Internal Controls Checklist by Job Responsibility

A "No" response to any of the following questions may indicate an internal control weakness. The district should perform a self-evaluation and investigate all potential weaknesses, and ensure that controls are put into place so that the weakness will no longer result in internal control issues.

Distr	ict Business Office Staff	YES	NO	N/A	Comments
1.	Does the district have a comprehensive board policy and administrative regulations that provide rules and regulations for ASB governance and operations?				
2.	Does the district have a comprehensive ASB manual with detailed procedures?				
3.	Has the FCMAT ASB Account Manual, Fraud Prevention Guide and Desk Reference been adopted as part of the district's ASB policies and procedures?				
4.	If the district has a comprehensive manual, is it reviewed and updated, if necessary, at least annually? Does the update address areas of concern or confusion identified in the previous year's audit?				
5.	Does the business office provide annual ASB training for all school and district employees who work with ASB activities, and retain a signed and dated training attendance log as proof that employees received training?				
6.	Do members of the business office staff periodically (at least annually) visit each school to provide support and to review the ASB procedures used at the school?				
7.	Has the district ensured that school employees and students know whom to call in the district business office if they have questions or concerns about ASB and are unable to get answers at the school?				
8.	Has the business office taken immediate action to correct annual audit findings related to ASB activities? Are the school sites involved in developing action plans to ensure that the findings do not recur?				

9.	Are all proposed fundraising events
	approved by the governing board or its
	designee at the beginning of each school
	year? Is this list updated throughout the
	year?

- 10. Does the business office's sales tax report include the sales and use tax for the student store and other purchases?
- Before any disbursement is issued to any independent contractor, does the business office have on file a valid and signed IRS Form W-9, Request for Taxpayer Identification Number and Certification?
- 12. Does the business office issue 1099s for all independent contractors paid with ASB funds?
- 13. Has the business office developed standard forms, processes and systems for ASB operations districtwide?
- 14. Does the business office receive and review periodic financial statements from the ASB organizations and sign and date that they have reviewed the documents?
- 15. Does the business office review the monthly bank reconciliations from the site ASBs?
- 16. Does the district have access to an independent third-party fraud reporting whistleblower website and telephone hotline?

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Comments

YES NO N/A

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Principal/School Administrator

The principal/school administrator is the primary manager and responsible person at the school site. This is where the ultimate responsibility lies for all activities on campus, from test scores and athletic events to parental satisfaction with teachers in the classroom. Many principals/school administrators delegate the responsibility and authority for ASB coordination and management to others, such as a vice principal, ASB advisor, club advisor and/or a teacher or other staff. This varies by school level and school size.

Some items listed as internal control questions for the principal/school administrator are equally important for the ASB advisor with delegated responsibilities.

Questions below that are more relevant to secondary schools or to schools with organized ASBs contain the notation [Secondary].

		YES	NO	N/A	Comments
1.	At the beginning of each year, do you spend some time at a staff meeting discussing ASB issues, operations and internal controls at the school (e.g., what is allowed and what are the procedures)?				
2.	Do you spend time each month discussing ASB activities with the ASB bookkeeper, particularly problems that are developing?				
3.	Do you report any questionable or suspicious activities to the district's business office for investigation?				
4.	Do you verify that only ASB funds are maintained in ASB bank accounts? ASB bank accounts should not include PTA or booster club money, donations to non-ASB entities, or faculty charitable funds.				
5.	Is a formal application required from any students who want to establish a new club at the school? [Secondary]				
6.	Is each club advisor a certificated staff member of the district?				
7.	Do the student council and all clubs have a constitution that establishes the policies and rules for student governance of the council or club? [Secondary]				
8.	Are all clubs required to prepare and maintain minutes of all club meetings, with all necessary items noted? [Secondary]				
9.	Are the student council and each club required to prepare, adopt and monitor a budget for the fiscal year? [Secondary]				

		YES	NO	N/A	Comments
10.	Do you ensure that only allowable expenses are paid from ASB funds?				
11.	Do you use a purchase order form with one required approval signature (unorganized) or three required approval signatures? [Secondary]				
12.	Are purchase orders dated and approved before the item is purchased?				
13.	Do you ensure that students are approving expenditures and that adults (teachers, advisors or coaches) are not making the decisions? [Secondary]				
14.	If food is sold in the student store, has it been approved by the director of food services? [Secondary Only. Primary grades cannot sell food daily.]				
15.	Do you verify that all ASB bank accounts are reconciled within two weeks of receipt of the bank statement?				
16.	If bank account reconciliations are not performed within two weeks of receipt of the bank statement, is a reconciliation completion promise date obtained and followed up to ensure the bank reconciliation is completed?				
17.	Are you one of the individuals authorized to sign ASB checks? Who are the other approved signers?				
18.	Do you know whom the board has approved to sign contracts? Up to what amount?				
19.	Do you review the bank reconciliations each month and initial the bank statement as well as the reconciliation as evidence of your review?				
20.	If you clearly delegated specific responsibilities and authority to an ASB advisor or advisors, do you meet regularly to coordinate and collaborate regarding school site needs and activities?				
21.	Is there a safe at the school with limited access that is adequate to hold all cash receipts until deposit?				

	YES	NO	N/A	Comments
22. Are bank deposits made within a few days of receipt, but at least weekly?				
23. Do you review ASB financial reports monthly?				
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ASB Advisor

The ASB advisor is a vital contributor to the success of ASB operations. This position is used in different ways in different LEAs statewide.

In numerous secondary schools, the principal/school administrator has delegated significant responsibility and authority to the ASB advisor. When this is the case, a number of the items identified above as internal control questions for the principal/school administrator apply to the ASB advisor.

		YES	NO	N/A	Comments
1.	Do you feel that the district staff and/or the principal/school administrator have adequately explained your responsibilities?				
2.	Do you know where to go for help if you have questions about ASB policies or procedures?				
3.	Are you a certificated staff member of the district?				
4.	Do you ensure that careful minutes are taken at each club meeting, with all necessary items noted?				
5.	Do you help your club prepare and monitor an annual budget?				
6.	Do you monitor spending during the year to ensure that the club will not end the year with a large carryover balance or a negative balance?				
7.	Do you work with your club to ensure that fundraisers are appropriate and adequate controls are in place to make them successful?				
8.	Do you work with the students to establish and implement cash receipt control procedures for each fundraising event?				
9.	Is potential revenue projected for each fundraising event?				

10.	Do you ensure that cash receipts are given
	to the ASB bookkeeper immediately, or as
	soon as possible, after the fundraising event?

- 11. Do you ensure that those responsible for the fundraising event have had two people count all funds raised and that both individuals sign and date the fundraising cash collection form?
- 12. Do you count the cash receipts in the presence of a second person, and do you both sign and date the form indicating that the counted funds are accurate?
- 13. Do you keep duplicate copies of cash count forms, and all other forms that are part of the financial process?
- 14. Do you understand what types of expenses ASB funds are allowed to be used for?
- 15. Are you one of the individuals who preapproves expenditures (with a student representative and the principal/school administrator) via a purchase order?
- 16. Do you review ASB financial reports monthly?
- 17. Are you one of the authorized signers of the ASB checks? Who are the other approved signers
- 18. If you are the advisor for the student store, are additional internal controls in place, such as comparing sales to inventory, periodic inventory of goods, and review of pricing policy?
- 19. Does the district provide staff development and training opportunities for you throughout the year?

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	YES	NO	N/A	Comments
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ASB Bookkeeper

Many accounting functions need to be performed for ASB operations. In the best-case situation, a person with adequate time and appropriate technical skills and knowledge will be assigned to perform these functions. The staff member performing the following tasks may not have the official title of ASB Bookkeeper, but for purposes of this checklist, that is the title used for the person performing the ASB accounting functions at the school.

		YES	NO	N/A	Comments
1.	Do you have sufficient time to devote to ASB recordkeeping?				
2.	Do you provide each club with information on the revenues and expenses to date each month? Is this also provided to the ASB advisor, principal/school administrator and ASB treasurer? [Secondary]				
3.	Do you understand the appropriate internal controls for cash receipts from each type of fundraising event?				
4.	Do you ensure that students and staff establish cash receipt control procedures for each fundraising event?				
5.	Do you maintain an adequate stock of supplies for cash receipt control procedures, such as prenumbered tickets, prenumbered receipt books, and duplicate carbon cash count forms?				
6.	Do you ensure that the advisors turn in the appropriate documentation for the fundraising event in addition to the cash collected? This documentation includes reports on tickets issued and other items.				
7.	Do you ensure that all cash count forms for fundraising and all events where funds are collected are counted and signed before you take custody of the deposit?				
8.	If a startup cash change box is issued, does the person(s) receiving the change count the startup cash in front of the ASB bookkeeper and sign indicating that the startup change is accurate?				
9.	Is cash deposited into the bank account	-	-	-	
	within a few days after it is collected and received?				
10.	Are all expenses approved in advance?				
11.	Do you have copies of the signed purchase orders?				

		YES	NO	N/A	Comments
12.	Is the purchase order dated and approved prior to the purchase?				
13.	Are the checkbook and the check stock stored in a locked file cabinet or safe?				
14.	Is there a log that identifies the individuals who have access to the ASB safe?				
15.	Are expenses paid only with an original invoice and a document that verifies that the goods were received?				
16.	Are two signatures required on all checks? Are there backup signers?				
17.	Are checks made to vendors and employees only for reimbursements (not to cash)?				
18.	Is a record maintained of all equipment purchased with ASB funds?				
19.	Do you have a process to determine whether a worker is an employee or an independent contractor?				
20.	Are all employees who perform work for the ASB paid through the district's payroll and then invoiced to ASB?				
21.	Is an IRS Form W-9, Request for Taxpayer Identification Number and Certification, obtained from all independent contractors before any disbursements are issued to them?				
22.	Do you reconcile all bank accounts within two weeks of receipt of the bank statement?				
23.	Are all outstanding deposits and checks identified and do they clear the bank in a timely manner? (deposits should remain outstanding for no more than two or three days).				
24.	If any journal entries or transfer entries are part of the bank reconciliation, are those entries authorized?				
25.	Does the district provide staff development and training opportunities for you throughout the year?				

	YES	NO	N/A	Comments
26. Is there a knowledgeable contact person in the business office to coordinate answering your questions and providing assistance?				
27. Is the ASB recordkeeping computerized? If so, is the accounting software adequate to meet the needs of the district and clubs?				
28. Is the computer on which the ASB accounting software resides user ID and password protected?				
29. Is the ASB accounting software protected by requiring a user ID and password for access?				
30. Are ASB computer and accounting software passwords safeguarded, not given out, and changed periodically?				
31. Are only ASB receipts deposited into the ASB account (e.g., not library fines or principal's/school administrator's discretionary accounts)?				
32. Are you being listened to when you express concerns about expenditures or other items?				
33. When money is brought to you from fundraisers, are you given time to count it in the person's presence and do you both sign and date the cash count form indicating that the funds agree?				
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