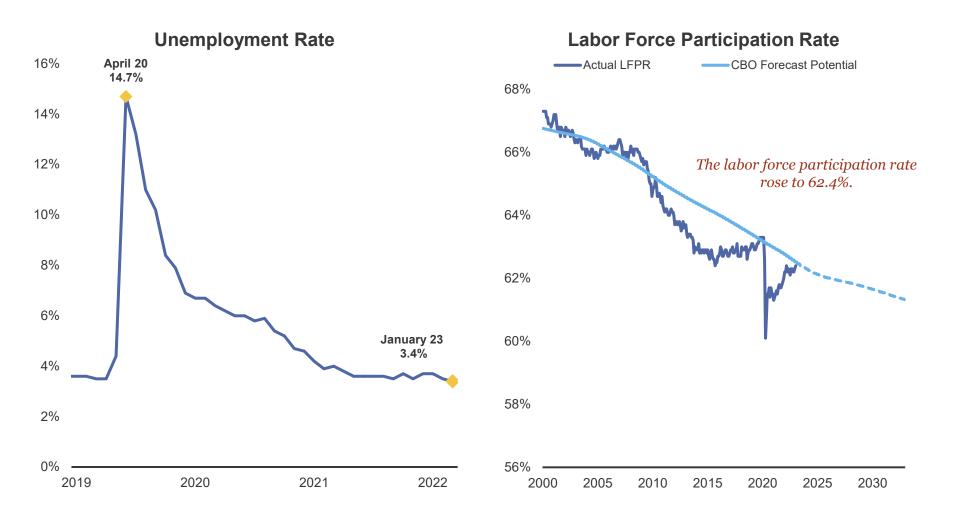
Current Market Conditions

Short-Term Interest Rates Are Still Rising





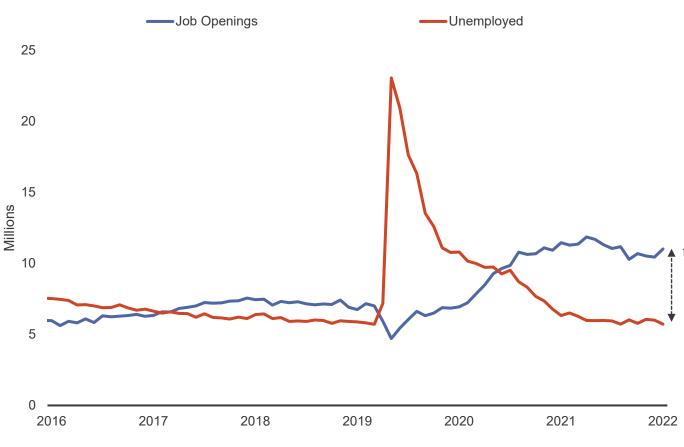
U.S. Economy Added 517,000 Jobs in January; Unemployment Rate Fell to 3.4%





The Labor Force Imbalance Persists

Job Openings vs. Unemployed Workers



The job openings-tounemployed ratio, which grew to 1.9 and is the Fed's preferred gauge of labor-market tightness, highlights the persistent labor market imbalance

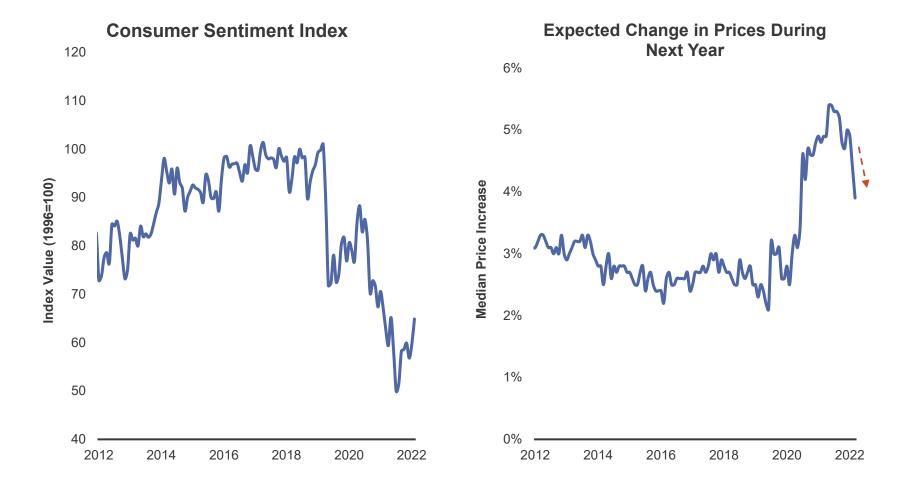


FOMC Slows Rate Hikes, Signals Further Increases Are Coming at February Meeting

February FOMC Meeting

- ► The Federal Reserve slowed its drive to rein in inflation and said further **interest-rate**hikes are in store as officials debate when to end their most aggressive tightening of
 credit in four decades.
- ► The Committee decided to raise the target range for the Federal Funds target rate to 4.50% 4.75% and anticipates that "ongoing increases" would be needed to bring inflation under control.
- Powell indicated that rate cuts in 2023 are not as likely as the market believes by reiterating that restrictive policy will be maintained.
- ► "There is only one way forward here, and that's for Congress to raise the debt ceiling," Powell said in response to a question at his press conference following the Fed's latest interest-rate-setting meeting.

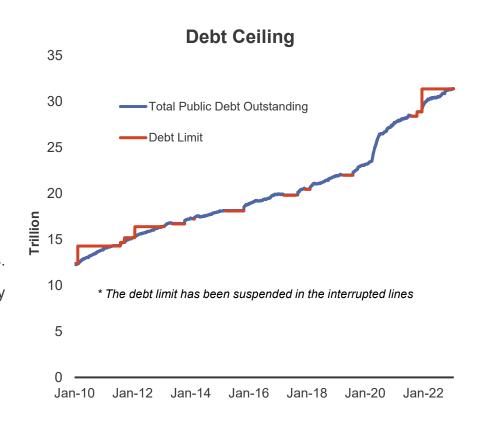






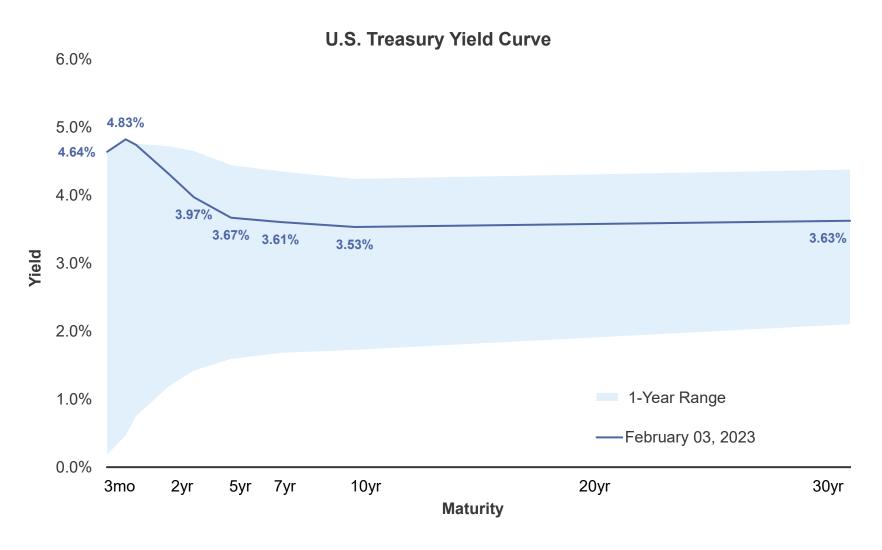
Treasury Has Hit the Debt Limit

- The statutory debt limit is the maximum amount of U.S. government debt authorized by Congress. The current limit, last increased in December 2021, is \$31.381 trillion.
- Failure by Congress to raise the debt limit would hinder the Treasury Department's ability to meet the nation's existing legal obligations, including Social Security and Medicare benefits, military salaries, principal and interest on the national debt, tax refunds, and other payments.
- Raising the debt limit does not authorize new spending, it simply allows the Treasury to raise sufficient funds to meet spending obligations already approved by Congress.
- The Treasury Department has implemented "extraordinary measures" in order to prevent the United States from defaulting on its obligations as Congress deliberates on increasing the debt limit. Secretary Yellen has indicated these measures can last at least into June, but timing is subject to considerable uncertainty.





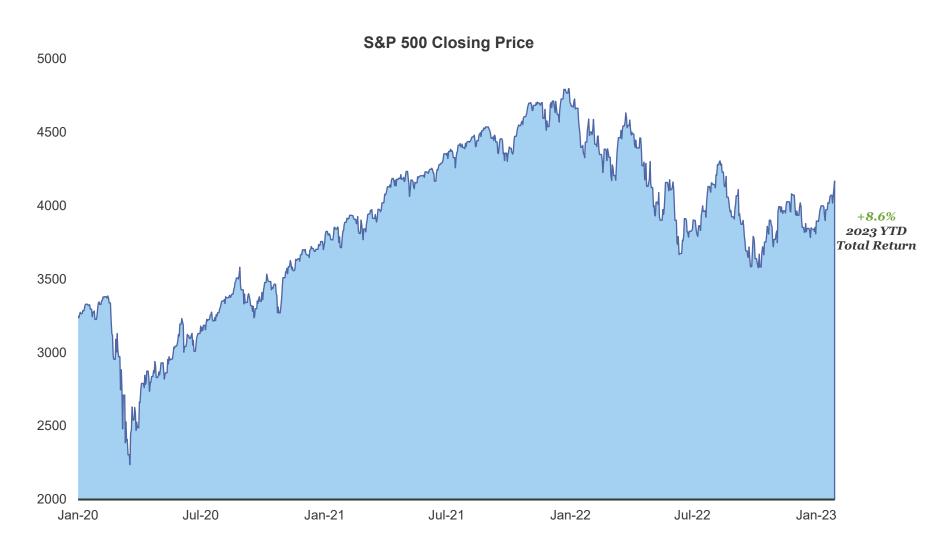
Yield Curve Is Deeply Inverted





Source: Bloomberg, as of 2/3/2023.

Equities Rally Following Fed Meeting





Source: Bloomberg, as of 2/2/2023.

Investment Strategy Considerations

Investment Considerations

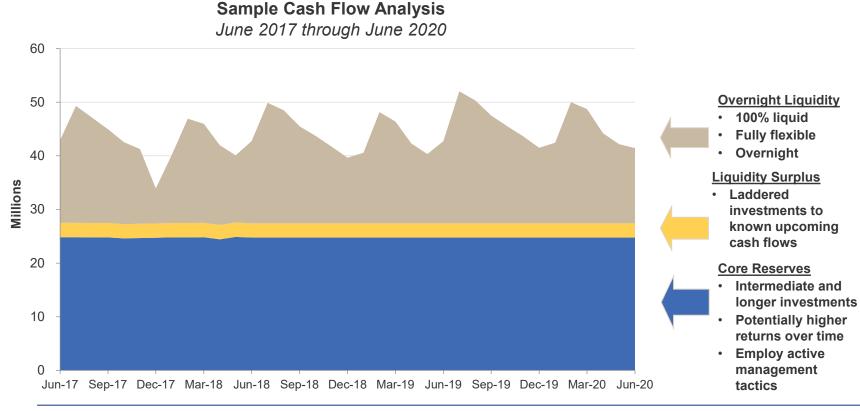
Investing is about safely optimizing available funds while meeting liquidity demands. Need to know how much for how long?

Investing To Do	Samples
SAFETY	Understand Credit Ratings
KNOW CASH FLOW	Invest Debt Service to May Due Date
DIVERSIFICATION	Utilize pool or separate account
UNDERSTAND RISKS	Understand credit, interest risks, etc.
SIMPLICITY	KISS – sustainable process
EARNINGS	Use LGIP / TERM / CD's
RELATIONSHIP	Develop relationship with advisor



Cash Flow Analysis Leads to Prudent Investment Decisions

- Excess liquidity in an investment management program can be an opportunity cost
- Detailed cash flow analysis can help prudently define fund balances that can be invested in intermediate – to longer-term investments at potentially higher yields.



Basics of a Cash Management Program

Overnight Liquidity

Liquidity Surplus

Core Reserves

GOAL: meet daily operating expenses

GOAL: match assets to future liabilities

GOAL: actively manage reserve fund to provide long-term growth

Key Components:

- Safety and 100% liquidity
- Low cost banking relationship
- Online banking
- Transaction functionality
- ACH/Wire capability
- Daily fund balances and monthly statements

Key Components:

- Safety and liquidity
- Understanding of known cash flow dates
- Ladder investments with maturities aligned to known future payment dates
- Enhance earnings potential

Key Components:

- · Safety, liquidity, and return
- Prudent reserve balance should not be anticipated to withdrawn on for at least 1-5 years
- Total return strategy
- Understanding of historical cash needs and month-end balances

Proposed Investment Strategy:

- Bank deposits
- LGIP
- Money market funds

Typical Investment Types:

- Treasury Bills/Notes
- Federal Agency Securities
- Certificates of Deposit
- TERM Investments

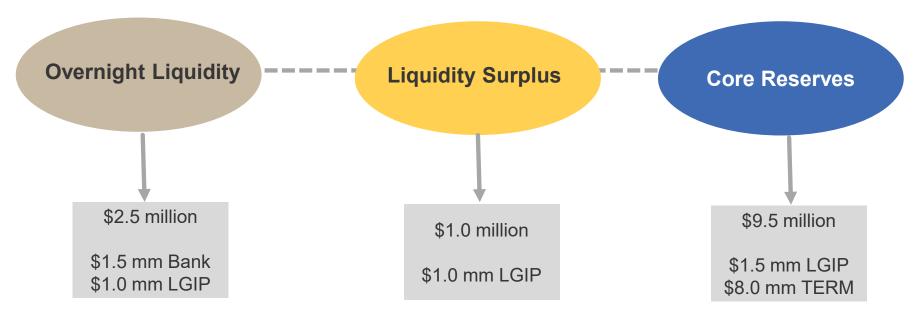
Typical Investment Types:

- Treasury Notes
- GNMA MBS
- Agency Notes
- Corporate Securities

Sample Investment Allocation

Assumptions:

- Total Funds available = \$12 million
- Annual Budget of \$30 million = \$2.5 million per month expenditures
- Debt Service of \$9.5 million November \$1.5 million / May \$8 million
- Tax Collection 100% Summer of \$9.5 million



Note: The above example is for illustrative purposes and is not a recommendation for investing.

Helpful Hints

01

Remember "S L Y" – Safety, Liquidity, and Yield (in that order)



02

Safeguarding of assets – safety comes first



03

Historically, yield curve provides higher earnings longer-term



04

Cash flow analysis is fundamental to managing public funds



05

If you can't explain it, don't buy it. Ask questions and tap into your colleagues and MSBO





Appendix: Investments Defined

Sources

Government Finance Officers Association

https://www.gfoa.org/best-practices

Association of School Business Officials International

https://asbointl.org/

Michigan Legislature

http://www.legislature.mi.gov/(S(tljqyswwc1twda4w2u4uv43j))/mileg.aspx?page=getObject&objectName= mcl-380-1221

Government Finance Officers Association of Texas

https://gfoat.org/

Security Types – U. S. Treasuries

- The Treasury Department issues debt to meet budgetary needs in the form of U.S. Treasury securities:
 - Highest credit rating (full faith and credit of the U.S. government)
 - Most marketable security provides for liquidity
 - Fixed rate and term
 - Non-callable

Description	Maturities	Interest Payments
U.S. Treasury Bills	Short-term 4, 13, or 26 weeks	Issued at discount – buy for less than par; at maturity receive full par
U.S. Treasury Notes	Intermediate-term 1 to 10 years	Paid semi-annually; priced at current market
U.S. Treasury Bonds	Long-term 10 years or more	Paid Semi-annually; priced at current market

Security Types – Federal Agencies

- Michigan School Code allows for investments in securities issued or guaranteed by agencies or instrumentalities of the U.S.
- Variety of debt instruments including **bullets**, **callables**, **fixed**, **variable**, etc.

Federal Agency / GSE	Short Name	Government Backing / Rating
Government National Mortgage Corporation	Ginnie Mae GNMA	Full faith and credit of the U.S. government
Federal Home Loan Mortgage Corporation	Freddie Mac FHLMC	Implicit backing of the U.S. government, temporarily explicit backing, AAA rating
Federal National Mortgage Association	Fannie Mae FNMA	Implicit backing of the U.S. government, temporarily explicit backing, AAA rating
Federal Home Loan Bank	FHLB	Implicit backing of the U.S. government, temporarily explicit backing, AAA rating

Credit Rating Scale

Moody's		S&P		Fitch				
Long-term	Short-term	Long-term	Short-term	Long-term	Short-term	Description		
Aaa		AAA		AAA		Prime		
Aa1		AA+	A-1+	AA+	F1+			
Aa2		AA	A-1+	AA	FIT	High grade		
Aa3	P-1	AA-		AA-				
A1		A+	A-1	A+	F1	Upper medium	Investment-	
A2		Α		Α		grade	grade	
A3		A-		A-				
Baa1	P-2	BBB+	A-2	BBB+	F2	Lower medium		
Baa2	P-3	BBB	A-3	BBB	F3	grade		
Baa3	F-3	BBB-	A-3	BBB-	F3			
Ba1		BB+		BB+				
Ba2		BB		BB		Speculative		
Ba3		BB-	В	BB-	В			
B1		B+	В	B+		Highly speculative		
B2		В		В			Highly speculative	Highly speculative
B3		B-		B-				
Caa1		CCC+		ccc		Substantial risks	Non-	
Caa2	Not prime	CCC				Extremely	investment	
Caaz		- 000	c		speculative	grade		
Caa3		ccc-				Default imminent		
Oddo						with little		
Ca		CC				prospect for		
		С				recovery		
С				DDD				
1		D	/	DD	/	In default		
				D				

Bank Cash Management Tools

 Banks offer multiple Cash Management Tools to make your job more efficient, increase security and earnings.

Deposit	Payment	Data Services	Security
Employee Courier	Check	Online Reporting	Positive Pay
Armored Service	ACH	Prior / Same Day	ACH Positive Pay
ACH	Wire		ACH Block
Wire	Purchasing Card	Account Reconciliation	Dual Authentication
Remote Deposit	File Transfer	Check Imaging	Notifications
Lockbox		Deposit Imaging	
Merchant Processing		ZBA / Sweeps	

Questions?

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BREAK



Michigan School Business Officials Certification Class

Cash Management

February 16, 2023

Mary Beth Rogers, EdS, CFO Executive Director of Business Services Clarkston Community Schools (248) 623-5410 mbrogers@clarkston.k12.mi.us

Cash Management Topics

- Financial Services Overview
- Cash Collection
- Cash Disbursement
- Purchase Card Procedures
- Internal Transfers & Loans
- Cash Flow Analysis
- Budgeting
- Fund Balance
- Fraud & Abuse



Financial Services Overview

Banking RFPs available on MSBO website

Identify a bank that can offer most comprehensive service at most competitive rate.



Financial Services Overview

- Provide bank with schools current account structure
 - General Fund/Athletics
 - Food Service
 - Club Accounts
 - Interest Sweep Account
 - Debt/Bond Accounts
- Provide bank with volume & balances
 - # deposit tickets & checks paid
 - # ACH Debits/Credits
- Additional services required
 - Internet Banking
 - Check Imaging

General Bank Information

- Financial Strength
 - Safety & Soundness (capital ratios, market capitalization, total assets)
- Credit Ratings
 - Standard & Poor's/Moody's
 - Bank Financial Strength
 - Bank Deposits
 - Issuer Rating
- Financial Statements
- www.bankrate.com
- Bank Contact Personnel Qualifications
- References



Cash Collection & Disbursement (since Covid-19 - More Electronic)

- Boosters/PTO Groups
- Activity Funds (Fund 29)
- Food Service
- Athletics
- General Fund

Comprehensive procedures are available on MSBO website

Recommendations for Boosters and PTO's

- Treasurer should issue monthly financial report to the organization's board
- Keep formal minutes in a book that is a permanent record passed on to successors
- Prepare and maintain formal bylaws
- Encourage use of B.O. procedures
- Best practice to stay completely separate from these organizations (requirement of GASB 84)
- Some schools choose to meet annually to review internal controls
- PTOs hire outside firm to complete formal audit
- Annual Attorney Seminar

Activity Funds (Fund 29 or GF)

- New activity funds must get BOE approval
- Gasb 84: will become either fund 29 or GF (unless you have no admin controls)
- All monies collected must be deposited
 - No commingling of personal monies with club funds
 - No money left in desks overnight
 - All funds collected should be counted by club treasurer (employee of District) and building secretary.
 - Building secretary will make the deposit
- Disbursements No Cash used for expenses
 - Activity Purchase Card will be issued to Treasurer
 - Business Office will process checks requested through the Building Secretary
 - Do not use for General Fund expenditures
- Reconciliation (Treasurer, Building Secretary & Business Office)

Food Service

Collections

- · Cashiers verify their start up cash before & after shift
- Cashiers verify collections at end of shift
- Cashiers turn monies into FS Secretary for verification
- Secretary makes daily deposits
- Bank verifies her deposit is correct
- FS Director verifies Secretary deposit with actual deposit slip
- Business Office reconciles bank statements

Disbursements

- Purchase Orders & invoices approved by FS Director
- Business Office processes payments

General Ledgers

- FS Director and Business Office reconcile monthly
- Business Office manages the general ledger

Athletics

Cash Collection

- The ticket seller verifies beginning & ending ticket number with Athletic Secretary
- Ticket seller counts all cash & reconciles tickets
- The cash box and tickets are verified by Secretary
- Ending ticket number is logged
- Some Districts are moving to scanners
- The cash box is kept locked up and then deposited the following day; Business Office counts and deposits
- Business Offices reconciles bank statements
- Disbursements No Cash
 - Athletic Directors approves all purchases
 - Business Office processes payment
 - Athletic Secretary pays officials Arbiter/Ref Pay
- General Ledgers
 - Business Office reconciles with AD monthly
 - Business Office manages the general ledger

Gate Receipt & Expense Report

Date:	Opponent	:	
Officials	Pay	Workers	Pay
Ticket Color:			
Nex	t unsold ticket#		
Firs	t sold ticket#		
No.	tickets sold		
	5.00 per ticket		
Gate Receipts			
Count Sheet:			
100s, 50s, 20s	, 10s, 5s	, 1s, Coin, Cks	5
Counted by	Date Co	unted by	_Date
Deposited by	Date Es	corted by	

Gate Receipt & Expense Report

Total Cash in Cashbox______
Less Cash Advance Amt._____
Total Gate Receipts_____
Pre-Sale Amount_____

Total Deposit_____

General Fund

Collections

- All Checks are opened by Business Office Assistant
- · Every check is copied and stapled to bank receipt
- Checks are deposited through remote scanners
- Accountant or Director verifies and post receipts
- Bank Reconciliations are completed monthly
- Cash is counted by two staff members
- Segregation of Duties

Disbursements

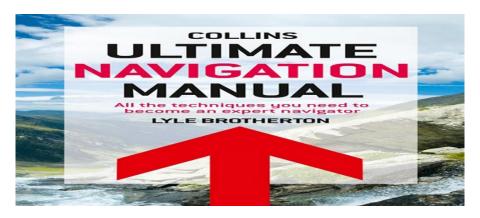
- Purchase Orders processed by Building Secretary
- Building Principals/Department Directors approve POs
- All orders and invoices approved by Building Secretary
- Finance Director approved POs over \$10,000
- BOE approves purchases over dollar limit set by policy
- Business Office processes payments

Deposit Worksheet

Date			
Activity Accour	nt Name		
Persons Count	ing		
	Depositor		
Coins		Bills	
Pennies	Ones		
Nickels	Twos		
Dimes	Fives		
Quarters	Tens		
	Twentys		
Silver Dollars_	Fiftys		
Total Coins	Total Bills		
Checks Total (from below)			
Grand Total			
Check Listing			
Name	Check Number	Amount	

GENERAL FUND - GRANTS

- YOU SHOULD HAVE IN PLACE A FEDERAL PROCEDURE MANUAL!
 - MSBO has examples/templates on their website
 - You should make it your own
 - Make sure that you are following the procedures
 - Your auditors will request it
 - · Can share mine mbrogers@clarkston.k12/mi.us



Purchase Card Procedures

- Every purchase card holder signs an agreement
- Every purchase card holder is given a copy of the policies and procedures
- Dollar limits are placed
- All receipts must be turned in with credit card statement to Business Office – No exceptions!
- No receipt or sales tax reimburse the District
- Purchases over \$500 still need either a Purchase
 Order or prior Business Office approval
- Summary of all purchases shared with BOE
- Auditor reviews statements and receipts
- Transparency Requirement
- Failure To Follow Procedures Card Limit to \$0

Purchase Card Procedures

Purchase card agreements and procedures are available on the MSBO website under the purchasing page.

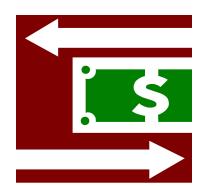
Here is the link:

http://msboonline.msbo.org/SPP/Policies/SPP/Policies/spp/

Or I can share mine - <u>mbrogers@clarkston.k12.mi.us</u>

Internal Transfers and Loans

- Due from Other Funds
 - General Fund / Debt Fund
 - General Fund / Food Service
 - Debt Fund / Debt Fund
- Incoming and Outgoing Transfers to/from ISDs
 - Check Accounting Manual listed as a transfer not an expense
- Reconciled for annual audit



Examples of Transfers

- Debt funds to/from General Fund
 - Property taxes
- General Fund to/from Food Service
 - Payroll run through General Fund
 - Payable checks run through General Fund
 - Federal and state electronic transfers
 - Purchase Card purchases
- ISD Transfers
 - Vocational and Special Education mills
 - Itinerant Staff
- Reconciliation spreadsheet for auditors-BEST PRACTICE-MONTHLY

Cash Flow For Borrowing (MFA)

- MFA pool program closes approx. Aug 20th
- Cash flow projection (14 month)
- Detail for greatest shortfall of the year
- Cash flow and application on MFA website
- Get assistance from attorney
 - Cash flow spreadsheet to attorney in May
 - Board resolution to attorney in June
- It is a one year note
 - Set aside (usually the less costly choice)
 - No set aside (all paid on 8/20)
- Can borrow from bank (more flexible)

Monthly Cash Flow

- Excel spreadsheet completed monthly
- Make sure that we can meet all payroll & payables
- Cash Flow Example:

Aug 31, 2022 Bank Balance	\$2,800,000
September Revenue (Local)	\$152,000
September Payables	(\$513,000)
September Payroll	(\$991,000)
Sept 30, 2022 Bank Balance	\$1,448,000

CASH FLOW ANALYSIS

 Before Oct 20, we are 33% into the 2022/2023 year but have received 0% of 90% of our funding.

Cash Flow Continued:

Sept 30, 2022 Bank Balance October Revenue Oct payables before Oct 20 Oct Payroll before Oct 20 Oct 19, 2022 Bank Balance \$1,448,000 \$18,000 (\$108,163) (\$1,100,000) \$257,837

CASH FLOW ANALYSIS

Cash Flow Continued:

```
Oct 19, 2022 Bank Balance $257,837
Oct 20 State Aid $1,400,000
Oct 30 payroll ($550,000)
Oct 23 payables ($300,000)
Oct 31, 2022 Bank Balance $807,837
```

*If pay bi-weekly need to be ready for three payrolls. Going to bi-monthly can help cash flow and reduce borrowing needs.

Budgeting

- Start with previous year's budget
- Complete budget to actuals
- Build assumptions into the budget
- All budget categories must be completely rejustified each fiscal year to cut waste
- Improve organizational and fiscal efficiency
- The primary purpose of a budget is to translate educational priorities into programmatic and fiscal terms
 - This is more and more difficult when finances become tighter and tighter
 - Covid-19 Challenges Falling off the cliff...

General Budget Process

- Estimate revenues
- Envision the educational programs
- Estimate expenses to support these programs
- Balance program needs against revenue and expenditure realities
- Gather input from administrators
- Project all salaries and benefits
- Determine any equipment needs
- Consider fuel and utilities
- Develop first draft and review with finance committee and make necessary adjustments
- First & second reading at BOE meetings
- Budgets for Gasb 84 Fund 29 (captures activity accts)

Budget Heading Examples

- Description
 - Teachers' Salaries
- ▶ 2022/2023 Final Budget
 - \$2,373,000
- Increases
 - \$0
- Decreases
 - \$107,000
- ▶ 2023/2024 Original Budget
 - \$2,266,000
- Comments
 - Step Increases; 0% raise; Elim 1.83 fte

Fund Balance

- Reasonable Fund Balance
- Recommended Fund Balance
- Describing Fund Balance to Board & Public
- Fund Balance Policy
- Fund Balance Designations

Reasonable Fund Balance

- State and federal funding cuts
- Tax collection practice
 - 100% summer/100% winter
 - 50% summer / 50% winter
- New school construction may require additional operating costs
- Bond rating agencies
- Declining enrollment
- Future Obligations
- Fund Balance trends
- Borrowing needs
- Monthly Cash Flow Analysis
- Early Warning Legislation
- One-Time Monies

Recommended Fund Balance by MSBO

15 to 20 Percent of Budget

Rationale:

- Necessary to avoid borrowing during the two-month period between August and October state aid payments
- Allows district to absorb mid-year cuts in state funding
- Avoids major changes to educational programs.
- Avoids mid-year layoffs
- Available for unanticipated and unbudgeted expenditures
- These economic times may be unrealistic
- Covide-19

Visit MSBO at www.msbo.org under school finance

Describing Fund Balance to the Public

- FB is necessary because at the end of each fiscal year the State of Michigan owes each district payments approximating 16% to 18% of their state aid.
- Each year Michigan schools begin operations in August or September without any current year state aid – which then starts in October.
- Our auditors recommend 10–15% fund balance.
- With 100% summer tax collection we need 9% to avoid cash flow borrowing.

Describing Fund Balance to the Public (example)

- Compared to a situation for an individual, 15% fund balance amount is the equivalent of \$6,000 for a person who earns \$40,000 per year.
- This \$6,000 would be the only amount available for emergencies of that individual.
- It would be used for such items as roof repairs, unanticipated home maintenance, unplanned medical bills, unexpected income loss, vehicle repairs, etc.

Fund Balance Board Policy

The Board of Education recognizes that good fiscal management comprises the foundational support to the entire school program. To make that support as effective as possible, the board intends to maintain a fund balance of ten percent of the district's general fund annual operating expenditures. If a fund balance declines below ten percent, it shall be recovered at rate of one percent, minimally, each year.

Or

You could have a fund balance policy that designates the importance of fund balance and fiscal responsibility and not state a specific %.

Fund Balance Designations

Technology Replacement

Capital Outlay Purchases

New Roofs and Boilers

Other Board Approved Items

GASB 54 Fund Balance

- Effective June 30, 2011
- Five Tier Fund Balance
- Nonspendable Inventory, prepaid items
- Restricted Legal constraints
- Committed Board approved
- Assigned Gov't entity intends
- Unassigned
- www.cde.ca.gov/fg/ac/co/documents/gasb5
 4.doc

Tips on Fraud Prevention

The best way to prevent fraud from happening in your organization is to be **Alert** and **Observant**.



Organization Created Opportunities

- Absence of policies and procedures
- Lack of adequate controls: administrative, operational, processing or documentation
- Turnover/loss of key employees
- Inadequate personnel screening
- Constantly operating under crisis conditions.
- Impersonal relationship and low morale
- Current school district environment in MI
- Lack of segregation of duties
- Covid-19 working from home & online

Preventing Fraud

- Design and implement procedures and internal controls
- Have a fraud risk evaluation by external auditors
- Conduct internal/external surprise audits
- Ongoing fraud education and training
- Create a culture of honesty and ethics set tone at the top
- Create an environment in which staff believe that fraud will be detected and punished
- Don't forget the Boosters/PTO Group

Fraud Examples

- Real examples that I have experienced:
 - Previous Superintendent turned in receipts multiple times for reimbursement, fake receipts, changed receipts
 - Secretary didn't deposit all fundraisings funds
 - Bus Driver stole student's I-pod
 - PTO president/super-volunteer only deposited checks no cash from fundraisers
- Everyone was terminated and prosecuted no tolerance message was sent
- The district changed procedures and added more internal controls
- Auditors were immediately brought-in

Procedures & Internal Controls Implemented

- Conduct surprise audits
- Implement procedures
- Monthly reconciliation between treasurers, building secretary and business office
- Building secretary training
- Require more than one signature on checks
- Require different people to collect, deposit and invest funds – segregation of duties
- Don't Allow or Limit Crowdfunding

Procedures & Internal Controls Implemented

- Implemented new deposit worksheet
- Implemented online payment program
- Formed fundraising committee
- More thoroughly review everyone's reimbursements including Superintendent
- Developed written Business Office procedures
- Secretary Training

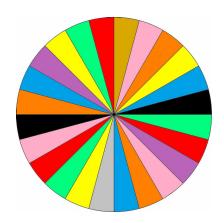
Any Questions?



BREAK



When we return, we'll spin the wheel for a gift card prize!



Cash Management— Prevent Fraud in Your School



BUSINESS SUCCESS
PARTNERS

PRESENTED BY

Kristi Krafft-Bellsky Partner

February 16, 2023

Meet Your Presenter



Kristi Krafft-Bellsky, CPAPartner, Quality Control Director

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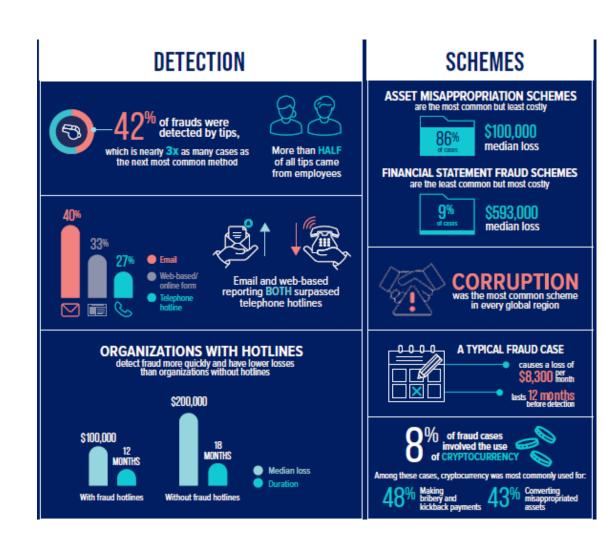
Today's Topics

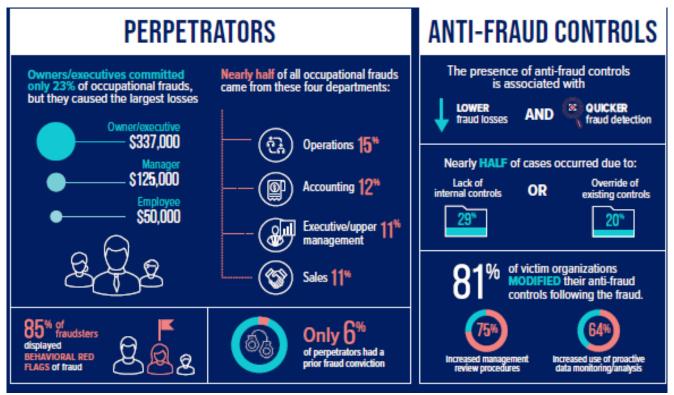
- Fraud Facts
- Fraud triangle
- Risks to cash receipts
- Risks to payroll
- Risks to disbursements
- Vendor fraud
- Cybersecurity risks
- Preventive measures

What is Fraud?

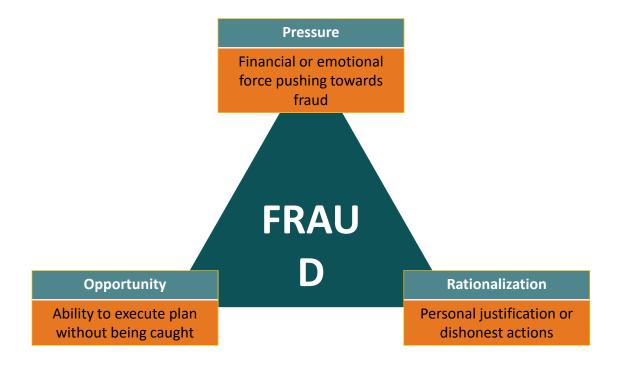
 A false representation of a matter of fact - whether by words or by conduct, by false or misleading allegations, or by concealment of what should have been disclosed -that deceives and is intended to deceive another so that the individual will act upon it to his or her legal injury.







Fraud Triangle



Pressure

- Financial hardship
- Personality changes
- Living beyond one's means
- Outside business interests
- Unwillingness or unable to share workplace duties



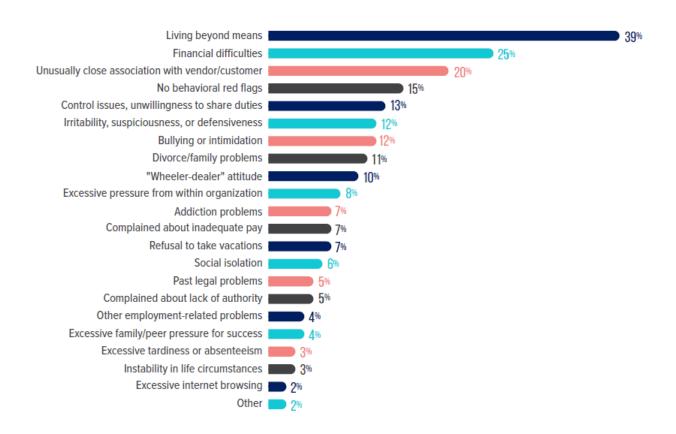
Rationalization



Opportunity

- Fraudsters don't wish to be caught, so they must believe their activities will be undetected
- Opportunity is created through WEAK internal controls and poor oversight
- Districts have the most control over this leg of the fraud triangle

FIG. 44 HOW OFTEN DO PERPETRATORS EXHIBIT BEHAVIORAL RED FLAGS?



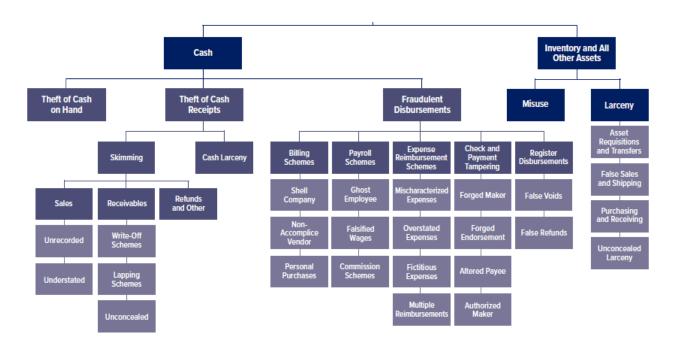
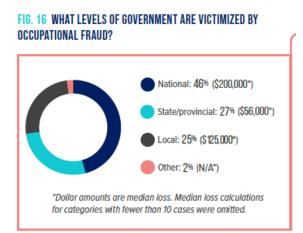


FIG. 21 WHAT ARE THE MOST COMMON OCCUPATIONAL FRAUD SCHEMES IN VARIOUS INDUSTRIES?

INDUSTRY	Cases	Billing	Cash larceny	Cash on hand	Check and payment tampering	Corruption	Expense reimbursements	Financial statement fraud	Noncash	Payroll	Register disbursements	Skimming
Banking and financial services	351	10%	11%	14%	14%	46%	8%	11%	11%	4%	2%	10%
Government and public administration	198	21%	8%	7%	9%	57%	12%	8%	16%	16%	3%	8%



Cash Handling Guidelines

- Separate the components of cash handling collecting, depositing, and reconciling
- Pre-numbered receipts for cash received in person
 - Sequentially numbered tickets at events
- Stored in a secure location until deposited
- Timely reconciliation prepared, reviewed, and maintained



Think Like an Auditor

- All copies of voided receipts are retained and show the reason for cancellation across the face of the receipt
- Mathematical accuracy of receipt reports is periodically verified
- Support is reviewed for appropriate signatures
- No receipts are missing
- Receipts are issued in numerical order



Think Like an Auditor

- Activity Funds how can you find misuse?
 - Think about the activities within a district and correlate that to your expected activity within an account.
 - Try to develop a predictive test when possible to test for completeness

Food Service

- Cash is collected and applied immediately to student account or meal purchased.
- Amount entered into cash register matches cash received.
- Cash register drawers are counted down after each meal service.
- Discrepancies are explained.
- Look for voided sales



Food Service

- Do surprise cash counts
- Look for red flags
 - Rubber bands
 - Paper Clips
 - Tally marks

Ghost employees

- This person does not exist
 - Do any two employees have the same social security number
 - Duplicate direct deposit routing numbers
 - Employee number outside of normal sequence
 - Have someone outside of the payroll process periodically look at employee list
 - Testing of cutoff for deceased, retired or terminated employees. Any extra pay given
 - Segregate the duties of adding employees and paying the employees

Falsified Wages

- Time card fraud
 - Punching in or out for another employee
 - Recording overtime not worked
 - Forging supervisor signatures
 - Updating the pay rate without authorization
 - Can your system produce an audit trail to look at changes?
 - Extra pay monitoring longevity, etc...



Benefit fraud

- Vacation and sick days
 - Are there controls to make sure that all time used has been recorded?
- Expense Reimbursement
 - Recording additional mileage
 - Using a district credit card to pay for gas and submitting mileage
 - Recording additional expenses by not including the detail of the receipt and just the credit card total.
 - Duplicate requests made
 - Falsification of documents

System Manipulators

- Manipulates tax reporting forms for their own benefit
 - Transfer federal withholdings from other employees to themselves
 - Quarterly overpayment of 941 then added to their withholdings
- Grade changing risk
 - What controls are in place to prevent an employee from accepting a bribe



Disbursements

- Watch all forms and consider controls over
 - Procurement who is involved in the bidding process
 - Purchase Cards or Credit Cards who has access, what controls are in place to make sure there is no abuse. What supporting documentation is retained for charges
 - EFTs who can authorize, is there a transfer limit as to which accounts can be transferred to and max dollar amounts?
 - Checks controls over signature, bank reconciliations, approval of invoices
 - Related parties how are they identified?

Policies vs. Procedures

 A <u>policy</u> is a guiding principle used to set direction in an organization. A <u>procedure</u> is a series of steps to be followed as a consistent and repetitive approach to accomplish an end result.



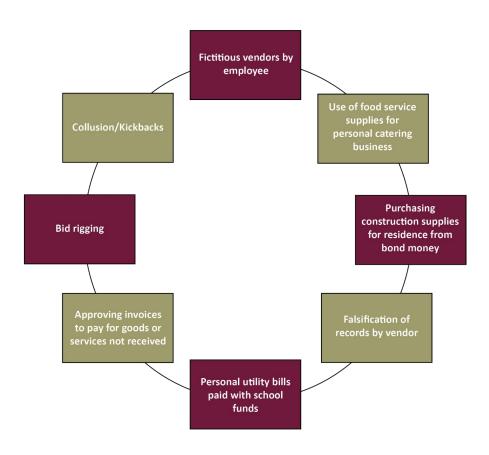
Best Practices for Procedures

- Written, uniform, accessible, and complete
- Exact instructions for each task
- Who, what, when, where and how
- Timeline from initial need to payment in full
- Reference to policies, as applicable
- Exceptions to procedures (emergency purchases, staff turnover or absence, etc.)

Purchasing Policy

- Items covered under the policy
- Full and open competition
- Good administrative practice and sound business judgment
- Single purchase transactions
- Bid requirements and timeline
- Bid protest process
- Emergency purchase guidelines

Common Purchasing Fraud



Reality Check

- New Mexico Española Public Schools Hiring a company that had the school district as its only client and kept all invoices under school board approval threshold
- New York Hempstead School District Kickbacks from a contractor doing business with the district and using public money to pay for personal expenses in a more than \$50,000 scheme
- Ohio Glen Este Middle School Kickbacks received for eighthgrade overnight field trips to Washington D.C. Totaled \$17,745 over three years.
- Texas Nova Academy Accepted \$50,000 in kickbacks in exchange for steering a school technology contract to a friend, who then botched the job

LET'S THRIVE

Vendor fraud

- Ban significant gifts
- Verify vendor setup/changes in information
- Disclose any personal relationships within the district
- Define acceptable business relationships
- Obtain references and contact them
- Background checks on vendors
- Use addresses and not PO boxes whenever possible
- Look for multiple payments to vendors that appear to circumvent approval thresholds
- Look for duplicate payments
- Expenditure account usage compared to budget

Uniform Guidance 2 CFR 200

- Must use own documented procurement procedures
- Oversee contractors are performing in accordance with contract
- Written conflict of interest standards on selection, award, and administration
 - Must include disciplinary actions

Uniform Guidance 2 CFR 200

- Procedures must avoid duplicative or unnecessary items
- Where applicable, lease versus purchase analysis
- Encourage inter-entity agreements where appropriate for procurement or use of common/shared goods/services
- Only award contracts to responsible contractors able to perform successfully
- Must allow for full and open competition

Yellow Book 2018

- Consider waste or abuse
 - Available grant funds
 - Unnecessary purchases
 - Personal use items
 - Double dipping to get expenditures reimbursed twice

Cybersecurity Risk

- Schools are at high risk for targeted phishing attacks
- Ransomware attacks
- Training for your employees
- Policies on how information is transferred
- Look into insurance policies to see what is covered.
- Do you know your IT controls?



More Examples

- Grand Rapids Public School 2022 email compromise resulted in MESSA payments of \$2.8 million being routed to a fraudulent account
- Jackson and Hillsdale Counties impacted by ransomware in November 2022 resulting in school closure for three days from compromised credentials
- Los Angeles, CA district hit with ransomware in 2022

Cybersecurity Best Practices

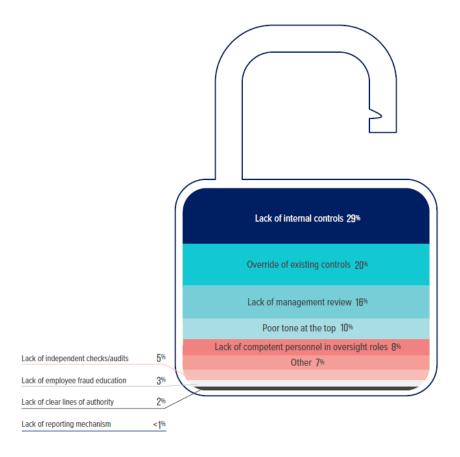
- MISecure.org resources
 - Best practices
 - Self audit
 - https://misecure.org



Internal Controls

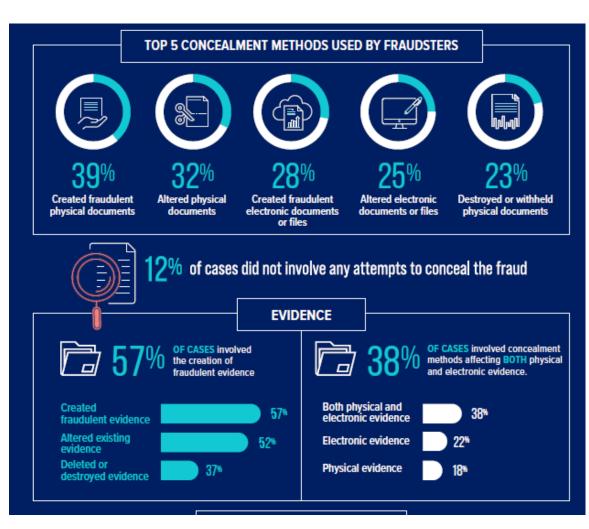
Source: Association of Certified Fraud Examiners 2022 *Report to the Nations*

FIG. 29 WHAT ARE THE PRIMARY INTERNAL CONTROL WEAKNESSES THAT CONTRIBUTE TO OCCUPATIONAL FRAUD?



Internal Controls

Source: Association of Certified Fraud Examiners 2022 *Report to the Nations*



- Know your policies and procedures
 - Make them available and accessible to all
 - Put in front of key personnel
 - Question deviations from procedures
 - Do you have segregation of duties
 - Don't allow exceptions



Prevention - Conflict of Interest

Shall Not:

- Engage in or have a financial interest, directly or indirectly, that conflicts with the District.
- Use position to benefit or create a benefit for any other individual or agency besides the District.
- Forego disclosing any business interest in a proposed contract.
- Engage in business, private sector of their profession.
- Make use of materials, equipment or facilities of the District for private practice.

- Be mindful of new vendors and long-term vendors
- Disable unused vendors
- Do background and credit checks
- Train staff on what to look for
- Think like a thief
- What is the tone at the top
- Trust but verify

- Think like an auditor
 - Compare vendor and employee addresses
 - Compare direct deposit/EFT account numbers
 - Compare tax ID numbers any SSN for vendors?
 - Research your vendors Google, website, invoice content
 - Reimbursements and CC receipts agree to product received at the district
 - Compare invoice info to website info
 - Compare receiving info to invoice/PO and look at addresses
 - Are all cash accounts properly identified by the District?

- Think like an auditor
 - Review cleared checks for a break in sequences.
 - Perform an unplanned audit of supplies and inventory
 - Haphazardly select purchase orders and verify they followed the correct procedures
 - Review budget to actual line items to ensure all amounts classified are appropriate



- Work with your vendors
 - What types of banking controls does your financial institution offer
 - Positive Pay
 - Multi-Factor Authentication
 - Transfer limits

Train Employees

- Train employees as to what constitutes fraud, and how it impacts the District (publicity, job loss, morale, etc.)
- Ensure employees understand where to seek advice when they are faced with uncertain ethical decisions.
- Communicate a policy of zero-tolerance through words and actions.
- Provide employees a confidential outlet to report suspicious or fraudulent activity.
- Instruct employees on how to recognize red flags and early warning signs.

Dealing with Suspected Fraud or Abuse

- Do you have a whistleblower policy?
- Does everyone in the district know what it is?
- Does the policy tell employees how and to whom to report suspected activity?
- Does anyone follow-up with and inform the whistleblower?

Take aways

- Review your policies and procedures to see if they are still up to date
- Look at the best practices and self-audit from MISecure
- Walk through each transaction cycle and ask yourself where could someone misappropriate assets
- Consider if additional training is necessary



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Finalize Credit for Attendance

New Process: The MSBO Evaluation is your record for attendance.

Please complete by February 21

- ✓ Receive an email from survey monkey for the MSBO evaluation. Your evaluation will be your record for attendance.
- ✓ Receive e-mail from MOECSnoreply@michigan.gov to fill out an evaluation for SCECHs.