



# INTERNAL CONTROL MANUAL

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# INTRODUCTION

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Oak Ridge Schools has the responsibility to its taxpayers, ratepayers, and constituents to be good stewards of public monies and property. In our efforts to serve the public as Oak Ridge Schools Board Members or Employees, Oak Ridge Schools established this Internal Control Manual using state and federal directives, and widely recognized best practices.

State of Tennessee statutes require the Comptroller's Office, Department of Audit to prescribe uniform accounting systems for entities that handle public funds. Those statutes require public officials to adopt and use the system designated by the Comptroller's Office. The Tennessee Legislature amended TCA Section 9-2-102 in 2015 to require local governments to establish and maintain internal controls in accordance with guidance issued by the U.S. Government Accountability Office (GAO). The guidance is titled *Standards for Internal Control in the Federal Government* (Green Book). The Green Book follows the format developed by the Committee of Sponsoring Organizations (COSO), which has been the gold standard of internal control for all entities except the federal government for several years.

The internal control system consists of three objectives and five main components.

## **THREE (3) OBJECTIVES OF INTERNAL CONTROLS:**

1. Reporting – reliability
2. Operations – effective and efficient
3. Compliance – compliant with applicable laws, regulations, contracts and grant agreements

## **FIVE (5) MAIN COMPONENTS OF INTERNAL CONTROLS THAT ARE REQUIRED TO BE ADDRESSED:**

1. Control Environment
2. Risk Assessment
3. Control Activities
4. Information and Communication
5. Monitoring

The purpose of this manual is to ensure that the objectives of reporting and compliance are established. The policies to achieve these objectives are derived from various financial best practices, state and federal laws, and regulations. Policies may be developed to suit the specific needs of Oak Ridge Schools' functions and resources. Detailed procedures are developed and documented as a means for entities to comply with its established policies.

# CONSIDERATIONS IN DEVELOPMENT OF INTERNAL CONTROLS

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Internal control is defined as a process effected by an entity's oversight body, management, and other personnel that provides reasonable assurance that the Oak Ridge School District's objectives will be achieved. Before developing its Internal Control System (ICS), Oak Ridge Schools as a whole and each department should determine its mission, strategic goals, and objectives, and then formulate a plan to achieve those objectives. The internal controls are policies and procedures put in place to help achieve those goals and objectives. By describing how the Oak Ridge School District and its departments expect to meet its various goals and objectives, using compensating controls to minimize risk, the entire Oak Ridge School District becomes more aware of expectations. Each department's internal control plan will be unique; however, it must be based on polices included in this guide which incorporate or reference other comprehensive state, federal or standard setting agency polices that have been adopted.

Constant monitoring of all components will ensure that the ICS (which must be reviewed and updated at least annually) is revised whenever changing conditions justify.

Since Oak Ridge School District's policies and procedures are the control activities for its internal control plans, it is important that they be reviewed in conjunction with the plans and referenced where appropriate. Everyone within the Oak Ridge Schools District has a responsibility to ensure that internal controls operate effectively.

As directed by T.C.A. 9-18-102 (a) and in accordance with the guidance issued by Tennessee Comptroller's Office, the Oak Ridge School District has adopted this internal control manual. It is critical to note that the development and operation of the internal control system involves everyone in the organization. As such, management must ensure that the manual is shared with all of its employees. The manual is a work in process and will be assessed periodically.

The following sections document the five components of internal control and significant financial and compliance areas that are deemed high risk.

***The Green Book states documentation is management's responsibility:***

3.09 Management develops and maintains documentation of its internal control system.

3.10 Effective documentation assists in management's design of internal control by establishing and communicating the who, what, when, where, and why of internal control execution to personnel. Documentation also provides a means to retain organizational knowledge and mitigate the risk of having that knowledge limited to a few personnel, as well as a means to communicate that knowledge as needed to external parties, such as external auditors.

# FIVE COMPONENTS OF INTERNAL CONTROL

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## CONTROL ENVIRONMENT

### *Overview*

The control environment is the foundation for all other components of internal control, providing discipline and structure. Moreover, management establishes the tone regarding the importance of internal control and the expected standards of conduct; and reinforces those expectations at various levels. Control environment factors include the integrity, ethical values and competence of Oak Ridge Schools' District personnel; the distribution of authority and responsibility; the development of its personnel; and the attention and direction provided by the governing body.

### *Objectives*

1. The governing body and management should conduct business with integrity and ethical behavior.
2. The governing body and management should provide direction and oversight for Oak Ridge Schools' internal control system.
3. The governing body and management should hire qualified and competent employees.
4. The governing body and management should establish structure, authority and responsibility to hold individuals accountable for internal control responsibilities.

### *Policies*

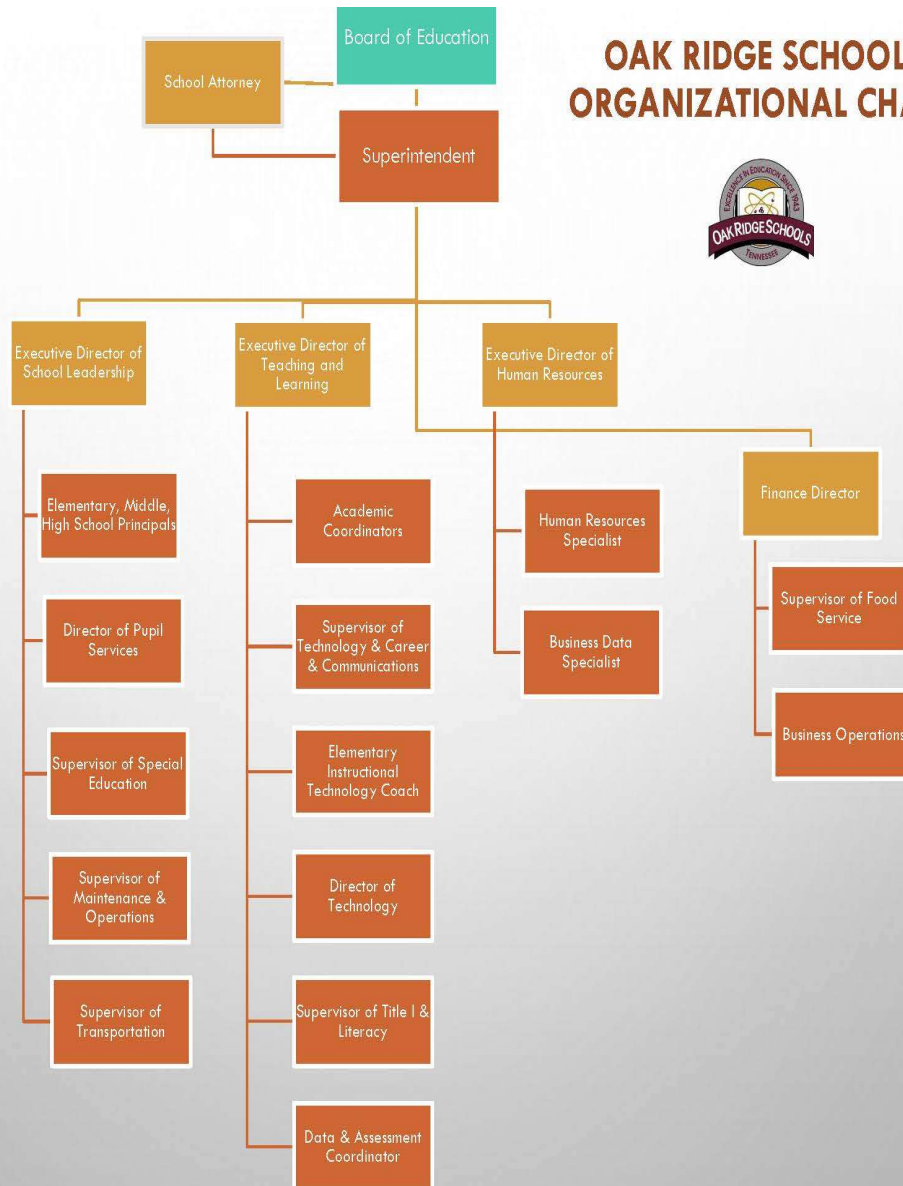
1. Conflicts of interest must be disclosed before business is conducted.
2. A code of Ethics has been adopted by the Board of Education and management and is reviewed annually with all employees.
3. The Board of Education has adopted a policy manual.
4. The Board of Education uses the budget process as a means of oversight with department heads.
5. Organizational charts are reviewed for needed changes in regard to authority and responsibility.

### *Procedures*

- If there is a conflict of interest, the disclosure statement from the policy manual must be completed and signed in front of a witness and given to the appropriate supervisor.
- The policy manual and corresponding forms are available to all employees and board members on the Oak Ridge Schools' website.
- The Board of Education formally adopts an annual budget. The adopted budget is given to the City for approval by the City Council.

- Oak Ridge Schools adopted a Board of Education Policy Manual based on TSBA guidelines. Those policies are reviewed and updated annually by the Board of Education.
- Monthly, the policy review committee reviews current policies and submits their findings to the Board of Education.
- Based on legislative changes, TSBA provides recommended policy updates.
- The Board of Education has adopted a personnel policy related to the recruitment and retention of highly qualified employees for the Oak Ridge Schools District.
- All positions shall be approved through the budget process in accordance with the organizational plan submitted by the Superintendent.
- Oak Ridge Schools' organizational chart is available on the system website and included in this manual to establish a defined chain of command.
- All positions require a job description and copies shall be maintained in the Executive Director of Human Resource's office.
- All Oak Ridge Schools' employees are required to complete annual online training and are encouraged to obtain additional professional and/or continuing education credits.

# OAK RIDGE SCHOOLS ORGANIZATIONAL CHART



## RISK ASSESSMENT

### Overview

Oak Ridge Schools' officials and management assess the risk of operations continually. The Oak Ridge Schools has chosen to transfer the most common types of risk through the purchase of the following types of insurance:

- Property and Casualty
- Liability
- Errors and Omissions
- Worker Compensation
- Surety Bonds

There are some risks that cannot be anticipated as they relate to financial and compliance issues. We have assessed the following areas and identified certain risks that necessitate the development of internal control policies and procedures. Internal controls will not eliminate all risk but will help reduce risk to gain reasonable assurance that reporting, and compliance objectives are met.

### Objectives

1. Collections are complete, timely and accurate.
2. Disbursements are for valid Oak Ridge School District purposes and are properly recorded.
3. Assets are properly safeguarded.
4. Oak Ridge Schools is in compliance with contractual, local, state and federal laws and regulations.

## SIGNIFICANT AREAS OF RISK

### Collections (General/ACH)

- Deposits not made within 3 days as required by law.
- Deposits not made intact.
- Funds not locked away until they are deposited.
- No segregation of duties in counting and preparing deposits
- Receipts not coded to proper revenue codes.
- Receipts not assigned to appropriate funds.
- Unreconciled accounts
- Commingling of funds



### ***Disbursements/Drafts***

- Broken law – expenditures must be appropriated.
- Owing late fees and penalties
- Improper reporting in financial statements; inaccurate reporting for the governing body – monthly budget vs actual
- Possible loss of school district funds; inappropriate disbursement; theft malfeasance

### ***Safeguarding Assets***

- Misuse or loss of assets, not just capital assets (i.e. checking accounts, investment accounts, etc.).
- Payback of grant funds

### ***Reconciliation of Accounts***

- Misuse or loss
- Missing entries

### ***Control of Investments***

- Lower than expected rates of return
- Assessed liability for OPEB investment fund subject to change based on school district policy

### ***Debt Management***

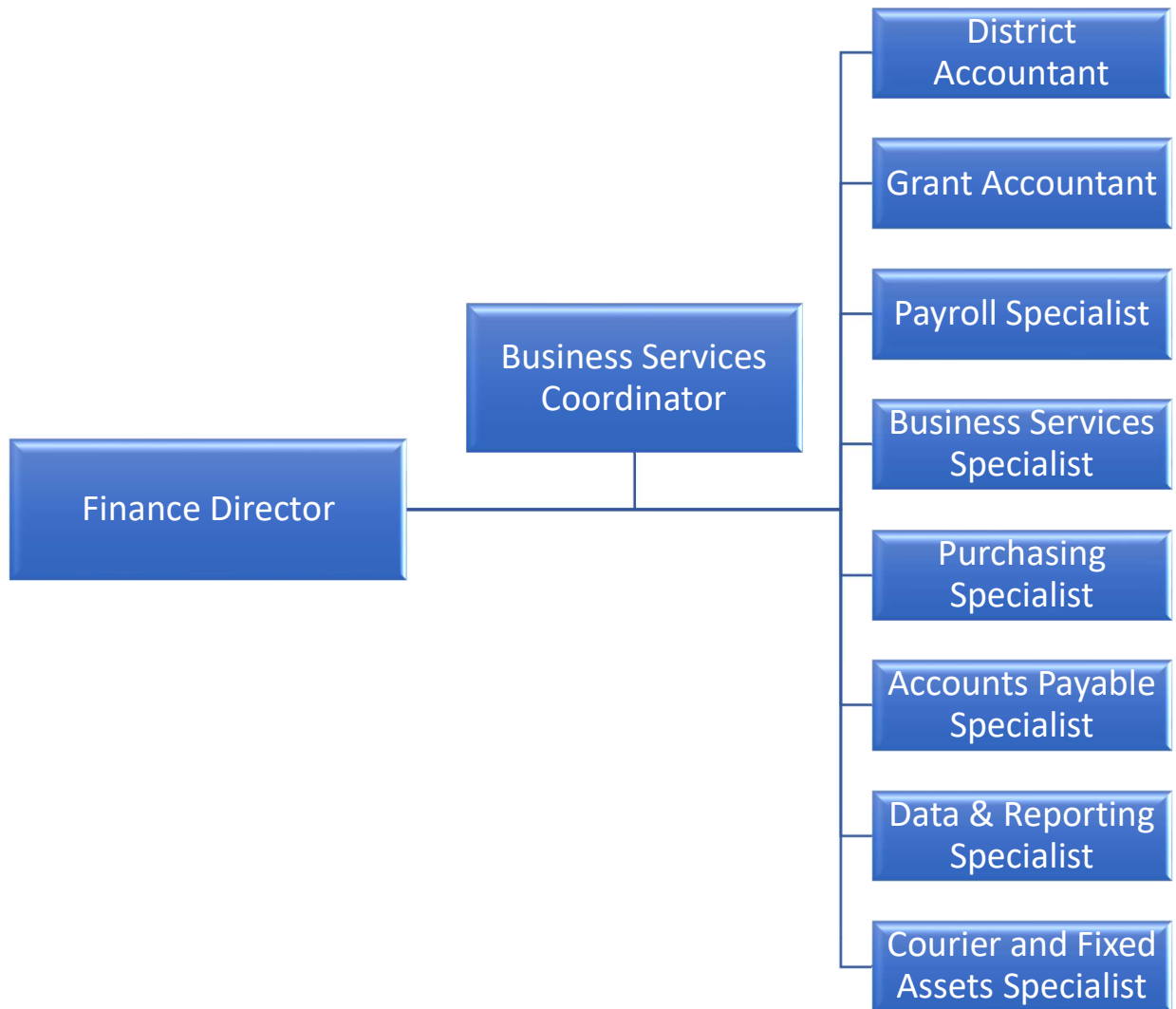
- Debt issuances not in compliance with state law
- Violations of the policies of the City Charter
- Additional effort with the annual budgetary practices
- Potential for defaulting on principal and interest payments.

### ***Grant Management***

- Grant requirements may have changed.
- The Accountant is not made aware of the grant transactions

The significant areas of risk are identified above, and policies and procedures will be documented in the next section to explain how Oak Ridge School District plans to implement internal controls to help reduce the risks associated with these areas of operations.

## District Business Services Department Organizational Chart



## CONTROL ACTIVITIES

### Overview

This section is where detailed implemented procedures are documented. The objectives, policies and procedures are described for each of the significant areas identified in the Risk Assessment section.

### COLLECTIONS (GENERAL/ACH)

#### Objectives

Collections are complete, timely, and accurate.

1. Collections are safeguarded.
2. Collections are recorded accurately and in a timely manner in the accounting system.

#### Policies

To receipt all revenues to the appropriate fund and revenue code.

1. To receipt all monies in compliance with the state statutes and intact.
2. Pre-numbered receipts are issued for all collections.
3. Two people are involved in the receipting/depositing process.
4. All collections are recorded in the General Ledger (G/L).
5. Reconciliations are completed monthly.

#### Procedures

##### For District Funds Collected at School Locations

- Each person involved in the receipting process must have their own cash drawer.
- All monies collected are receipted on pre-numbered receipts.
- Money received at the school is counted by the employee who collects the funds and initials for accuracy. Money is then turned into the School Bookkeeper, who counts and prepares the deposit.
- Mail Payments – monies received through the mail are opened by an office staff member other than the Bookkeeper. They should fill out a receipt and give a copy to the Bookkeeper along with the check or cash that was received. The Bookkeeper then verifies and prepares the deposit.
- Deposit slips are prepared in duplicate and initialed by the Bookkeeper; other personnel take all school deposits to the bank.
- Funds are deposited daily, if possible, but no later than three (3) days after receipt. If funds are kept at school overnight, they must be kept in a secure location.
- Once deposit has been made, the bank receipt is given to the Bookkeeper and attached to the duplicate deposit slip.

- The Bookkeeper sends the deposit slip to the Accounts Payable Specialist in the District Office who assigns the proper revenue code and forwards it to the District Accountant to receipt it to the G/L in the proper revenue code.

#### For ACH collections

- Most funds collected at the district office are deposited via ACH. The School District Accountant prints the remittance advice or verification of deposit, applies the proper revenue code, and provides the paperwork to the Accounts Payable Specialist for cash receipt batch entry.
- The Accounts Payable Specialist enters the cash receipt into the financial software using the proper revenue code assigned by the District Accountant.
- The Cash Receipt Batch is printed and signed by the Accounts Payable Specialist and provided to the District Accountant.
- The District Accountant reviews the Cash Receipt Batch for accuracy and then posts the receipt(s) to the G/L.
- The Batch and Update Reports are signed by the District Accountant and filed in the Accounting Office by Date in the ACH Receipts Binder.

#### For Collections at District Office

- School System Courier receives payments through U.S. Mail and stamps “For Deposit Only” and forwards the payment to the Accounts Payable Specialist.
- The Accounts Payable Specialist enters the cash receipt into the financial software using the proper revenue code; and references the cash receipt number on the deposit slip.
- The Accounts Payable Specialist prepares the deposit slip in duplicate & initials.
- For check deposits:
  - The Accounts Payable Specialist securely signs onto the bank website to complete a remote deposit utilizing a check scanner that is located in the Accounting Office.
  - Copies of all checks are stored by the bank along with the deposit paperwork.
  - Original checks are filed and kept for one month.
- For cash deposits
  - The School System Courier verifies the deposit slip and initials, then carries it to the bank to execute deposit within three (3) days of receiving and returns with the deposit receipt.
  - The deposit receipt is returned to the Accounts Payable Specialist.
- The Accounts Payable Specialist attaches the deposit and duplicate deposit slip to backup documentation, signs the backup documentation and provides it to District Accountant.
- District Accountant reviews the Cash Receipt Batch for accuracy, confirms amount matches deposit ticket and bank confirmation, ensures proper revenue code has been used; and then posts the receipt(s) to the G/L.
- The Cash Receipt Batch and Update Reports are signed by the District Accountant and filed in the Accounting Office by Date in the Cash Receipts Binder

## Disbursements/Drafts

### Objectives

1. Disbursements are for a valid school system purpose and are necessary.
2. Disbursements are timely.
3. Disbursements are accurately coded and recorded in the accounting system.
4. Disbursements are legally appropriated.

### Policies

1. Accounts Payables (A/P) payments are processed daily or weekly, as needed.
2. More than one person reviews the A/P payment process.
3. Checks are printed using Financial Software based on approved AP Check Batches.
4. Separate employees will code invoices and PO's, enter requisitions, and process check files.
5. An electronic purchase order system with approval authorization groups is in place.
6. All vendor checks are mailed or deposited via ACH.

### Procedures

- Before purchases are made, electronic requisitions and purchase orders are approved at a minimum by the Superintendent of Schools or his Designee (an Executive Director) and the Finance Director. (Additionally, building principals, department supervisors, and grant administrators are required to approve the requisition for their location/area)
- The Purchase Order is printed and provided to the Vendor by the Purchasing Specialist. A Goldenrod color copy is provided to the Department ordering the items.
- When purchases are received or a service is completed, the packing slips are matched with the Goldenrod copy of the Purchase Order. The receiving department signs Goldenrod to acknowledge that the items or services have been received and submits it with any backup information to the Purchasing Specialist.
- The Purchasing Specialist matches invoices with the received copy of the Purchase Order and provides the Accounts Payable Specialist for payment processing.
- The Accounts Payable Specialist audits the payment requests and invoices and enters them into the financial software as a batch process.
- The Accounts Payable Specialist processes and prints the pre-check register and attaches a calculator tape of all invoices to match the report. The report along with the AP Check-Off List and all backup documentation for the payments (signed as being audited by the Accounts Payable Specialist) is submitted to the Data & Reporting Specialist and the Business Services Specialist (or the District Accountant, Grant Accountant, Business Services Specialist if the Data & Reporting Specialist and/or the Business Services Coordinator is unavailable).
- The Business Services Coordinator and Data & Reporting Specialist (or the District Accountant, Grant Accountant, Business Services Specialist) audits the check register and supporting invoice(s) and purchase order(s) to confirm the proper account code, vendor, invoice number, and amounts are used.

- Once each person has completed the audit, the AP Check-Off List is signed off to indicate auditing the auditing has been completed. The check batch packet is then returned to the AP Specialist for processing.
- The Business Services Coordinator reviews the pre-check register and supporting documentation and initials as evidence of review.
- The Accounts Payable Specialist processes the checks using the Financial Software. A password allowing check printing is required prior to printing checks. This password is entered on the Accounts Payable Specialist computer to approve the check printing processing by the Business Services Coordinator. (If the Business Services Coordinator is unavailable and approves, the District Accountant or Grant Accountant will provide the required password for printing accounts payable checks)
- Once the Accounts Payable Checks are run, the Accounts Payable Specialist provides all original checks and backup to the Business Services Coordinator for review and confirmation of the vendor name and amounts on the actual checks.
- The Business Services Coordinator provides all original checks and backup to the Finance Director for final review.
- The checks are then returned to the Accounts Payable Specialist for mailing and filing.
- At the end of the month, all checks are reconciled by the District Accountant. An outstanding check register is pulled and filed with the bank reconciliation.
- At year-end, the District Accountant will review all of the previous years' accounts, prior year activity, and invoices received to help determine what is still outstanding.

### **SAFEGUARDING ASSETS**

1. Ensure school system assets are properly valued and protected.
2. Ensure cash, accounts receivable and other asset accounts are reconciled.
3. Ensure school system assets are protected against loss, misappropriation, or theft.
4. Ensure inventory items are available when needed.
5. Ensure inventory is necessary and reasonable.
6. Ensure all capital assets and inventories are properly recorded.

### ***Policies***

1. District Accountant reconciles all bank and investment accounts on a monthly basis within 10 days of receipt of a bank statement.
2. Bank accounts are appropriately collateralized.
3. Accounts Payable and Payroll checks are provided to the Banking Institution for inclusion in the Positive Pay process (both for vendor name, check number, and amount) as an additional level of security and protection
4. All bank accounts are held in the School System's name.
5. All assets with a value of \$500 or more must be tagged.
6. The School System keeps an asset and inventory log that is updated as assets are acquired and disposed of.

### **Procedures**

- The District Accountant reconciles all bank and investment accounts monthly and gives to Business Services Coordinator for review and approval.
- All reconciliations are kept in the District Accountant's office.
- All employees who handle school monies are bonded and all accounts are in the School System's name and properly collateralized.
- Prior to mailing checks, the District Accountant submits an electronic file to the Banking institution for inclusion in the Positive Pay process (both by vendor name and check number and amount)
- When new assets are acquired, the Fixed Assets Specialist or the Instructional Technology Specialist records them on the appropriate list (inventory or capital assets). If the item is over \$500, he/she will affix an asset tag.
- When items are determined to be surplus, destroyed, or need to be sold, the Fixed Assets Specialist or the Instructional Technology Specialist is responsible for editing the inventory and asset logs.
- Annually, the District Accountant will review the fixed asset listing. The fixed asset list is provided to auditors annually.

## **RECONCILIATION OF ACCOUNTS**

1. Ensure that all bank and investment accounts are recorded and reconciled.
2. Ensure that change funds are secure and properly accounted for.

### **Policies**

1. The District Accountant reconciles all bank and investment accounts on a monthly basis within 10 days of receipt of the bank statement.
2. Any funds not immediately deposited are placed in vault for safe keeping.
3. All accounts are accounted for in the general ledger.

### **Procedures**

- Monthly, the District Accountant reconciles all general ledger accounts with the bank statements.
- The Business Services Coordinator reviews and approves all reconciliations.
- All signed reconciliations are filed in the District Accountant's office.
- Any funds not immediately deposited are counted daily and locked in vault for safe keeping.
- Deposits are made within the three (3) day rule and verified by multiple employees.
- All accounts (assets, liabilities, revenues, and expenditures) are listed within the accounting software.
- The State of Tennessee's Uniform Chart of Accounts is used, and all active account numbers are in the accounting software.

- Trial balances are periodically pulled and reviewed by the District Accountant, Business Services Coordinator, and Finance Director.

## CONTROL OF INVESTMENTS

1. Ensure investments are safe and in accordance with the adopted investment policy.
2. Ensure that investments are authorized and provide maximum returns with minimum risks.
3. Ensure investments comply with legal requirements.
4. Insure investments are recorded accurately.

### *Policies*

1. The Superintendent is authorized to invest excess funds of Oak Ridge Schools.
2. Interest earned shall be credited to the appropriate funds and revenue codes.

### *Procedures*

#### **Other Post-Employment Benefits (OPEB)**

- The Board of Education approves OPEB trust contributions as part of the annual budget. Upon Superintendent's approval, the District Accountant issues payment to the OPEB trust.
- The School System has an actuarial at least every two (2) years, and annually, auditors record OPEB liability.

#### **LGIP (Local Government Investment Pool)**

- Funds invested in the LGIP, with Finance Director's approval, can be wired between the School System's account and the LGIP.
- All interest earned on the LGIP is receipted into the proper fund and revenue code.
- The LGIP statement is printed monthly and reconciled by the District Accountant.
- The reconciliation is given to the Business Services Coordinator to verify and approve.
- Signed reconciliation statements are kept in the District Accountant's office.

## DEBT MANAGEMENT

1. Ensure that city, state, and federal regulations are understood and followed in regard to issuance of debt.
2. Ensure that all grant regulations are understood and followed in regard to issuance of debt.
3. Ensure that note disclosures in the financial statements contain all required elements.



### ***Policies***

1. All debt issuances are made in compliance with state law and City Code
2. All transfers are examined to ensure they do not meet the qualifications to be classified as debt.
3. All debt issuances will only be made after the approval of the Board of Education and City Council.

### ***Procedures***

- Oak Ridge Schools complies with all legal requirements for notices and public meetings related to issuing debt.
- In the interest of transparency, all associated costs (including interest, issuance, continuing, and one-time) are disclosed in a timely manner.
- Professionals involved in debt transactions are required to disclose any conflicts of interest.

## **GRANT MANAGEMENT**

### ***Objectives***

1. Ensure that all grant requirements are met.
2. Ensure that all grant transactions are properly recorded.
3. Ensure that matching funds are available and approved.

### ***Policies***

1. Every department must notify the Accounting Office when a grant application is submitted and awarded.
2. All grant applications must be approved by the Superintendent, and all grants with matching requirements must be approved by the Board of Education prior to submission of the application.
3. Once awarded, a detailed budget is prepared outlining the grant.
4. Grant management responsibilities are assigned to an appropriate employee for every grant.

### ***Procedures***

- Appropriate personnel complete the grant application and submit to the Executive Director of Teaching and Learning prior to Superintendent for approval. If the grant requires matching funds or maintenance of effort, the application must be approved by the Board of Education and budgeted for in annual budget or via budget amendments.
- A copy of the grant application and award letter is given to the Accounting Department. The Accounting Department assigns a project code specific to the grant for tracking in the accounting system.

- The awarded grant has an approved budget detail in E-Plan and that budget is entered into school system accounting software. If any amendments need to be made to the grant budget, state approval is required.
- The Superintendent assigns grant management responsibilities to the appropriate employee. Accounting office submits grant reimbursement requests. Grant reimbursements are issued through ACH and receipted to the G/L. The grant manager reviews grant monthly to ensure that funds are properly expended.
- District Uniform Grants Guidance and Policy Manual (UGG) is reviewed and updated annually or as necessary.

## **INFORMATION AND COMMUNICATION**

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### **Overview**

Management has the responsibility to adequately communicate information to both internal and external parties. It is important that employees know the objectives, policies and procedures management has established and what the expectations are for internal controls. External stakeholders may also seek information regarding objectives and reliable financial information.

### **Objectives**

1. Necessary information for achieving the entity’s objectives is available and used.
2. Necessary information for achieving the entity’s objectives is internally communicated by management.
3. Necessary information for achieving the entity’s objectives is externally communicated by management.

### **Policies**

1. Information maintained in a format should be communicated in that same format. For example, if the general ledger is maintained on computer, the monthly budget to actual reports should be provided through a computer-generated report from that software package.
2. Reliable and accurate information from Oak Ridge Schools must be communicated to the people who need it in a timely and useful format.
3. Because the credibility of Oak Ridge Schools, its Board of Education, and its employees is at stake whenever information is released to outside parties, management should be confident the information being released is accurate and in compliance with policies and procedures.
4. The Board of Education communicates the types of information required to achieve their objectives and mitigate risk.

## **Procedures**

- The staff of Oak Ridge Schools is required to submit quality information that allows the Board of Education to make informed decisions and evaluate whether the school system is achieving its objectives.
- Oak Ridge Schools clearly defines lines of communication through the policy manual and organizational chart.
- The District has a written organizational chart for employees to show clear lines of authority (who manages whom) and written job descriptions for all employees and open positions.
- The internal control manual is available to all staff via the Oak Ridge Schools' website.
- Oak Ridge Schools abides by Tennessee's Open Records laws for communicating with external parties, which includes the redaction of sensitive information.
- System generated reports pulled from various software programs are available in both electronic and printed formats.
- Information presented to the Board of Education is provided on a monthly basis and is also available upon request.

# **MONITORING**

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## **Overview**

The internal control system changes as technology, staff, objectives and policies change. Management is charged with continually monitoring the internal control system to determine if it is operating as designed and to ensure the policies are being followed.

## **Objectives**

1. To practice activities that monitor the internal control system and evaluate the results.
2. To address deficiencies noted in the internal control system in a timely manner.

## **Policies**

1. To ensure that internal controls do not deteriorate and continue to work as designed over time, an annual risk assessment will be conducted by Oak Ridge Schools.
2. To establish more efficient and effective operations over time.
3. To ensure that accurate and reliable financial information is used in decision-making.

## **Procedures**

- Monitor internal control through built-in monitoring activities and separate periodic evaluations and document the results.
- Evaluate differences to determine if:
  1. Changes in internal control have occurred but have not been documented
  2. Internal control has not been properly implemented
  3. Internal control design changes are needed.

- All accounts with financial institutions (checking, savings, investment, etc.) will be reconciled to the general ledger within 10 days of receipt of any statement from the financial institution.
- The above reconciliation will include a listing of outstanding checks and will be reviewed by the Business Services Coordinator.
- Reports comparing actual to budget amounts for revenues and expenditures will be generated monthly and reviewed by those in a position of authority over financial operations. Those in a position of authority include, but are not limited to the Bookkeeper, Principal, Supervisor, Executive Directors, District Accountant, Business Services Coordinator, Finance Director, Superintendent, and Board of Education

## SUMMARY

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The framework of this manual complies with the state requirements and was created using the Green Book as guidance. This manual will be reviewed annually and updated as needed. All members of Oak Ridge Schools will be required to abide by the policies and procedures outlined in this manual and it will be made available for reference on the school system website.

In turn, Oak Ridge Schools will abide by the Internal Control and Compliance Manual for Governmental Entities and other Audited Entities in Tennessee issued by the Comptroller. This policy manual does not supersede the requirements outlined in the Oak Ridge Schools Policies and Procedures for Administration of Federal Education Programs Aligned with the Requirements of the New Uniform Grant Guidance (UGG). Application of the policies and procedures will default to whichever policy manual is most stringent in its requirements.

In addition, this policy manual does not supersede the requirements outlined in the Internal School Funds Manual. Oak Ridge Schools as a District and Individual School Locations (Internal School Funds) will apply the policies and procedures to whichever policy manual is most stringent in its requirements.

Finally, this policy manual does not supersede the requirements outlined in the Board of Education Policies, other District policies and procedures, State regulations, rules, and policies, and other sources. All application of the policies and procedures will default to whichever policy manual is most stringent in its requirements.

## SUPPLEMENTARY INFORMATION

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### State regulations, rules, and policies:

- TN State Board of Education Rules & Regulations
- TN State Board of Education Policies, Standards, and Guidelines
- TN Comptroller of the Treasury
- Internal Control and Compliance Manual (12/2015)
- TN Internal School Funds Manual

### Oak Ridge Schools' regulations, rules, and policies:

- Board of Education Policies
- Oak Ridge Schools' UGG Policy Manual
- Oak Ridge Schools' Financial Policy & Operations Manual
- Oak Ridge Schools' Travel Policy and Procedures
- Oak Ridge Schools' Technology Purchasing Procedure
- Oak Ridge Schools' Employee Code of Conduct
- Oak Ridge Schools Time Keeping Guidelines for True Time
- Cash Deposit Rules
- Inventory and Fixed Assets Policy