

George Washington Academy
Thursday August 22, 2013
7:30 p.m.

Board Meeting Minutes

Location: 2277 S 3000 E St George, UT
Board Room, Portable Building

Board Members Present: Shannon Greer, President; Patrick Carroll, CFO; Anna Bohannan; Matt Hafen, Secretary; Steve Wattles; and Tiffany Draper.

Board Members Absent: Owen Olsen

Others Present: Don Fawson, Principal; Anya Yeager, Vice Principal; Glenda Raschke, District Manager; Zahabia Saiffee; Thayne Smith; Steven Finley; Rachelle Crawford

The Board work session began at 7:00 p.m.

Work Session: Open Meeting Act Training – Anna Bohannan provided a training on the Open Meeting Act.

The Board meeting began at 7:30 p.m. following the work session.

Board President Welcome: Shannon Greer

Roll Call: Shannon Greer, President

Shannon Greer presented Anna Bohannan with a plaque for her service on the Board.

Pledge of Allegiance: Shannon Greer

Jeff Ames from Holbrook Asphalt Co. presented the asphalt bids from Holbrook. They would preserve the asphalt using “HA5” product, which is guaranteed by Holbrook for 5 years. Holbrook will work with GWA to ensure that we do not have to worry about it for 5-7 years. The seal coat does not have a warranty. Steve Wattles asked about the exclusion in the warranty for “oil and gas.” Jeff explained that, if oil gets on the surface, Holbrook will still honor the warranty, they just can’t warrant that no damage will occur if oil is spilled on the asphalt. They guarantee that after five years it will not going to be grey, it will not have aggregate coming out of it, and it will look like new.

Kaber Esplin reported that the proposed server would provide a lot of backup and would balance the load that the current server handles. We currently have an external hard drive that backs up data, but if we had a network outage, all of the services would be cut off. It is best practice to have two servers running. The server we currently use is about 3 years old. At peak times, it slows down significantly, and occasionally crashes. It causes significant problems for both faculty and staff. We are not receiving bids from any other companies because we originally have a Dell server and we need to have a compatible server. Otherwise, we would have to buy two servers of another brand. The costs from other companies are very similar to the cost for servers from other brands. Dell also has a good warranty service (Premier Service), which means they would next-day air parts to us to install if we have issues. The warranty on the old server is about up. The life expectancy is about 5-7 years. Kaber recommended that we extend our warranty on the current server as well when it terminates in 14 months.

Approval of Minutes: Patrick Carroll presented a motion to approve the July 23, 2013 minutes, which was seconded by Tiffany Draper and passed unanimously.

Public Opportunity to Address the Board: Zahabia Saifee presented the Lego League program. Private or public teams can participate. Zahabia recommended that our school have a team in the higher grades to represent the school. We now have a dedicated science teacher and a parent volunteer (Zahabia) who is volunteering her time and energy for this project. The minimum starting cost would probably be approximately \$1,000 for one team. The item was not on the agenda for Board discussion and could not be voted on in this public meeting.

Adjournment was set for 9:30 p.m.

Teacher Representative Report: Rachelle Crawford, Teacher Representative, did not have anything to report, other than that the first two weeks went well at the school.

Administration Report: Don Fawson, Principal and/or Anya Yeager, Vice Principal

- Enrollment Report and Employee hours reported vs. budgeted
 - Current enrollment is 1,015, and we have two employees who have had overtime since July 1, 2013. The custodian has had 14.75 hours of overtime and the front office manager has had 15 hours of overtime since the start of the fiscal year. Total overtime is at 29.75 hours.
- Trimester 3 Reporting and CRT Scores 2013
 - Anya presented the DIBELS, phonograms, SRIs, and CRT scores from GWA. The “End-of-Year Assessment Reporting 2012-2013” handout is attached. Each grade exceeded their goals. The school’s scores far exceeded the states scores on CRTs. The scores on the CRTs this year increased from last year. Washington County scores will be available shortly and Anya will supply those to the Board.
- Don Fawson reported that the response to the lunch program has been very positive. The participation has gone up steadily, and today there were 300 students using the service. The server has been down which has caused Gelene to put in overtime.
- **Status of State Reports Due in August**
 - 10 days from start of school – Vision screenings for all students, ages 3-8 – Glenda Raschke reported that this is on hold right now. The state will get in touch with us when they are ready to do a training on this. We don’t know how long that will be.

Financial Report: Business Administrator

- Financial Summary as of July 31, 2013 – Steve Finley reported on the first month of financial information for the year.
- Budget Detail Report as of July 31, 2013 – Steve Finley reported on the first month of financial information for the year. Red Apple will follow up on the copier lease.
- **Status of State Reports due in August:** None

Additional Discussion and/or Action Items:

- **Expenditures over \$3,000:**
 - Parking Lot Striping and Sealing
 - Don Fawson commented that the cost of not having to stripe again if we go with Holbrook offsets some of the extra cost.
 - Patrick Carroll presented a motion to accept the bid of Southwest Asphalt Services Inc. for \$5,685.00. Kody seconded the motion, which passed by all but Matt Hafen and Shannon Greer, who voted against.
 - School Lottery Program

Committee Reports (3 min each):

- **Policies** – Matt Hafen, Chair, will send separate PDF versions of the policies that were passed today to Anya Yeager. Matt Hafen will also search for the most recent procurement policy and send it to Patrick.
- **Compensation-** Patrick Carroll, CFO, Chair had nothing to report.
- **Finance** – Patrick Carroll, CFO, Chair reported that they have sent out minutes of their meeting.
- **Investment Policy** – Glenda Raschke, Chair reported that the committee met last week and they are looking to offer better investments and reduce fees to employees.
- **Continuation** – Steve Wattles, Chair, reported that they are meeting this week.
- **Curriculum /Accreditation**– Shannon Greer, Chair, had nothing to report.
- **Charitable Giving** – Steve Wattles, Chair, reported that this is in progress and we are shooting for \$20,000 - \$30,000.
- **Technology** – Kent Schwager, Chair. The Board discussed the need of being aware of the technology that is available and the potential uses and benefits of the technology.
- **Outreach** – Steve Wattles reported that they have met and have been putting together a 12-month calendar. Car stickers have been developed as well.
- **Parent Teacher Organization** – Tiffany Draper, Chair reported that the current volunteer hours are 1,714 and the PTO has met with Red Apple and Red Apple is ensuring that they are following proper procedures.
- **Board Development/Recruitment** had nothing to report.

Kody Young motioned that the Board enter into a close sessions to discuss the potential purchase of real property. Tiffany Draper seconded the motion. A roll call vote was taken as follows:

Patrick Carroll – Yes	Steve Wattles – Yes
Shannon Greer – Yes	Matt Hafen – Yes
Tiffany Draper – Yes	Kody Young – Yes

Being no further business for the closed meeting, Steve Wattles made a motion to come out of the closed session. Patrick Carroll seconded the motion, which passed unanimously.

Next Meeting: The next regular Board meeting will be held on September 26, 2013 at 7:00 p.m.

Being no further business, Patrick Carroll made a motion to adjourn. Steve Wattles seconded the motion, which passed unanimously.

Respectfully submitted by Matt Hafen, Secretary

APPROVED BY THE BOARD OF DIRECTORS ON SEPTEMBER 26, 2013

BOARD MEETING SIGN-IN SHEET

GEORGE WASHINGTON ACADEMY

Meeting Date: August 22, 2013

Matt Hafen

Shannon Greer

Zahabia Saifee

PATRICK CARRON

Thayne Smith

Steven Finley

Rachelle Crawford

Glenda Wilson Paschke

Donald

Amya Seager

John Wall

[Signature] (Young)

2013-14 Scheduled GWA Board Meetings

August 22 nd	7:30 pm	
September 26 th	7:30 pm	
October 24 th	7:30 pm	
November 21 st	7:30 pm	
December 19 th	7:30 pm	
January 23 rd	7:30 pm	
February 27 th	7:30 pm	
March 27 th	7:30 pm	
April 24 th	7:30 pm	
May 15 th	7:30 pm	
June 26 th	7:30 pm	
July 22 nd	8:00 am	Board Retreat

*June WAPCS
9th & 10th*

In addition to all board meetings, please plan to attend PTO sponsored events and other school functions.

GWA Board Committee List 2013-14

- Accreditation Committee- Don Fawson
- Board Development Committee-Anna Bohannon
- Board Recruitment Committee-Shannon Greer
- Charitable Giving Committee-Stephen Wattles
- Compensation Committee-Patrick Carroll
- School Continuation Committee-Stephen Wattles
- Curriculum Committee-Jennifer McCorvey
- Finance Committee-Patrick Carroll
- Grant Writing Committee-Tiffany Draper
- Investment Policy Committee-Glenda Wilson Raschke
- LANDS Trust Committee-Lance Greer
- Outreach Committee-Owen Olsen
- Policy Committee-Matt Hafen
- PTO Committee-Tiffany Draper
- Technology Committee-Kent Schwager

END-OF-YEAR ASSESSMENT REPORTING 2012-2013

Kindergarten	1st Trimester Math %	2nd Trimester Math %	3rd Trimester Math %	DIBELS COMPOSITE SCORE (FALL)	DIBELS COMPOSITE SCORE (WINTER)	DIBELS COMPOSITE SCORE (SPRING)	32 PHONOGRAM TEST (# CORRECT OUT OF 32)	50 PHONOGRAM TEST (# CORRECT OUT OF 50)	70 PHONOGRAM TEST (# CORRECT OUT OF 70)(WPR)			
TEACHER A	90	89	90	56	168	147	24	47	62			
TEACHER B	96	95	90	60	175	159	29	47	59			
TEACHER C	95	94	95	52	148	162	31	50	69			
TEACHER D	95	94	90	61	198	154	30	46	64			
TEACHER E	97	95	97	49	179	142	32	48	69			
Class Average:	95	93	92.4	56	173	153 (Goal 119)	29	48	65			
1st Grade	1st Trimester Math %	2nd Trimester Math %	3rd Trimester Math %	DIBELS COMPOSITE SCORE (FALL)	DIBELS COMPOSITE SCORE (WINTER)	DIBELS COMPOSITE SCORE (SPRING)	50 PHONOGRAM TEST (# CORRECT OUT OF 50)	70 PHONOGRAM TEST (# CORRECT OUT OF 70)	70 PHONOGRAM TEST (# CORRECT OUT OF 70)(WPR)			
TEACHER A	97	93	91	148	234	221	46	64	63			
TEACHER B	98	95	91	178	296	271	49	67	66			
TEACHER C	95	92	86	156	262	240	48	66	68			
TEACHER D	96	96	92	165	250	227	48	68	67			
TEACHER E	96	94	92	159	265	237	45	63	63			
Class Average:	96	94	90.4	161	261	239 (Goal 155+)	47	66	65.4			
2nd Grade	1st Trimester Math %	2nd Trimester Math %	3rd Trimester Math %	DIBELS COMPOSITE SCORE (FALL)	DIBELS COMPOSITE SCORE (WINTER)	DIBELS COMPOSITE SCORE (SPRING)	70 PHONOGRAM TEST (# CORRECT OUT OF 70)	70 PHONOGRAM TEST (# CORRECT OUT OF 70)	70 PHONOGRAM TEST (# CORRECT OUT OF 70)(WPR)	NOVEMBER SRI GOAL: 300-500	FEBRUARY SRI GOAL: 300-500	MAY SRI GOAL: 300-500
TEACHER A	91	87	84	230	266	318	68	66	66	433	456	511
TEACHER B	89	89	84	190	270	280	63	63	63	348	400	462
TEACHER C	90	86	79	243	291	348	65	67	67	463	542	615
TEACHER D	91	88	80	257	334	361	62	64	65	393	480	490
TEACHER E	93	89	87	223	286	308	58	65	66	348	502	563
TEACHER F	93	91	89	223	299	295	63	65	67	460	560	591
Class Average:	91	90	84	228	291	318 (Goal 238+)	63	65	66	408	490	584
3rd Grade	1st Trimester Math %	2nd Trimester Math %	3rd Trimester Math %	DIBELS COMPOSITE SCORE (FALL)	DIBELS COMPOSITE SCORE (WINTER)	DIBELS COMPOSITE SCORE (SPRING)	50 WORD SPELLING TEST (NOVEMBER)	50 WORD SPELLING TEST (FEBRUARY)	50 WORD SPELLING TEST (MAY)	NOVEMBER SRI GOAL: 500-800	FEBRUARY SRI GOAL: 500-800	MAY SRI GOAL: 500-800
TEACHER A	87	82	80	94	368	426	5	5	5.8	563	627	682
TEACHER B	89	84	82	272	389	406	4.5	5.1	5.7	514	548	573
TEACHER C	87	79	80	303	374	418	4.9	5.3	5.5	581	638	640
TEACHER D	86	78	81	281	327	375	5	4.9	5.4	523	528	552
TEACHER E	88	82	78	313	332	418	5.3	4.8	5.7	586	623	646
Class Average:	87	81	80	253	358	409 (Goal 330+)	5	5	5.6	553	593	619
4th Grade	1st Trimester Math %	2nd Trimester Math %	3rd Trimester Math %	50 WORD SPELLING TEST (NOVEMBER)	50 WORD SPELLING TEST (FEBRUARY)	50 WORD SPELLING TEST (MAY)	NOVEMBER SRI GOAL: 600-900	FEBRUARY SRI GOAL: 600-900	MAY SRI GOAL: 600-900			
TEACHER A	87	91	90	35	7.9	7.7	764	799	829			
TEACHER B	90	88	90	32	8	8.3	682	771	801			
TEACHER C	87	88	83	32	6.8	7.1	749	758	780			
TEACHER D	85	74	76	33	6.4	6.2	701	735	735			
TEACHER E	83	89	89	33	7.1	7.5	787	860	896			
Class Average:	86	86	86	33	7.2	7.4	737	785	809			
5th Grade	1st Trimester Math %	2nd Trimester Math %	3rd Trimester Math %	50 WORD SPELLING TEST (NOVEMBER)	50 WORD SPELLING TEST (FEBRUARY)	50 WORD SPELLING TEST (MAY)	NOVEMBER SRI GOAL: 700-1000	FEBRUARY SRI GOAL: 700-1000	MAY SRI GOAL: 700-1000			
TEACHER A	90	94	93	8.3	8.7	9.3	919	956	971			
TEACHER B	88	86	90	7.7	8.7	9.4	839	890	901			
TEACHER C	86	81	93	7.7	7.7	8.4	861	883	903			
TEACHER D	87	91	89	7.9	8.1	8	923	943	942			
TEACHER E	85	84	83	7.1	7.5	7	872	920	971			
Class Average:	87	87	90	7.8	8.1	8.4	883	918	938			
6th Grade	1st Trimester Math %	2nd Trimester Math %	3rd Trimester Math %	50 WORD SPELLING TEST (NOVEMBER)	50 WORD SPELLING TEST (FEBRUARY)	50 WORD SPELLING TEST (MAY)	NOVEMBER SRI GOAL: 800-1050	FEBRUARY SRI GOAL: 800-1050	MAY SRI GOAL: 800-1050			
TEACHER A	88	89	87	8.7	8.7	8.7	965	999	1015			
TEACHER B	89	94	88	8.3	8.9	9.8	932	970	987			
TEACHER C	92	93	89	9.5	9.7	9.4	940	955	1053			
TEACHER D	84	80	80	7.8	8.5	8	946	938	967			
Class Average:	88	89	81	8.6	9	9	946	966	1006			

END-OF-YEAR ASSESSMENT REPORTING 2012-2013

7th & 8th Grade	1st Trimester Math %	2nd Trimester Math %	3rd Trimester Math %	50 WORD SPELLING TEST (NOVEMBER)	50 WORD SPELLING TEST (FEBRUARY)	50 WORD SPELLING TEST (MAY)	NOVEMBER SRI GOAL: 900-1150	FEBRUARY SRI GOAL: 900-1150	MAY SRI GOAL: 900-1150
TEACHER A	(ALGEBRA) 83	(ALGEBRA) 86	(ALGEBRA) 84	8.6	9.6	9.5	1074	1071	887
TEACHER B	(COURSE 3) 86	(COURSE 3) 82	(COURSE 3) 84	7.6	8.7	9	1031	1078	1102
TEACHER C	(ALGEBRA) 81	(ALGEBRA) 81	(ALGEBRA) 81	9.9	9	9.9	1058	1064	1089
TEACHER D	(COURSE 3) 82	(COURSE 3) 83	(COURSE 3) 75	8.7	9.9	9.5	1123	1152	1148
TEACHER E	(COURSE 3) 84	(COURSE 3) 85	(COURSE 3) 84	8.7	9.3	9.5	1072	1091	1057
TEACHER F	(GEOMETRY) 93	(GEOMETRY) 91							
TEACHER F	(ALGEBRA 2) 98	(GEOMETRY) 96							
Course Average:									
Algebra 1	82	84	83						
Course 3	84	83	81						
Geometry	93	91	89						
Algebra 2	98	96	94						

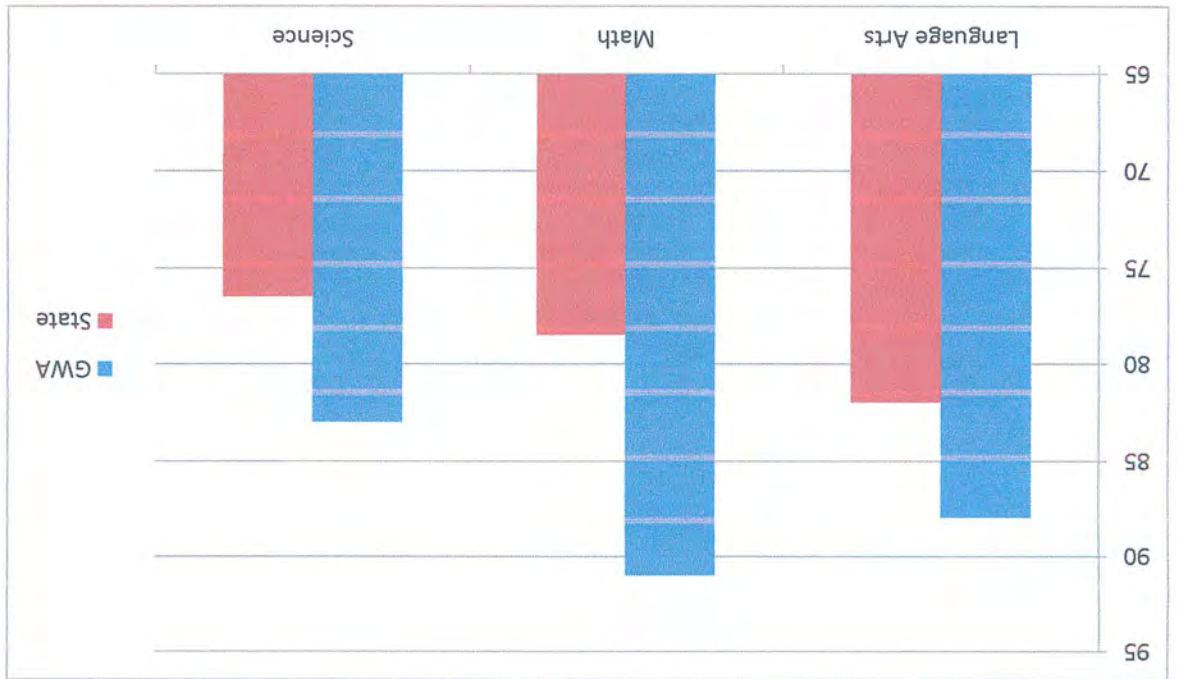
3rd Grade	Language Arts	Math	Science
3rd (A)	85	87	N/A
3rd (B)	86	88	N/A
3rd (C)	86	88	N/A
3rd (D)	81	83	N/A
3rd (E)	88	86	N/A
Average	85.2	86.4	N/A
Adjusted Compared to State	88/85	90/81	81/76
4th (A)	87	88	80
4th (B)	84	86	77
4th (C)	87	88	82
4th (D)	84	87	79
4th (E)	85	85	75
Average	85.4	86.8	78.6
Adjusted Compared to State	87/80	88/78	81/76
5th (A)	92	91	87
5th (B)	85	85	84
5th (C)	91	86	83
5th (D)	92	92	86
5th (E)	89	84	84
Average	89.8	87.6	84.8
Adjusted Compared to State	91/82	90/78	84/74
6th (A)	87	77	78
6th (B)	90	86	85
6th (C)	85	85	83
6th (D)	90	88	85
Average	88	84	82.75
Adjusted Compared to State	94/87	89/71	84/77
7th (A)	86	91	72
7th (B)	85	89	72
7th (C)	91	96	81
Average	87.3	92	75
Adjusted Compared to State	87/80	94/81	82/80
8th (A)	85	92	86
Adjusted Compared to State	83/78	94/82	85/76
	Algebra 1	Geometry	Algebra 2
	90/66	98/61	100/61

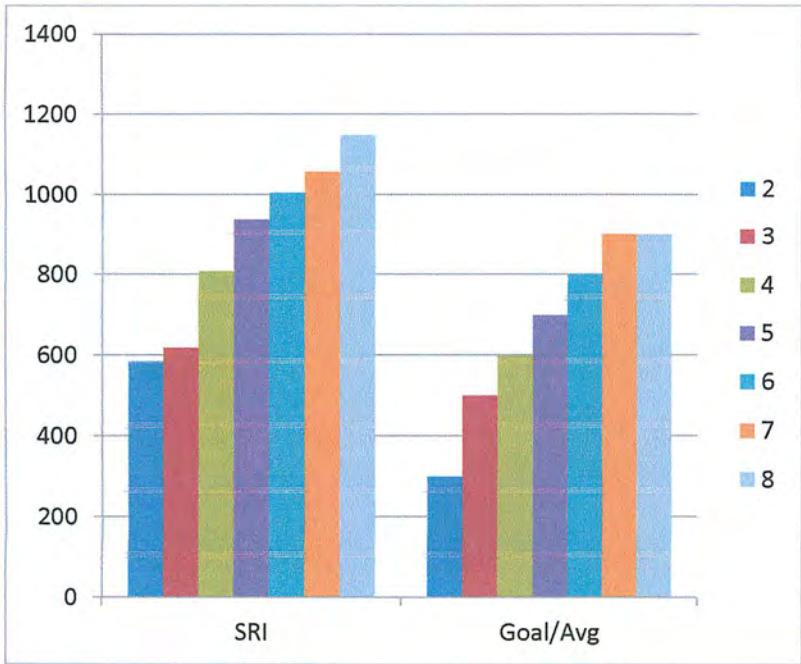
CRTs by Grade Level and Subject 2012-2013

Language Arts	Math	Science
88	90	81
87	88	81
91	90	84
94	89	84
87	94	82
83	94	85
88%	91%	83%

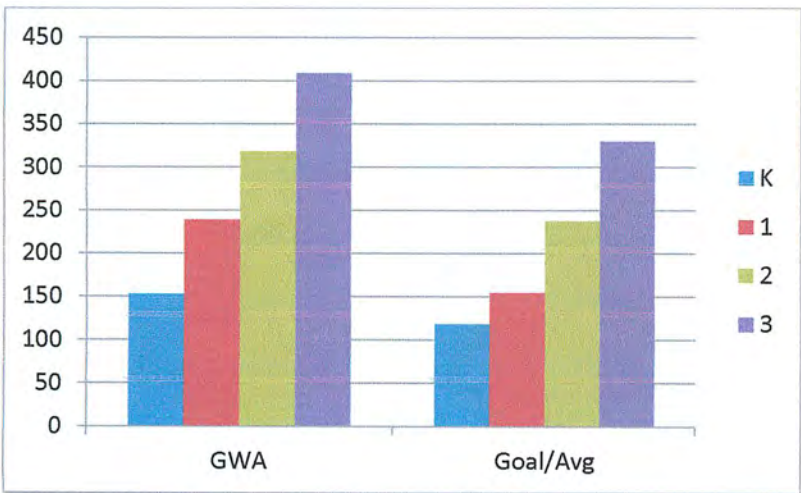
90
88
90
89
94
94
90
98
100
93%

GWA Compared to State of Utah - CRTs 2012-2013





Scholastic Reading Inventory (SRI)
Reading Comprehension



DIBELS
(Reading Fluency)

GWA Effectiveness Goals

Goals	Specific Objectives	Measurement Criteria
<p>1. Improve student learning</p>	<p>1a. Students will exhibit grade level appropriate reading, or pre-reading skills.</p> <p>1b. Students will understand math principles and facts, develop fluency in computation, and demonstrate a variety of problem solving skills.</p> <p>1c. Students will write effectively.</p> <p>1d. Students will develop skills in the scientific method and adhere to standards outlined by the Utah Core and/or Common Core.</p> <p>1e. Students will develop incremental knowledge of geography and social studies, including State, American and World History.</p> <p>1f. Student's dress and appearance will not be distracting and adhere to the GWA dress code.</p> <p>1g. Students will use respectful language in their communications and treat others with consideration.</p>	<p>1a. Create a baseline within the first 30 days, of each student's current levels of knowledge and achievement.</p> <p>1b. 80% of students in grade levels 3-8 will score at levels 3 or 4 on the Utah CRT's in Language Arts and meet Utah Benchmarks for student achievement.</p> <p>1c. 80% of students in grade levels 3-8 will score at levels 3 or 4 on the Utah CRT's in Math and meet Utah Benchmarks for student achievement.</p> <p>1d. Grade levels 3-8 will score a median percentile score of 80% on the Science portion of the Utah CRT's and meet Utah Benchmarks for student achievement.</p> <p>1e. 90% of students in grades 5 & 8 will score a three or higher on the Direct Writing Assessment portion of the Utah CRT's.</p> <p>1f. Students who perform below grade level benchmarks will be progress monitored in the Response To Intervention [RTI] system.</p> <p>1g. If baseline standards of 85% on CRT's are not met or if CRT's drop by 10% or more in a one year period we will create a school improvement plan to address concerns.</p> <p>1h. Classroom size shall not exceed 25</p>

		<p>students per class, except with the approval of the Board of Directors on a case-by-case basis upon notification by the Administration given at a public Board Meeting, so long as the Board of Directors determines, in its sole discretion, that the integrity of the quality of education will not be substantially impeded.</p> <p>1i. Uniforms are mandatory.</p> <p>1j. Each classroom teacher will develop clearly defined classroom and discipline procedures within the first week of school, and parents will receive a copy of the classroom policies.</p> <p>1k. A variety of assessment tools will be used to assess student learning and growth. Examples of these methods could include combinations of the following: Utah State Mandated Tests, DIBELS, 6 Minute Solution, SRI's, Project Evaluations, Student Portfolios, and Writing Rubrics as well as Formal Assessments from Core Knowledge, Saxon Math, and Spalding Spelling.</p> <p>1l. Students will make Adequate Yearly Progress [AYP] each year as set by state standards in the following areas: Math, Language Arts, Science, and Attendance.</p>
<p>2. Students will be punctual and attend regularly.</p>	<p>2a. Students will come to school on time and avoid excessive absences.</p>	<p>2a. 100% of students will have at least 93% attendance.</p> <p>2b. 90% of students will have less than three tardies per trimester.</p>
<p>3. All faculty members meet</p>	<p>3a. All faculty members will secure</p>	<p>3a. 100% of faculty will have and</p>

<p>Utah's definition of professionally highly qualified and federally NCLB qualified.</p>	<p>and maintain Utah Educator Licenses appropriate to their assignments.</p>	<p>maintain appropriate types of Utah licenses, or be enrolled and progressing in Alternative Routes to Licensing, and be accurately entered into the State Cactus System.</p>
<p>4. Faculty will be trained and able to implement George Washington Academy Curriculum.</p>	<p>4a. Faculty will be able to implement Core Knowledge, Saxon Math, Spalding Language Arts, and Shurley English in supplement to the Common Core and/or state standards.</p> <p>4b. Faculty understands the Utah State Core and Common Core standards for each core subject, and uses curriculum prescribed material to meet and exceed Utah objectives</p>	<p>4a. Core Knowledge Training is required by new faculty prior to the start of the school year. They will have the textbooks and supplementary materials to effectively implement the curriculum.</p> <p>4b. Saxon Math training will be offered and faculty will have the textbooks and supplementary materials to effectively implement the curriculum.</p> <p>4c. New faculty will receive Spalding Language Arts training prior to the start of the school year. They will have the textbooks and supplementary materials to effectively implement the curriculum.</p> <p>4d. First year faculty members will be assigned an EYE trained mentor. Faculty members with less than three years of experience, or those with a need, as determined by the Administration, will be assigned a mentor. Administration will develop a professional development plan as necessary.</p> <p>4e. Faculty member(s) will be designated and trained as specialists in each area of the curriculum, and will provide academic support for other faculty members.</p>
<p>5. George Washington Academy is a safe school.</p>	<p>5a. All students, faculty and staff know emergency response plans and</p>	<p>5a. Emergency plan is in place and reviewed with faculty and staff prior to</p>

	appropriate exit routes.	the beginning of each school year. 5b. Faculty and staff comply with state requirements for emergency drills.
6. George Washington Academy faculty, parents, students and partnering community members have a shared responsibility for the education of the students.	6a. Open channels of communication are established and information flows between groups. 6b. Parents are expected to donate a minimum of forty volunteer hours per family, per academic year. 6c. Campus is open to community visitors, except during scheduled standardized testing.	6a. Weekly communication with parents, including specific homework information, is initiated by 100% of the faculty. 6b. Families will receive comprehensive communication from the school and updates on volunteer hours completed. 6c. A Curriculum Committee consisting of; one faculty member per grade level, members of administration, at least one board member, at least one parent, and representatives from other relevant areas will plan and implement curricular decisions. 6d. Annual parent curriculum workshops will be offered for core subject areas. 6e. The Principal will be available for discussion with parents as needed and may schedule special events as necessary. 6f. The parent volunteer hours will be reported at Board meetings.

Distribution of Promotional Materials Policy

(Approved by the Board of Directors on August 22, 2013)

1. Purpose. The purpose of this policy is to provide guidelines and rules for financial augmentation of curricular and extra-curricular programs at George Washington Academy (“GWA”) and to prevent advertising and fundraising from detracting from instructional purposes of GWA. GWA recognizes the value of limited promotional material distribution and fundraising that benefits students, but has an affirmative responsibility to protect the educational environment, to maintain order and discipline on the school premises, and to protect the well-being of students and employees. This policy is intended to balance the interests of GWA and the compatible interests of those who desire to distribute or display promotional materials.

2. Distribution of Promotional Materials. Except as specifically provided for in this policy, companies, organizations, and individuals (to include employees) with interests outside of GWA may not use GWA facilities for the posting or distribution of "promotional materials" to include flyers, advertisements, bulletins, newspapers, posters, signs, banners, coupons, or any other materials.

Advertising permitted pursuant to this policy shall not be considered as an endorsement or approval by the Board of Directors or any particular group, organization or company, nor of any purposes, programs, activities, products or services or any such group.

Authorized promotional materials **MUST** be age appropriate and **MUST NOT**:

- Distract from, interfere with, or disrupt the educational environment of the school.
- Promote any substance or activity that is illegal for minors, such as alcohol, tobacco, and drugs, or gambling.
- Promote any religious or political purpose or interests.
- Promote any competing educational organizations, company, or individual that may be in conflict or competition with GWA, its educational mission, or its goals.
- Require the school, teacher, or student to partner with the promoter or otherwise exert excessive pressure on students, parents, or employees to purchase or investigate a product, service, or idea.
- Promote hostility, disorder or violence.
- Contain vulgar, abusive, obscene, offensive, or sexually explicit language.
- Demean any person or group on the basis of race, gender, ethnicity, age, disability or religion.
- Advocate for the violation of law or Board policy.
- Promote, favor, or oppose a candidate for elected office or a ballot measure.

All flyers, for profit advertisements, and business promotional materials, to include employee businesses or financial interests, must be approved by the Principal or his/her designee based on the standards set forth in this policy and distributed as follows:

- Flyers shall not be distributed to students at GWA more than once a week and distribution may be delayed at the discretion of Administration in order to avoid undue and frequent disruption of class time.
- GWA recommends that interested individuals obtain pre-approval prior to printing materials.
- The Principal may require, at his/her sole discretion, the following disclaimer to be printed in at least a 10 point font size, and displayed clearly at the bottom of the flyer: **“These materials are neither sponsored nor endorsed by George Washington Academy.”**
- Approved flyers must be bundled and divided into groups of 26 per class.
- The Principal or his/her designee shall have the sole and absolute discretion to determine the appropriate method of distribution for approved flyers and advertisements. Examples of methods of distribution for approved flyers and advertisements include, but are not limited to, delivering flyer bundles to each classroom and having teachers distribute the flyers or placing the flyers at the front office to be available for any students or parents to pick up.
- Governmental, City, College, or University information, flyers, and event promotional information must not include advertisements or promotional material for third parties. If the information or material contains or is supplemented with commercial advertising or other non-governmental promotional information or material it will not be distributed.

3. Sales Representatives and Agents. Because sales activities have the potential to disrupt the educational program, representatives, agents, and other individuals, are prohibited from promoting or selling individual products such as tax-sheltered annuities, insurance programs, investment opportunities, life insurance programs, accident insurance, etc, in classrooms, schools, break rooms, or at work site locations during school or business hours (to include 30 minutes before and 30 minutes after school time). This limitation includes the use of lunch breaks and prep time. Sales agents and representatives promoting products specific to the operation of GWA are not subject to this limitation and may visit with administration or authorized personnel during work hours. Except as approved by the Principal for group benefits, sales representatives and agents shall not be given time in faculty meetings or other group meetings.

Donations, Gifts & Sponsorships Policy

(Approved by the Board of Directors on August 22, 2013)

A. PURPOSE

The purpose of this policy is to establish George Washington Academy (“GWA”) policy and procedure governing the acceptance, valuation, and recognition of all types of donations, gifts, and sponsorships for GWA. This policy is intended to create practices that adequately safeguard public funds, provide for accountability, and ensure compliance with all state and federal laws. GWA encourages and supports community and business partnerships that enhance and supplement the public education system. GWA is committed to work effectively with donors and sponsors to provide donation receipts, as required by law, and to facilitate the donor’s charitable intent to the extent that the intent of the donation is in harmony with LEA goals and the law, and is appropriately approved.

GWA is ultimately responsible for the accounting, custody, expenditure, and allocation of all monies, including those that are obtained through donations, gifts, and sponsorships. GWA is accountable for and must comply with all federal and state laws and rules, regardless of the source of funds.

The board also desires to protect students, parents, teachers, and school administrators from over-commercialization and restrictions or requirements that are coercive, distracting, or disruptive to the education processes, threatening to the health and welfare of students, or lacking in educational merit. GWA reserves the right to decline, restrict, or redirect donations, gifts, and sponsorships at GWA.

B. SCOPE

This policy applies to all LEA administrators, licensed educators, staff members, students, organizations, volunteers, and individuals who receive, authorize, accept, value, or record donations, gifts, or sponsorships for GWA. It is expected that in all dealings, LEA and school employees will act ethically, consistent with GWA’s ethics training, the Utah Educators’ Standards (R277-515), the Public Officers’ and Employees’ Ethics Act (Utah Code 67-16), and State procurement law (Utah Code 63G-6a).

C. GENERAL POLICY STATEMENTS FOR GWA

1. “Public funds” are defined as money, funds, and accounts, regardless of the source from which the funds are derived, that are owned, held, or administered by the state or any of its political subdivisions, including GWA [Utah Code 51-7-3(26)]. All monies received through donations, gifts, or sponsorships are considered public funds.
2. All funds, property, or goods donated become public funds and the property of GWA, and should be used for the purpose for which they were donated and in accordance with State and GWA policies.
3. GWA recognizes that fundraising efforts, donations, gifts, sponsorships, and public support vary among schools. GWA is committed to appropriate distribution of unrestricted funds and

the management of donations and gifts to ensure that the educational opportunities for all students are equal and fair.

4. GWA is committed to principles of gender equity and compliance with Title IX guidance. GWA commits to use all facilities, unrestricted donations and gifts, and other available funds in harmony with these principles. GWA reserves the right to decline or restrict donations, gifts, and fundraising proceeds, including those that might result in gender inequity or a violation of Title IX. The benefits derived from donations and gifts should be equitable for all students, comply with Title IX, and be in harmony with Article X of the Utah Constitution.
5. Donors may donate directly to GWA's foundation, if applicable, for tax purposes. The donation or gift shall follow the foundation's policies and procedures.
6. GWA will comply with all applicable state and federal laws; the State procurement code (Utah Code 63G-6a); State Board of Education rules, including construction and improvements; IRS Publication 526 "Charitable Contributions"; and other applicable IRS regulations.
7. The collection of funds or assets associated with donations, gifts, or sponsorships will comply with GWA cash receipting policies. The expenditure of any public funds associated with donations, gifts, or sponsorships will comply with GWA cash disbursement policies.
8. Donations, whether in-kind, cash, or otherwise, shall be complete transfers of ownership, rights, privileges, and/or title in or to the donated goods or services and become exclusive property of GWA upon delivery.
9. GWA employees may not direct operating expenditures to outside funding sources to avoid GWA procurement rules (operating expenditures include equipment, uniforms, salaries or stipends, improvements or maintenance for facilities, etc.).
10. GWA employees must comply with GWA procurement policies and procedures, including complying with obtaining competitive quotes; bid splitting; and not accepting gifts, gratuities, or kickbacks from vendors or other interested parties.
11. Donations and gifts should be accounted for at an individual contribution level.
12. Donations, gifts, and sponsorships shall be directed to GWA, GWA program(s), school, or school program(s). Donations, gifts, and sponsorships shall not be directed at specific GWA employees, individual students, vendors, or brand name goods or services.
13. Donated funds shall not compensate public employees, directly or indirectly.
14. If donations or gifts are offered in exchange for advertising or other services, an objective valuation will be performed and a charitable receipt will be issued by the Business Manager.
15. Donations or gifts shall not be accepted that advertise or depict products that are prohibited by law for sale or use by minors, such as alcohol, tobacco, or other substances that are known to endanger the health and well-being of students.
16. Donations, gifts, and sponsorships given by vendors to specific programs (e.g., drama, sports teams) or GWA employees shall be evaluated for compliance with Utah Code 63G-6a-2304.5, "Gratuities, Kickbacks, Unlawful use of position or influence." As required by state law, donations will only be accepted where there is no expectation or promise, expressed or implied, of remuneration or any undue influence or special consideration. GWA employees are not permitted to accept personal payment or gratuities in any form from a vendor or potential vendor as a precondition for purchase of any product or service.

17. Donations and gifts over \$250 will be provided with an acknowledgment of the contribution from GWA for IRS purposes. The acknowledgment will be in the form of a receipt issued by the Business Manager. These receipts will be generated from the information provided on the "Donations, Gifts, and Sponsorships" form.

Fundraising Policy

(Approved by the Board of Directors on August 22, 2013)

A. PURPOSE

The purpose of this policy is to establish George Washington Academy (“GWA”) policies and procedures governing the initiation, authorization, and review of all fundraising activities of GWA. This policy is intended to create practices that adequately safeguard public funds, provide for accountability, and ensure compliance with state and federal laws.

GWA encourages community and business partnerships that enhance and supplement the public education system. GWA also desires to protect students, parents, teachers, and school administrators from over-commercialization and fundraising efforts that are coercive and disruptive to the education processes, threatening to the health and welfare of students, or lacking in educational merit.

B. SCOPE

This policy applies to all GWA administrators, licensed educators, staff members, students, organizations, volunteers and individuals who initiate, authorize, or participate in fundraising events or activities for GWA-sponsored events.

It is expected that in all dealings, GWA and school employees will act ethically and consistent with GWA’s ethics training, the Utah Educators Standards, the Public Officers’ and Employees’ Ethics Act, and State procurement law.

C. GENERAL POLICY STATEMENTS FOR GWA & GWA-SPONSORED ACTIVITIES

1. “Public funds” are money, funds, and accounts, regardless of the source from which the funds are derived, that are owned, held, or administered by the state or any of its political subdivisions, including GWA (Utah Code 51–7–3[26]).
2. Fundraising is permitted within GWA to allow GWA to raise additional funds to supplement school-sponsored academic and co-curricular programs.
3. “School-sponsored” means activities, fundraising events, clubs, camps, clinics, programs, sports, etc., or events, or activities that are authorized by GWA that support GWA or authorized curricular school clubs, activities, sports, classes or programs that also satisfy one or more of the following criteria. The activity:
 - a. Is managed or supervised by a/an school employee.
 - b. Uses the GWA facilities, equipment, or other school resources.
 - c. Is supported or subsidized, more than inconsequently, by public funds, including the public school’s activity funds or minimum school program dollars.
 - d. Does not include non-curricular clubs specifically authorized and meeting all criteria of Utah Code 53A–11–1205 through 1208.
4. GWA is committed to principles of gender equity and compliance with Title IX guidance. GWA commits to use all facilities, unrestricted gifts and other available funds in harmony with these principles. GWA reserves the right to decline or restrict donations, gifts, and fundraising proceeds, including those that might result in gender inequity or a violation of Title IX.

Fundraising opportunities should be equitable for all students, comply with Title IX, and be in harmony with Article X of the Utah Constitution.

5. All fees for school-sponsored activities must be properly noticed and approved by the Board of Directors of GWA and are subject to fee waiver provisions in R277-407.
6. Principals, consistent with GWA policy, have the responsibility to waive fees, if appropriate. Individual teachers, coaches, advisors, etc. do not have the authority to waive board-approved fees.
7. Annually, each GWA division, department, or program and individual school will review all planned camps, clinics, activities, and fundraisers and determine those designated as school-sponsored.
8. All monies raised through fundraisers for GWA-sponsored activities are considered public funds. GWA is ultimately responsible for the expenditure and allocation of all monies collected and expended through student, GWA organized fundraising.
9. The collection of money associated with fundraisers for school-sponsored activities will comply with GWA cash receipting policies.
10. The expenditure of any public funds associated with fundraisers for school-sponsored activities will comply with GWA cash disbursement policies.
11. Properly approved school-sponsored activities may:
 - a. Use GWA's name, facilities, and equipment.
 - b. Utilize GWA employees and other resources to supervise, promote, and otherwise staff the activity or fundraiser.
 - c. Be insured under GWA's risk management policy (pending approval by the GWA risk manager) or general liability insurance policy.
 - d. Provide additional compensation or stipends for GWA employees with the approval of the Principal, Vice Principal, or immediate supervisor and under GWA payroll policies.
12. GWA-sponsored activities must comply with all fee approval and fee waiver provisions established in Utah Code and Utah State Board of Education rules. GWA may be responsible for providing student transportation for these activities.
13. Authorization and supervision of fundraising for school-sponsored activities:
 - a. Fundraising at GWA shall be approved in writing, prior to the activity, by the Principal or Vice Principal and supervised by GWA employee(s) designated by the Principal or Vice Principal. The approver shall ensure that the activity is appropriately classified as a GWA-sponsored activity.
 - b. Donations from individuals or organizations will follow GWA's gift and donation policy.
 - c. The sale of banners, advertising, signs, or other promotional material that will be displayed on school property must be approved by the Principal or Vice Principal before the items are initiated or printed, and must meet community standards. Partisan or political advertising and advertising for products that are prohibited by law for sale or use by minors, such as alcohol, tobacco, or other substances that are known to endanger the health and well-being of students, are prohibited.
 - d. All fundraising projects for construction, maintenance, facilities renovation or improvement and other capital equipment purchases must be approved in writing by the Principal or Vice Principal and the GWA Board of Directors. (See capital fundraising section below.)

D. GENERAL FUNDRAISING STANDARDS FOR GWA & GWA SPONSORED ACTIVITIES

1. GWA reserves the right to prohibit, restrict or limit any fundraising activities associated with GWA.
2. Faculty and student participation in fundraisers is typically voluntary. However, employees may be directed to supervise specific activities as an employment assignment. Students, including fee-waiver-eligible students, may be required to participate fully in school, team, or group-wide fundraisers in order to benefit from fundraisers.
3. Participation in fundraising shall not affect a student's grade. Students shall not be required to participate in fundraising activities as a condition of belonging to a team, club or group, nor shall a student's fundraising effort affect his/her participation time or standing on any team, club or group, except as to fee waiver requirements.
4. Competitive enticements for participation in fundraisers are discouraged. If prizes or rewards are offered by a selected fundraising vendor, they should only be awarded to groups, classes or students, and must be disclosed and approved prior to the fundraiser. Rewards, prizes, commissions, or other direct or indirect compensation shall not be received by any teacher, activity, club or group director, or any other GWA employee or volunteer.
5. Schools may not impose a sales quota (or the like) as part of fundraising efforts, and students or parents shall not be required to pay for any unsold items, or pay for goals not met.
6. Door-to-door sales are prohibited for all students unless the student is accompanied by their legal parent or guardian. Suitable procedures must be used by GWA, administrators and supervising faculty to safeguard students and funds collected. Procedures must be clearly communicated to parents.
7. Approval may be denied for fundraising activities that would expose GWA to risk of financial loss or liability if the activity is not successful.
8. Fundraising activities shall be age appropriate, and shall maintain the highest standards of ethical responsibility and integrity.
9. Fundraising revenues should be accounted for at an individual contribution level or participation level. Participation logs should be retained and turned into the accounting office to be included with the deposit detail.
10. Employees who approve, manage, or oversee fundraising activities are required to disclose if they have a financial or controlling interest or access to bank accounts in a fundraising organization or company.
11. Records of all fundraising efforts shall be open to the parents, students and donors, including accurate reporting on participation levels and financial outcomes. This policy does not require the release of students' personally identifiable information protected by FERPA.

F. EMPLOYEE RELATIONSHIPS & DISCLOSURE

1. Participation in Private or Non-GWA-Sponsored Events
 - a. GWA employees:
 - (1) May participate in a private but public education-related activity, such as LDS seminary graduation and firesides, extracurricular travel, etc.

- (2) Must ensure that personal participation in activities is separate and distinguishable from the employee's public employment, official job title, or job duties.
 - (3) May not contact students in GWA using education records or information obtained through public employment unless the records or information are available to the general public.
 - (4) May not use school time to discuss, promote, or prepare for a private or non-school-sponsored activity.
 - (5) May offer public education-related services, programs or activities to students, provided they are not advertised or promoted during school time or using any type or amount of school resources.
 - (6) May use school or student publications available to the general public to advertise and promote the private or non-GWA-sponsored activity.
 - (7) May not require private or non-GWA-sponsored activities for credit or participation in school programs.
 - (8) Must satisfy all requirements of Utah Code 53A-1-402.5, regarding ethical conduct standards, and R277-107, regarding educational services outside of the educator's regular employment.
2. GWA employees may purchase advertising space to promote private or non-school sponsored events in the same manner as the general public. GWA employee's employment and experience can be used to demonstrate qualifications. The advertisement must specifically state that the activity is not school-sponsored. (See R277-107-5 through 6.)
 3. GWA employees may engage in outside employment with a private entity or other separate organizations that does not interfere with GWA duties or job functions. Employees must complete the GWA disclosure agreement annually when engaging in outside employment that is similar to the employee's official job duties or functions.
 4. Parental notification is required if GWA students are recruited to participate in these activities.
 5. GWA employees may not set up bank accounts for activities or fundraisers associated with GWA responsibilities or job functions.
 6. GWA employees may not direct fees or fundraiser proceeds from GWA-sponsored activities to outside entities.
 7. GWA employees may not direct operating expenditures to outside funding sources or groups to avoid GWA procurement rules (such as equipment, uniforms, salaries or stipends, improvements, maintenance for facilities, etc.).
 8. GWA employees must comply with GWA procurement policies and procedures, including complying with competitive quotes; bid splitting; and not accepting gifts, gratuities, or kickbacks from vendors or other interested parties.

Cash Disbursement Policy

(Approved by the Board of Directors on August 22, 2013)

A. PURPOSE

To establish George Washington Academy (“GWA”) policy and procedure governing the initiation, authorization, and review of all expenditures of GWA.

B. SCOPE

These policies, guidelines, and procedures are applicable without exception to all funds owned or administered by GWA. All expenditures of GWA are to be consistent with applicable state and federal laws and regulations; any restrictions, rules, or regulations placed on the use of the funds by donors and granting agencies; and prudent management practices. In addition, all expenditures must be reasonable and necessary for carrying out the programs and activities of GWA, and are to be documented in a way which clearly substantiates such reasonableness and necessity. This policy applies to all GWA administration, licensed educators, staff, students, organizations, and individuals that initiate, authorize, or process cash disbursements on behalf of GWA. The scope includes all activities at GWA and in all locations where GWA activities and public funds are expended. It is expected that in all dealings, GWA employees will act in an ethical manner that is consistent with GWA’s code of ethics, the Utah Educators’ Standards, the Public Officers’ and Employees’ Ethics Act, and State procurement law.

C. SEGREGATION OF DUTIES

Wherever possible, duties such as custody of purchase cards and blank checks, initiating expenditures, approving expenditures, maintaining documentation, issuing checks and reconciling records should be segregated among different individuals. When segregation of duties is not possible due to the small size and limited staffing of GWA, compensating controls such as management supervision and review of cash disbursement records by independent parties should be implemented.

D. DEFINITIONS

1. “Public funds” are defined as money, funds, and accounts, regardless of the source from which the funds are derived, that are owned, held, or administered by the state or any of its political subdivisions, including GWA [Utah Code 51-7-3(26)].
2. “Small purchase” is the procurement of goods or services for which the total cost is less than \$50,000.

E. GENERAL POLICIES

1. All checks or check stock, credit/purchase cards, access to bank accounts and statements, etc. shall be secured and controlled by the Business Administrator with limited access.
2. All disbursing of funds at GWA should be done through the Business Administrator.
3. Expenditure transactions must be approved by an individual having sufficient knowledge and authority to evaluate the transaction for reasonableness and appropriateness. GWA shall designate

employees by title or job descriptions, which are authorized to approve various dollar amount levels of disbursements and instructed never to sign blank checks.

4. All expenditures made using cash, checks, credit/purchase cards, electronic fund transfers, etc. shall be recorded in GWA's accounting records.
5. Passwords should be established on user access to the accounting system.
6. Checks should be made payable to specified payees and never to "cash" or "bearer."
7. All disbursement activity should be substantiated by supporting documents. Documents should be available, and should demonstrate that proper disbursement controls are in place (signatures for approval, purchase orders, receipts, invoices, bids or quotes, reimbursement forms, travel forms, journal entries, reconciliations, etc.).
 - a. Quotes shall contain the following information:
 - (1) Date received or dates that the quoted price is valid, delivery date
 - (2) Company name, address
 - (3) Each item, description or specifications, unit, total price, and quantity listed
 - (4) Shipping and freight charges
 - b. Quotes may be obtained and documented by printing pages from a website; however, all of the quote elements must be documented. Better prices are usually obtained by contacting vendors directly. Telephone quotes must be documented and include all quote elements. Written quotes should be requested on the vendor's letterhead.
8. Bank and credit card statements should be reviewed and accounts reconciled in a timely manner. Activity accounts should be reviewed quarterly by the custodian of the activity.
9. GWA must comply with applicable GWA and state purchasing laws.
10. Expenditures will follow the guidelines outlined in the State Procurement Code (Utah Code 63G-6a) and federal purchasing laws, or GWA will adopt stricter policies.
11. Contracts must follow the guidelines outlined in the State Procurement Code, specifically regarding the length of multi-year contracts [Utah Code 63G-6a-1204(7)].
12. Construction and improvements must comply with the provisions of the State Procurement Code (Utah Code 63G-6a), the Utah State Board of Administrative Rules, and Title IX.
13. Exclusive contracts must comply with the guidelines outlined in the State Procurement

Code (Utah Code 63G-6a), GWA's procurement policy, and the Utah Public Officers' and Employees' Ethics Act (Utah Code 67-16).

14. Purchases of goods or services with GWA funds for personal use or personal gain are strictly prohibited; see the Utah Public Officers' and Employees' Ethics Act (Utah Code 67-16).
15. Multi-year contracts must comply with Utah Code 63G-6a-1204.
16. Construction and improvements must comply with the provisions in Utah Code 63G-6a.

F. GWA PROCUREMENT THRESHOLDS

GWA's procurement policy shall be followed for all qualifying purchases of goods or services. The procurement policy should include the basic items:

1. Small Purchases

- a. The “individual procurement threshold” for GWA is \$1,000. This is the maximum amount that GWA can expend to obtain a single item/service from one vendor at one time without requiring competitive purchasing (Utah Code 63G-6a-408).
 - b. The “single procurement aggregate threshold” for GWA is \$5,000. This is the maximum amount that GWA can expend to obtain multiple procurement items/services from one vendor at one time. This includes any combination of individual procurement items costing less than \$1,001 purchased from one vendor at one time, not to exceed in total \$5,000 (Utah Code 63G-6a-408).
 - c. The “annual cumulative threshold” for GWA is \$50,000. This is the maximum total annual amount that GWA can expend to obtain procurement item(s) from the same vendor during the fiscal year (July 1—June 30). If a purchase exceeds \$50,000, it is not considered a small purchase and shall be processed through a bidding process or a request for proposal (RFP) process (Utah Code 63G-6a-408 and R33-3).
 - d. Professional services, such as architectural, engineering, accounting, legal, or consulting services less than \$100,001 shall be acquired using a competitive bidding or RFP process, or by selecting a provider from an approved potential vendor list created using an invitation for bids or an RFP under provisions in Utah Code 63G-6a-403 and 404.
2. Reoccurring Purchase Over Annual Cumulative Threshold
 - a. If purchases from the same vendor are ongoing, continuous, and regularly scheduled, and exceed the annual cumulative threshold of \$50,000 during the fiscal year, a contract shall be utilized if feasible [Utah Code 63G-6a-408(6)].
3. Artificially Dividing a Purchase
 - a. Utah Code 63G-6a-408 makes it unlawful to intentionally divide a procurement purchase into one or more smaller purchases to divide an invoice or purchase order into two or more invoices or purchase orders, or to make smaller purchases over a period of time.
 - (1) This means that intentionally splitting a purchase of similar items that would typically be purchased at the same time from the same vendor to avoid requiring competitive quotes is unlawful (e.g., uniforms, club or athletic equipment, textbook orders, etc.). This includes dividing the purchases or invoices over a period of time, or making separate purchases over a period of time. Purchase splitting often occurs when making purchases on a purchase card. Employees should not split invoices to stay under daily purchase limits on purchase cards or the established purchasing thresholds.
 - (2) It may be determined after an order is placed or received that a large enough quantity was not ordered or the correct sizes were not obtained, and that additional items must be ordered. If this occurs, the employee initiating the purchase must include a written explanation of the purpose of the purchase and justification as to why it is not considered splitting a purchase. This should be retained with the vendor invoice.
 - (3) Penalties for violating this statute are outlined in Utah Code 63G-6a-2305 and 2306. Penalties range from a class B misdemeanor to a second degree felony, depending on the total value of the divided procurements.
4. **Hospitality Gifts, Gratuities, Kickbacks, or Position and Influence**
 - a. **“Contract administrator”** means a person who administers a current contract, on behalf of GWA, including making payments relating to the contract, ensuring compliance with the

contract, auditing a contractor in relation to the contract, or enforcing the contract (Utah Code 63G-6a-2304.5).

b. **“Interested person”** is a person interested in any way in the sale of a procurement item or insurance to GWA (Utah Code 63G-6a-2304.5).

c. **“Procurement participant”** means a person involved in:

- (1) Administering, conducting, or making decisions regarding a standard procurement process.
- (2) Making a recommendation regarding award of a contract or regarding a decision to obtain a procurement item for a particular person.
- (3) Evaluating a quote, bid, or response.
- (4) Awarding a contract or otherwise making a decision to obtain a procurement item from a particular person (Utah Code 63G-6a-2304.5).

d. **Hospitality Gift**

“Hospitality gift” means a promotional or hospitality item, including, a pen, pencil, stationery, toy, pin, trinket, snack, nonalcoholic beverage, or appetizer. This does not include money, a meal, a ticket, admittance to an event, entertainment for which a charge is normally made, travel, or lodging (Utah Code 63G-6a-2304.5).

- (1) Utah Code 63G-6a-2304.5 states that the total value of all hospitality gifts given, offered, or promised to, or received or accepted by the “procurement participant” or “contract administrator” in relation to a particular procurement or contract must be less than \$10; the total value of all hospitality gifts given, offered or promised to, or received or accepted by, the “procurement participant” or “contract administrator” from any one person, vendor, bidder, responder, or contractor in a fiscal year must be less than \$50.
- (2) Any hospitality gift exceeding the \$10 and \$50 threshold is considered a gratuity, and the provisions below apply.

e. **Gratuities**

“Gratuity” means anything of value, including money, a loan at an interest rate below the market value or with terms that are more advantageous to the person receiving the loan than terms offered generally on the market, an award, employment, admission to an event, a meal, lodging, travel, or entertainment for which a charge is normally made (Utah Code 63G-6a-2304.5).

- (1) Utah Code 63G-6a-2304.5 makes it unlawful:
 - (a) For an “interested person” to give, offer, or promise to give a gratuity to a “procurement participant” or an individual the person knows is a family member of the procurement participant.
 - (b) For a “procurement participant” to ask, receive, offer to receive, accept, or ask for a promise to receive a gratuity from an “interested person.”
 - (c) For a contractor to give a gratuity to a “contract administrator” of the contractor’s contract or an individual the contractor knows is a family member of a “contract administrator” of the contractor’s contract.
 - (d) For a “contract administrator” of a contract to ask, receive, offer to receive, accept, or ask for a promise to receive, for the “contract administrator” or a family member of a “contract administrator,” a gratuity from a contractor for that contract.

- (2) Penalties for violating this statute are established in Utah Code 63G-6a-2304.5 and 2306. The LEA will adhere to these penalties and report violations to the attorney general's office as required by statute.
 - (a) Interested person and contractors: penalties range from a class B misdemeanor to a second degree felony.
 - (b) Procurement participant and contract administrator: penalties range from a class B misdemeanor to a second degree felony and make employees subject to disciplinary action up to and including dismissal from employment.

f. Kickback

"Kickback" means a gratuity given in exchange for favorable treatment in a pending procurement or the administration of a contract (Utah Code 63G-6a-2304.5).

- (1) Utah Code 63G-6a-2304.5 makes it unlawful:
 - (a) For a person to give, offer, or promise to give a "kickback" to a "procurement participant" or to another person for the benefit of a "procurement participant."
 - (b) For a "procurement participant" to ask, receive, offer to receive, accept or ask for a promise to receive a kickback for the "procurement participant" or for another person.
 - (c) For a person to give a kickback to a "contract administrator," or to another person for the benefit of a "contract administrator."
 - (d) For a "contract administrator" to ask, receive, offer to receive, accept, or ask for a promise to receive a kickback for the "contract administrator" or for another person.
- (2) Penalties for violating this statute are established in Utah Code 63G-6a-2304.5 and 2306. GWA will adhere to these penalties and report violations to the attorney general's office, as required by statute.
 - (a) Person and contractors: penalties range from a class B misdemeanor to a second degree felony.
 - (b) Procurement participant and contract administrator: penalties range from a class B misdemeanor to a second degree felony and individuals are subject to disciplinary action up to and including dismissal from employment.

g. Position or Influence

Utah Code 63G-6a-2304.5 makes it unlawful for a "procurement participant" to use the "procurement participant's" position or influence to obtain a personal benefit for the "procurement participant," or for a family member of the "procurement participant," from an "interested person."

- (1) Penalties for violating this statute are established in Utah Code 63G-6a-2304.5 and 2306. GWA will adhere to these penalties and report violations to the attorney general's office, as required by statute.
 - (a) Interested person: penalties range from a class B misdemeanor to a second degree felony.

(b) Procurement participant: penalties range from a class B misdemeanor to a second degree felony and individuals are subject to disciplinary action up to and including dismissal from employment.

Cash Receipts Policy

(Approved by the Board of Directors on August 22, 2013)

A. PURPOSE

To establish George Washington Academy (“GWA”) policy and procedure for the handling of all cash receipts, to include currency, coin, checks, ACH transactions, and credit card transactions.

B. SCOPE

This policy applies to all GWA administration, licensed educators, staff, students, organizations, and individuals that handle cash receipts or accept payment in any form on behalf of GWA. The scope includes all activities at GWA and in all locations where GWA activities and public funds are collected.

C. SEGREGATION OF DUTIES

Wherever possible, duties such as collecting funds, maintaining documentation, preparing deposits and reconciling records should be segregated among different individuals. When segregation of duties is not possible due to the small size and limited staffing of GWA, compensating controls such as management supervision and review of cash receipting records by independent parties should be implemented.

D. DEFINITION

“Public funds” are defined as money, funds, and accounts, regardless of the source from which the funds are derived, that are owned, held, or administered by the state or any of its political subdivisions, including GWA [Utah Code 51-7-3(26)].

E. POLICY FOR CASH RECEIPTS AT GWA

1. GWA will comply with all applicable state and federal laws.
2. All receipting of funds at GWA should be done at the front office. No receipting is to be done in other offices or in unapproved off-site locations. Employees shall instruct payers to take all cash, checks, and credit card transactions to the cashier for receipt. Provisions should be made for cash receipting/collection at approved off-site activities or functions. Please refer to the Fundraising Policy.
3. GWA employees should not open bank accounts, outside of the control of GWA, for the receipting or expending of public funds associated with school-sponsored activities. The Board of Directors must approve all checking and savings accounts used in GWA business.
4. All funds shall be kept in a secure location controlled by the front office staff until they can be deposited in a GWA-approved fiduciary institution. Funds should be deposited daily or within three days after receipt, in compliance with Utah Code 51-4-2(2) (a), in a GWA approved account. Employees should never hold funds in any location for any reason.

5. If the front office staff has left for the day or funds are receipted on the weekends, administrators should be available to lock cash receipts or cash boxes in the GWA safe until the next business day. Cash receipts should not be taken home by employees or volunteers, or left in offices.
6. All checks should be made payable to George Washington Academy. Checks should not be made payable to an employee, a specific department, or a program.
7. Appropriate internal controls and segregation of duties should be implemented for all cash activity. Cash should always be verified. Where verification is difficult, cash should be counted by two individuals.
8. All funds (cash, checks, credit card payments, etc.) received must be receipted and recorded in GWA's accounting records. All transactions are recorded in the accounting records by the Business Manager who is not allowed to receive or make deposits.
9. Documents should be available, and should demonstrate that proper cash controls are in place (signatures for approval, tally sheets, reconciliations, etc.).
10. Under no circumstances are disbursements to be made directly from cash receipts (i.e., for purchases, reimbursements, refunds, or to cash personal checks).
11. All payments of fees shall correspond with the approved fee schedule, as required by Board Administrative Rule 277-407.
12. Periodic and unscheduled audits or reviews should be performed for all cash activity.
13. All activities involving cash must be supervised by a GWA employee or authorized volunteer to ensure adequate controls are in place. Training should be given to those involved in handling cash.

F. PETTY CASH/CHANGE FUNDS POLICY

1. Petty cash and change funds must be authorized by the GWA business office.
2. All petty cash and change funds will be reflected on the school's accounting records and reconciled monthly.
3. These funds should not exceed the amount designated by the GWA business office.
4. All petty cash funds and change funds should be kept locked, in a secure location.
5. Checks may not be made payable to "cash" or "bearer" and cashed by GWA or school employees to create change funds or petty cash funds outside of the approved petty cash and change fund accounts.
6. Reimbursements to petty cash accounts will be made only when supported by receipts and approved by the principal.
7. Expenditures should not be paid out of change funds. Change funds will be included in all tally forms or on deposit count sheets, and accounted for with each use.
8. Funds are subject to unannounced counts by GWA personnel at any time.