STATE BOARD OF ACCOUNTS 302 West Washington Street Room E418 INDIANAPOLIS, INDIANA 46204-2769

SUPPLEMENTAL COMPLIANCE REPORT

OF

SOUTH HENRY SCHOOL CORPORATION

HENRY COUNTY, INDIANA

July 1, 2014 to June 30, 2015





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SCHEDULE OF OFFICIALS

Office	<u>Official</u>	<u>Term</u>
Treasurer	Amy Milner	07-01-15 to 06-30-16
Superintendent of Schools	Wesley Hammond	07-01-15 to 06-30-16
President of the School Board	Amy Miller Casey Carmichael	01-01-15 to 12-31-15 01-01-16 to 12-31-16



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TO: THE OFFICIALS OF THE SOUTH HENRY SCHOOL CORPORATION, HENRY COUNTY, INDIANA

This report is supplemental to our audit report of the South Henry School Corporation (School Corporation), for the period from July 1, 2014 to June 30, 2015. It has been provided as a separate report so that the reader may easily identify any Federal Findings and Audit Results and Comments that pertain to the School Corporation. It should be read in conjunction with our Financial Statement and Federal Single Audit Report of the School Corporation, which provides our opinions on the School Corporation's financial statement and federal program compliance. This report may be found at www.in.gov/sboa/.

The Federal Findings, identified in the above referenced audit report, are included in this report and should be viewed in conjunction with the Audit Result and Comment as described below.

As authorized under Indiana Code 5-11-1, we performed procedures to determine compliance with applicable Indiana laws and uniform compliance guidelines established by the Indiana State Board of Accounts. The Audit Result and Comment contained herein describes the identified reportable instance of noncompliance found as a result of these procedures. Our tests were not designed to identify all instances of noncompliance; therefore, noncompliance may exist that is unidentified.

Any Corrective Action Plan for the Federal Findings incorporated within this report, was not verified for accuracy.

Paul D. Joyce, CPA State Examiner

April 7, 2016

SOUTH HENRY SCHOOL CORPORATION FEDERAL FINDINGS

FINDING 2015-001 - INTERNAL CONTROLS OVER FINANCIAL TRANSACTIONS AND REPORTING

There were several deficiencies in the internal control system of the School Corporation related to financial transactions and reporting.

- Lack of Segregation of Duties: The School Corporation has not separated incompatible activities related to receipts. There was no segregation of duties over receipts; the School Corporation Treasurer issued receipts, made deposits, and posted transactions to the records.
- 2. Monitoring of Controls: An evaluation of the School Corporation's system of internal control has not been conducted. The failure to monitor the internal control system places the School Corporation at risk that controls may not be either designed properly or operating effectively to provide reasonable assurance that controls will prevent, or detect and correct, misstatements in a timely manner. Additionally, the School Corporation has no process to identify or communicate corrective actions to improve controls. Effective internal controls over financial reporting require the School Corporation to monitor and assess the quality of the system of internal control.

The failure to establish these controls could enable material misstatements or irregularities to remain undetected. Control activities should be in place to reduce the risks of errors in financial reporting.

Governmental units should have internal controls in effect which provide reasonable assurance regarding the reliability of financial information and records, effectiveness and efficiency of operations, proper execution of management's objectives, and compliance with laws and regulations. Among other things, segregation of duties, safeguarding controls over cash and all other assets, and all forms of information processing are necessary for proper internal control.

Controls over the receipting, disbursing, recording, and accounting for the financial activities are necessary to avoid substantial risk of invalid transactions, inaccurate records and financial statements, and incorrect decision making. (Accounting and Uniform Compliance Guidelines Manual for Indiana Public School Corporations, Chapter 9)

FINDING 2015-002 - PREPARATION OF THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

The School Corporation did not have a proper system of internal control in place to prevent, or detect and correct, errors on the Schedule of Expenditures of Federal Awards (SEFA). The SEFA reports were reviewed by the Superintendent of Schools, but errors were not discovered.

The School Corporation should have proper controls in place over the preparation of the SEFA to ensure accurate reporting of federal awards. Without a proper system of internal control in place that operates effectively, material misstatements of the SEFA could remain undetected.

During the audit of the SEFA, we noted the following errors:

Commodities for 2015 totaling \$21,918, the 2012 Improving Teacher Quality State Grant (\$5,028), and the Special Education Cluster (\$178,386) were omitted from the SEFA. Audit adjustments were proposed, accepted by the School Corporation, and made to the SEFA presented in this report.

Governmental units should have internal controls in effect which provide reasonable assurance regarding the reliability of financial information and records, effectiveness and efficiency of operations, proper execution of management's objectives, and compliance with laws and regulations. Among other things, segregation of duties, safeguarding controls over cash and all other assets, and all forms of information processing are necessary for proper internal control.

Controls over the receipting, disbursing, recording, and accounting for the financial activities are necessary to avoid substantial risk of invalid transactions, inaccurate records and financial statements, and incorrect decision making. (Accounting and Uniform Compliance Guidelines Manual for Indiana Public School Corporations, Chapter 9)

OMB Circular A-133, Subpart C, section .300 states in part: "The auditee shall: . . . (d) Prepare appropriate financial statements, including the schedule of expenditures of Federal awards in accordance with section .310."

OMB Circular A-133, Subpart C, section .310(b) states:

"Schedule of expenditures of Federal awards. The auditee shall also prepare a schedule of expenditures of Federal awards for the period covered by the auditee's financial statements. While not required, the auditee may choose to provide information requested by Federal awarding agencies and pass-through entities to make the schedule easier to use. For example, when a Federal program has multiple award years, the auditee may list the amount of Federal awards expended for each award year separately. At a minimum, the schedule shall:

- (1) List individual Federal programs by Federal agency. For Federal programs included in a cluster of programs, list individual Federal programs within a cluster of programs. For R&D, total Federal awards expended shall be shown either by individual award or by Federal agency and major subdivision within the Federal agency. For example, the National Institutes of Health is a major subdivision in the Department of Health and Human Services.
- (2) For Federal awards received as a subrecipient, the name of the pass-through entity and identifying number assigned by the pass-through entity shall be included.
- (3) Provide total Federal awards expended for each individual Federal program and the CFDA number or other identifying number when the CFDA information is not available.
- (4) Include notes that describe the significant accounting policies used in preparing the schedule.
- (5) To the extent practical, pass-through entities should identify in the schedule the total amount provided to subrecipients from each Federal program.
- (6) Include, in either the schedule or a note to the schedule, the value of the Federal awards expended in the form of non-cash assistance, the amount of insurance in effect during the year, and loans or loan guarantees outstanding at year end. While not required, it is preferable to present this information in the schedule."

FINDING 2015-003 - CASH MANAGEMENT AND SPECIAL TESTS AND PROVISIONS - VERIFICATION OF FREE AND REDUCED PRICE APPLICATIONS

Federal Agency: Department of Agriculture

Federal Programs: School Breakfast Program, National School Lunch Program

CFDA Numbers: 10.553, 10.555

Federal Award Numbers and Years (or Other Identifying Number): FY 2014-15, After School Snack

Pass-Through Entity: Indiana Department of Education

Management of the School Corporation has not established an effective internal control system, which would include segregation of duties, related to the grant agreement and the following compliance requirements: Cash Management and Special Tests and Provisions - Verification of Free and Reduced Price Applications.

The failure to establish an effective internal control system places the School Corporation at risk of noncompliance with the grant agreement and the compliance requirements. A lack of segregation of duties within an internal control system could also allow noncompliance with compliance requirements and allow the misuse and mismanagement of federal funds and assets by not having proper oversight, reviews, and approvals over the activities of the programs.

Cash Management

Reimbursement claims were prepared and submitted by the Cafeteria Manager without an oversight, review, or approval process.

Special Tests and Provisions - Verification of Free and Reduced Price Applications

Verification determinations were performed by the Cafeteria Manager without an oversight, review, or approval process.

An internal control system, including segregation of duties, should be designed and operate effectively to provide reasonable assurance that material noncompliance with the grant agreement or a compliance requirement of a federal program will be prevented, or detected and corrected, on a timely basis. In order to have an effective internal control system, it is important to have proper segregation of duties. This is accomplished by making sure proper oversight, reviews, and approvals take place and to have a separation of functions over certain activities related to the programs. The fundamental premise of segregation of duties is that an individual or small group of individuals should not be in a position to initiate, approve, undertake, and review the same activity.

OMB Circular A-133, Subpart C, section .300 states in part:

"The auditee shall: . . . (b) Maintain internal control over Federal programs that provides reasonable assurance that the auditee is managing Federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on each of its Federal programs."

The failure to establish internal controls could enable material noncompliance to go undetected. Non-compliance with the grant agreement or the compliance requirements could result in the loss of federal funds to the School Corporation.

We recommended that the School Corporation's management establish controls, including segregation of duties, related to the grant agreement and compliance requirements listed above.

FINDING 2015-004 - ELIGIBILITY

Federal Agency: Department of Agriculture

Federal Programs: School Breakfast Program, National School Lunch Program

CFDA Numbers: 10.553, 10.555

Federal Award Numbers and Years (or Other Identifying Number): FY 2014-15, After School Snack

Pass-Through Entity: Indiana Department of Education

Management of the School Corporation has not established an effective internal control system related to the grant agreement and the Eligibility compliance requirement.

The School Corporation made eligibility determinations by inputting applicant data into eligibility software at the Food Service Office without an oversight, review, or approval process. The eligibility determinations were then manually entered into the cafeteria's point-of-sale systems without an oversight, review, or approval process.

An internal control system, including segregation of duties, should be designed and operate effectively to provide reasonable assurance that material noncompliance with the grant agreement or a compliance requirement of a federal program will be prevented, or detected and corrected, on a timely basis. In order to have an effective internal control system, it is important to have proper segregation of duties. This is accomplished by making sure proper oversight, reviews, and approvals take place and to have a separation of functions over certain activities related to the programs. The fundamental premise of segregation of duties is that an individual or small group of individuals should not be in a position to initiate, approve, undertake, and review the same activity.

Testing of 120 students revealed the following errors:

- Two students who qualified for reduced meals were charged paid meal prices.
- One student who qualified for reduced meals received free meals.
- One student who did not qualify for free/reduced meals received free meals.
- All applications tested did not include eligibility notification letters to the household.
- All direct certifications did not include eligibility notification letters to the household.

OMB Circular A-133, Subpart C, section .300 states in part:

"The auditee shall: . . . (b) Maintain internal control over Federal programs that provides reasonable assurance that the auditee is managing Federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on each of its Federal programs."

7 CFR 245.6(c)(1) states in part:

"Duration of eligibility. Except as otherwise specified in paragraph (c)(3) of this section, eligibility, as determined through an approved application or by direct certification for free or reduced price meals, must remain in effect for the entire school year and for up to 30 operating days into the subsequent school year. The local educational agency must determine household eligibility, for free or reduced price meals, either through direct certification or the application process at or about the beginning of the school year. The local educational agency must determine eligibility for free or reduced price meals when a household submits an application or, if feasible, through direct certification, at any time during the school year."

7 CFR 245.6(c)(6) states in part:

- "(i) Income applications. The local educational agency must promptly notify the household of the children's eligibility and provide the eligible children the benefits to which they are entitled.
- (ii) Direct Certification. Households approved for benefits based on information provided by the appropriate State or local agency responsible for the administration of the SNAP, FDPIR or TANF must be notified, in writing, that their children are eligible for free meals or free milk, that no application for free and reduced price school meals or free milk is required. . . . "

The failure to establish internal controls enabled material noncompliance to go undetected. Noncompliance with the grant agreement or the compliance requirement could result in the loss of federal funds to the School Corporation.

We recommended that the School Corporation's management establish controls to ensure compliance and comply with the Eligibility compliance requirement of the programs.

FINDING 2015-005 - REPORTING

Federal Agency: Department of Agriculture

Federal Programs: School Breakfast Program, National School Lunch Program

CFDA Numbers: 10.553, 10.555

Federal Award Numbers and Years (or Other Identifying Number): FY 2014-15, After School Snack

Pass-Through Entity: Indiana Department of Education

Management of the School Corporation has not established an effective internal control system, which would include segregation of duties, related to the grant agreement and the Reporting compliance requirement. The failure to establish an effective internal control system places the School Corporation at risk of noncompliance with the grant agreement and the compliance requirement. A lack of segregation of duties within an internal control system could also allow noncompliance with compliance requirement and allow the misuse and mismanagement of federal funds and assets by not having proper oversight, reviews, and approvals over the activities of the programs.

Monthly reimbursement claims, annual verification reports, and annual reports were prepared and submitted by the Cafeteria Manager without an oversight, review, or approval process.

An internal control system, including segregation of duties, should be designed and operate effectively to provide reasonable assurance that material noncompliance with the grant agreement or a compliance requirement of a federal program will be prevented, or detected and corrected, on a timely basis. In order to have an effective internal control system, it is important to have proper segregation of duties. This is accomplished by making sure proper oversight, reviews, and approvals take place and to have a separation of functions over certain activities related to the programs. The fundamental premise of segregation of duties is that an individual or small group of individuals should not be in a position to initiate, approve, undertake, and review the same activity.

Annual Financial Report

The Annual Financial Report filed by the School Corporation with the Indiana Department of Education, for the fiscal year ending June 30, 2015, did not agree with the School Corporation's financial records. The beginning balance was overstated by \$11,750, receipts were understated by \$72,809, and disbursements were understated by \$61,059.

Monthly Claims for Reimbursement

There were multiple months, during the audit period, where the number of meals for which the School Corporation requested reimbursement did not match the number of meals shown within the School Corporation's Comalex software. Seven of the ten monthly reimbursement requests tested contained instances of incorrect reporting. The August 2014, October 2014, January 2015, February 2015, March 2015, April 2015, and May 2015 reimbursement requests all overstated the number of meals served compared to the reports generated by the School Corporation's Comalex software.

OMB Circular A-133, Subpart C, section .300 states in part:

"The auditee shall: . . . (b) Maintain internal control over Federal programs that provides reasonable assurance that the auditee is managing Federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on each of its Federal programs."

7 CFR 3016.20(b) states in part:

"The financial management systems of other grantees and subgrantees must meet the following standards:

- (1) Financial reporting. Accurate, current, and complete disclosure of the financial results of financially assisted activities must be made in accordance with the financial reporting requirements of the grant or subgrant. . . .
- (6) Source documentation. Accounting records must be supported by such source documentation as cancelled checks, paid bills, payrolls, time and attendance records, contract and subgrant award documents, etc. . . . "

7 CFR 210.7(c) states in part:

- "(iii) Base Claims for Reimbursement on lunch counts, taken daily at the point of service, which correctly identify the number of free, reduced price and paid lunches served to eligible children:
- (iv) Correctly record, consolidate and report those lunch and supplement counts on the Claim for Reimbursement; and
- (v) Ensure that Claims for Reimbursement do not request payment for any excess lunches produced, as prohibited in §210.10(a)(2), or non-Program lunches (i.e., a la carte or adult lunches) or for more than one meal supplement per child per day."

The failure to establish internal controls enabled material noncompliance to go undetected. Noncompliance with the grant agreement or the Reporting compliance requirement could result in the loss of federal funds to the School Corporation.

We recommended that the School Corporation's management establish controls, including segregation of duties, related to the grant agreement and ensure that all required reports are prepared on an accurate basis in accordance with the Reporting requirement.

FINDING 2015-006 - ACTIVITIES ALLOWED OR UNALLOWED AND ALLOWABLE COSTS/COST PRINCIPLES

Federal Agency: Department of Education

Federal Programs: Special Education Grants to States, Special Education Preschool Grants

CFDA Numbers: 84.027, 84.173

Federal Award Numbers and Years (or Other Identifying Number): 14213-044-PN01, 14214-044-PN01,

14215-044-PN01, 45714-044-PN01, 45715-044-PN01, 99914-044-PN01

Pass-Through Entity: Indiana Department of Education

Management of the School Corporation has not established an effective internal control system, which would include segregation of duties, related to the grant agreement and the following compliance requirements: Activities Allowed or Unallowed and Allowable Costs/Cost Principles. The School Corporation is a member of the New Castle Area Special Services Cooperative (Co-Op), and they provide oversight of the Co-Op through the School Corporation Superintendent who serves as a member of the Co-Op Board. However, the Co-Op has not established an effective internal control system in relation to the Activities Allowed or Unallowed and Allowable Costs/Cost Principles compliance requirements.

The failure to establish an effective internal control system places the school corporation at risk of noncompliance with the grant agreement and the compliance requirements. A lack of segregation of duties within an internal control system could also allow noncompliance with compliance requirements and allow the misuse and mismanagement of federal funds and assets by not having proper oversight, reviews, and approvals over the activities of the programs.

Activities Allowed or Unallowed

For fiscal year 2015, there was no documentation of reviews of payroll to verify that all employees paid from Special Education program were allowed. This could lead to ineligible employees getting paid from the Special Education program.

Allowable Costs/Cost Principles

For fiscal year 2015, at the Co-Op there was no oversight, review, or approval process over the personnel activity logs or Semi-Annual Certifications. This could cause an employee to be paid an improper amount from Special Education programs.

An internal control system, including segregation of duties, should be designed and operate effectively to provide reasonable assurance that material noncompliance with the grant agreement or a compliance requirement of a federal program will be prevented, or detected and corrected, on a timely basis. In order to have an effective internal control system, it is important to have proper segregation of duties. This is accomplished by making sure proper oversight, reviews, and approvals take place and to have a separation of functions over certain activities related to the programs. The fundamental premise of segregation of duties is that an individual or small group of individuals should not be in a position to initiate, approve, undertake, and review the same activity.

OMB Circular A-133, Subpart C, section .300 states in part:

"The auditee shall: . . . (b) Maintain internal control over Federal programs that provides reasonable assurance that the auditee is managing Federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on each of its Federal programs."

The failure to establish internal controls could enable material noncompliance to go undetected. Noncompliance with the grant agreement or the compliance requirements could result in the loss of federal funds to the School Corporation.

We recommended that the School Corporation's management establish controls, including segregation of duties, related to the grant agreement and the compliance requirements listed above.

SOUTH HENRY SCHOOL CORPORATION

6972 S. St. Rd. 103 Straughn, IN 47387 (765) 987-7882 FAX: (765) 987-7589

CORRECTIVE ACTION PLAN

FINDING 2015-001

Contact Person: Amy Milner, Business Manager Contact Person Number: (765) 987-7882 ext. 152

View: We concur with the finding

Description of Corrective Action Plan:

- 1. South Henry School Corporation is aware of the risks associated with a limited staff and has determined the benefits of hiring additional staff, in order that all accounting functions are performed by different individuals, are not sufficient to justify the increase in personnel cost to the taxpayers of South Henry School Corporation. Control activities will be in place to reduce the risks of errors in financial reporting.
- 2. South Henry School Corporation will adopt the *Uniform Internal Control Standards for Indiana Political Subdivisions* by resolution. After June 30, 2016, management will document in writing the specific internal control policies, monitoring policies, and procedures required for use in each department of the unit. This will include segregation of duties. South Henry School Corporation will process to identify and communicate corrective actions to improve controls. The implementation of controls over the receipting, disbursing, recording and accounting for the financial activities will be regularly evaluated and adapted for changes affecting the monitoring of controls.



FINDING 2015-002

View: We concur with the finding

Description of Corrective Action Plan:

Adjustments proposed for the errors found during the audit of the SEFA were accepted and made to the SEFA presented in this report. South Henry School Corporation will adopt the *Uniform Internal Control Standards for Indiana Political Subdivisions* by resolution. After June 30, 2016, management will document in writing the specific internal control policies, monitoring policies, and procedures required for use in each department of the unit. This will include segregation of duties. South Henry School Corporation will process to identify and communicate corrective actions to improve controls. The implementation of controls over the receipting, disbursing, recording and accounting for the financial activities will be regularly evaluated and adapted for changes affecting the monitoring of controls.

FINDING 2015-003

View: We concur with the finding

Description of Corrective Action Plan:

Management of the School Corporation will establish an effective internal control system, which will include segregation of duties, related to the grant agreement, Cash management, Special Test and Provisions and Provisions Verifications. South Henry School Corporation will adopt the *Uniform Internal Control Standards for Indiana Political Subdivisions* by resolution. After June 30, 2016, management will document in writing the specific internal control policies, monitoring policies, and procedures required for use in each department of the unit. This will include segregation of duties. South Henry School Corporation will process to identify and communicate corrective actions to improve controls. The implementation of controls over the receipting, disbursing, recording and accounting for the financial activities will be

regularly evaluated and adapted for changes affecting the monitoring of controls.

FINDING 2015-004

View: We concur with the finding

Description of Corrective Action Plan:

Management of the School Corporation will establish an effective internal control system related to the grant agreement and Eligibility compliance requirements. South Henry School Corporation will adopt the *Uniform Internal Control Standards for Indiana Political Subdivisions* by resolution. After June 30, 2016, management will document in writing the specific internal control policies, monitoring policies, and procedures required for use in each department of the unit. This will include segregation of duties. South Henry School Corporation will process to identify and communicate corrective actions to improve controls. The implementation of controls over the receipting, disbursing, recording and accounting for the financial activities will be regularly evaluated and adapted for changes affecting the monitoring of controls.

FINDING 2015-005

View: We concur with the finding

Description of Corrective Action Plan:

Management of the School Corporation will establish an effective internal control system related to the grant agreement and Reporting compliance requirements. South Henry School Corporation will adopt the *Uniform Internal Control Standards for Indiana Political Subdivisions* by resolution. After June 30, 2016, management will document in writing the specific internal control policies, monitoring policies, and procedures required for use in each department of the unit. This will include segregation of duties. South Henry School Corporation will process to identify and communicate corrective actions to improve controls. The implementation of controls over the receipting, disbursing, recording and accounting for the financial activities will be

regularly evaluated and adapted for changes affecting the monitoring of controls.

FINDING 2015-006

View: We concur with the finding

Description of Corrective Action Plan:

Management of the School Corporation will establish an effective internal control system, which will include segregation of duties, related to the grant agreement and the following compliance requirements: Activities Allowed or Unallowed, Allowable Costs/Cost Principles, Cash Management, Period of Availability, and Reporting. As part of the New Castle Area Special Services, we will work with the compliance requirements. South Henry School Corporation will adopt the *Uniform Internal Control Standards for Indiana* Political Subdivisions by resolution. After June 30, 2016, management will document in writing the specific internal control policies, monitoring policies, and procedures required for use in each department of the unit. This will include segregation of duties. South Henry School Corporation will process to identify and communicate corrective actions to improve controls. The implementation of controls over the receipting, disbursing, recording and accounting for the financial activities will be regularly evaluated and adapted for changes affecting the monitoring of controls.

Anticipated Completion Date: 07/01/2016

Signature

Business Manager

Title

04/11/16

SOUTH HENRY SCHOOL CORPORATION AUDIT RESULT AND COMMENT

PREPAID FOOD FUND

Prepaid lunch receipts were not placed in Fund 8400 Prepaid Food, but were instead accounted for in the School Lunch fund and were posted directly to lunch or breakfast depending on the time posted. A balance of prepaid lunches was not maintained on the general ledger.

Clearing Account Number 8400 - Prepaid Food has been established to account for prepaid food. The collections are to be receipted to 8410 with 8420 representing the transfers out of the clearing account and recognition in the appropriate revenue classifications (1611 to 1614 series) in the School Lunch Fund. The transfer should be made periodically and at the end of each month to appropriately classify meals (breakfast, lunch, etc.) when known (charged by student). Subsidiary records by student should be routinely reconciled to the cash balance and at month end. The School Food Prescribed Forms and any approved computerized Forms will be required to be maintained in the following manner to accurately account for prepaid items. (The School Administrator, September 2008) Subsidiary records by student should be routinely reconciled to the cash balance and at month end. (Accounting and Uniform Guidelines Manual for Extra-Curricular Accounts, Chapter 3)

SOUTH HENRY SCHOOL CORPORATION EXIT CONFERENCE
The contents of this report were discussed on April 7, 2016, with Amy Milner, Treasurer; Wesley Hammond, Superintendent of Schools; and Casey Carmichael, President of the School Board.