The School Committee authorizes the use of Student Activity Accounts in the schools for the purpose of supporting student activities and authorized student groups. All funds collected or raised to support student activities belong to the students and shall only be used to support the activities of the participating students and authorized student groups. The School Committee recognizes the value of student activities in contributing to and enhancing the overall education and wellbeing of students beyond the instructional classroom. Students are the legal owners of all student activity funds, which are held in a fiduciary capacity by the School Principals. When age appropriate, and in particular at the high school, student class officers and club leaders should be encouraged to take an active role in working with their faculty advisor to manage any associated student activity funds.

Student Activity Accounts shall be managed in accordance with sound business practices, which include accepted safeguarding, accounting, and internal control practices. The Superintendent shall establish procedures to govern the collection, safe deposit and expenditure of all student activity funds in a manner that meets or exceeds DESE guidelines. The Superintendent shall ensure that all Principals and other building administrators, along with all authorized student groups and their advisors, annually receive a copy (either paper or electronic) of this policy and any related procedures, as well as any guidance or instruction necessary to ensure compliance with these directives.

# **Authorized Activities and Groups**

Authorized student activities may include approved student activity organizations and will automatically include any grade-level and school-wide student activities. Funds are intended for student activities, and may not be spent for the benefit of staff or to supplement the school budget. Any student organization receiving monies from any source, including fundraisers, ticket sales, donations, etc., shall deposit those funds in the Student Activity Agency Account and those funds shall be used exclusively for student activities. Student Activity Accounts should include separate subsidiary accounts for each school-wide or grade-level activity, such as field trips, and separate subsidiary accounts for each authorized student group.

The School Principal shall approve all student activity groups. Once a group is approved, it will remain in existence unless it is officially determined to be inactive. A Principal may approve the establishment of a subsidiary account for certain one-time events related to student activities. At the end of the school year, any remaining funds in such a one-time event subsidiary account should be transferred to school-wide activities. On an annual basis, the Superintendent or their designee shall submit a list of approved student activity groups at each school to the School Committee.

# **Required Activity Accounts**

The School Committee authorizes the Town Treasurer to establish and maintain an interest-bearing Student Activity Agency Account for each school in the district. A school principal may receive monies in connection with approved student activities and must deposit said monies in that school's Student Activity Agency account for the expressed purpose of conducting student activities.

The School Committee also authorizes the Town Treasurer to establish and maintain a Student Activity Checking Account for each school in the district. These accounts should be used for expenditures only and funds may not be deposited directly into the checking accounts. These checking accounts may not be funded by any source other than transfer from the school's agency account.

#### **Maximum Balances**

On an annual basis, the School Committee will set maximum balances that may be on deposit in each school's Student Activity Checking Account. This amount may vary in accordance with the school's grade levels and particular needs. This maximum balance should not be exceeded except for limited, designated periods when approved by the Superintendent for certain school-wide or grade-level event expenditures. Periodically, the checking account balances can be replenished through the transfer of funds with all appropriate documentation from the student activity agency account via the Town's warrant process.

## Signature Authority

School Principals or a School-Committee approved designee must sign all checks and authorizations with an original signature. The School Committee will set a maximum amount for a single check and this maximum amount may differ for each school. Any check in excess of the stated maximum may require a second authorized signature and/or shall be subject to any accounting requirements or procedural safeguards as set forth by the Superintendent.

The School Business Office will provide guidance as to best practices for managing student activity funds. The Superintendent may establish appropriate guidelines for reimbursements to a club advisor, other staff member or parent who has made an expenditure on behalf of a student activity group.

## **Performance Bonds**

The Town will ensure that each School Principal and any other School Committee-designated signatory on the account shall provide a bond to the Town in such amount as the Town Treasurer shall determine to secure the faithful performance of all duties in conjunction with student activity accounts.

#### **Year-End Balances**

All student activity groups' subsidiary year-end balances will be maintained from year to year for the sole benefit of that club or activity. Subsidiary balances for a grade-level class will advance with the class of students through that particular school. Each class will be encouraged to make use of their student activity funds prior to advancing to the next school as such balances will not move between schools. Excess class balances of students who move to the next grade-level school will revert to a subsidiary account for school-wide student activities. Advisors and principals should endeavor to minimize excess class balances for grades that will be transitioning to a different school in the following year.

# **High School Graduating Classes**

Monies for classes that have graduated may not be kept in student activity accounts beyond the time needed to reconcile the account and pay any outstanding expenses. Upon graduation, the senior class balance should be donated to the school and/or otherwise disbursed in accordance with a class vote which shall be the responsibility of the senior class officers. If there is no such vote and/or no direction from the class officers within 180 days of graduation, the funds will revert to the high school school-wide activity account. Class accounts may remain active for 180 days after graduation to ensure that any outstanding financial obligations of the senior class have been met.

Should the class wish to retain monies after graduation, it is recommended that the class select three class members who will take full ownership and responsibility for the class funds. Within 180 days of graduation, any remaining funds must be transferred into an independent checking account and hereafter the account and any funds shall be the responsibility of the designated members of the graduating class. The School Principal's and the School Committee's fiduciary responsibility for said funds will cease upon their transfer.

#### **Inactive Accounts**

Principals shall be responsible for the review of all student activity accounts at the end of each fiscal year to determine those that are inactive as indicated by a lack of any club activity for an extended period of time and/or no activity account transactions in the past 24 months. If a student activity appears to be inactive, the principal or designee should contact the student activity advisor to verify that the group is inactive and determine if the account should be closed out. If the account should be closed out and has any remaining funds, the balance will revert to that school's school-wide activity account.

### **Interest Earned**

The interest earned by the Student Activity bank accounts can be utilized to (1) cover the cost of periodic outside audits of the accounts, (2) to purchase forms, checks and supplies related to maintaining the student activity accounts and (3) to cover the cost of a student attending a class or school function when students are charged for such, but the School Principal determines that the student or their family is unable to cover such expense, or (4) to replenish accounts with deficit year-end balances.

#### Commissions

Any funds paid to the school or to a student activity organization as commissions belong to the students. At no time shall such commissions, such as from student photographs, be used to benefit staff or for facility or curriculum expenses. Commissions should be spent in support of any corresponding student activity or may be designated to a grade-level or school-wide student activity subsidiary account as appropriate.

#### **Account Reconciliation, Audits & Reporting**

Monthly account reconciliation will be the responsibility of the School Principal and designated administrative staff. The Principal shall maintain the subsidiary accounts in order to match the receipts and expenditures to the appropriate recognized student activity organization. The

development and oversight of financial practices, procedures and training will be the responsibility of the Superintendent and more specifically, the School Business Office, in conjunction with the Town Treasurer and Town Accountant.

Annual audit of the student activity funds shall be conducted in accordance with the procedures as agreed upon by the School Committee and the auditor, based on DESE guidelines. For accounts with balances over \$25,000, an independent audit firm will conduct an audit at least once every three years. The cost of any such audit will be paid for by the school department's budget and/or interest from the student activity accounts.

Monthly student activity financial reports shall be distributed to the student activity groups, the School Business Office and the Superintendent's office. Annual reconciliations will be prepared and distributed to the School Business Office, the Town Treasurer, the Superintendent, and the School Committee.

# **School Committee Actions and Oversight**

On an annual basis, the School Committee will review the status of all student activity accounts and will make any determinations as needed for their continued management. In particular, such annual review shall include:

- All account balances, including balances of all subsidiary accounts
- All class grade-level and school-wide account balances
- A list of all student activity organizations and whether they are active or inactive
- Any account in deficit should be highlighted for appropriate remedial action
- Any adjustment if needed to the account maximums for each school
- Any adjustment if needed to the maximum amount for checks that can be written without being co-signed

Each Building Principal shall make the above student activity account information available to their School Advisory Council.

## **Public Information and Transparency**

Parents and other residents of Westford are entitled to full and transparent information regarding student activity accounts. The annual report to the School Committee shall be a matter of public record. Any other specific inquiries should be directed to the Building Principal, or if necessary, the School Business Office or the Superintendent.

#### **Massachusetts General Law References:**

M.G.L 71:47 – Athletic programs; school organizations; student activity accounts

#### Other References:

Student Activity Accounts Guidelines for Massachusetts School Districts, MASBO (1997, revised 2016)

Agreed Upon Procedures and Audit Guidelines: Student Activity Funds, Mass DESE (2014, revised 2016)

# **MASC Model Policy Reference:**

JJF

# **Westford Public Schools Policy References:**

P1601 School Advisory Councils

P1109 Public's Right to Know

P3402 Cash Receipts, Gate Receipts, and Admissions

Policy Adopted: December 2, 2002 Policy Revised: December 16, 2019 WESTFORD PUBLIC SCHOOLS Westford, Massachusetts