

FINANCIAL POLICIES AND PROCEDURES

BACKGROUND INFORMATION	5
TAX STATUS AND PURPOSE	5
FINANCIAL POLICIES AND PROCEDURES	5
ACCOUNTING PRINCIPLES AND PROCEDURES	5
GENERAL ACCOUNTING POLICIES	5
REVENUE RECOGNITION	5
MATCHING OF REVENUES AND EXPENSES	6
FIXED ASSETS AND DEPRECIATION	6
DONATED GOODS AND SERVICES	6
MANAGEMENT AND OVERSIGHT	6
RECEIPTS	·····7
DEPOSITS – CHECK AND CASH	7
OBLIGATIONS / DISBURSEMENTS	·····7
RECORDING OF CONTRACTS	7
RECORDING OF PURCHASE ORDERS	8
RECORDING OF ACCOUNTS PAYABLE	8
PAYMENT PROCESSING – GENERAL	8
WIRE TRANSFERS AND ELECTRONIC PAYMENTS	
DEBIT CARD	8
PURCHASES WITH BOARD-APPROVED CREDIT CARD	9
REIMBURSEMENT PROCEDURES AND FORMS	10
PETTY CASH	10
BANKING	10
ACCOUNT MANAGEMENT	10
BANK STATEMENT RECONCILIATION	10
BUDGETS	11
BUDGET PROCESS	11
FINANCIAL STATEMENTS PROCESS	11
AUDIT	11
CONTRACTING WITH AUDITING FIRM	11
THE ANNUAL AUDIT	
AUDIT REVIEW AND BOARD APPROVAL	11
DISTRIBUTION AND PUBLICATION OF AUDIT AND TAX FORMS	12
INSURANCE	12

Policy	12
SOURCING ANNUAL INSURANCE	12
PAYROLL	13
CONTRACTING PAYROLL PROCESSING FIRM	13
PROCESSING PROCEDURES	_
PAYROLL TAXES	13
FRAVEL ALLOWANCES AND EXPENSE POLICY	13
PROCUREMENT	15
PROCUREMENT GENERAL POLICIES AND GUIDELINES	•
CODE OF CONDUCT	15
General	15
Conflict of Interest	15
Gratuities, Kickbacks, and Use of Confidential Information	16
PROCUREMENT GENERAL ROLES AND RESPONSIBILITIES	16
Chief Financial Officer's Responsibilities	16
Contractor Responsibility	16
VENDOR ACCOUNTS	17
PURCHASE ORDER PROCEDURES	17
OPERATIONS PURCHASING PROCEDURES	18
DEVELOPMENT PURCHASING PROCEDURES	
SCHOOL SUPPORT PURCHASING PROCEDURES	
INVENTORY MANAGEMENT	19
Inventory Management or Asset Tracking	
HIGHER VALUE PURCHASES, CONTRACTS AND LEASES	19
CATEGORY PURCHASES OVER \$10,000	
PURCHASES, CONTRACTS OR LEASES OVER \$100,000	
PURCHASES MADE WITH FEDERAL FUNDS	20
Solicitation and Receipt of Bids	20
Bid Opening and Award	20
Mistakes in Bids	21
RECORD RETENTION	21
RECORD RETENTION GENERAL POLICIES AND GUIDELINES	21
RECORD RETENTION PROCEDURES	91

GRANT MANAGEMENT AND ACCOUNTING	22
GIFT ACCEPTANCE POLICY	
GIFT ACCEPTANCE AND IRS COMPLIANCE	
ETHICS	_
REPORTING	2 3
USE	23
ACCOUNTABILITY	2 4
APPENDIX A: PURCHASE ORDER / REIMBURSEMENT FORM	25
APPENDIX B: VENDOR ACH APPROVAL FORM	26
APPENDIX C: AFP CODE OF ETHICAL STANDARDS	2 7
APPENDIX D: AFP DONOR BILL OF RIGHTS	,

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BACKGROUND INFORMATION

TAX STATUS AND PURPOSE

American Classical Schools of Idaho is a nonprofit organization incorporated as a 501 (c) (3) organization and operating as a charter school support office.

In accordance with IRS Code Section 501 (c) (3), American Classical Schools of Idaho is organized and operates exclusively for the exempt purpose as described in Form 1023, the application for exemption. In compliance with the restrictions on organizations qualifying under the 501 (c) (3) code, no part of the net earnings of the Corporation shall inure to the benefit of or be distributed to its members, trustees, officers or other private persons.

FINANCIAL POLICIES AND PROCEDURES

This document, "Financial Policies & Procedures", is the Chief Executive Officer (or designees)'s directive to American Classical Schools of Idaho employees, and it is intended, among other things, to cause American Classical Schools of Idaho to perform in accordance with Board strategic direction and oversight.

ACCOUNTING PRINCIPLES AND PROCEDURES

GENERAL ACCOUNTING POLICIES

The accounting principles of American Classical Schools of Idaho will be consistent with all applicable laws and regulations. Accounting will be in accordance with Generally Accepted Accounting Principles (GAAP), including Governmental Accounting Standards Board (GASB) regulations.

American Classical Schools of Idaho will record financial transactions in one or more funds in consultation with the Chief Financial Officer (or designee).

The organization operates with one bank account for business operations aligned to the accounting fund(s) as described above, and one brokerage account to deposit stock and securities donations.

REVENUE RECOGNITION

Funds from federal, state and local entities will be recognized as revenue in the period received.

Fundraising contributions will be recorded as revenue in the period received. Fundraising pledges are not recorded on financial statements.

Stock donations as well as credit card donations will be recognized as revenue in the amount of sale less commission and/or fees.

Funds from grants will be recognized as revenue when the grant money is received. Each restricted grant will be set up as a separate class to allow for accurate accounting of income and expenses.

MATCHING OF REVENUES AND EXPENSES

In order to present accurate and consistent financial statements, the revenues and expenses attributable to each period will be reflected in that period.

American Classical Schools of Idaho records transactions on the accrual basis of accounting.

FIXED ASSETS AND DEPRECIATION

The general capitalization policy is that all equipment and other fixed assets costing \$5,000 or more will be recorded as an asset. Repairs or improvements will be capitalized if the expenditure extends the useful life of the item. All equipment and other fixed assets purchased using federal grant funds will be recorded as an asset.

All capital assets will be depreciated over their estimated useful lives on a straight-line basis. The half-year convention will be followed in the year the item is purchased or retired. That means that no matter when an item is purchased during the year, ½ year depreciation will be taken for the first year.

Computers & Equipment 3 years
Furniture 7 years
Building 30 years
Leasehold improvements Term of lease

DONATED GOODS AND SERVICES

Property or services donated to American Classical Schools of Idaho will be recorded as in-kind donations if their fair market values at the time of receipt are deemed financially material.

In accordance with FAS 116, certain services may be recorded as revenues and expenses. Such services would be those professional services for which American Classical Schools of Idaho would have ordinarily paid; for example, legal or accounting services.

MANAGEMENT AND OVERSIGHT

The Chief Financial Officer (or designee) performs the day-to-day financial operations under the supervision of and with the support of the Chief Executive Officer (or designee).

The Chief Financial Officer (or designee) will segregate financial duties to other employees to the extent possible.

The Board provides financial oversight in accordance with the applicable Board-Management Delegation policies.

The Chief Executive Officer (or designee) is responsible for performance and reporting in accordance with the Board's policies.

RECEIPTS

DEPOSITS – CHECK AND CASH

All incoming cash and checks are logged into a spreadsheet. All checks received will be endorsed "For Deposit Only." All funds received are then deposited into the bank account either via remote check deposit machine (provided by CapEd Credit Union) or via direct deposit. Cash deposit receipts received from the bank are initialed by the Chief Financial Officer (or designee) to confirm all cash was deposited. Copies of checks are made and retained per the records retention section.

All donations shall be acknowledged in writing by the Chief Executive Officer (or designee).

All donations shall be recorded in a donor database, and all revenue, including donations, shall be recorded by the Chief Financial Officer (or designee) in a financial accounting system. The Chief Financial Officer (or designee) and the Chief Executive Officer (or designee) shall reconcile donation receipts in the donor database and accounting systems monthly.

OBLIGATIONS / DISBURSEMENTS

RECORDING OF CONTRACTS

The Chief Financial Officer (or designee) will maintain hard copies and/or electronic copies of all American Classical Schools of Idaho contracts.

The Chief Financial Officer (or designee) will maintain a schedule of payment amounts and dates for all contracts. The Chief Financial Officer will use appropriate estimates for variable cost contracts.

The Chief Financial Officer (or designee) will record the current amount due for all contracts in the American Classical Schools of Idaho accounting system on a month-bymonth basis.

RECORDING OF PURCHASE ORDERS

The Chief Financial Officer (or designee) will maintain an electronic database/spreadsheet of all completed and open Purchase Orders.

The database will document the Purchase Order amount, the expected payment due date, and the account to which the invoice will be posted.

The database will be updated within 2 business days of the issuance of any new Purchase Order or receipt of invoices against Purchase Orders.

RECORDING OF ACCOUNTS PAYABLE

The Chief Financial Officer (or designee) will record a valid vendor invoice in the American Classical Schools of Idaho accounting system within two (2) business days of receipt of invoice.

PAYMENT PROCESSING – GENERAL

To the extent possible, payments will be processed using the CapEd ACH online payment system. The Chief Financial Officer (or designee) will prepare ACH transactions (or checks if necessary) on a weekly basis.

Invoices will be paid within the week they are due.

The Chief Financial Officer (or designee) will present the following information/documentation to the Chief Executive Officer for each ACH or check run payment cycle: ACH payments for approval or checks to be signed by the Chief Executive Officer with appropriate back-up documentation (e.g. Purchase Order number and vendor invoice or purchase receipt).

WIRE TRANSFERS AND ELECTRONIC PAYMENTS

The following circumstances are established as pre-approved for wire transfer or electronic payment:

- Periodic interest and principal payments related to Board-approved debt
- Credit card payments (via the BILL Spend and Expense platform)
- Invoices with vendors who agree to accept ACH payment
- Payroll, payroll taxes, and payroll processing fees via electronic payment
- Other taxing authority payments via electronic payment

DEBIT CARD

American Classical Schools of Idaho shall not maintain a Debit Card.

PURCHASES WITH BOARD-APPROVED CREDIT CARD

American Classical Schools of Idaho will maintain a line of credit through BILL Spend and Expense (formerly Divvy). BILL Spend and Expense allows for tight spending controls and provides a free, automated expense management software.

The Chief Executive Officer shall recommend authorized card holders to the Board for approval. All credit cards shall be combined into one overarching control account with a maximum limit of \$23,000.

All cards will have a default maximum limit of \$0. The Chief Executive Officer (or designee) shall authorize card holders to make mission-supporting purchases with the Board-approved credit card in accordance with the Purchase Order process. Once the Purchase Order is approved, the Chief Executive Officer (or designee) will release the approved funds to the authorized card to complete the purchase.

Authorized card holders will have access to a physical card and virtual cards. Physical cards act as traditional credit cards. Virtual cards are digitally generated, unique card numbers often used for online purchases to reduce fraud by keeping the physical card number protected. Only the Chief Executive Officer (or designee) may create virtual cards. The use of a virtual card shall follow the same procedure as the use of a physical card.

The Chief Financial Officer (or designee) will designate appropriate General Ledger account codes and pre-populate the BILL Spend and Expense application with a list of accounts that are to be used to code expenses. If applicable, default General Ledger account codes can be preset for specific cards.

Authorized credit card holders will:

- 1. upload all receipts directly to BILL Spend and Expense;
- 2. select the appropriate General Ledger expense code for each expense unless the code is preset; and
- 3. type in the PO number in the "Notes" field.

The Chief Financial Officer (or designee) shall present an export of transactions grouped by General Ledger Code and the accompanying purchase orders to the Chief Executive Officer each month. The Chief Executive Officer will review and approve the report, evidenced by a signature and date (digitally-certified electronic signatures are acceptable).

The credit card account shall be paid in full and on time each month so as not to incur interest or late fees. The account shall be paid automatically from American Classical Schools of Idaho's CapED checking account.

A redacted copy of the previous month's credit card statement and the reviewed transaction report shall be included in the monthly financial report to the Board. The

Board Treasurer shall be assigned an auditor-level role through BILL Spend and Expense, which grants the ability to view and export transaction data at any time.

REIMBURSEMENT PROCEDURES AND FORMS

Reimbursements are authorized only when an Approver approves a purchase that cannot be purchased from a American Classical Schools of Idaho vendor on terms or using the Board-approved credit card. Reimbursements should be limited to emergency circumstances or time-urgent requests.

After following the appropriate procurement procedures, the Requester is authorized to make the purchase using a personal means (credit card, debit card, check or cash). Upon receipt of a completed reimbursement form (Appendix A), the original signed Purchase Order and the receipt(s), the Chief Financial Officer (or designee) will process the reimbursement request similar to all other invoices received from vendors. Reimbursement to the individual will be made in the next American Classical Schools of Idaho check run.

PETTY CASH

American Classical Schools of Idaho will not operate with petty cash.

BANKING

ACCOUNT MANAGEMENT

New bank accounts may be opened only with the approval of the Board.

Check signing and bank wire authority is granted to the Chief Executive Officer and Board Chair.

The Board Secretary shall have "view only" access to all bank records and transactions.

BANK STATEMENT RECONCILIATION

The Chief Executive Officer (or designee) is authorized to maintain one (1) bank account at CapEd Credit Union:

General (or Operations) Account

Bank statements are opened and reviewed by the Chief Financial Officer (or designee).

Bank accounts are reconciled monthly by the Chief Financial Officer (or designee).

The individual who reconciles the bank statements cannot be authorized to approve ACH transactions or sign checks.

The reconciliation is performed by the 10th day of the month.

BUDGETS

BUDGET PROCESS

The budget is prepared annually for Board approval prior to the end of the fiscal year.

The Board shall approve American Classical Schools of Idaho's budget, and the Chief Executive Officer (or designee) shall manage the school's finances in accordance with Board policies.

The Chief Executive Officer (or designee) is responsible for presenting a draft budget to the Board prior to final approval.

FINANCIAL STATEMENTS PROCESS

The Chief Financial Officer (or designee) produces monthly financial statements and presents the statements to the Chief Executive Officer (or designee) at least 7 days in advance of the Board's regular monthly meetings.

AUDIT

CONTRACTING WITH AUDITING FIRM

The Board is responsible for soliciting and reviewing Requests for Proposal (RFP) from qualified external auditors annually. The Board is responsible for contracting with the auditing firm.

THE ANNUAL AUDIT

An independent accounting firm will conduct an annual financial audit.

The independent accounting firm also prepares IRS 990 and 1099 Forms.

The Chief Executive Officer (or designee) and Chief Financial Officer (or designee) will support the work of the auditor.

AUDIT REVIEW AND BOARD APPROVAL

The Chief Executive Officer (or designee) will present the draft audited financial statements to the Board prior to finalizing with the auditor.

After Board approval, the Chief Executive Officer/Chief Financial Officer (or designees) will coordinate with the auditor to finalize the audited financial statements.

DISTRIBUTION AND PUBLICATION OF AUDIT AND TAX FORMS

The final report of the audit and IRS 990 are presented to the Board for signature.

The Chief Financial Officer (or designee) provides copies of the audit and IRS 990 to appropriate entities. A PDF file of the annual audit and IRS 990 shall be posted on American Classical Schools of Idaho's website.

The auditing firm submits all tax forms to the IRS.

INSURANCE

POLICY

American Classical Schools of Idaho shall procure and keep in force appropriate insurance coverage.

Insurance coverage should include:

- Medical
- Short and Long-Term Disability
- Life
- General liability
- Property
- Umbrella
- Director's and Officers' coverage
- Worker's compensation

SOURCING ANNUAL INSURANCE

Insurance brokerage firms will be used to source annual insurance policies to meet the needs of American Classical Schools of Idaho.

The Chief Financial Officer (or designee) is responsible for setting the timetable to review insurance needs and recommend any changes to specific policies, carriers and brokers used.

Requests for Proposal for selecting the brokerage firms should go out every three years as a minimum.

Board approval is required to modify any insurance policy for American Classical Schools of Idaho.

PAYROLL

CONTRACTING PAYROLL PROCESSING FIRM

In accordance with an annual no fee service agreement, Bluum, Inc., handles payroll processing, including the filing and payment of all taxes.

PROCESSING PROCEDURES

For employees empaneled with Bluum, payroll will be processed via Bluum's internal procedures.

For employees empaneled with an ACSI member school, employee payroll is processed on a monthly basis. The monthly pay period runs from the 16th of the month to the 15th of the next month and is paid no later than the 25th of the month.

The Chief Financial Officer (or designee) prepares, and the Principal (or designee) reviews and signature approves, each payroll.

PAYROLL TAXES

In accordance with an annual no fee service agreement, Bluum, Inc., files W-2s, state and federal payroll taxes. Copies of the reports are held by the Chief Financial Officer (or designee).

Independent Contractors

- If cumulative payments to an independent contractor exceed \$599 during a calendar year, an IRS Form 1099 filing may be required. The filing is required when the contractor is other than a corporation. The one exception is that payments to an attorney, no matter the business type, must be issued a Form 1099 if payments exceed \$599.
- If there is a question as to business type, the Chief Financial Officer (or designee) will ask the contractor to complete a Form W-9. If the contractor is an individual, as opposed to a corporation, and the cumulative payment criterion of \$599 has been met, a 1099 will need to be issued to the contractor.

TRAVEL ALLOWANCES AND EXPENSE POLICY

American Classical Schools of Idaho reimburses reasonable travel costs associated with conducting business and carrying out initiatives and activities. Extravagance on the part of those conducting business may be perceived as misuse of funds or improper fiscal management and is not allowed. A Purchase Order Form detailing travel expenses with estimated costs and supporting documents must be submitted to and approved by the

Chief Executive Officer in advance. The guidelines that follow provide a basis for making responsible travel arrangements and reimbursing employee travel costs.

Airfare: Reasonable coach rates; priority and first-class accommodations will not be reimbursed. If an employee chooses to upgrade their seat, it will be at their own expense. Airline travel should be scheduled at least 14 days in advance to obtain the best airfares. The employee may submit fees associated with up to one checked bag for reimbursement.

Lodging: A standard business-class hotel room or comparable peer-to-peer accommodations (e.g. Air BnB, Vrbo, etc.) will be reimbursed if school business has taken the employee 100 or more miles from home or if they are participating in a multiday trip on behalf of the school.

Meals: American Classical Schools of Idaho does not reimburse for meals during travel.

Mileage: Mileage will only be reimbursed for business travel in excess of the employee's standard commute; employees will not be reimbursed for travel within the Treasure Valley area. Mileage will be reimbursed at the federal mileage rate (currently 65.5 cents per mile) to cover the cost of fuel, insurance, and wear-and-tear to the employee's personal vehicle.

Parking: Reasonable charges for parking will be reimbursed.

Rental Cars: When available, hotel transportation should be used. Compact or midsized vehicles are allowed for one to three passengers. If more than three people are traveling, a large vehicle or van is allowed. Luxury class vehicles are never allowed. When renting a vehicle, the employee must add the "Loss Damage Waiver" insurance that covers the vehicle itself. The school provides liability coverage, so that option should be waived.

Other Ground Transportation: When available, hotel transportation should be used. Reasonable charges for taxi and other ground transportation are allowed for the purpose of conducting school business. Employees should use the most cost-effective mode of transportation given timeframe, safety of the traveler, and baggage being transported.

Tips: Reasonable tips for baggage handling and ground transportation are allowed according to the IRS incidentals rate (currently \$5.00 per day).

Receipts: Receipts are required for reimbursement of travel expenses. These are submitted along with a completed copy of the Reimbursement Form. Requests for reimbursement must be submitted within 14-days after the employee returns from their trip.

PROCUREMENT

PROCUREMENT GENERAL POLICIES AND GUIDELINES

All procurement transactions shall be conducted in a manner to provide open and free competition and secure the items at the lowest and best price or is made to the bidder whose proposal offers the greatest value to American Classical Schools of Idaho, considering price, technical, and other factors as specified in the solicitation.

Awards shall be made to the supplier whose bid or offer is responsive to the solicitation and is most advantageous to American Classical Schools of Idaho, when price, quality, and other factors are considered.

All employees of American Classical Schools of Idaho should avoid purchasing unnecessary items. Where appropriate, an analysis is to be made of lease and purchase alternatives to determine which would be the most economical and practical.

This policy applies to all general purchases made by American Classical Schools of Idaho, including contracts for services. Purchases made using federal funds must be made according to the procurement policy as proscribed by the federal government.

CODE OF CONDUCT

GENERAL

American Classical Schools of Idaho shall adhere to the following code of conduct. Any employee, officer, or agent of American Classical Schools of Idaho found to be in violation of the following code of conduct shall be subject to dismissal as outlined in American Classical Schools of Idaho's personnel policies.

CONFLICT OF INTEREST

American Classical Schools of Idaho shall not knowingly permit any employee, officer or agent to participate directly or indirectly in the selection or in the award or administration of any contract if a conflict, real or apparent, would be involved. When American Classical Schools of Idaho has knowledge of a potential or actual conflict, American Classical Schools of Idaho will take such steps as to isolate, remove, or otherwise neutralize the contact and influence of any particular employee, officer, or agent, when they have such potential conflict from participating in the selection, award, or administration of such procurement. Such conflict would arise when a financial or other interest in a firm selected for award is held by:

- An employee, officer, or agent involved in making the award.
- His/her relative (including but not limited to father, mother, son, daughter, brother, sister, uncle, aunt, first cousin, nephew, niece, husband,

wife, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half-brother, or half-sister);

- His/her partner; a major business client/customer (greater than \$10,000 per year); board ties; stockholder/other business ownership interests (greater than 10%); or,
- An organization which employs, is negotiating to employ, or has an arrangement concerning prospective employment of any of the above.

GRATUITIES, KICKBACKS, AND USE OF CONFIDENTIAL INFORMATION

American Classical Schools of Idaho employees shall not personally solicit or accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to subcontracts, and shall not knowingly use confidential information for actual or anticipated personal gain.

PROCUREMENT GENERAL ROLES AND RESPONSIBILITIES

CHIEF FINANCIAL OFFICER'S RESPONSIBILITIES

The Chief Financial Officer (or designee) will ensure that:

- Procurement requirements are efficient and economical.
- A contract award is made to the responsive and responsible bidder
 offering the lowest and best price; or is made to the bidder whose proposal
 offers the greatest value to American Classical Schools of Idaho,
 considering price, technical, and other factors as specified in the
 solicitation.
- Work is inspected before payment and payment is made in accordance with terms for contract work performed and accepted.

CONTRACTOR RESPONSIBILITY

Procurement shall be conducted only with responsible contractors and American Classical Schools of Idaho shall make inquiry and will not knowingly contract with those who do not have technical and financial competence and who do not have a satisfactory record of integrity and performance.

VENDOR ACCOUNTS

American Classical Schools of Idaho will endeavor to establish and maintain accounts with key vendors (e.g., Amazon Business, Staples Advantage, etc.) to streamline the ordering process.

The Chief Financial Officer (or designee) will maintain a list of active vendor accounts and will circulate the list to those persons involved in initiating Purchase Orders - "Category Approvers."

The Chief Financial Officer (or designee), in conjunction with Category Approvers, will establish the most favorable terms for American Classical Schools of Idaho (e.g., Net 60 days).

All vendor accounts will be set up such that American Classical Schools of Idaho does not pay sales tax. The Chief Financial Officer (or designee) maintains current documentation from the taxing authorities.

PURCHASE ORDER PROCEDURES

American Classical Schools of Idaho purchases according to the following categories: Operations, Development, and School Support. Each category has a Category Approver. The role of the Category Approver is to take requests from staff, be the first level of review and accountability, initiate the Purchase Order and manage the vendor and ordering process for goods or services in the category.

The Chief Executive Officer (or designee) is the approval authority for all Purchase Orders. Any unbudgeted expenditures above \$25,000 require the Board's approval. Purchases and contracts may not be artificially divided to avoid these requirements.

The general procedures are as follows for all categories:

- The Category Approver receives purchasing requirement from staff or faculty.
- The Category Approver obtains quotes, initiates a Purchase Order by completing the Purchase Order form (Appendix A) and presents the Purchase Order to the Chief Executive Officer (or designee).
- The Chief Executive Officer (or designee) may initiate a Purchase Order but may not approve his/her own Purchase Orders.
- If approved, the Category Approver gives the Purchase Order to the Chief Financial Officer (or designee) to assign the Purchase Order number and document such on the Purchase Order form.

- The Chief Financial Officer (or designee) works with Category Approver to ensure the most favorable terms are established and, as needed, establish an American Classical Schools of Idaho account with the vendor.
- The Category Approver places the order and facilitates the ordering process.
- Upon receipt, the Requester provides evidence of receipt and/or inspection of the purchased items or services, facilitates returns as needed, and provides receipt documentation to the Chief Financial Officer (or designee).
- The Chief Financial Officer (or designee) processes the invoice and categorizes/logs the expense. All vendor invoices will be promptly delivered to the Chief Financial Officer (or designee).
- The Chief Financial Officer (or designee) shall prepare payment using the completed, approved Purchase Order form, back-up documentation, and invoice or contract.
- The Chief Executive Officer (or designee) shall sign checks or approve electronic payments on a weekly basis during the school year, and as required during the Summer.

OPERATIONS PURCHASING PROCEDURES

Purchases of items that may be generally required by programs overseen by the Chief Operating Officer.

Category Approver: Chief Operating Officer (or designee)

DEVELOPMENT PURCHASING PROCEDURES

Purchases used to acquire any items related to American Classical Schools of Idaho's development and outreach activities.

Category Approver: Development & Outreach Director (or designee)

SCHOOL SUPPORT PURCHASING PROCEDURES

Purchases of items that may be generally required by programs or initiatives that support member schools.

Category Approver: Chief Operating Officer (or designee)

INVENTORY MANAGEMENT

Requesters will establish inventory management procedures for their respective purchasing categories where appropriate. The Chief Executive Officer (or designee) must approve all inventory management procedures and copies of all approved procedures must be provided to the Chief Financial Officer (or designee). From time to time, the Chief Financial Officer (or designee) will review compliance of procedures with the Requesters.

INVENTORY MANAGEMENT OR ASSET TRACKING

Asset Tracking

- 1. All assets will be tracked in Book Tracks.
- 2. Barcodes are scanned to assign an asset or assets to an individual.

HIGHER VALUE PURCHASES, CONTRACTS AND LEASES

CATEGORY PURCHASES OVER \$10,000

For purchases in excess of \$10,000, no less than three vendors shall be solicited to submit price quotations, which may be obtained orally, by telephone, or in writing. Awards shall be made to the supplier whose bid or offer is responsive to the solicitation and is most advantageous to American Classical Schools of Idaho, when price, quality, and other factors are considered.

If factors other than price are used (for example, technical qualifications), they shall be disclosed to all potential vendors. The names, addresses, and/or telephone numbers of the vendors and persons contacted, and the date and amount of each quotation shall be recorded and maintained as a public record.

PURCHASES, CONTRACTS OR LEASES OVER \$100,000

Purchases, contracts, or leases that exceed \$100,000 shall be awarded based on competitive sealed bidding if the following conditions are present:

- A complete, adequate, and realistic specification or purchase description is available;
- Two or more responsible bidders are willing and able to compete effectively for the work;
- The procurement lends itself to a firm fixed price contract;
- The selection of the successful bidder can be made principally on the basis of cost.

- For professional service contracts, sealed bidding should not be used.
- Procurements that exceed \$100,000 will be advertised in the area where the products or services are to be rendered and any other publication deemed appropriate by American Classical Schools of Idaho.

PURCHASES MADE WITH FEDERAL FUNDS

Purchases, contracts, or leases between \$10,000 and \$250,000 made using federal funds must adhere to the following criteria:

- Solicitation and at least three bids from qualified sources (unless not possible), two of which must be new sources;
- Solicitation must adequately describe the goods and/or services to be procured;
- Solicitation cannot impose unreasonable requirements on potential sources;
- Decisions regarding which bid to accept must be made in an impartial manner and on the basis of the criteria established in the solicitation (lowest bid is not required to be accepted);
- Efforts must be made to use small and minority businesses and women's business enterprises where practicable.

In addition to the criteria listed above, purchases, contracts, or leases made using federal funds in excess of \$250,000 must be awarded based on competitive sealed bidding. As a matter of practice, American Classical Schools of Idaho will adhere to Idaho Code and use a competitive bidding process for all purchases over \$250,000.

SOLICITATION AND RECEIPT OF BIDS

An invitation for bids shall be issued including specifications and all contractual terms and conditions applicable to the procurement, including a statement that the award will be made to the lowest and best responsible and responsive bidder whose bid meets the requirements of the invitation for bids. The invitation for bids shall state the time and place for both the receipt of bids and the public bid opening. All bids received shall be time-stamped but not opened and shall be stored in a secure place until bid opening. A bid may be withdrawn at any time prior to bid opening.

BID OPENING AND AWARD

Bids shall be opened publicly, with an abstract of bids recorded. All bids shall be available for public inspection. If equal low bids are received from responsible bidders, the award shall be made by requesting the low bidders to lower their bids and then

selecting the lowest and best, or by American Classical Schools of Idaho drawing lots or similar random method, unless otherwise provided in State or local law and stated in the invitation for bids. If only one responsive bid is received from a bidder, an award shall not be made unless a cost or price analysis verifies the reasonableness of the price.

MISTAKES IN BIDS

Where appropriate, the correction or withdrawal of inadvertently erroneous bids may be permitted before bid opening by written or electronic notice to the office designated in the invitation for bids prior to the time set for bid opening. After bid opening, corrections to bids may be permitted only if the bidder can show by clear and convincing evidence that a mistake of a nonjudgmental character was made, the nature of the mistake, and the bid price actually intended.

RECORD RETENTION

RECORD RETENTION GENERAL POLICIES AND GUIDELINES

The records retention policy for American Classical Schools of Idaho is derived from the Idaho State Board of Education Retention Schedule of the Records Management Guide.

This policy applies to all such documents in both written and electronic formats.

Electronic documents covered under this policy include those received via e-mail.

RECORD RETENTION PROCEDURES

Written records maintained in file cabinets are secured as mandated by confidentiality requirements (i.e., employee and financial records). Access is controlled by issuance of physical keys only to those with a need to access the records.

All electronic documents that are covered under this policy must be saved and backed up. Access to electronic files is managed through the creation of user groups. Only users with a need to access the records will be added to the group.

Archived records are maintained according to the schedule below. Records past their retention date are destroyed in a secure manner. Specifically, employee and financial records are shredded.

Series	Series Title	Retention	Guidance
		Period*	
SG1842	Administrative Policies	PM	
SG1893	Facility Contracts/Leases	AC +6 years	
SG1895	Facility Inventory Logs	FE +3 years	
SG18113	Fiscal – Audits	PM	
SG18139	Fiscal – Donations	FE +3 years	
SG18142	Fiscal – Grants Documents	AC +3 years	per respective grant
SG18190	Personnel Complaints	FE +3 years	

SG18279 Safety – Incident Reports	AC +3 years	
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^{*}The retention period listed is the mandatory minimum retention period

LEGEND

Retention Codes: **AC**-After closed, terminated, completed, expired, settled or last date of contact; **AV**-As long as administratively valuable; **CE**-Calendar Year End (December 31st); **FE**-Fiscal Year End (June 30th); **LA**-Life of Asset; **PM**-Permanent; **US**-Until Superseded.

Guidance: RA-Refers to the security needs of a record series, requires justification.

GRANT MANAGEMENT AND ACCOUNTING

American Classical Schools of Idaho will follow the rules and guidelines of any grant awarded to American Classical Schools of Idaho. Each grant will be accounted for as separate from other grants and non-grant operations of American Classical Schools of Idaho.

GIFT ACCEPTANCE POLICY

GIFT ACCEPTANCE AND IRS COMPLIANCE

Acceptance of any contribution, gift or grant is at the discretion of American Classical Schools of Idaho. American Classical Schools of Idaho will not accept any gift unless it can be used or expended consistently with the purpose and mission of American Classical Schools of Idaho.

American Classical Schools of Idaho will refrain from providing advice about the tax or other treatment of gifts and will encourage donors to seek guidance from their own professional advisors.

American Classical Schools of Idaho will accept donations of cash or publicly traded securities. Gifts of in-kind services will be accepted at the discretion of American Classical Schools of Idaho.

Certain other gifts, real property, personal property, in-kind gifts, non-liquid securities, and contributions whose sources are not transparent or whose use is restricted in some manner, must be reviewed prior to acceptance due to the special obligations raised or liabilities they may pose for American Classical Schools of Idaho.

American Classical Schools of Idaho will provide acknowledgments to donors meeting IRS substantiation requirements for property received by the charity as a gift. However, except for gifts of cash and publicly traded securities, no value shall be ascribed to any receipt or other form of substantiation of a gift received by American Classical Schools of Idaho.

ETHICS

American Classical Schools of Idaho is committed to operating in accordance with the highest ethical standards. Accordingly, American Classical Schools of Idaho employees are directed to operate in accordance with the Association of Fundraising Professional's *Code of Ethical Standards* (Appendix B, @1964, Association of Fundraising Professionals (AFP), all rights reserved, reprinted with permission from the Association of Fundraising Professionals) and AFP's *Donor's Bill of Rights* (Appendix C, @2016, Association of Fundraising Professionals (AFP), all rights reserved, reprinted with permission from the Association of Fundraising Professionals).

American Classical Schools of Idaho will protect the confidentiality of all privileged information relating to donors.

Communications to donors and prospective donors will accurately present the organization, its strategic case, and its intended use of funds.

American Classical Schools of Idaho shall record and acknowledge all contributions in a timely manner.

American Classical Schools of Idaho will use donations for the purposes for which they are intended.

REPORTING

American Classical Schools of Idaho will prepare and file IRS Form 990 which is required for non-profits with gross receipts in excess of \$200k and assets in excess of \$500k, and submit the Form 990 on or before the tax return due date, November 15. Form 990 will declare, for each tax year, aggregate gifts per each donor, in excess of \$5,000.

American Classical Schools of Idaho will complete reporting requirements of each grantor. In situations where a grantor does not have reporting requirements, the development office will engage to contact the grantor on at least a semi-annual basis and also present a letter annually that provides information on the state of the school, along with information on specific programs toward which they contributed.

Use

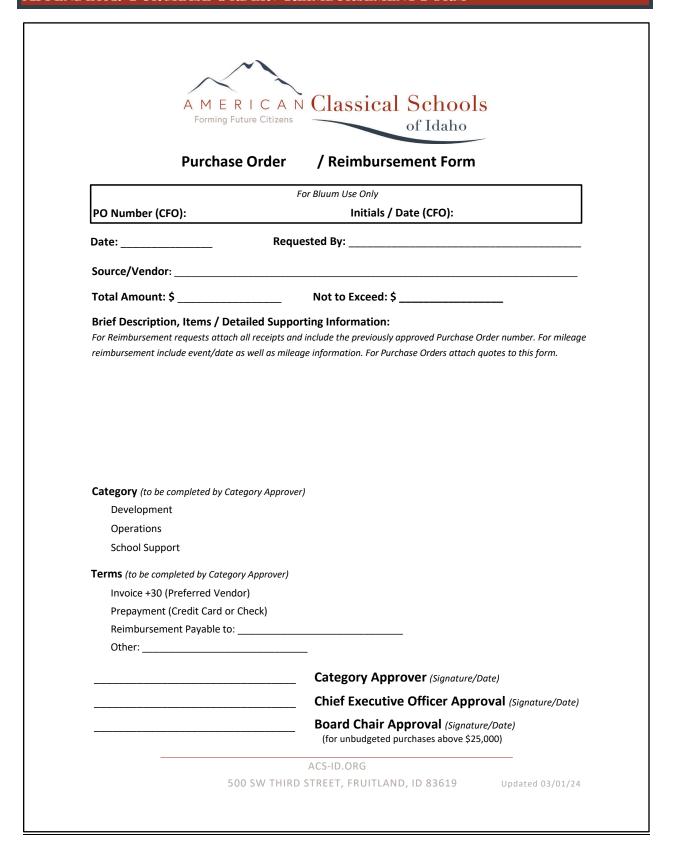
American Classical Schools of Idaho will use philanthropic funds only for the intended purposes.

American Classical Schools of Idaho will at all times account for restricted funds and annotate restricted uses.

ACCOUNTABILITY

All charitable contributions will be received by and deposited through the business office. Internal reporting between the business office and the development office will occur on a monthly basis. Reconciliation of contributed gifts will occur on a monthly basis.

APPENDIX A: PURCHASE ORDER / REIMBURSEMENT FORM



APPENDIX B: VENDOR ACH APPROVAL FORM



VENDOR AUTHORIZATION FOR DIRECT ACH DEPOSIT

ACH Direct Deposit is the deposit of funds into a vendor's account.

I (we) hereby authorize American Classical Schools of Idaho (ACSI) to electronically credit my (our) bank account as follows:

Vendor Name:		
Financial Institution:		
Type of Account:		
☐ Checking Account☐ Savings Account		
Routing Number:		
Account Number:		
Name on the Account:		
ACSI by e-mail (info@acs-id.or	thorization will remain in full force and effect until I (we) not rg) or in writing (500 SW Third Street, Fruitland, ID 83619) the prization. I (we) understand that ACSI requires at least 7 days ation.	at I
Name	Title	
Signature		
3		

500 SW THIRD STREET | FRUITLAND | ID 83619

ACS-ID.ORG

info@acs-id.org

APPENDIX C: AFP CODE OF ETHICAL STANDARDS



CODE OF ETHICAL STANDARDS

ETHICAL STANDARDS (Adopted 1964; amended Oct 2014)

The Association of Fundraising Professionals believes that ethical behavior fosters the development and growth of fundraising professionals and the fundraising profession and enhances philanthropy and volunteerism. AFP Members recognize their responsibility to ethically generate or support ethical generation of philanthropic support. Violation of the standards may subject the member to disciplinary sanctions as provided in the AFP Ethics Enforcement Procedures. AFP members, both individual and business, agree to abide (and ensure, to the best of their ability, that all members of their staff abide) by the AFP standards.

PUBLIC TRUST, TRANSPARENCY & CONFLICTS OF INTEREST

Members shall:

- 1 not engage in activities that harm the members' organizations, clients or profession or knowingly bring the profession into disrepute.
- 2 not engage in activities that conflict with their fiduciary, ethical and legal obligations to their organizations, clients or profession.
- 3 effectively disclose all potential and actual conflicts of interest; such disclosure does not preclude or imply ethical impropriety.
- not exploit any relationship with a donor, prospect, volunteer, client or employee for the benefit of the members or the members' organizations.
- 5 comply with all applicable local, state, provincial and federal civil and criminal laws.
- recognize their individual boundaries of professional competence.
- present and supply products and/or services honestly and without misrepresentation.
- 3 establish the nature and purpose of any contractual relationship at the outset and be responsive and available to parties before, during and after any sale of materials and/or services.
- never knowingly infringe the intellectual property rights of other parties.
- protect the confidentiality of all privileged information relating to the provider/client relationships.
- never disparage competitors untruthfully.

SOLICITATION & STEWARDSHIP OF PHILANTHROPIC FUNDS

Members shall:

- ensure that all solicitation and communication materials are accurate and correctly reflect their organization's mission and use of solicited funds.
- ensure that donors receive informed, accurate and ethical advice about the value and tax implications of contributions.

- ensure that contributions are used in accordance with donors' intentions.
- ensure proper stewardship of all revenue sources, including timely reports on the use and management of such funds.
- obtain explicit consent by donors before altering the conditions of financial transactions.

TREATMENT OF CONFIDENTIAL & PROPRIETARY INFORMATION

Members shall:

- on not disclose privileged or confidential information to unauthorized parties.
- adhere to the principle that all donor and prospect information created by, or on behalf of, an organization or a client is the property of that organization or client.
- give donors and clients the opportunity to have their names removed from lists that are sold to, rented to or exchanged with other organizations.
- when stating fundraising results, use accurate and consistent accounting methods that conform to the relevant guidelines adopted by the appropriate authority.

COMPENSATION, BONUSES & FINDER'S FEES

Members shall:

- anot accept compensation or enter into a contract that is based on a percentage of contributions; nor shall members accept finder's fees or contingent fees.
- be permitted to accept performance-based compensation, such as bonuses, only if such bonuses are in accord with prevailing practices within the members' own organizations and are not based on a percentage of contributions.
- neither offer nor accept payments or special considerations for the purpose of influencing the selection of products or services.
- not pay finder's fees, commissions or percentage compensation based on contributions.
- meet the legal requirements for the disbursement of funds if they receive funds on behalf of a donor or client.

APPENDIX D: AFP DONOR BILL OF RIGHTS

A DONOR BILL OF RIGHTS

DEVELOPED BY:



Association of Fundraising Professionals (AFP)



Association for Healthcare Philanthropy (AHP)



Council for Advancement and Support of Education (CASE)



Giving Institute: Leading Consultants to Non-Profits

PHILANTHROPY is based on voluntary action for the common good. It is a tradition of giving and sharing that is primary to the quality of life. To assure that philanthropy merits the respect and trust of the general public, and that donors and prospective donors can have full confidence in the not-for-profit organizations and causes they are asked to support, we declare that all donors have these rights:



To be informed of the organization's mission, of the way the organization intends to use donated resources, and of its capacity to use donations effectively for their intended purposes.



To be informed of the identity of those serving on the organization's governing board, and to expect the board to exercise prudent judgment in its stewardship responsibilities.



To have access to the organization's most recent financial statements.



To be assured their gifts will be used for the purposes for which they were given.



To receive appropriate acknowledgement and recognition.



To be assured that information about their donations is handled with respect and with confidentiality to the extent provided by law.

VII

To expect that all relationships with individuals representing organizations of interest to the donor will be professional in nature.

VIII

To be informed whether those seeking donations are volunteers, employees of the organization or hired solicitors.



To have the opportunity for their names to be deleted from mailing lists that an organization may intend to share.



To feel free to ask questions when making a donation and to receive prompt, truthful and forthright answers.

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