

Princeton Public Schools - ISD 477

School Board Meeting Agenda

Tuesday, September 17, 2019 at 5:00 PM
Policy Committee Meeting
Superintendent's Office

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* If any one board member wishes to remove an item from the consent agenda for discussion, that item should be added to the board meeting agenda prior to its approval.

PRINCETON PUBLIC SCHOOLS
POLICY 701 - ESTABLISHMENT AND ADOPTION OF SCHOOL DISTRICT BUDGET

I. PURPOSE

The purpose of this policy is to establish lines of authority and procedures for the establishment of the school district's revenue and expenditure budgets.

II. GENERAL STATEMENT OF POLICY

It is the policy of this school district to establish its revenue and expenditure budgets in accordance with the applicable provisions of law. Budget planning is an integral part of program planning so that the annual budget will effectively express and implement school board goals and the priorities of the school district.

III. REQUIREMENT

- A. The superintendent or such other school official as designated by the superintendent or the school board shall each year prepare preliminary revenue and expenditure budgets for review by the school board or its designated committee or committees. The preliminary budgets shall be accompanied by such written commentary as may be necessary for them to be clearly understood by the members of the school board and the public. The school board shall review the projected revenues and expenditures for the school district for the next fiscal year and make such adjustments in the expenditure budget as necessary to carry out the education program within the revenues projected.
- B. The school district must maintain separate accounts to identify revenues and expenditures for each building. Expenditures shall be reported in compliance with Minn. Stat. § 123B.76.
- C. Prior to July 1 of each year, the school board shall approve and adopt its initial revenue and expenditure budgets for the next school year. The adopted expenditure budget document shall be considered the school board's expenditure authorization for that school year. No funds may be expended for any purpose in any school year prior to the adoption of the budget document which authorizes that expenditure for that year, or prior to the adoption of an amendment to that budget document by the school board to authorize that expenditure for that year.

- D. Each year, the school district shall publish its adopted revenue and expenditure budgets for the current year, the actual revenues, expenditures, and fund balances for the prior year, and the projected fund balances for the current year in the form prescribed by the Commissioner within one week of the acceptance of the final audit by the school board, or November 30, whichever is earlier. A statement shall be included in the publication that the complete budget in detail may be inspected by any resident of the school district upon request to the superintendent. These budgets, reports of revenue, expenditures, and fund balances must be published in a newspaper of general circulation in the school district. At the same time as this publication, the school district shall publish the other information required by Minn. Stat. § 123B.10.
- E. At the public hearing on the adoption of the school district's proposed property tax levy, the school board shall review its current budget and the proposed property taxes payable in the following calendar year.
- F. The school district must also post the materials specified in Paragraph III.D. above on the school district's official website, including a link to the school district's school report card on the Minnesota Department of Education's website, and publish a summary of information and the address of the school district's website where the information can be found in a qualified newspaper of general circulation in the district.
- G. The school district must also include the budget information specified in Paragraph III.D. above in the materials provided as part of its truth-in-taxation hearing.

IV. IMPLEMENTATION

- A. The school board places the responsibility for administering the adopted budget with the superintendent. The superintendent may delegate duties related thereto to other school officials, but maintains the ultimate responsibility for this function.
- B. The program-oriented budgeting system will be supported by a program-oriented accounting structure organized and operated on a fund basis as provided for in Minnesota statutes through the Uniform Financial Accounting and Reporting Standards for Minnesota School Districts (UFARS).

- C. The superintendent or the superintendent's designee is authorized to make payments of claims or salaries authorized by the adopted or amended budget prior to school board approval.
- D. Supplies and capital equipment can be ordered prior to budget adoption only by authority of the school board. If additional personnel are provided in the proposed budget, actual hiring may not occur until the budget is adopted unless otherwise approved by the school board. Other funds to be expended in a subsequent school year may not be encumbered prior to budget adoption unless specifically approved by the school board.
- E. The school district shall make such reports to the Commissioner as required relating to initial allocations of revenue, reallocations of revenue, and expenditures of funds.

Legal References: Minn. Stat. § 123B.10 (Publication of Financial Information)
Minn. Stat. § 123B.76 (Expenditures; Reporting)
Minn. Stat. § 123B.77 (Accounting, Budgeting and Reporting Requirements)
Minn. Stat. § 126C.23 (Allocation of General Education Revenue)
Minn. Stat. § 275.065 (Truth in Taxation; Proposed Property Taxes; Notice)

Cross References: MSBA/MASA Model Policy 701.1 (Modification of School District Budget)
MSBA/MASA Model Policy 702 (Accounting)
MSBA Service Manual, Chapter 7, Education Funding

Adopted: July 22, 2008
Revised: February 16, 2016
Reviewed: October 18, 2016

Adopted: _____

MSBA/MASA Model Policy 701

Orig. 1995

Revised: _____

Rev. 2011

701 ESTABLISHMENT AND ADOPTION OF SCHOOL DISTRICT BUDGET

[Note: The provisions of this policy substantially reflect the requirements of Minnesota Statutes.]

I. PURPOSE

The purpose of this policy is to establish lines of authority and procedures for the establishment of the school district's revenue and expenditure budgets.

II. GENERAL STATEMENT OF POLICY

The policy of the school district is to establish its revenue and expenditure budgets in accordance with the applicable provisions of law. Budget planning is an integral part of program planning so that the annual budget will effectively express and implement school board goals and the priorities of the school district.

III. REQUIREMENT

- A. The superintendent or such other school official as designated by the superintendent or the school board shall each year prepare preliminary revenue and expenditure budgets for review by the school board or its designated committee or committees. The preliminary budgets shall be accompanied by such written commentary as may be necessary for them to be clearly understood by the members of the school board and the public. The school board shall review the projected revenues and expenditures for the school district for the next fiscal year and make such adjustments in the expenditure budget as necessary to carry out the education program within the revenues projected.
- B. The school district must maintain separate accounts to identify revenues and expenditures for each building. Expenditures shall be reported in compliance with Minn. Stat. § 123B.76.
- C. Prior to July 1 of each year, the school board shall approve and adopt its initial revenue and expenditure budgets for the next school year. The adopted expenditure budget document shall be considered the school board's expenditure authorization for that school year. No funds may be expended for any purpose in any school year prior to the adoption of the budget document which authorizes that expenditure for that year, or prior to the adoption of an amendment to that budget document by the school board to authorize that expenditure for that year.
- D. Each year, the school district shall publish its adopted revenue and expenditure budgets for the current year, the actual revenues, expenditures, and fund balances

for the prior year, and the projected fund balances for the current year in the form prescribed by the Commissioner within one week of the acceptance of the final audit by the school board, or November 30, whichever is earlier. A statement shall be included in the publication that the complete budget in detail may be inspected by any resident of the school district upon request to the superintendent. A summary of this information and the address of the school district's official website where the information can be found must be published in a newspaper of general circulation in the school district. At the same time as this publication, the school district shall publish the other information required by Minn. Stat. § 123B.10.

- E. At the public hearing on the adoption of the school district's proposed property tax levy, the school board shall review its current budget and the proposed property taxes payable in the following calendar year.
- F. The school district must also post the materials specified in Paragraph III.D. above on the school district's official website, including a link to the school district's school report card on the Minnesota Department of Education's website, and publish a summary of information and the address of the school district's website where the information can be found in a qualified newspaper of general circulation in the district.

IV. IMPLEMENTATION

- A. The school board places the responsibility for administering the adopted budget with the superintendent. The superintendent may delegate duties related thereto to other school officials, but maintains the ultimate responsibility for this function.
- B. The program-oriented budgeting system will be supported by a program-oriented accounting structure organized and operated on a fund basis as provided for in Minnesota statutes through the Uniform Financial Accounting and Reporting Standards for Minnesota School Districts (UFARS).
- C. The superintendent or the superintendent's designee is authorized to make payments of claims or salaries authorized by the adopted or amended budget prior to school board approval.
- D. Supplies and capital equipment can be ordered prior to budget adoption only by authority of the school board. If additional personnel are provided in the proposed budget, actual hiring may not occur until the budget is adopted unless otherwise approved by the school board. Other funds to be expended in a subsequent school year may not be encumbered prior to budget adoption unless specifically approved by the school board.
- E. The school district shall make such reports to the Commissioner as required relating to initial allocations of revenue, reallocations of revenue, and expenditures of funds.

Legal References: Minn. Stat. § 123B.10 (Publication of Financial Information)
Minn. Stat. § 123B.76 (Expenditures; Reporting)
Minn. Stat. § 123B.77 (Accounting, Budgeting, and Reporting Requirements)
~~Minn. Stat. § 126C.23 (Allocation of General Education Revenue)~~

Cross References: MSBA/MASA Model Policy 701.1 (Modification of School District Budget)
MSBA/MASA Model Policy 702 (Accounting)
MSBA Service Manual, Chapter 7, Education Funding

PRINCETON PUBLIC SCHOOLS
701.1 - PURCHASING AND PROCUREMENT POLICY

I. PURPOSE

The purpose of this policy is to provide clear purchasing and procurement guidelines.

II. GENERAL STATEMENT OF POLICY

The policy of this school district is that purchasing and procurement procedures are developed and maintained.

III. DEVELOPMENT OF PURCHASING AND PROCUREMENT PROCEDURE(S)

The Director of Business Services shall be responsible for the development and maintenance of a procurement and purchasing procedures. The procedures shall be operated in compliance with UGG, UFARS and all other state and federal rules and regulations.

IV. PURCHASING AND PROCUREMENT PROCEDURE GUIDELINES

- A. All purchases of goods, services and equipment for which the District will be responsible for payment must be made on a district purchase order form, properly approved and executed.
- B. No employee of the school system may obligate the Board for any purchase without having gone through the regular, approved procedures. Such procedures include the use of purchase orders.
- C. Whenever practical, all goods used by the District should be standardized. This provides for purchasing in greater volume; reduces and restricts indiscriminate ordering; effects increased economy in all phases of procurement, including ordering, purchasing delivering, and final distribution.
- D. All Buildings shall promote standardization of supplies and equipment to all personnel, and it shall be the responsibility of all employees of the District to accept and encourage standardization of supplies and

equipment, if practical and applicable within an employee's area of responsibility.

- E. Purchases shall be from local vendors if price is equivalent or lower than outside vendors taking transportation costs and timelines of availability into consideration.

Cross References: Princeton Public Schools Policy 412 - Expense Reimbursement
Princeton Public Schools Policy 701 - Est. & Adoption of School District Budget
Princeton Public Schools Policy 702 - Accounting
Purchasing, Procurement & Reimbursement Procedure
Quote Procedures for Purchasing and Procurement
Quote Purchasing Form

Adopted: February 16, 2016

Reviewed: October 18, 2016

Adopted: _____

MSBA/MASA Model Policy 701.1

Orig. 1996

Revised: _____

Rev. 2000

701.1 MODIFICATION OF SCHOOL DISTRICT BUDGET

[Note: The provisions of this policy substantially reflect the requirements of Minnesota Statutes.]

I. PURPOSE

The purpose of this policy is to establish procedures for the modification of the school district's adopted revenue and expenditure budgets.

II. GENERAL STATEMENT OF POLICY

~~It is the~~ The policy of this school district is to modify its revenue and expenditure budgets in accordance with the applicable provisions of law.

III. REQUIREMENT

- A. The school district's adopted expenditure budget shall be considered the school board's expenditure authorization for that school year.
- B. If revisions or modifications in the adopted expenditure budget are determined to be advisable by the administration, the superintendent shall recommend the proposed changes to the school board. The proposed changes shall be accompanied by sufficient and appropriate background information on the revenue and policy issues involved to allow the school board to make an informed decision. A school board member may also propose modifications on that board member's own motion, provided, however, the school board member is encouraged to review the proposed modifications with the superintendent prior to their being proposed so that the administration may prepare necessary background materials for the school board prior to its consideration of those proposed modifications.
- C. If sufficient funds are not included in the expenditure budget in a particular fund to allow the proposed expenditure, funds for this purpose may not be expended from that fund prior to the adoption of an expenditure budget amendment by the school board to authorize that expenditure for that school year. An amended expenditure shall not exceed the projected revenues available for that purpose in that fund.
- D. The school district's revenue budget shall be amended from time to time during a fiscal year to reflect updated or revised revenue estimates. The superintendent shall make recommendations to the school board for appropriate revisions. If necessary, the school board shall also make necessary revisions in the expenditure

budget if it appears that expenditures would otherwise exceed revenues and fund balances in a fund.

Legal References: Minn. Stat. § 123B.77 (Accounting, Budgeting, and Reporting Requirement)
~~Minn. Stat. § 126C.23 (Allocation of General Education Revenue)~~

Cross References: MSBA/MASA Model Policy 701 (Establishment and Adoption of School District Budget)
MSBA Service Manual, Chapter 7, Education Funding



PRINCETON

DISTRICT CENTER

Procedures Title: Purchasing, Procurement and Reimbursements

Introduction: To provide clear guidance on purchasing and procurement procedures following State, Federal and Local laws and policies.

Policy Context: Policies 701.1, 721, & 412 are the current board approved policies related to procurement and purchasing.

Responsibility: The Director of Business Services is responsible for the oversight and maintenance of the purchasing and procurement procedure(s).

Definitions:

- Micro Purchase: Under \$10,000 no quotations, equitable distributions (2 CFR §200.67)
- Small Purchase: \$10,000 to \$49,999, rate quotations, no cost or price analysis (2 CFR §200.88) Requires quote procedure.
- Medium Purchase: \$50,000 to \$174,999, rate quotations, no cost or price analysis (2 CFR §200.88) Requires quote procedure.
- Large Purchase: \$175,000, bid law.

Vendor Selection: Princeton Public Schools will contract with small, minority and women's businesses and labor surplus area firms when possible.

Conflict of Interest: Any employee of Princeton Public Schools who is directly and/or indirectly involved in the following acquisition-related activities must adhere to the ethics and conflicts of interest principles of Princeton Public Schools.

Procedures:

A. Regular Purchase Orders: Regular purchase orders are used to order in advance for items such as supplies, equipment, professional services, advertising, printing, rental of equipment, food, repair supplies, etc. from vendors. The purchase order gives the person ordering the item the authority to do so in the school district's name.

- Staff will complete the designated portions of the **Purchase Request Form** and route the form to the department head. **This may be done electronically or by paper.**
- The department head determines if the item(s) being requested is an allowable and eligible purchase and whether the purchase is a micro, small, or large purchase by completing the corresponding questions enclosed in the form.
- If the department head determines that the item(s) being requested are a small, medium or large purchases then the department head will start the **Quote Procedure.**
- The department head then approves the purchase and routes to the Department Administrative Assistant or District Office Secretary.
- Purchases made by the Buildings. The Department Administrative Assistant enters the approved request into the department tracking spreadsheet and creates the purchase order.
- Purchases made by district level departments. The District Office Secretary creates a purchase order using the information provided in the Purchase Order Request Form.
- The completed purchase order is provided to the Director of Business Services in an electronic format.
- The Director of Business Services authorizes the purchase through an electronic approval. The Director of Business Services also notes on the purchase order if the item is a fixed asset and verifies that the vendor is not on the debarred and suspended vendor list located on Sam.gov for any purchases over 25,000 and are being purchased with federal funds.
- The District Office Secretary processes all orders and distributes purchase order copies to the appropriate departments..
- Delivered items will be received at the main offices of the buildings and then forwarded to the staff member or department noted on the purchase order.
- The staff member or department who requested the order will be asked to certify on their copy of the invoice that the items have been received and are in good working order within **5 days** of receipt. If a packing slip is received include that with your approval. They are also to note any concerns or problems with the order that would require the district to withhold payment until resolved.
- Items ordered on approval should be so indicated on the purchase order. It is the requestor's responsibility to notify them, well within the approval time limit,

whether the items have been approved or rejected. This should be done via a copy of the purchase order and identified as APPROVED or REJECTED by the requestor. Items to be returned should be sent to the building office, properly labeled, within the approval time limit. Items will be returned and insured by using UPS.

B. Local Purchase Orders: Local purchase orders are used when making purchases from local vendors. This purchase order method and payment may be used for charges at local businesses and when critical timing is apparent.

- Staff will complete the designated portions of the **Purchase Request Form** and route the form to the Department Administrator.
- The Department Administrator determines in advance if the purchase is allowable under the local purchase order method as defined above.
- The department head determines if the item(s) being requested is an allowable and eligible purchase and whether the purchase is a micro, small, or large purchase by completing the corresponding questions enclosed in the form.
- If the department head determines that the item(s) being requested are a small or large purchase then the department head will start the **Quote Procedure**.
- If allowable under the local purchase order method the Administrator approves the Request form and returns to requestor.
- The requestor then picks up the item(s) and is responsible for signing the invoice.
- The requestor then attaches the invoice to the request form.
- The request form is then sent to the Business Office Accounts Payable who organizes and sends to the Director of Business Services for approval.
- Once approved by the Director of Business Services the request can be paid.

C. Request for Reimbursement, travel, or Check Request: is to be used for workshop registrations, membership dues, mileage or other forms of reimbursement.

- Staff will complete the designated portions of the **Purchase/Reimbursement Request Form** and route the form to the Department Administrator electronically.
- When requesting reimbursement for travel attach a travel log or a map to the destination. Also see Hourly Employee Travel Time located in the ISD Procedures Folder within the Business Office Folder.
- **Expense reimbursements must be turned in within 30 days of the event.**
- Attach registration forms and invoices related to membership dues when requesting payment.

- Fill request form out completely and route to your Department Administrator electronically.
- The Department Administrator reviews and approves electronically.
- The Department Administrator electronically sends the request to the Business Office Accounts Payable person for processing.
- The Accounts Payable person reviews for appropriate charges and organizes and electronically sends to Director of Business Services for Approval.
- Once approved by the Director of Business Services the request can be paid and is sent electronically to payroll.
- Note: Employees can be reimbursed for items purchased for the school, with prior approval from their supervisor. Sales Tax will be excluded from the reimbursement.
- Weekly check runs are reserved for items that have a deadline due to the nature of the expenditure, not because an employee neglected to complete the paperwork on time. Examples of acceptable items for weekly payment are: referees, field trips, registrations & emergency items that could not be planned for in advance. All weekly check requests must be to the district office by noon Wednesday.

D. **Orders that require timely purchase.** Items that need immediate repair or are extremely time sensitive in order to operate daily operations. This process will typically be used by Building and Grounds, Food Service, and Technology. This will exclude all federal purchases.

- Department Administrator may order the items necessary.
- Department Administrator must code and sign invoice indicating it is ok to pay.
- Department Administrator routes to Accounts Payable.
- Accounts Payable reviews for administrative signature.
- Accounts Payable forwards to Director of Business Services.
- Director of Business Services reviews for appropriateness.
- If questions, Director of Business Services will contact administrator.
- Director of Business Services signs invoice and returns to Accounts Payable for Processing.

E. Request for Purchase Card (P-Card) Payment: The P-card is a simplified cost effective method of purchasing and remitting payment for approved expenditures.

P-cards are to be used for micro purchases(\$0-\$3,000) and must have prior approval for purchases.

- Any individuals who have been issued a P-Card must follow the P-Card Manual Purchasing Procedures.
 - Must have prior approval, this may be on purchase orders or email communication to your Supervisor.
 - All purchases are recorded on the log sheet and must have a detailed receipt attached.
 - The log sheets with supporting documentation are turned in monthly to your direct Administrator for approval for payment.
- For more information the P-Card Manual is located in the ISD 477 Procedures Folder within the Business Office Folder. The procedures in this manual must be followed for all P-Card transactions.

Original Date: June 2016

Review Date: Reviewed 07.10.17 by Director of Business Services

Review Date: Updated 07.30.18 by Director of Business Services

Review Date: Updated 08.23.18 by Director of Business Services

Review Date: Updated 02.15.19 by Director of Business Services

Review Date: 08.12.19 by Director of Business Services



Procedures Title: Purchasing and Procurement Quote

Introduction: To provide clear guidance on quote and bid requirements.

Policy Context: Policies 701.1 and 721 are the current board approved policies related to procurement and purchasing.

Responsibility: The Director of Business Services is responsible for the oversight and maintenance of the purchasing and procurement quote procedure(s).

Definitions:

- Micro Purchase: Under \$10,000 no quotations, equitable distributions (2 CFR §200.67)
- Small Purchase: \$10,000 to \$49,999, rate quotations, no cost or price analysis (2 CFR §200.88) Requires quote procedure.
- Medium Purchase: \$50,000-\$174,999, rate quotations, no cost or price analysis (2 CFR §200.88) Requires quote procedure.
- Large Purchase: \$175,000, or bid law.

When purchasing capital items or large quantities of the same items follow the following guidelines:

\$0.00-\$9,999	Micro Purchases	No Quotes Required
\$10,000-\$49,999	Small Purchase	2 Quotes
\$50,000-\$174,999	Medium Purchases	3 Quotes
\$175,000 or More	Large Purchase	Bid Law

Procedures:

- Obtain required quotes from appropriate vendors.
- Check the State Bid Website and Cooperative Purchasing for any applicable vendors that may apply to the purchase.
- Fill out quote form that is located in the ISD Procedures Folder within the Business Office Folder.
- After the appropriate quotes are obtained:
 1. Prepare a requisition request for your vendor of choice.

2. Forward the quote form and the quotes via email and the purchase order request to the Director of Business Services.
3. Director of Business Services will review the quotes, budget plan, and recommended vendor.
4. Director of Business Services will notify administrator with any concerns, if any.
5. Once the item is approved, purchase order will be drafted and processed through the normal purchasing and procurement procedures.

Review Date: 10.04.16

Reviewed 07.10.17 by Director of Business Services

Reviewed 07.30.18 by Director of Business Services

Reviewed: Updated 08.23.18 by Director of Business Services

Updated: 08.09.19 by Director of Business Services

**PRINCETON PUBLIC SCHOOLS
POLICY 702-ACCOUNTING**

I. PURPOSE

The purpose of this policy is to adopt the Uniform Financial Accounting and Reporting Standards for Minnesota School Districts provided for in guidelines adopted by the Minnesota Department of Education.

II. GENERAL STATEMENT OF POLICY

It is the policy of this school district to comply with the Uniform Financial Accounting and Reporting Standards for Minnesota School Districts.

III. MAINTENANCE OF BOOKS AND ACCOUNTS

The school district shall maintain its books and records and do its accounting in compliance with the Uniform Accounting and Reporting Standards for Minnesota School Districts (UFARS) provided for in the guidelines adopted by the Minnesota Department of Education and in compliance with applicable state laws and rules relating to reporting of revenues and expenditures.

IV. PERMANENT FUND TRANSFERS

Unless otherwise authorized pursuant to Minn. Stat. § 123B.80, as amended, or any other law, fund transfers shall be made in compliance with UFARS and permanent fund transfers shall only be made in compliance with Minn. Stat. §123B.79, as amended.

V. REPORTING

The school board shall provide for an annual audit of the books and records of the school district to assure compliance of its records with UFARS. Each year, the school district shall also, on or before October 1 of each year, provide for the publication of the financial information specified in Minn. Stat. §123B.10 in the manner specified therein.

Legal References: Minn. Stat. § 123B.75 (Revenue) Minn. Stat. § 123B.76
(Expenditures)
Minn. Stat. § 123B.77 (Accounting, Budgeting and
Reporting Requirements)
Minn. Stat. § 123B.78 (Cash Flow, Revenues, Borrowing,
Deficits)
Minn. Stat. § 123B.79 (Permanent Fund Transfers)
Minn. Stat. § 123B.80 (Exceptions for Permanent Fund
Transfers)
Minn. Stat. § 123B.09 (School Board Powers)

Minn. Stat. § 123B.14, Subd. 7 (Duties of School Board Clerk)
Minn. Stat. § 123B.02 (School District Powers)
Minn. Stat. § 123B.10 (Publication of Financial Information)

Cross References: MSBA/MASA Model Policy 703 (Annual Audit)
MSBA Service Manual, Chapter 7, Education Funding

Adopted: December 17, 2002

Revised: April 19, 2016

Revised: October 18, 2016

Adopted: _____

MSBA/MASA Model Policy 702

Orig. 1995

Revised: _____

Rev. 2002 2006

702 ACCOUNTING

[Note: The provisions of this policy reflect the applicable statutes and are not discretionary in nature.]

I. PURPOSE

The purpose of this policy is to adopt the Uniform Financial Accounting and Reporting Standards for Minnesota School Districts provided for in guidelines adopted by the Minnesota Department of Education.

II. GENERAL STATEMENT OF POLICY

It is the policy of this school district to comply with the Uniform Financial Accounting and Reporting Standards for Minnesota School Districts.

III. MAINTENANCE OF BOOKS AND ACCOUNTS

The school district shall maintain its books and records and do its accounting in compliance with the Uniform Accounting and Reporting Standards for Minnesota School Districts (UFARS) provided for in the guidelines adopted by the Minnesota Department of Education and in compliance with applicable state laws and rules relating to reporting of revenues and expenditures.

IV. PERMANENT FUND TRANSFERS

Unless otherwise authorized pursuant to Minn. Stat. § 123B.80, as amended, or any other law, fund transfers shall be made in compliance with UFARS and permanent fund transfers shall only be made in compliance with Minn. Stat. §123B.79, as amended, or other applicable statute.

V. REPORTING

The school board shall provide for an annual audit of the books and records of the school district to assure compliance of its records with UFARS. Each year, the school district shall also, ~~on or before October 1 of each year,~~ provide for the publication of the financial information specified in Minn. Stat. §123B.10 in the manner specified therein.

Legal References: Minn. Stat. § 123B.02 (School District Powers)
Minn. Stat. § 123B.09 (School Board Powers)
Minn. Stat. § 123B.10 (Publication of Financial Information)
Minn. Stat. § 123B.14, Subd. 7 (Duties of School Board Clerk)

Minn. Stat. § 123B.75 (Revenue)
Minn. Stat. § 123B.76 (Expenditures)
Minn. Stat. § 123B.77 (Accounting, Budgeting and Reporting Requirements)
Minn. Stat. § 123B.78 (Cash Flow, Revenues, Borrowing, Deficits)
Minn. Stat. § 123B.79 (Permanent Fund Transfers)
Minn. Stat. § 123B.80 (Exceptions for Permanent Fund Transfers)

Cross References: MSBA/MASA Model Policy 703 (Annual Audit)
MSBA Service Manual, Chapter 7, Education Funding



Procedure Title: Reclassification of Purchases or Receipts

Introduction: To provide clear guidance on reclassification of purchases or receipts.

Policy Context: Policies 702 and 721 are the current board approved policies related to reclassification of purchases or receipts.

Responsibility: The Director of Services is responsible for the oversight and maintenance of the reclassification of purchases or receipts procedure.

Procedure:

- Purchaser determines there has been a miss-classification of purchases(expenses) or receipts(revenues).
- Purchaser requests reviewal of classification change by Department Administrator.
- Department Administrator determines if the reclassification is to a Federal Program, if so the Department Administrator fills out the Questions related to the reclassification.
- Department Administrator fills out Request for Reclassification of purchase or receipt.
- Department Administrator routes to District Center Accountant.
- District Center Accountant enters required Journal Entry into SMART and attaches the request electronically to the journal entry.
- District Center Accountant routes the entry to the Director of Business Services.
- Director of Business Services reviews the entry and attached document.
- Director of Business Services approves the entry when it is an allowable reclassification.

Revised 10.04.16

Reviewed 07.10.17 by Director of Business Services

Reviewed 08.09.19 by Director of Business Services



Procedure Title: District Cash Management Receipts Procedure for Revenues Received

Introduction: To provide clear guidance on revenues received.

Policy Context: Policies 702 and 721

Responsibility: The Director of Business Services is responsible for the oversight and maintenance of revenues received.

Procedure: (Note: All deposits are to be deposited within one week of receipt in the district. Money not deposited shall be held in the building office's secure location.)

1. Teaching or other staff fill out a Deposit Collection Form, count, and sign for various functions.
2. Then the money is forwarded to the building offices.
3. Building office staff verify the deposit and sign the verification, if they are responsible for the Deposit Collection Form another office staff person must verify the deposit.
4. Each building makes deposits to the bank using bank deposit slips. They are written up by office staff and food service employees and then put in locked bank bags that are delivered to the bank by the school delivery driver.
5. A copy of the deposit slip and backup is sent to the Secretary at the District Center.
6. Deposit receipts from the bank are returned to the District Center by the delivery driver.
7. District Center Secretary matches the bank receipts with the deposit slip, copies and writes up the district receipts for any deposits made by the district center (county checks, insurance payments, etc.)
8. Credit card payments from families are collected by all programs for various events.

9. Accountant runs a report from R-schools and Rev Track that match the deposit on the bank statement to verify proper account code.
10. Accountant reconciles the credit card deposits to the bank statement and enters the district receipts.
11. Accountant develops the receipt for credit cards with proper coding.
12. For reimbursement of grants or aids the Accountant follows the Reimbursement of Grants and Aids procedure.
13. Accountant prepares the local, state, and federal receipts and draws which are electronically deposited to the District Account at MSDLAF and/or Bremer Bank.
14. Accountant forwards to Director of Business Service for verification and signature for IOWA Authorization before draw is completed.
15. The daily deposits are coded and entered into the finance system by Accounts Payable/Accounts Receivable.
16. The system assigns receipt numbers.
17. Accountant reconciles the receipts to the bank statement each month.
18. Accountant forwards reconciliation to the Director of Business Services for review and signature.
19. Director of Business Services reviews all revenues monthly to ensure all receipts are entered and coded correctly.

Revised: 10.04.16

Reviewed: 07.10.17 by the Director of Business Services

Reviewed: 08.09.19 by the Director of Business Services



Procedure Title: Development of Reimbursement Requests for Grants and Aids

Introduction: To provide clear guidance on reimbursement requests for grants and aids.

Policy Context: Policies 701.1, 702 and 721 are the current board approved policies related to reimbursement requests for grants and aids.

Responsibility: The Director of Business Services is responsible for the oversight and maintenance of reimbursement requests.

Procedure:

- All grants and aids will follow the purchasing and procurement policy and procedures of the district.
- All grants and aids reimbursements must follow the allowability of cost guidelines.
- After the payments have been processed either through accounts payable or payroll, the accountant works with Program Administrator to run detailed history of the grant or aid codes that need a reimbursement request.
- Accountant works with Program Administrator to collect copies of all necessary backup details.
- Accountant works with Program Administrator to fill out the draw request form.
- Accountant forwards draw request form and documentation to the Director of Business Services or Superintendent.
- Director of Business Services or Superintendent review for allowability of funds spent.
- Director of Business Services or Superintendent sign and return documentation to the accountant.
- The Accountant and or Program Administrator then sends the request to the appropriate agency.
- If Program Administrator requests funds then the Administrator forwards the agency request form to the Accountant.

- When funds are received the Accountant follows the Cash Management procedures for receipts.

Reviewed 10.04.16

Reviewed 07.10.17 by Director of Business Services

Updated 08.09.19 by Director of Business Services

**PRINCETON PUBLIC SCHOOLS
POLICY 703 - ANNUAL AUDIT**

I. PURPOSE

The purpose of this policy is to provide for an annual audit of the books and records of the school district in order to comply with law, to provide a permanent record of the financial position of the school district, and to provide guidance to the school district to correct any errors and discrepancies in its practices.

II. GENERAL STATEMENT OF POLICY

The policy of this school district is to comply with all laws relating to the annual audit of the books and records of the school district.

III. REQUIREMENT

- A. The school board shall appoint independent certified public accountants to audit, examine and report upon the books and records of the school district. The school board may enter into a contract with a person or firm to provide the agreed upon services.
- B. After the close of each fiscal year, the books, records and accounts of the school district shall be audited by said independent certified public accountants in accordance with applicable standards and legal requirements. The superintendent and members of the administration shall cooperate with the auditors.
- C. The school district shall, prior to September 15 of each year, submit unaudited financial data for the preceding year to the Commissioner of Education—on forms prescribed by the Commissioner. The report shall also include those items required by Minn. Stat. § 123B.14, Subd. 7.
- D. The school district shall, prior to November 30 of each year, provide to the Commissioner audited financial data for the preceding fiscal year. The school district shall, prior to December 31 of each year, provide to the Commissioner and the State Auditor an audited financial statement in a form that will allow comparison with and correction of material differences in the unaudited data. The audited financial statement must also provide a statement of assurance pertaining to compliance with uniform financial accounting and reporting standards and a copy of the management letter submitted to the school district by its auditor.
- E. The audit must be conducted in compliance with generally accepted governmental auditing standards, the Federal Single Audit Act and the Minnesota Legal Compliance Guide issued by the

Office of the State Auditor.

- F. The school board must approve the audit report by resolution or require a further or amended report.
- G. The administration shall report to the school board regarding any actions necessary to correct any deficiencies or exceptions noted in the audit.
- H. The accounts and records of the school district shall also be subject to audit and inspection by the State Auditor to the extent provided in Minn. Stat. Ch. 6.

Legal References: Minn. Stat. Ch. 6 (State Auditor)
Minn. Stat. § 123B.09 (School Board Powers)
Minn. Stat. § 123B.14, Subd. 7 (Duties of School Board Clerk) Minn. Stat. § 123B.02 (School District Powers)
Minn.Stat. § 123B.77, Subds. 2 and 3 (Audited Financial Statements; Statement for Comparison and Correction)

Cross References: MSBA/MASA Model Policy 702 (Accounting)
MSBA Service Manual, Chapter 7, Education Funding

Adopted: December 17, 2002

Revised: April 19, 2016

Revised: October 18, 2016

Adopted: _____

MSBA/MASA Model Policy 703

Orig. 1995

Revised: _____

Rev. 2000

703 ANNUAL AUDIT

[Note: The provisions of this policy reflect the applicable statutes and are not discretionary in nature.]

I. PURPOSE

The purpose of this policy is to provide for an annual audit of the books and records of the school district in order to comply with law, to provide a permanent record of the financial position of the school district, and to provide guidance to the school district to correct any errors and discrepancies in its practices.

II. GENERAL STATEMENT OF POLICY

~~It is the~~ The policy of this school district is to comply with all laws relating to the annual audit of the books and records of the school district.

III. REQUIREMENT

- A. The school board shall appoint independent certified public accountants to audit, examine, and report upon the books and records of the school district. The school board may enter into a contract with a person or firm to provide the agreed upon services.
- B. After the close of each fiscal year, the books, records, and accounts of the school district shall be audited by said independent certified public accountants in accordance with applicable standards and legal requirements. The superintendent and members of the administration shall cooperate with the auditors.
- C. The school district shall, prior to September 15 of each year, submit unaudited financial data for the preceding year to the Commissioner of ~~the Department of~~ Education (~~the~~ Commissioner) on forms prescribed by the Commissioner. The report shall also include those items required by Minn. Stat. § 123B.14, Subd. 7.
- D. The school district shall, prior to November 30 of each year, provide to the Commissioner audited financial data for the preceding fiscal year. The school district shall, prior to December 31 of each year, provide to the Commissioner and the State Auditor an audited financial statement in a form that will allow comparison with and correction of material differences in the unaudited data. The audited financial statement must also provide a statement of assurance pertaining to compliance with uniform financial accounting and reporting standards and a copy of the management letter submitted to the school district by its auditor.

- E. The audit must be conducted in compliance with generally accepted governmental auditing standards, the Federal Single Audit Act and the Minnesota Legal Compliance Guide issued by the Office of the State Auditor.
- F. The school board must approve the audit report by resolution or require a further or amended report.
- G. The administration shall report to the school board regarding any actions necessary to correct any deficiencies or exceptions noted in the audit.
- H. The accounts and records of the school district shall also be subject to audit and inspection by the State Auditor to the extent provided in Minn. Stat. Ch. 6.

Legal References: Minn. Stat. Ch. 6 (State Auditor)
Minn. Stat. § 123B.02 (School District Powers)
Minn. Stat. § 123B.09 (School Board Powers)
Minn. Stat. § 123B.14, Subd. 7 (Duties of School Board Clerk)
Minn.Stat. § 123B.77, Subds. 2 and 3 (Audited Financial Statements;
Statement for Comparison and Correction)

Cross References: MSBA/MASA Model Policy 702 (Accounting)
MSBA Service Manual, Chapter 7, Education Funding

**PRINCETON PUBLIC SCHOOLS
POLICY-704 DEVELOPMENT AND MAINTENANCE OF AN INVENTORY OF
FIXED ASSETS AND A FIXED ASSET ACCOUNTING SYSTEM**

I. PURPOSE

The purpose of this policy is to provide for the development and maintenance of an inventory of the fixed assets of the school district and the establishment and maintenance of a fixed asset accounting system.

II. GENERAL STATEMENT OF POLICY

The policy of this school district that a fixed asset accounting system and an inventory of fixed assets be developed and maintained.

III. DEVELOPMENT OF INVENTORY AND ACCOUNTING SYSTEM

The superintendent or such other school official as designated by the superintendent or the school board shall be responsible for the development and maintenance of an inventory of the fixed assets of the school district, and for the establishment and maintenance of a formal fixed asset accounting system. The accounting system shall be operated in compliance with the applicable provisions of the Uniform Financial Accounting and Reporting Standards for Minnesota School Districts (UFARS). The inventory shall specify the location of all continued abstracts showing the conveyance of the property to the school district; certificates of title showing title to the property in the school district; title insurance policies; surveys; and other property records relating to the real property of the school district.

IV. CAPITALIZATION

Princeton Public Schools General Fixed Asset Account Group includes assets valued at \$1,500 or otherwise required by law, and with a useful life of more than one year.

V. DEPRECIABLE LIVES

In determining the useful life of an asset the district uses ASBO (Association of School Business Officials) GASB 34 Implementation Recommendations for School Districts guidelines. The guidelines are listed below.

Asset Class	Estimated Useful Life (Years)
Athletic Equipment	10
Audio/Visual Equipment	10
Building Construction	25
Buses / Other Vehicles	8
Business Machines	10
Carpet Replacement	7
Communication Equipment	10
Computer Hardware	5
Computer Software (administrative)	10-20
Computer Software (instructional)	5-10
Copiers	5
Custodial Equipment	15
Electrical/Plumbing	30
Furniture & Accessories	20
Grounds Equipment	15
HVAC Systems	20
Instructional Equipment	10
Kitchen Equipment	15
Land	N/A
Large Equipment	10
Library Books	5
Machinery & Tools	15
Musical Instruments	10
Outdoor Equipment	20
Plumbing	30
Portable Classrooms	25
Roofing	20
School Buildings	50
Science & Engineering	10
Site Improvements	20
Sprinkler/Fire System	25

VI. DEPRECIATION METHOD

Princeton Public School will depreciate all classes of fixed assets based on the straight line depreciation method.

VII. DONATIONS/GIFTS

Princeton Public Schools will assign a value to donations or gifts based on the current market value of that item at the time of receipt. The inventory database is to be maintained and updated semi-annually and upon receipt of any new equipment and disposal of any equipment. Each building will also have a trained representative to ensure inventory is updated. In addition to updating the inventory, each classroom, office or department will complete a physical inventory of all assets in their respective areas to ensure current information is available on the database, including all items disposed. Each building representative will update their building inventory semi-annually and give the report to the district office for updating the master list. The district office representative will be trained and updated annually in accordance with our financial software vendor.

The administration shall annually update the property records of the school district and provide an inventory of the fixed assets of the school district to the school board. This inventory may be utilized to prepare the annual report to the Commissioner required by Minn. Stat. §123B.14, Subd. 7.

Legal References: Minn. Stat. § 123B.09 (School Board Powers)
Minn. Stat. § 123B.02 (School District Powers)
Minn. Stat. § 123B.51 (Schoolhouse and Sites; Access for Noncurricular Purposes)

Cross References: Princeton School District Policy 702 (Accounting)
MSBA Service Manual, Chapter 7, Education Funding
MSBA Service Manual, Chapter 9, Public School Finance

Adopted: December 16, 2003
Revised: June 22, 2004
Revised: December 20, 2011
Revised: August 10, 2010
Revised: March 27, 2012
Revised: January 8, 2013
Reviewed: April 19, 2016
Reviewed: October 18, 2016

Adopted: _____

MSBA/MASA Model Policy 704

Orig. 1995

Revised: _____

Rev. 1999 2009

704 DEVELOPMENT AND MAINTENANCE OF AN INVENTORY OF FIXED ASSETS AND A FIXED ASSET ACCOUNTING SYSTEM

I. PURPOSE

The purpose of this policy is to provide for the development and maintenance of an inventory of the fixed assets of the school district and the establishment and maintenance of a fixed asset accounting system.

II. GENERAL STATEMENT OF POLICY

~~It is the~~ **The** policy of the school district **is** that a fixed asset accounting system and an inventory of fixed assets be developed and maintained.

III. DEVELOPMENT OF INVENTORY AND ACCOUNTING SYSTEM

The superintendent or such other school official as designated by the superintendent or the school board shall be responsible for the development and maintenance of an inventory of the fixed assets of the school district and for the establishment and maintenance of a formal fixed asset accounting system. The accounting system shall be operated in compliance with the applicable provisions of the Uniform Financial Accounting and Reporting Standards for Minnesota School Districts (UFARS). In addition, the inventory shall specify the location of all continued abstracts showing the conveyance of the property to the school district; certificates of title showing title to the property in the school district; title insurance policies; surveys; and other property records relating to the real property of the school district.

IV. REPORT

The administration shall annually update the property records of the school district and provide an inventory of the fixed assets of the school district to the school board. ~~This inventory may be utilized to prepare the annual report to the Commissioner required by Minn. Stat. §123B.14, Subd. 7.~~

Legal References: Minn. Stat. § 123B.02 (School District Powers)
Minn. Stat. § 123B.09 (School Board Powers)
~~Minn. Stat. § 123B.14, Subd. 7 (Duties of School Board Clerk)~~
Minn. Stat. § 123B.51 (Schoolhouse and Sites; Access for Noncurricular Purposes)

Cross References: MSBA/MASA Model Policy 702 (Accounting)
MSBA Service Manual, Chapter 7, Education Funding



Procedures Title: Fixed Asset Inventory

Introduction: To provide clear guidance on when and how to categorize a purchase as a fixed asset of the District.

Policy Context: Policies 704 and 721 are the current board policies related to Fixed Asset Inventory.

Responsibility: The Director of Business Services is responsible for the oversight and maintenance of the fixed asset procedures.

1. Items tagged as a fixed asset will be based on the dollar amount set in Policy # 704.
2. Director of Business Services, in the comment area of the purchase order or requisition, notes the item is a fixed asset. The fixed asset note will print out on the purchase order.
3. Items are received at each building site.
4. Departments and/or Staff that ordered the item are responsible for verifying the item has been received.
5. Departments and/or Staff notify Accounts Payable when items have been received.
6. If the item has not been received the staff person is to notify their Administrator and Accounts Payable.
7. Accounts Payable will process the item for payment and flag the item as a fixed asset in the system and provide a report to the District Center Secretary a monthly report in order to record assets correctly.
8. District Center Secretary will then move the item(s) into the fixed asset system.
9. District Center Secretary then fills out the Fixed Asset Form, attaches the fixed asset tag or tags related to the item on the form except in the case of technology.
10. Technology tracks inventory for their department separately on a master inventory google document. The District Office Secretary reviews monthly and

includes any item at or over Policy 704 dollar amount threshold in our Smart Finance Fixed Asset Inventory.

11. Types of tags are: District, Federal or Technology.
12. District Center Secretary copies the form and then inner school mail the original form to the purchaser. In the case of Technology the District Office Secretary reviews the master inventory list and includes the technology tag number in SMART Finance.
13. The individual Federal Department's track their fixed asset inventory on an approved spreadsheet form.
14. The purchaser affixes the Fixed Asset Tag(s) to the purchased item and fills out the model # and serial # on the form.
15. The purchaser then returns the form to the District Center Secretary.
16. The District Office Secretary then enters the model # and serial # into the fixed asset system.
17. If the District Center Secretary doesn't receive the form back, the District Center Secretary follows up with the purchaser based on the copy of the form.
18. At the start of the school year, the District Center Secretary will send to each staff person identified as being in possession of fixed assets a statement of assurance noting the items they possess and an explanation of their responsibility of loss, theft, and/or damage prevention.
19. At year end the physical inventory is completed by each staff person, including a signed and dated copy of any federal inventories which will include a Statement of Assurance.
20. The physical inventory verifies the location of the item, in which the District Center Secretary records any changes.
21. At year end the Director of Business Services verifies that all items purchased in the current year are in the fixed asset system. The Director of Business Services is provided a copy of all federal program tracking spreadsheets at year end and verifies that current year purchases are accounted for.
22. District Center Secretary makes any corrections necessary in the system.
23. Accountant performs the year end close process to recognize the year end fixed assets and disposals. For disposals see Disposal Procedure.

Reviewed June 2016

Reviewed 07.10.17 by Director of Business Services

Reviewed 07.30.18 by Director of Business Services

Reviewed 08.09.19 by Director of Business Services

**PRINCETON PUBLIC SCHOOLS
POLICY 705-INVESTMENTS**

I. PURPOSE

The purpose of this policy is to establish guidelines for the investment of school district funds.

II. GENERAL STATEMENT OF POLICY

The policy of this school district is to comply with all state laws relating to investments and to guarantee that investments meet certain primary criteria.

III. SCOPE

This policy applies to all investments of the surplus funds of the school district, regardless of the fund accounts in which they are maintained, unless certain investments are specifically exempted by the school board through formal action.

- A. Pooling of Funds. Except for cash in certain restricted and special funds, Princeton Public Schools will consolidate cash and reserve balances from all funds to maximize investment earnings and to increase efficiencies with regard to investment pricing, safekeeping and administration. Investment income will be allocated to the various funds based on their respective participation and in accordance with generally accepted accounting principles.

IV. AUTHORITY; OBJECTIVES

- A. The funds of the school district shall be deposited or invested in accordance with this policy, Minn. Stat. Chapter 118A and any other applicable law or written administrative procedures.
- B. The primary criteria for the investment of the funds of the school district, in priority order, are as follows
 - 1. Safety. Safety of principal is the foremost objective of the investment program. Investments shall be undertaken in a manner that seeks to ensure the preservation of capital in the overall portfolio. The objective will be to mitigate credit risk and interest rate risk.
 - a) Credit Risk. Princeton Public Schools will minimize credit risk, which is the risk of loss due to the failure of the security issuer or backer, by:

- (1) Limiting investments to the types of securities listed

in Section IX of this Investment Policy.

(2) Pre-qualifying the financial institutions, broker/dealers, intermediaries, and advisers with which Princeton Public Schools will do business in accordance with Section V.

(3) Diversifying the investment portfolio so that the impact of potential losses from any one type of security or from any one individual issuer will be minimized.

b) Interest Rate Risk. Princeton Public Schools will minimize interest rate risk, which is the risk that the market value of securities in the portfolio will fall due to changes in market interest rates, by:

(1) Structuring the investment portfolio so that securities mature to meet cash requirements for ongoing operations, thereby avoiding the need to sell securities on the open market prior to maturity.

(2) Investing operating funds primarily in shorter-term securities, money market mutual funds, or similar investment pools and limiting the average maturity of the portfolio in accordance with this policy (see section IX).

2. Liquidity. The investment portfolio shall remain sufficiently liquid to meet all operating requirements that may be reasonably anticipated. This is accomplished by structuring the portfolio so that securities mature concurrent with cash needs to meet anticipated demands (static liquidity). Furthermore, since all possible cash demands cannot be anticipated, the portfolio should consist largely of securities with active secondary or resale markets (dynamic liquidity). Alternatively, a portion of the portfolio may be placed in money market mutual funds or local government investment pools which offer same-day liquidity for short-term funds.

3. Yield. The investment portfolio shall be designed with the objective of attaining a market rate of return throughout budgetary and economic cycles, taking into account the investment risk constraints and liquidity needs. Return on investment is of secondary importance compared to the safety and liquidity objectives described above. The core of investments are limited to relatively low risk securities in anticipation of earning a fair return relative to the risk being assumed. Securities shall generally be

held until maturity with the following exceptions:

- a) A security with declining credit may be sold early to minimize loss of principal.
 - b) A security swap would improve the quality, yield, or target duration in the portfolio.
 - c) Liquidity needs of the portfolio require that the security be sold.
4. Maintaining the Public's Trust. The investment officer(s) shall seek to act responsibly as custodians of the public trust and shall avoid any transaction that might impair public confidence in the District, the Board, or the School Board Treasurer.

V. DELEGATION OF AUTHORITY

- A. The Director of Business Services and the Assistant Business Affairs Executive of the school district are designated as the investment officers of the school district and is responsible for investment decisions and activities under the direction of the school board. The investment officer(s) shall operate the school district's investment program consistent with this policy. The investment officer(s) may delegate certain duties to a designee or designees, but shall remain responsible for the operation of the program.
- B. All officials and employees that are a part of the investment process shall act professionally and responsibly as custodians of the public trust, and shall refrain from personal business activity that could conflict with the investment program or which could reasonably cause others to question the process and integrity of the investment program. The investment officer(s) shall avoid any transaction that could impair public confidence in the school district.

VI. STANDARD OF CONDUCT

- A. The standard of conduct regarding school district investments to be applied by the investment officer(s) shall be the "prudent person standard." Under this standard, the investment officer(s) shall exercise that degree of judgment and care, under the circumstances then prevailing, that persons of prudence, discretion and intelligence would exercise in the management of their own affairs, investing not for speculation and considering the probable safety of their capital as well as the probable investment return to be derived from their assets. The prudent person standard shall be applied in the context of managing the overall investment portfolio of the school district. The investment officer(s), acting in accordance with this policy and exercising due

diligence, judgment and care commensurate with the risk, shall not be held personally responsible for a specific security's performance or for market price changes. Deviations from expectations shall be reported in a timely manner and appropriate actions shall be taken to control adverse developments.

- B. Ethics and Conflicts of Interest. Officers and employees involved in the investment process shall refrain from personal business activity that could conflict with the proper execution and management of the investment program, or that could impair their ability to make impartial decisions. Employees and investment officials shall disclose any material interests in financial institutions with which they conduct business. They shall further disclose any personal financial / investment positions that could be related to the performance of the investment portfolio. Employees and officers shall refrain from undertaking personal investment transactions with the same individual with whom business is conducted on behalf of Princeton Public Schools.

VII. MONITORING AND ADJUSTING INVESTMENTS

The investment officer(s) shall routinely monitor existing investments and the contents of the school district's investment portfolio, the available markets and the relative value of competing investment instruments.

VIII. INTERNAL CONTROLS

The investment officer(s) shall establish a system of internal controls which shall be documented in writing. The internal controls shall be reviewed by the school board and shall be annually reviewed for compliance by the school district's independent auditors. The internal controls shall be designed to prevent and control losses of public funds due to fraud, error, misrepresentation, unanticipated market changes or imprudent actions by officers, employees or others. The internal controls may include, but shall not be limited to, provisions relating to controlling collusion, separating functions, separating transaction authority from accounting and recordkeeping, custodial safekeeping, avoiding bearer form securities, clearly delegating authority to applicable staff members, limiting securities losses and remedial action, confirming telephone transactions in writing, supervising and controlling employee actions, minimizing the number of authorized investment officials, and documenting transactions and strategies.

IX. PERMISSIBLE INVESTMENT INSTRUMENTS

The school district may invest its available funds in those instruments specified in Minn. Stat. §§ 118A.04 and 118A.05, as these sections may be amended from time to time, or any other law governing the investment of school district funds.

The school district may invest in any type of security allowed by Minnesota

statute, as may be amended to those instruments listed below:

- A. Bonds, notes, certificates of indebtedness, treasury bills or other securities now or hereafter issued by the United States of America, its agencies and allowable instrumentalities;
- B. Interest bearing savings accounts, interest bearing certificates of deposit or interest bearing time deposits, or any other investments constituting direct obligations of any bank;
- C. Certificates of deposit with federally insured institutions that are collateralized or insured in excess of the \$100,000 provided by the Federal Deposit Insurance Corporation coverage limit;
- D. Collateralized repurchase agreements, which conform to the requirements stated in 118A.05, sub.2 of the statutes;
- E. Commercial paper meeting the following requirements:
 - 1. The corporation must be organized in the United States or be a Canadian subsidiary.
 - 2. The corporation's assets must exceed \$500,000,000.
 - 3. The obligations at the time of purchase must be rated at the highest classifications by at least two of the four standard rating services (Standard and Poor's, Duff and Phelp's, Moody's and Fitch Investors Service).
 - 4. The obligations cannot have a maturity longer than 270 days.
 - 5. The school district's goal shall be not more than 50% of the total investment fund can be invested in commercial paper at any time.
 - 6. The total investment in any one corporation should not exceed 10% of the corporation's outstanding obligations.
 - 7. The total investment in any one corporation cannot be more than \$10 million.
- F. Investments may be made only in those savings banks or savings and loan associations the shares, or investment certificates of which are insured by the Federal Deposit Insurance Corporation.
- G. Investment products that are considered as derivatives are specifically excluded from approved investments.

X. PORTFOLIO DIVERSIFICATION; MATURITIES

- A. Limitations on instruments, diversification and maturity scheduling shall depend on whether the funds being invested are considered short-term or long-term funds. All funds shall normally be considered short-term except those reserved for building construction projects or specific future projects and any unreserved funds used to provide financial-related managerial flexibility for future fiscal years.
- B. The school district shall diversify its investments to avoid incurring unreasonable risks inherent in over-investing in specific instruments, individual financial institutions or maturities.
 - 1. The investment officer(s) shall prepare and recommend to the Superintendent annually for presentation to the school board for review and approval. The table shall specify the maximum percentage of the school district's investment portfolio that may be invested in a single type of investment instrument, such as U.S. Treasury Obligations, certificates of deposit, repurchase agreements, banker's acceptances, commercial paper, etc. The approved table shall be attached as an exhibit to this policy and shall be incorporated herein by reference.
 - 2. Investment maturities shall be scheduled to coincide with projected school district cash flow needs, taking into account large routine or scheduled expenditures, as well as anticipated receipt dates of anticipated revenues. Maturities for short-term and long-term investments shall be timed according to anticipated need. Within these parameters, portfolio maturities shall be staggered to avoid undue concentration of assets and a specific maturity sector. The maturities selected shall provide for stability of income and reasonable liquidity.
 - 3. Maximum Maturities. To the extent possible, Princeton Public Schools shall attempt to match its investments with anticipated cash flow requirements. Unless matched to a specific cash flow, Princeton Public Schools will not directly invest in securities maturing more than five (5) years from the date of purchase or in accordance with state and local statutes and ordinances. Princeton Public Schools shall adopt weighted average maturity limitations (which often range from 90 days to 3 years), consistent with the investment objectives.

Reserve funds and other funds with longer-term investment horizons may be invested in securities exceeding five (5) years if the maturities of such investments are made to coincide as nearly

as practicable with the expected use of funds. The intent to invest in securities with longer maturities shall be disclosed in writing to the legislative body (see the GFOA Recommended Practice on “Maturities of Investments in a Portfolio” in Appendix).

XI. COMPETITIVE SELECTION OF INVESTMENT INSTRUMENTS

Before the school district invests any surplus funds in a specific investment instrument, a competitive bid or quotation process shall be utilized. If a specific maturity date is required, either for cashflow purposes or for conformance to maturity guidelines, quotations or bids shall be requested for instruments which meet the maturity requirement. If no specific maturity is required, a market trend analysis, which includes a yield curve, will normally be used to determine which maturities would be most advantageous. Quotations or bids shall be requested for various options with regard to term and instrument. The school district will accept the quotation or bid which provides the highest rate of return within the maturity required and within the limits of this policy. Generally all quotations or bids will be computed on a consistent basis, i.e., a 360-day or a 365-day yield. Records will be kept of the quotations or bids received, the quotations or bids accepted and a brief explanation of the decision that was made regarding the investment. If the school district contracts with an investment advisor, bids are not required in those circumstances specified in the contract with the advisor.

XII. QUALIFIED INSTITUTIONS AND BROKER-DEALERS

- A. The school district shall maintain a list of the financial institutions that are approved for investment purposes.
- B. Prior to completing an initial transaction with a broker, the school district shall provide to the broker a written statement of investment restrictions which shall include a provision that all future investments are to be made in accordance with Minnesota statutes governing the investment of public funds. The broker must annually acknowledge receipt of the statement of investment restrictions and agree to handle the school district’s account in accordance with these restrictions. The school district may not enter into a transaction with a broker until the broker has provided this annual written agreement to the school district. The notification form to be used shall be that prepared by the State Auditor. A copy of this investment policy, including any amendments thereto, shall be provided to each such broker.

XIII. SAFEKEEPING AND COLLATERALIZATION

- A. All investment securities purchased by the school district shall be held in third-party safekeeping by an institution designated as custodial agent. The custodial agent may be any Federal Reserve Bank, any bank authorized under the laws of the United States or any state to exercise corporate trust powers, a primary reporting dealer in United States

Government securities to the Federal Reserve Bank of New York, or a securities broker-dealer defined in Minn. Stat. § 118A.06. The institution or dealer shall issue a safekeeping receipt to the school district listing the specific instrument, the name of the issuer, the name in which the security is held, the rate, the maturity, serial numbers and other distinguishing marks, and other pertinent information.

- B. Deposit-type securities shall be collateralized as required by Minn. Stat. § 118A.03 for any amount exceeding FDIC, SAIF, BIF, FCUA, or other federal deposit coverage, as follows:

Subd. 1. For deposits beyond insurance. To the extent that funds on deposit at the close of the financial institution's banking day exceed available federal deposit insurance, the government entity shall require the financial institution to furnish collateral security or a corporate surety bond executed by a company authorized to do business in the state. For the purposes of this section, "banking day" has the meaning given in Federal Reserve Board Regulation CC,

Subd. 2. In lieu of surety bond. The following are the allowable forms of collateral in lieu of a corporate surety bond:

- a) United States government Treasury bills, Treasury notes, Treasury bonds;
- b) issues of United States government agencies and instrumentalities as quoted by a recognized industry quotation service available to the government entity;
- c) general obligation securities of any state or local government with taxing powers which is rated "A" or better by a national bond rating service, or revenue obligation securities of any state or local government with taxing powers which is rated "AA" or better by a national bond rating service;
- d) unrated general obligation securities of a local government with taxing powers may be pledged as collateral against funds deposited by that same local government entity;
- e) irrevocable standby letters of credit issued by Federal Home Loan Banks to a municipality accompanied by written evidence that the bank's public debt is rated "AA" or better by Moody's Investors Service, Inc., or Standard & Poor's Corporation; and time deposits that are fully insured by any federal agency.

Subd. 3. Amount. The total amount of the collateral computed at its market value shall be at least ten percent more than the amount on deposit plus accrued interest at the close of the financial institution's banking day, except that where the collateral is irrevocable standby letters of credit issued by Federal Home Loan Banks, the amount of collateral shall be at least equal to the amount on deposit plus accrued interest at the close of the financial institution's banking day. The financial institution may furnish both a surety bond and collateral aggregating the required amount.

Subd. 4. Assignment. Any collateral pledged shall be accompanied by a written assignment to the government entity from the financial institution. The written assignment shall recite that, upon default, the financial institution shall release to the government entity on demand, free of exchange or any other charges, the collateral pledged. Interest earned on assigned collateral will be remitted to the financial institution so long as it is not in default. The government entity may sell the collateral to recover the amount due. Any surplus from the sale of the collateral shall be payable to the financial institution, its assigns, or both.

Subd. 5. Withdrawal of excess collateral. A financial institution may withdraw excess collateral or substitute other collateral after giving written notice to the governmental entity and receiving confirmation. The authority to return any delivered and assigned collateral rests with the government entity.

Subd. 6. Default. For purposes of this section, default on the part of the financial institution includes, but is not limited to, failure to make interest payments when due, failure to promptly deliver upon demand all money on deposit, less any early withdrawal penalty that may be required in connection with the withdrawal of a time deposit, or closure of the depository. If a financial institution closes, all deposits shall be immediately due and payable. It shall not be a default under this subdivision to require prior notice of withdrawal if such notice is required as a condition of withdrawal by applicable federal law or regulation.

Subd. 7. Safekeeping. All collateral shall be placed in safekeeping in a restricted account at a Federal Reserve bank, or in an account at a trust department of a commercial bank or other financial institution that is not owned or controlled by the financial institution furnishing the collateral. The selection shall be approved by the government entity.

- C. Repurchase agreements shall be secured by the physical delivery or transfer against payment of the collateral securities to a third party or

custodial agent for safekeeping. The school district may accept a safekeeping receipt instead of requiring physical delivery or third-party safekeeping of collateral on overnight repurchase agreements of less than \$1,000,000.

- D. Collateralization. Where allowed by state law and in accordance with the GFOA Recommended Practices on the Collateralization of Public Deposits, full collateralization will be required on all demand deposit accounts, including checking accounts and non-negotiable certificates of deposit (see GFOA Recommended Practices in Appendix).

XIV. REPORTING REQUIREMENTS

- A. The Investment Officers shall submit to the Finance Committee and the Superintendent an annual investment report which shall include information regarding securities in the portfolio by class or type, book value, income earned, and market values as of the report date. Generally accepted accounting principles shall be used for valuation purposes. The report shall indicate any areas of policy concern and planned revision of investment strategies.
- B. If necessary, the investment officer(s) shall establish systems and procedures to comply with applicable federal laws and regulations governing the investment of bond proceeds and funds in a debt service account for a bond issue. The record keeping system shall be reviewed annually by the independent auditor or by another party contracted or designated to review investments for arbitrage rebate or penalty calculation purposes.

XV. DEPOSITORIES

The school board shall annually designate one or more official depositories for school district funds. The treasurer or the Director of Business Services of the school district may also exercise the power of the school board to designate a depository. The school board shall be provided notice of any such designation by its next regular meeting. The school district and the depository shall each comply with the provisions of Minn. Stat. § 118A.03 and any other applicable law, including any provisions relating to designation of a depository, qualifying institutions, depository bonds, and approval, deposit, assignment, substitution, addition and withdrawal of collateral.

XVI. ELECTRONIC FUNDS TRANSFER OF FUNDS FOR INVESTMENT

The school district may make electronic fund transfers for investments of excess funds upon compliance with Minn. Stat. § 471.38.

Legal References: Minn. Stat. § 118A.01 (Public Funds; Depositories and Investments)
Minn. Stat. § 118A.02 (Authorization for Deposit and Investment)
Minn. Stat. § 118A.03 (Depositories and Collateral)
Minn. Stat. § 118A.04 (Investments)
Minn. Stat. § 118A.05 (Contracts and Agreements)
Minn. Stat. § 118A.06 (Delivery and Safekeeping)

Cross References: Policy 703 (Annual Audit)
MSBA Service Manual, Chapter 7, Education Funding
Minnesota Legal Compliance Audit Guide Prepared by the Office of the State Auditor

Adopted: April 25, 2006
Revised: March 25, 2008
Revised: October 26, 2010
Reviewed: April 19, 2016
Reviewed: October 18, 2016

Adopted: _____

MSBA/MASA Model Policy 705

Orig. 1995

Revised: _____

Rev. 2008 2009

705 INVESTMENTS

[Note: The provisions of this policy substantially reflect legal requirements.]

I. PURPOSE

The purpose of this policy is to establish guidelines for the investment of school district funds.

II. GENERAL STATEMENT OF POLICY

~~It is the~~ **The** policy of this school district **is** to comply with all state laws relating to investments and to guarantee that investments meet certain primary criteria.

III. SCOPE

This policy applies to all investments of the surplus funds of the school district, regardless of the fund accounts in which they are maintained, unless certain investments are specifically exempted by the school board through formal action.

IV. AUTHORITY; OBJECTIVES

- A. The funds of the school district shall be deposited or invested in accordance with this policy, Minn. Stat. Ch. 118A and any other applicable law or written administrative procedures.
- B. The primary criteria for the investment of the funds of the school district, in priority order, are as follows
 1. Safety and Security. Safety of principal is the first priority. The investments of the school district shall be undertaken in a manner that seeks to ensure the preservation of the capital in the overall investment portfolio.
 2. Liquidity. The funds shall be invested to assure that funds are available to meet immediate payment requirements, including payroll, accounts payable, and debt service.
 3. Return and Yield. The investments shall be managed in a manner to attain a market rate of return through various economic and budgetary cycles, while preserving and protecting the capital in the investment portfolio and taking into account constraints on risk and cash flow requirements.

V. DELEGATION OF AUTHORITY

- A. The _____ of the school district is designated as the investment officer of the school district and is responsible for investment decisions and activities under the direction of the school board. The investment officer shall operate the school district's investment program consistent with this policy. The investment officer may delegate certain duties to a designee or designees but shall remain responsible for the operation of the program.
- B. All officials and employees that are a part of the investment process shall act professionally and responsibly as custodians of the public trust and shall refrain from personal business activity that could conflict with the investment program or which could reasonably cause others to question the process and integrity of the investment program. The investment officer shall avoid any transaction that could impair public confidence in the school district.

VI. STANDARD OF CONDUCT

The standard of conduct regarding school district investments to be applied by the investment officer shall be the "prudent person standard." Under this standard, the investment officer shall exercise that degree of judgment and care, under the circumstances then prevailing, that persons of prudence, discretion, and intelligence would exercise in the management of their own affairs, investing not for speculation and considering the probable safety of their capital as well as the probable investment return to be derived from their assets. The prudent person standard shall be applied in the context of managing the overall investment portfolio of the school district. The investment officer, acting in accordance with this policy and exercising due diligence, judgment, and care commensurate with the risk, shall not be held personally responsible for a specific security's performance or for market price changes. Deviations from expectations shall be reported in a timely manner and appropriate actions shall be taken to control adverse developments.

VII. MONITORING AND ADJUSTING INVESTMENTS

The investment officer shall routinely monitor existing investments and the contents of the school district's investment portfolio, the available markets, and the relative value of competing investment instruments.

VIII. INTERNAL CONTROLS

The investment officer shall establish a system of internal controls which shall be documented in writing. The internal controls shall be reviewed by the school board and shall be annually reviewed for compliance by the school district's independent auditors. The internal controls shall be designed to prevent and control losses of public funds due to fraud, error, misrepresentation, unanticipated market changes, or imprudent actions by officers, employees, or others. The internal controls may include, but shall not be limited to, provisions relating to controlling collusion, separating functions, separating transaction authority from accounting and record keeping, custodial safekeeping,

avoiding bearer form securities, clearly delegating authority to applicable staff members, limiting securities losses and remedial action, confirming telephone transactions in writing, supervising and controlling employee actions, minimizing the number of authorized investment officials, and documenting transactions and strategies.

IX. PERMISSIBLE INVESTMENT INSTRUMENTS

The school district may invest its available funds in those instruments specified in Minn. Stat. §§ 118A.04 and 118A.05, as these sections may be amended from time to time, or any other law governing the investment of school district funds. The assets of an other postemployment benefits (OPEB) trust or trust account established pursuant to Minn. Stat. § 471.6175 to pay postemployment benefits to employees or officers after their termination of service, with a trust administrator other than the Public Employees Retirement Association, may be invested in instruments authorized under Minn. Stat. Ch. 118A or § 356A.06, Subd. 7. Investment of funds in an OPEB trust account under Minn. Stat. § 356A.06, Subd. 7, as well as the overall asset allocation strategy for OPEB investments, shall be governed by an OPEB Investment Policy Statement (IPS) developed between the investment officer, as designed herein, and the trust administrator.

X. PORTFOLIO DIVERSIFICATION; MATURITIES

- A. Limitations on instruments, diversification, and maturity scheduling shall depend on whether the funds being invested are considered short-term or long-term funds. All funds shall normally be considered short-term except those reserved for building construction projects or specific future projects and any unreserved funds used to provide financial-related managerial flexibility for future fiscal years.
- B. The school district shall diversify its investments to avoid incurring unreasonable risks inherent in over-investing in specific instruments, individual financial institutions or maturities.
 - 1. The investment officer shall prepare and present a table to the school board for review and approval. The table shall specify the maximum percentage of the school district's investment portfolio that may be invested in a single type of investment instrument, such as U.S. Treasury Obligations, certificates of deposit, repurchase agreements, banker's acceptances, commercial paper, etc. The approved table shall be attached as an exhibit to this policy and shall be incorporated herein by reference.
 - 2. The investment officer shall prepare and present to the school board for its review and approval a recommendation as to the maximum percentage of the total investment portfolio that may be held in any one depository. The approved recommendation shall be attached as an exhibit or part of an exhibit to this policy and shall be incorporated herein by reference.
 - 3. Investment maturities shall be scheduled to coincide with projected school district cash flow needs, taking into account large routine or scheduled expenditures, as well as anticipated receipt dates of anticipated revenues.

Maturities for short-term and long-term investments shall be timed according to anticipated need. Within these parameters, portfolio maturities shall be staggered to avoid undue concentration of assets and a specific maturity sector. The maturities selected shall provide for stability of income and reasonable liquidity.

XI. COMPETITIVE SELECTION OF INVESTMENT INSTRUMENTS

Before the school district invests any surplus funds in a specific investment instrument, a competitive bid or quotation process shall be utilized. If a specific maturity date is required, either for cash flow purposes or for conformance to maturity guidelines, quotations or bids shall be requested for instruments which meet the maturity requirement. If no specific maturity is required, a market trend analysis, which includes a yield curve, will normally be used to determine which maturities would be most advantageous. Quotations or bids shall be requested for various options with regard to term and instrument. The school district will accept the quotation or bid which provides the highest rate of return within the maturity required and within the limits of this policy. Generally all quotations or bids will be computed on a consistent basis, i.e., a 360-day or a 365-day yield. Records will be kept of the quotations or bids received, the quotations or bids accepted, and a brief explanation of the decision that was made regarding the investment. If the school district contracts with an investment advisor, bids are not required in those circumstances specified in the contract with the advisor.

XII. QUALIFIED INSTITUTIONS AND BROKER-DEALERS

- A. The school district shall maintain a list of the financial institutions that are approved for investment purposes.
- B. Prior to completing an initial transaction with a broker, the school district shall provide to the broker a written statement of investment restrictions which shall include a provision that all future investments are to be made in accordance with Minnesota statutes governing the investment of public funds. The broker must annually acknowledge receipt of the statement of investment restrictions and agree to handle the school district's account in accordance with these restrictions. The school district may not enter into a transaction with a broker until the broker has provided this annual written agreement to the school district. The notification form to be used shall be that prepared by the State Auditor. A copy of this investment policy, including any amendments thereto, shall be provided to each such broker.

XIII. SAFEKEEPING AND COLLATERALIZATION

- A. All investment securities purchased by the school district shall be held in third-party safekeeping by an institution designated as custodial agent. The custodial agent may be any ~~F~~Federal ~~R~~Reserve ~~B~~Bank, any bank authorized under the laws of the United States or any state to exercise corporate trust powers, a primary reporting dealer in United States Government securities to the Federal Reserve Bank of New York, or a securities broker-dealer defined in Minn. Stat. §

118A.06. The institution or dealer shall issue a safekeeping receipt to the school district listing the specific instrument, the name of the issuer, the name in which the security is held, the rate, the maturity, serial numbers and other distinguishing marks, and other pertinent information.

- B. Deposit-type securities shall be collateralized as required by Minn. Stat. § 118A.03 for any amount exceeding FDIC, SAIF, BIF, FCUA, or other federal deposit coverage.
- C. Repurchase agreements shall be secured by the physical delivery or transfer against payment of the collateral securities to a third party or custodial agent for safekeeping. The school district may accept a safekeeping receipt instead of requiring physical delivery or third-party safekeeping of collateral on overnight repurchase agreements of less than \$1,000,000.

XIV. REPORTING REQUIREMENTS

- A. The investment officer shall generate daily and monthly transaction reports for management purposes. In addition, the school board shall be provided a monthly report that shall include data on investment instruments being held as well as any narrative necessary for clarification.
- B. The investment officer shall prepare and submit to the school board a quarterly investment report that summarizes recent market conditions, economic developments, and anticipated investment conditions. The report shall summarize the investment strategies employed in the most recent quarter and describe the investment portfolio in terms of investment securities, maturities, risk characteristics, and other features. The report shall summarize changes in investment instruments and asset allocation strategy approved by the investment officer for an OPEB trust in the most recent quarter. The report shall explain the quarter's total investment return and compare the return with budgetary expectations. The report shall include an appendix that discloses all transactions during the past quarter. Each quarterly report shall indicate any areas of policy concern and suggested or planned revisions of investment strategies. Copies of the report shall be provided to the school district's auditor.
- C. Within ~~forty-five (45)~~ ninety (90) days after the end of each fiscal year of the school district, the investment officer shall prepare and submit to the school board a comprehensive annual report on the investment program and investment activity of the school district for that fiscal year. The annual report shall include 12-month and separate quarterly comparisons of return and shall suggest revisions and improvements that might be made in the investment program.
- D. If necessary, the investment officer shall establish systems and procedures to comply with applicable federal laws and regulations governing the investment of bond proceeds and funds in a debt service account for a bond issue. The record keeping system shall be reviewed annually by the independent auditor or by another party contracted or designated to review investments for arbitrage rebate

or penalty calculation purposes.

XV. DEPOSITORIES

The school board shall annually designate one or more official depositories for school district funds. The treasurer or the chief financial officer of the school district may also exercise the power of the school board to designate a depository. The school board shall be provided notice of any such designation by its next regular meeting. The school district and the depository shall each comply with the provisions of Minn. Stat. § 118A.03 and any other applicable law, including any provisions relating to designation of a depository, qualifying institutions, depository bonds, and approval, deposit, assignment, substitution, addition, and withdrawal of collateral.

XVI. ELECTRONIC FUNDS TRANSFER OF FUNDS FOR INVESTMENT

The school district may make electronic fund transfers for investments of excess funds upon compliance with Minn. Stat. § 471.38.

Legal References: Minn. Stat. § 118A.01 (Public Funds; Depositories and Investments)
Minn. Stat. § 118A.02 (Authorization for Deposit and Investment)
Minn. Stat. § 118A.03 (Depositories and Collateral)
Minn. Stat. § 118A.04 (Investments)
Minn. Stat. § 118A.05 (Contracts and Agreements)
Minn. Stat. § 118A.06 (Delivery and Safekeeping)
Minn. Stat. § 356A.06, Subd. 7 (Authorized Investment Securities)
Minn. Stat. § 471.38 (Claims)
Minn. Stat. § 471.6175 (Trust for Postemployment Benefits)

Cross References: MSBA/MASA Model Policy 703 (Annual Audit)
MSBA Service Manual, Chapter 7, Education Funding
Minnesota Legal Compliance Audit Guide Prepared by the Office of the State Auditor

**PRINCETON PUBLIC SCHOOLS
POLICY 705-INVESTMENTS**

I. PURPOSE

The purpose of this policy is to establish guidelines for the investment of school district funds.

II. GENERAL STATEMENT OF POLICY

The policy of this school district is to comply with all state laws relating to investments and to guarantee that investments meet certain primary criteria.

III. SCOPE

This policy applies to all investments of the surplus funds of the school district, regardless of the fund accounts in which they are maintained, unless certain investments are specifically exempted by the school board through formal action.

- A. Pooling of Funds. Except for cash in certain restricted **accounts such as bond proceeds and OPEB funds** and **other** special funds, Princeton Public Schools will consolidate cash and reserve balances from all funds to maximize investment earnings and to increase efficiencies with regard to investment pricing, safekeeping and administration. Investment income will be allocated to the various funds based on their respective participation and in accordance with generally accepted accounting principles.

IV. AUTHORITY; OBJECTIVES

- A. The funds of the school district shall be deposited or invested in accordance with this policy, Minn. Stat. Chapter 118A and any other applicable law or written administrative procedures.
- B. The primary criteria for the investment of the funds of the school district, in priority order, are as follows
 - 1. Safety. Safety of principal is the foremost objective of the investment program. Investments shall be undertaken in a manner that seeks to ensure the preservation of capital in the overall portfolio. The objective will be to mitigate credit risk and interest rate risk.
 - a. Credit Risk. Princeton Public Schools will minimize credit risk,

which is the risk of loss due to the failure of the security issuer or backer, by:

- Limiting investments to the types of securities listed in Section IX of this Investment Policy.
- Pre-qualifying the financial institutions, broker/dealers, intermediaries, and advisers with which Princeton Public Schools will do business in accordance with Section V.
- Diversifying the investment portfolio so that the impact of potential losses from any one type of security or from any one individual issuer will be minimized.

b. Interest Rate Risk. Princeton Public Schools will minimize interest rate risk, which is the risk that the market value of securities in the portfolio will fall due to changes in market interest rates, by:

- Structuring the investment portfolio so that securities mature to meet cash requirements for ongoing operations, thereby avoiding the need to sell securities on the open market prior to maturity.
- Investing operating funds primarily in shorter-term securities, money market mutual funds, or similar investment pools and limiting the average maturity of the portfolio in accordance with this policy (see section IX).

2. Liquidity. The investment portfolio shall remain sufficiently liquid to meet all operating requirements that may be reasonably anticipated. This is accomplished by structuring the portfolio so that securities mature concurrent with cash needs to meet anticipated demands (static liquidity). Furthermore, since all possible cash demands cannot be anticipated, the portfolio should consist largely of securities with active secondary or resale markets (dynamic liquidity). Alternatively, a portion of the portfolio may be placed in money market mutual funds or local government investment pools which offer same-day liquidity for short-term funds.

3. Yield. The investment portfolio shall be designed with the objective of attaining a market rate of return throughout budgetary and economic cycles, taking into account the investment risk constraints and liquidity needs. Return on investment is of secondary importance compared to the safety and liquidity objectives described above. The core of investments are limited to

relatively low risk securities in anticipation of earning a fair return relative to the risk being assumed. Securities shall generally be held until maturity with the following exceptions:

- a. A security with declining credit may be sold early to minimize loss of principal.
 - b. A security swap would improve the quality, yield, or target duration in the portfolio.
 - c. Liquidity needs of the portfolio require that the security be sold.
4. Maintaining the Public's Trust. The investment officer(s) shall seek to act responsibly as custodians of the public trust and shall avoid any transaction that might impair public confidence in the District, the Board, or the School Board Treasurer.

V. DELEGATION OF AUTHORITY

- A. The Director of Business Services and the ~~Assistant Business Affairs Executive~~ District Accountant of the school district are designated as the investment officers of the school district and is responsible for investment decisions and activities under the direction of the school board. The investment officer(s) shall operate the school district's investment program consistent with this policy. The investment officer(s) may delegate certain duties to a designee or designees, but shall remain responsible for the operation of the program.
- B. All officials and employees that are a part of the investment process shall act professionally and responsibly as custodians of the public trust, and shall refrain from personal business activity that could conflict with the investment program or which could reasonably cause others to question the process and integrity of the investment program. The investment officer(s) shall avoid any transaction that could impair public confidence in the school district.

VI. STANDARD OF CONDUCT

- A. The standard of conduct regarding school district investments to be applied by the investment officer(s) shall be the "prudent person standard." Under this standard, the investment officer(s) shall exercise that degree of judgment and care, under the circumstances then prevailing, that persons of prudence, discretion and intelligence would exercise in the management of their own affairs, investing not for

speculation and considering the probable safety of their capital as well as the probable investment return to be derived from their assets. The prudent person standard shall be applied in the context of managing the overall investment portfolio of the school district. The investment officer(s), acting in accordance with this policy and exercising due diligence, judgment and care commensurate with the risk, shall not be held personally responsible for a specific security's performance or for market price changes. Deviations from expectations shall be reported in a timely manner and appropriate actions shall be taken to control adverse developments.

- B. Ethics and Conflicts of Interest. Officers and employees involved in the investment process shall refrain from personal business activity that could conflict with the proper execution and management of the investment program, or that could impair their ability to make impartial decisions. Employees and investment officials shall disclose any material interests in financial institutions with which they conduct business. ~~They shall further disclose any personal financial / investment positions that could be related to the performance of the investment portfolio. Employees and officers shall refrain from undertaking personal investment transactions with the same individual with whom business is conducted on behalf of Princeton Public Schools.~~

VII. MONITORING AND ADJUSTING INVESTMENTS

The investment officer(s) shall routinely monitor existing investments and the contents of the school district's investment portfolio, the available markets and the relative value of competing investment instruments.

VIII. INTERNAL CONTROLS

The investment officer(s) shall establish a system of internal controls which shall be documented in writing. The internal controls shall be reviewed by the school board and shall be annually reviewed for compliance by the school district's independent auditors. The internal controls shall be designed to prevent and control losses of public funds due to fraud, error, misrepresentation, unanticipated market changes or imprudent actions by officers, employees or others. The internal controls may include, but shall not be limited to, provisions relating to controlling collusion, separating functions, separating transaction authority from accounting and recordkeeping, custodial safekeeping, avoiding bearer form securities, clearly delegating authority to applicable staff members, limiting securities losses and remedial action, confirming telephone transactions in writing, supervising and controlling employee actions, minimizing the number of authorized investment officials, and documenting transactions and strategies.

IX. PERMISSIBLE INVESTMENT INSTRUMENTS

The school district may invest its available funds in those instruments specified in Minn. Stat. §§ 118A.04 and 118A.05, 356A.06 as these sections may be amended from time to time, or any other law governing the investment of school district funds.

The school district may invest in any type of security allowed by Minnesota statute, as may be amended to those instruments listed below:

- A. Bonds, notes, certificates of indebtedness, treasury bills or other securities now or hereafter issued by the United States of America, its agencies and allowable instrumentalities;
- B. Interest bearing savings accounts, interest bearing certificates of deposit or interest bearing time deposits, or any other investments constituting direct obligations of any bank;
- C. Certificates of deposit with federally insured institutions that are collateralized or insured in excess of the ~~\$100,000~~ \$250,000 provided by the Federal Deposit Insurance Corporation coverage limit;
- D. Collateralized repurchase agreements, which conform to the requirements stated in 118A.05, sub.2 of the statutes;
- E. Commercial paper meeting the following requirements:
 - 1. The corporation must be organized in the United States or be a Canadian subsidiary.
 - 2. The corporation's assets must exceed \$500,000,000.
 - 3. The obligations at the time of purchase must be rated at the highest classifications by at least two of the four standard rating services (Standard and Poor's, Duff and Phelps, Moody's and Fitch Investors Service).
 - 4. The obligations cannot have a maturity longer than 270 days.
 - 5. The school district's goal shall be not more than ~~50%~~5% of the total investment fund can be invested in commercial paper at any time. The District will invest only in commercial paper if it is in a pooled format.
 - 6. The total investment in any one corporation should not exceed 10% of the corporation's outstanding obligations.

7. The total investment in any one corporation cannot be more than \$10 million.
- F. Investments may be made only in those savings banks or savings and loan associations the shares, or investment certificates of which are insured by the Federal Deposit Insurance Corporation.
- G. Investment products that are considered as derivatives are specifically excluded from approved investments.

X. PORTFOLIO DIVERSIFICATION; MATURITIES

- A. Limitations on instruments, diversification and maturity scheduling shall depend on whether the funds being invested are considered short-term or long-term funds. All funds shall normally be considered short-term except those reserved for building construction projects or specific future projects and any unreserved funds used to provide financial-related managerial flexibility for future fiscal years.
- B. The school district shall diversify its investments to avoid incurring unreasonable risks inherent in over-investing in specific instruments, individual financial institutions or maturities.
 1. ~~The investment officer(s) shall prepare and recommend to the Superintendent annually for presentation to the school board for review and approval. The table shall specify the maximum percentage of the school district's investment portfolio that may be invested in a single type of investment instrument, such as U.S. Treasury Obligations, certificates of deposit, repurchase agreements, banker's acceptances, commercial paper, etc. The approved table shall be attached as an exhibit to this policy and shall be incorporated herein by reference.~~
 2. Investment maturities shall be scheduled to coincide with projected school district cash flow needs, taking into account large routine or scheduled expenditures, as well as anticipated receipt dates of anticipated revenues. Maturities for short-term and long-term investments shall be timed according to anticipated need. Within these parameters, portfolio maturities shall be staggered to avoid undue concentration of assets and a specific maturity sector. The maturities selected shall provide for stability of income and reasonable liquidity.
 3. Maximum Maturities. To the extent possible, Princeton Public Schools shall attempt to match its investments with anticipated

cash flow requirements. Unless matched to a specific cash flow, Princeton Public Schools will not directly invest in securities maturing more than five (5) years from the date of purchase or in accordance with state and local statutes and ordinances. ~~Princeton Public Schools shall adopt weighted average maturity limitations (which often range from 90 days to 3 years), consistent with the investment objectives.~~

Reserve funds and other funds with longer-term investment horizons may be invested in securities exceeding five (5) years if the maturities of such investments are made to coincide as nearly as practicable with the expected use of funds. The intent to invest in securities with longer maturities shall be disclosed in writing to the legislative body (see the GFOA Recommended Practice on “Maturities of Investments in a Portfolio” in Appendix).

XI. COMPETITIVE SELECTION OF INVESTMENT INSTRUMENTS

Before the school district invests any surplus funds in a specific investment instrument, a competitive bid or quotation process shall be utilized. If a specific maturity date is required, either for cashflow purposes or for conformance to maturity guidelines, quotations or bids shall be requested for instruments which meet the maturity requirement. If no specific maturity is required, a market trend analysis, which includes a yield curve, will normally be used to determine which maturities would be most advantageous. Quotations or bids shall be requested for various options with regard to term and instrument. The school district will accept the quotation or bid which provides the highest rate of return within the maturity required and within the limits of this policy. Generally all quotations or bids will be computed on a consistent basis, i.e., a 360-day or a 365-day yield. Records will be kept of the quotations or bids received, the quotations or bids accepted and a brief explanation of the decision that was made regarding the investment. If the school district contracts with an investment advisor, bids are not required in those circumstances specified in the contract with the advisor.

XII. QUALIFIED INSTITUTIONS AND BROKER-DEALERS

- A. The school district shall maintain a list of the financial institutions that are approved for investment purposes.
- B. Prior to completing an initial transaction with a broker, the school district shall provide to the broker a written statement of investment restrictions which shall include a provision that all future investments are to be made in accordance with Minnesota statutes governing the investment of public funds. The broker must annually acknowledge receipt of the statement of

investment restrictions and agree to handle the school district's account in accordance with these restrictions. The school district may not enter into a transaction with a broker until the broker has provided this annual written agreement to the school district. ~~The notification form to be used shall be that prepared by the State Auditor.~~ A copy of this investment policy, including any amendments thereto, shall be provided to each such broker.

XIII. SAFEKEEPING AND COLLATERALIZATION

A. All investment securities purchased by the school district shall be held in third-party safekeeping by an institution designated as custodial agent. The custodial agent may be any Federal Reserve Bank, any bank authorized under the laws of the United States or any state to exercise corporate trust powers, a primary reporting dealer in United States Government securities to the Federal Reserve Bank of New York, or a securities broker-dealer defined in Minn. Stat. § 118A.06. The institution or dealer shall issue a safekeeping receipt to the school district listing the specific instrument, the name of the issuer, the name in which the security is held, the rate, the maturity, serial numbers and other distinguishing marks, and other pertinent information.

B. Deposit-type securities shall be collateralized as required by Minn. Stat. § 118A.03 for any amount exceeding FDIC, SAIF, BIF, FCUA, or other federal deposit coverage, as follows:

Subd. 1. For deposits beyond insurance. To the extent that funds on deposit at the close of the financial institution's banking day exceed available federal deposit insurance, the government entity shall require the financial institution to furnish collateral security or a corporate surety bond executed by a company authorized to do business in the state. For the purposes of this section, "banking day" has the meaning given in Federal Reserve Board Regulation CC,

Subd. 2. In lieu of surety bond. The following are the allowable forms of collateral in lieu of a corporate surety bond:

- (1) United States government Treasury bills, Treasury notes, Treasury bonds;
- (2) issues of United States government agencies and instrumentalities as quoted by a recognized industry quotation service available to the government entity;
- (3) general obligation securities of any state or local government with taxing powers which is rated "A" or better by a national bond

rating service, or revenue obligation securities of any state or local government with taxing powers which is rated "AA" or better by a national bond rating service;

- (4) unrated general obligation securities of a local government with taxing powers may be pledged as collateral against funds deposited by that same local government entity;
- (5) irrevocable standby letters of credit issued by Federal Home Loan Banks to a municipality accompanied by written evidence that the bank's public debt is rated "AA" or better by Moody's Investors Service, Inc., or Standard & Poor's Corporation; and
- (6) time deposits that are fully insured by any federal agency.

Subd. 3. Amount. The total amount of the collateral computed at its market value shall be at least ten percent more than the amount on deposit plus accrued interest at the close of the financial institution's banking day, except that where the collateral is irrevocable standby letters of credit issued by Federal Home Loan Banks, the amount of collateral shall be at least equal to the amount on deposit plus accrued interest at the close of the financial institution's banking day. The financial institution may furnish both a surety bond and collateral aggregating the required amount.

Subd. 4. Assignment. Any collateral pledged shall be accompanied by a written assignment to the government entity from the financial institution. The written assignment shall recite that, upon default, the financial institution shall release to the government entity on demand, free of exchange or any other charges, the collateral pledged. Interest earned on assigned collateral will be remitted to the financial institution so long as it is not in default. The government entity may sell the collateral to recover the amount due. Any surplus from the sale of the collateral shall be payable to the financial institution, its assigns, or both.

Subd. 5. Withdrawal of excess collateral. A financial institution may withdraw excess collateral or substitute other collateral after giving written notice to the governmental entity and receiving confirmation. The authority to return any delivered and assigned collateral rests with the government entity.

Subd. 6. Default. For purposes of this section, default on the part of the financial institution includes, but is not limited to, failure to make interest payments when due, failure to promptly deliver upon demand all money on deposit, less any early withdrawal penalty

that may be required in connection with the withdrawal of a time deposit, or closure of the depository. If a financial institution closes, all deposits shall be immediately due and payable. It shall not be a default under this subdivision to require prior notice of withdrawal if such notice is required as a condition of withdrawal by applicable federal law or regulation.

Subd. 7. Safekeeping. All collateral shall be placed in safekeeping in a restricted account at a Federal Reserve bank, or in an account at a trust department of a commercial bank or other financial institution that is not owned or controlled by the financial institution furnishing the collateral. The selection shall be approved by the government entity.

- C. Repurchase agreements shall be secured by the physical delivery or transfer against payment of the collateral securities to a third party or custodial agent for safekeeping. The school district may accept a safekeeping receipt instead of requiring physical delivery or third-party safekeeping of collateral on overnight repurchase agreements of less than \$1,000,000.
- D. Collateralization. Where allowed by state law and in accordance with the GFOA Recommended Practices on the Collateralization of Public Deposits, full collateralization will be required on all demand deposit accounts, including checking accounts and non-negotiable certificates of deposit (see GFOA Recommended Practices in Appendix).

XIV. REPORTING REQUIREMENTS

- A. ~~The Investment Officers shall submit to the Finance Committee and the Superintendent an annual investment report which shall include information regarding securities in the portfolio by class or type, book value, income earned, and market values as of the report date. Generally accepted accounting principles shall be used for valuation purposes. The report shall indicate any areas of policy concern and planned revision of investment strategies.~~
- B. If necessary, the investment officer(s) shall establish systems and procedures to comply with applicable federal laws and regulations governing the investment of bond proceeds and funds in a debt service account for a bond issue. The record keeping system shall be reviewed annually by the independent auditor or by another party contracted or designated to review investments for arbitrage rebate or penalty calculation purposes.

XV. DEPOSITORIES

The school board shall annually designate one or more official depositories for school district funds. The treasurer or the Director of Business Services of the school district may also exercise the power of the school board to designate a depository. The school board shall be provided notice of any such designation by its next regular meeting. The school district and the depository shall each comply with the provisions of Minn. Stat. § 118A.03 and any other applicable law, including any provisions relating to designation of a depository, qualifying institutions, depository bonds, and approval, deposit, assignment, substitution, addition and withdrawal of collateral.

XVI. ELECTRONIC FUNDS TRANSFER OF FUNDS FOR INVESTMENT

The school district may make electronic fund transfers for investments of excess funds upon compliance with Minn. Stat. § 471.38.

Legal References: Minn. Stat. § 118A.01 (Public Funds; Depositories and Investments)
Minn. Stat. § 118A.02 (Authorization for Deposit and Investment)
Minn. Stat. § 118A.03 (Depositories and Collateral)
Minn. Stat. § 118A.04 (Investments)
Minn. Stat. § 118A.05 (Contracts and Agreements)
Minn. Stat. § 118A.06 (Delivery and Safekeeping)

Cross References: Policy 703 (Annual Audit)
MSBA Service Manual, Chapter 7, Education Funding
Minnesota Legal Compliance Audit Guide Prepared by the Office of the State Auditor

Adopted: April 25, 2006
Revised: March 25, 2008
Revised: October 26, 2010
Reviewed: April 19, 2016
Reviewed: October 18, 2016

PRINCETON PUBLIC SCHOOLS POLICY 706-ACCEPTANCE OF GIFTS

I. PURPOSE

The purpose of this policy is to provide guidelines for the acceptance of gifts by the school board from booster clubs, commercial venues, individuals or other organizations.

II. GENERAL STATEMENT OF POLICY

It is the policy of this school district to accept gifts only in compliance with state law.

III. ACCEPTANCE OF GIFTS GENERALLY

The school board may receive, for the benefit of the school district, bequests, donations or gifts for any proper purpose. The school board shall have the sole authority to determine whether any gift or any precondition, condition, or limitation on use included in a proposed gift furthers the interests of or benefits the school district and whether it should be accepted or rejected.

IV. GIFTS OF REAL OR PERSONAL PROPERTY

The school board may accept a gift, grant or devise of real or personal property only by the adoption of a resolution approved by two-thirds of its members. The resolution must fully describe any conditions placed on the gift. The real or personal property so accepted may not be used for religious or sectarian purposes.

V. ADMINISTRATION IN ACCORDANCE WITH TERMS

If the school board agrees to accept a bequest, donation, gift, grant or devise which contains preconditions, conditions or limitations on use, the school board shall administer it in accordance with those terms. Once accepted, a gift shall be the property of the school district unless otherwise provided in the agreed upon terms.

VI. GUIDELINES

- A. Acceptance of Gifts Form #706 must be complete and contain all necessary signatures prior to requesting board approval.
- B. Approval MUST be obtained from the School Board prior to implementation or acceptance of gift.
- C.

Legal References Minn. Stat. § 123B.02, Subd. 6 (Bequests, Donations, Gifts)
Minn. Stat. § 465.03 (Gifts)

Cross References: Form 706

Adopted: September 25, 1984
Revised: May 14, 2002
Revised: September 14, 2004
Revised: October 27, 2009
Revised: May 14, 2013
Reviewed: October 18, 2016



PRINCETON PUBLIC SCHOOLS
ACCEPTANCE OF GIFTS FORM

In compliance with school district **Policy 706 (Acceptance of Gifts)**, this form must be completed for approval by the School Board before the district receives the gift or donation.

Please obtain Principal or Director signature prior to sending to board for approval.

Donor name: _____

Description of gift:

Pre-Condition, Condition, or Limitation on use: _____

How this gift specifically relates to the program or school: _____

This gift meets all requirements of Policy 706 _____

Accepted Not Accepted _____ Date: _____
Staff Name
Principal or Director

Accepted Not Accepted _____ Date: _____
Superintendent

Accepted Not Accepted _____ Date: _____
School Board Chairperson

Code Assigned: _____ Program Name _____

Routeing:

Principal or Director (thank you note attached)

Copy to Building

Business Services

Board Approval

Revised: October 18, 2016

Adopted: _____

MSBA/MASA Model Policy 706

Orig. 1995

Revised: _____

Rev. 1999 2007

706 ACCEPTANCE OF GIFTS

[Note: The provisions of this policy substantially reflect statutory requirements.]

I. PURPOSE

The purpose of this policy is to provide guidelines for the acceptance of gifts by the school board.

II. GENERAL STATEMENT OF POLICY

It is the policy of this school district to accept gifts only in compliance with state law.

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The school board may receive, for the benefit of the school district, bequests, donations or gifts for any proper purpose. The school board shall have the sole authority to determine whether any gift or any precondition, condition, or limitation on use included in a proposed gift furthers the interests of or benefits the school district and whether it should be accepted or rejected.

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The school board may accept a gift, grant or devise of real or personal property only by the adoption of a resolution approved by two-thirds of its members. The resolution must fully describe any conditions placed on the gift. The real or personal property so accepted may not be used for religious or sectarian purposes.

[Note: This voting requirement and gift use provision is specified by Minn. Stat. § 465.03.]

V. ADMINISTRATION IN ACCORDANCE WITH TERMS

If the school board agrees to accept a bequest, donation, gift, grant or devise which contains preconditions, conditions or limitations on use, the school board shall administer it in accordance with those terms. Once accepted, a gift shall be the property of the school district unless otherwise provided in the agreed upon terms.

Legal References: Minn. Stat. § 123B.02, Subd. 6 (Bequests, Donations, Gifts)
Minn. Stat. § 465.03 (Gifts)

Cross References:

PRINCETON PUBLIC SCHOOLS

POLICY 712-VIDEO SURVEILLANCE OTHER THAN ON BUSES

I. PURPOSE

Maintaining the health, welfare, and safety of students, staff, and visitors while on school district property and the protection of school district property are important functions of the school district. The behavior of individuals who come on to school property is a significant factor in maintaining order and discipline and protecting students, staff, visitors, and school district property. The school board recognizes the value of video/electronic surveillance systems in monitoring activity on school property in furtherance of protecting the health, welfare, and safety of students, staff, visitors, and school district property.

II. GENERAL STATEMENT OF POLICY

A. Placement

1. School district buildings and grounds may be equipped with video cameras.
2. Video surveillance may occur in any school district building or on any school district property.
3. Video surveillance will normally not be used in bathrooms or locker rooms, although these areas may be placed under surveillance by individuals of the same sex as the occupants of the bathrooms or locker rooms. Video surveillance in bathrooms or locker rooms will only be utilized in extreme situations, with extraordinary controls, and only as expressly approved by the superintendent.

B. Use of Video Recordings

1. Video recordings will be viewed by school district personnel on a random basis and/or when problems have been brought to the attention of the school district.
2. A video recording of the actions of students and/or employees may be used by the school district as evidence in any disciplinary action brought against any student or employee arising out of the student's or employee's conduct in school district buildings or on school grounds.
3. A video recording will be released only in conformance with the Minnesota Government Data Practices Act, Minn. Stat. Ch. 13, and

the Family Educational Rights and Privacy Act, 20 U.S.C. § 1232g, and the rules and/or regulations promulgated thereunder.

C. Security and Maintenance

1. The school district shall establish appropriate security safeguards to ensure that video recordings are maintained and stored in conformance with the Minnesota Government Data Practices Act, Minn. Stat. Ch. 13, and the Family Educational Rights and Privacy Act, 20 U.S.C. § 1232g, and the rules and/or regulations promulgated thereunder.
2. The school district shall ensure that video recordings are retained in accordance with the school district's records retention schedule.

Legal References: Minn. Stat. Ch. 13 (Minnesota Government Data Practices Act)
Minn. Stat. § 121A.585 (Notice of Recording Device)
Minn. Stat. § 138.17 (Government Records; Administration)
Minn. Stat. § 609.746 (Interference with Privacy)
20 U.S.C. § 1232g (Family Educational Rights and Privacy Act)
34 C.F.R. §§ 99.1-99.67 (Family Educational Rights and Privacy)

Cross References: Princeton Policy 403 (Disciplines, Suspension, and Dismissal of School District Employees)
Princeton Policy 406 (Public and Private Personnel Data)
Princeton Policy 502 (Search of Student Lockers, Desks, Personal Possessions, and Student's Person)
Princeton Policy 506 (Student Discipline)
Princeton Policy 515 (Protection and Privacy of Pupil Records)
Princeton Policy 709 (Student Transportation Safety Policy)
Princeton Policy 711 (Video Recording on School Buses)
MSBA Service Manual, Chapter 2, Transportation

Adopted: August 9, 2011
Revised: October 18, 2016

Adopted: _____

MSBA/MASA Model Policy 712

Orig. 1996

Revised: _____

Rev. ~~2010~~ 2012

712 VIDEO SURVEILLANCE OTHER THAN ON BUSES

[See Model Policy 711 for Video Recording on School Buses]

I. PURPOSE

Maintaining the health, welfare, and safety of students, staff, and visitors while on school district property and the protection of school district property are important functions of the school district. The behavior of individuals who come on to school property is a significant factor in maintaining order and discipline and protecting students, staff, visitors, and school district property. The school board recognizes the value of video/electronic surveillance systems in monitoring activity on school property in furtherance of protecting the health, welfare, and safety of students, staff, visitors, and school district property.

II. GENERAL STATEMENT OF POLICY

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2. A video recording of the actions of students and/or employees may be used by the school district as evidence in any disciplinary action brought against any student or employee arising out of the student's or employee's conduct in school district buildings or on school grounds.
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Legal References: Minn. Stat. Ch. 13 (Minnesota Government Data Practices Act)
Minn. Stat. § 121A.585 (Notice of Recording Device)
Minn. Stat. § 138.17 (Government Records; Administration)
Minn. Stat. § 609.746 (Interference with Privacy)
20 U.S.C. § 1232g (Family Educational Rights and Privacy Act)
34 C.F.R. §§ 99.1-99.67 (Family Educational Rights and Privacy)

Cross References: [MSBA/MASA Model Policy 403 \(Discipline, Suspension, and Dismissal of School District Employees\)](#)
[MSBA/MASA Model Policy 406 \(Public and Private Personnel Data\)](#)
MSBA/MASA Model Policy 502 (Search of Student Lockers, Desks, Personal Possessions, and Student's Person)
MSBA/MASA Model Policy 506 (Student Discipline)
MSBA/MASA Model Policy 515 (Protection and Privacy of Pupil Records)
MSBA/MASA Model Policy 709 (Student Transportation Safety Policy)
MSBA/MASA Model Policy 711 (Video Recording on School Buses)
MSBA Service Manual, Chapter 2, Transportation

PRINCETON PUBLIC SCHOOLS
903 - VISITORS TO SCHOOL DISTRICT BUILDINGS AND SITES

I. PURPOSE

The purpose of this policy is to inform the school community and the general public of the position of the school board on visitors to school buildings and other school property.

II. GENERAL STATEMENT OF POLICY

A. The school board encourages interest on the part of parents and community members in school programs and student activities. The school board welcomes visits to school buildings and school property by parents and community members provided the visits are consistent with the health, education and safety of students and employees and are conducted within the procedures and requirements established by the school district.

B. The school board reaffirms its position on the importance of maintaining a school environment that is safe for students and employees and free of activity that may be disruptive to the student learning process or employee working environment.

III. POST-SECONDARY ENROLLMENT OPTIONS STUDENTS

A. A student enrolled in a post-secondary enrollment options course may remain at the school site during regular school hours in accordance with established procedures.

B. A student enrolled in a post-secondary enrollment options course may be provided with reasonable access, during regular school hours, to a computer and other technology resources that the student needs to complete coursework for a post-secondary enrollment course in accordance with established procedures.

IV. RESPONSIBILITY

A. The school district administration is responsible for visitor and post-secondary enrollment options student procedures and requirements.

- B. The superintendent shall be responsible for providing coordination that may be needed throughout the process and providing for periodic school board review and approval of the procedures.

V. VISITOR LIMITATIONS

- A. An individual, post-secondary enrollment options student, or group may be denied permission to visit a school or school property or such permission may be revoked if the visitor(s) does not comply with the school district procedures and regulations or if the visit is not in the best interest of students, employees or the school district.
- B. Visitors, including post-secondary enrollment options students, are authorized to park vehicles on school property at times and in locations specified in the approved visitor procedures and requirements which are an addendum to this policy or as otherwise specifically authorized by school officials. When unauthorized vehicles of visitors are parked on school property, school officials may:
 - 1. move the vehicle or require the driver or other person in charge of the vehicle to move it off school district property; or
 - 2. if unattended, provide for the removal of the vehicle, at the expense of the owner or operator, to the nearest convenient garage or other place of safety off of school property.
- C. An individual, post-secondary enrollment options student, or group who enters school property without complying with the procedures and requirements may be guilty of criminal trespass and thus subject to criminal penalty. Such persons may be detained by the school principal or a person designated by the school principal in a reasonable manner for a reasonable period of time pending the arrival of a police officer.

Legal References: Minn. Stat. § 123B.02 (General Powers of Independent School Districts)

Minn. Stat. § 124D.09 (Post-Secondary Enrollment Options Program)
Minn. Stat. § 128C.08 (Assaulting a Sports Official Prohibited)
Minn. Stat. § 609.605, Subd. 4 (Trespasses on School Property)

Adopted August 10, 2010
Reviewed: June 25, 2103
Revised: May 17, 2016
Reviewed: August 18, 2016
Revised: April 3, 2018

Adopted: _____

MSBA/MASA Model Policy 903

Orig. 1995

Revised: _____

Rev. 2002 2017

903 VISITORS TO SCHOOL DISTRICT BUILDINGS AND SITES

I. PURPOSE

The purpose of this policy is to inform the school community and the general public of the position of the school board on visitors to school buildings and other school property.

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- A. The school board encourages interest on the part of parents and community members in school programs and student activities. The school board welcomes visits to school buildings and school property by parents and community members provided the visits are consistent with the health, education and safety of students and employees and are conducted within the procedures and requirements established by the school district.
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- A. A student enrolled in a post-secondary enrollment options course may remain at the school site during regular school hours in accordance with established procedures.
- B. A student enrolled in a post-secondary enrollment options course may be provided with reasonable access, during regular school hours, to a computer and other technology resources that the student needs to complete coursework for a post-secondary enrollment course in accordance with established procedures.

III IV. RESPONSIBILITY

- A. The school district administration shall present recommended visitor and post-secondary enrollment options student procedures and requirements to the school board for review and approval. The procedures should reflect input from employees, students and advisory groups, and shall be communicated to the school community and the general public. Upon approval by the school board, such procedures and requirements shall be an addendum to this policy.
- B. ~~It shall be the responsibility of the~~ The superintendent shall be responsible for providing to provide coordination that may be needed throughout the process and providing provide for periodic school board review and approval of the procedures.

IV V. VISITOR LIMITATIONS

- A. An individual, post-secondary enrollment options student, or group may be denied permission to visit a school or school property or such permission may be revoked if the visitor(s) does not comply with the school district procedures and regulations or if the visit is not in the best interest of students, employees or the school district.
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1. move the vehicle or require the driver or other person in charge of the vehicle to move it off school district property; or
 2. if unattended, provide for the removal of the vehicle, at the expense of the owner or operator, to the nearest convenient garage or other place of safety off of school property.
- C. An individual, post-secondary enrollment options student, or group who enters school property without complying with the procedures and requirements may be guilty of criminal trespass and thus subject to criminal penalty. Such persons may be detained by the school principal or a person designated by the school principal in a reasonable manner for a reasonable period of time pending the arrival of a police officer.

Legal References: Minn. Stat. § 123B.02 (General Powers of Independent School Districts)
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Minn. Stat. § 128C.08 (Assaulting a Sports Official Prohibited)
Minn. Stat. § 609.605, Subd. 4 (Trespasses on School Property)

Cross References: