Internal Audit Report

Hollywood Elementary School School Activity Funds

For the Period Ended August 31, 2024

Table of Contents

INTERNAL AUDITOR'S REPORT	2
SUMMARY	3
OBJECTIVES	3
SCOPE	3
FINDINGS AND RECOMMENDATIONS	4
STATUS OF PRIOR AUDIT FINDINGS	12
ACKNOWLEDGEMENT	12

Internal Auditor's Report

We have examined the School Activity Funds (SAF) of Hollywood Elementary School for the period March 1, 2018 through August 31, 2024. Hollywood Elementary School Principal is responsible for the administration of SAF. Our responsibility is to express an opinion based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and Generally Accepted Government Auditing Standards and, accordingly, included examining, on a test basis, evidence supporting SAF, and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion.

Our examination disclosed the following findings:

- ➤ Administration of Financial Records
- ➤ Mismanagement of Funds Received
- ➤ *Mismanagement of Disbursements*
- ➤ Depository Safe Not on Premises
- ➤ Administration of Grant Funds
- ➤ Unapproved Vending Company
- ➤ Administration of Fund Transfers
- ➤ Fundraiser Reports Not Completed

Individually or in aggregate, these findings resulted in a material deviation from Board of Education (BOE) Policies and Procedures and the requirements of the Accounting Procedures Manual for School Activity Funds (APM).

In our opinion, except for the deviation from the criteria described in the preceding paragraph, the APM referred to above was administered in compliance with BOE policies and procedures and the APM, in all material respects, for the period ended August 31, 2024.

Janice Walters-Semple, CPA Acting Director, Internal Audit

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SUMMARY

An audit of the school activity funds (SAF) of **Hollywood Elementary School** was completed for the period March 1, 2018, through August 31, 2024. The audit was conducted as part of the department's annual audit plan.

This audit report includes 8 findings which occurred under the leadership of the former and current principals. A listing of the findings and the personnel responsible are included in the appendix at the end of the audit report. Detailed findings from the current audit are cited on the following pages with accompanying recommendations for corrective action.

OBJECTIVES

The objectives of the audit were to determine the effectiveness of the system of internal controls and to determine whether the school was in compliance with the policies and procedures of the APM and the BOE. It is important to recognize that, while the audit focused on deficiencies, it was intended to be constructive. The audit was not designed and conducted to evaluate the effectiveness of the educational programs in the school. Therefore, the absence of comments related to the educational programs should not be construed to imply that these programs are either adequate or deficient.

SCOPE

The audit was based on our review of all bank statements, available financial reports, cancelled checks and all available Monetary Transmittal Form (MTF) envelopes submitted by staff for the period March 1, 2018, through August 31, 2024. Also, selected receipts, disbursements and available supporting documentation were reviewed for the said period.

This is an audit of funds related to students' activities at the school and does not include SOR funds or any funds not derived from students' activities for the audit period.

FINDINGS AND RECOMMENDATIONS

The audit resulted in the following findings and recommendations:

2025.01 Administration of Financial Records

The following 115 instances were noted where financial records were not provided or were incomplete to substantiate SAF transactions during the audit period:

- 59 End-of-Year Monetary Transmittal Forms (FY 2018 50; FY 2021 2; FY 2022 5; FY 2023 2). This condition was noted during the previous audit for the period ended February 2018.
- 37 School Funds Expenditure Forms to substantiate expenditures (FY 2021 14; FY 2022 23)
- 19 Canceled Checks (FY 2022 7; FY 2021 5; FY 2022 7)

The APM provides the following guidelines relative to records management:

- Section 6.12, *Record Retention*, requires the retention of financial records for 7 years and/or until audited including the current fiscal year. This includes but is not limited to, financial reports, bank statements, receipts, disbursement authorities, monetary transmittal forms, school funds expenditure forms, canceled checks, and contracts.
- The APM Exhibit B Staff Responsibility for SAF Bookkeeper/Financial Secretary indicates that the bookkeeper or financial secretary is to produce and maintain all financial documents/reports in an organized fashion.

During the audit period, there was turnover in principal and recordkeeping staff positions. Also, the school did not have an effective records management system which resulted in some financial records not being available for review.

The absence of a reliable records management system affects the retrieval and accessibility of requested documentation to substantiate the school's financial transactions. Evidence for determining that all SAF policies and procedures were followed is removed when financial records are not available for review.

Recommendations: The following recommendations are provided to ensure the school's compliance with the APM requirements for administering financial records:

A. The principal must implement and enforce internal controls to include a provision for record retention and retrieval of all financial records. Establishing a standardized and consistent records management system will help to ensure that all financial documents are retained and made available during transition periods.

B. The principal should complete a periodic review of financial records to determine proper organization and retention.

2025.02 Mismanagement of Funds Received

There were at least 13 instances of non-compliance regarding the administration of funds received.

- A. **Delinquent Deposits:** There were at least 8 instances where funds were not remitted and/or deposited timely. Delinquent remittance ranged from 7 to 270 days. **This** condition was noted during the previous audit for the period ended February 2018.
- B. *Unassessed Sales Taxes*: There were at least 5 instances where yearbooks were sold to students without sales taxes being accessed as required.

The following criteria is established in the APM for administering collections:

- A. Section 4.5.2.2 (1) Collecting Funds and Guidelines for Bank Deposits Completing the MTF, and Preparing Bank Deposits, require all funds collected to be remitted to the bookkeeper on the day of collection. The bookkeeper is also required to make timely deposits with the financial institution. The MTF must be completely filled out and documentation should be provided for all funds received.
- B. Section 8.3 *Sales Tax Procedures* indicates that fundraisers other than dance tickets, plays, and fees are taxable, and sales tax should be remitted to the State of Maryland.

The following summarizes the causes of deficiencies noted:

- A. Internal controls to ensure the timely remittance and deposit of funds were not always followed. Staff members and the recordkeeping staff were not held accountable for remitting and depositing funds in a timely manner.
- B. Also, 4 checks were dropped in the drop safe between September 2022 and October 2022 and could not be processed because the current recordkeeping staff and the principal did not have the keys or the combination to open the safe. The current recordkeeping staff's attempts to gain access to the safe were unsuccessful. The safe was only accessible after the office floors were removed and the safe was damaged in June 2023.
- C. The yearbook administrator and the recordkeeping staff were not aware that Yearbook sales were taxable.

The following are the potential effects of the mismanagement of funds received:

- A. Internal controls are compromised and there is a risk of loss of funds when funds are not remitted and deposited as required.
- B. There is potential for assessed penalties when sales taxes are not assessed and remitted as required.

Recommendations: The following are recommendations for proper management of funds received:

- 1. The principal must require timely remittance and deposit of funds. The staff members and recordkeeping staff must be held accountable for compliance. The principal should perform periodic reviews of deposit records to ensure compliance with the requirement for timely deposits.
- 2. The recordkeeping staff should review the APM Section 8.3, *Sales Tax Procedures* to understand which items are taxable and ensure that the appropriate sales tax is assessed. This information must be shared with staff during staff development at the beginning of the school year.

2025.03 Mismanagement of Disbursements

There were at least 16 instances of non-compliance regarding the administration of disbursements.

- A. *Insufficient Documentation:* There were at least **3** instances where disbursements were supported by quotes instead of invoices.
- B. *Transactions Not Properly Recorded:* There were at least 3 instances where disbursements were not posted to the correct fund account. Payments for were special events we incorrectly posted to PSA and fundraiser fund accounts. *This condition was noted during the previous audit for the period ended February 2018.*
- C. **Delinquent Reimbursements and/or Vendor Payment:** There were at least 4 instances where reimbursements and/or vendor payments were not processed timely, resulting in delinquent payments ranging from 27 130 days. **This condition was noted during the previous audit for the period ended February 2018.**
- D. Administration of Voided Checks: There were 6 instances where voided checks were not properly defaced by removal of the signature and account lines. This condition was noted during the previous audit for the period ended February 2018.

The following criteria are established in the APM for administering checks

- A. Section 4.5.3 (2) *Inclusion of Supporting Documentation* requires that all checks must have itemized documentation attached to the SFEF that supports the amount of the check. Examples of supporting documents are cash register receipts, invoices, bills of sale, etc. Examples of documents that are not itemized invoices or receipts include credit card receipts, statements, order confirmations, price quotes, and packing slips.
- B. Section 3.2.2 *Ownership, Bookkeepers/Financial Secretaries* requires the bookkeeper or financial secretary to accurately record and report the school's financial transactions. Also, Section 4.3.2 *Fund Account Procedures* states transactions should be recorded in the most specific account related to the activity.
- C. Section 4.5.3 (2) *Inclusion of Supporting Documentation* requires reimbursements and/or invoices to be paid within 30 days of receipt or by the due date of the invoice.
- D. Section 4.5.3.2 & 4.5.3.4 (e), Summary of Check Disbursement Procedures and Check Writing respectively requires accounting for a physical check when an error is made at the time of processing or when a check is damaged. Voided checks are required to be defaced by removal of the signature and account lines.

The following summarizes the causes for the deficiencies noted:

- A. The recordkeeping staff was not aware that a quote was inadequate documentation.
- B. The misclassification of funds were as a result of the recordkeeping staff's error.
- C. Staff were not aware that store receipts were required to be submitted within 30 days for reimbursement. The delinquent payment of the vendor invoice was an oversight by the recordkeeping staff.
- D. Failure to properly deface voided checks in the 6 instances occurred due to the former and current recordkeeping staff's oversight.

The following are the potential effects of mismanagement of funds disbursed:

- A. Evidence to substantiate the approval of expenditures is not available when appropriate documentation is not provided and maintained on file.
- B. The principal cannot make informed financial management decisions when funds are not accurately posted to the specific fund accounts.

- C. Delinquent payments can affect the availability of funds as reported in the school's financial reports and impact the principal's ability to make proper fiscal decisions.
- D. Inappropriate administration of voided checks exposes the school to check fraud through potential unauthorized check negotiations.

Recommendations: The following are recommendations for ensuring disbursements are properly managed:

- 1. The principal and recordkeeping staff must implement and enforce internal controls to ensure appropriate documentation is attached to the SFEF to substantiate expenditures.
- 2. The recordkeeping staff should ensure that all financial transactions are accurately posted in SFO. The principal should review monthly financial reports for accuracy.
- 3. The recordkeeping staff should ensure that all invoices are paid in a timely manner. Reimbursements and invoices are required to be paid within 30 days of receipt or by the invoice due date. The principal must hold the staff and recordkeeping staff accountable for compliance.
- 4. The recordkeeping staff should ensure that checks voided are properly defaced by the removal of the signature and account lines. The principal should perform a periodic review of voided checks to ensure compliance with BOE policies and procedures related to defacement.

2025.04 Depository Safe Not on Premises

The school does not have a depository (drop) safe to securely store funds remitted by staff members after normal business hours or in the recordkeeping staff's absence.

The APM Section 4.5.2.2 (3) Cash Receipts Guidelines for Bank Deposits requires each school to secure funds in a locked fireproof safe that is only accessible to the principal and bookkeeper. Drop safes are required for every school. The safe should be bolted to the floor and placed in a location accessible to the staff.

The previous administration purchased a drop safe in response to the prior audit finding; however, in 2023 the school's floor where the previous safe was located had to be removed. When the floor was removed, the depository safe was damaged. The safe was not replaced as of the end of fieldwork. A replacement depository safe was ordered on February 26, 2025.

Without a depository safe, security of SAF is impacted. As a result, funds are susceptible to loss. Staff members are denied the opportunity to securely remit funds when the recordkeeping staff is not available. *This condition was noted during the previous audit for the period ended February 2018.*

Recommendations: The principal must ensure that a drop safe is purchased and installed to facilitate staff members' ability to remit funds when the recordkeeping staff is unavailable.

2025.05 Administration of Grant Funds

The school received annual College Park Community Grant funding since 2018. Grant funds of \$8,000.00 have been received during the past 5 years. The *Grants Reporting Form* was not submitted to the Grants Financial Management Office (GFMO) as required.

Administrative Procedure 3230, Grant Assistance, Funding Solicitations, and Acceptance of Other Funds and Resources, (4) Grant Compliance states the following: For all grants and donations made directly to schools, irrespective of amount, the authorized school administrator must inform the Grants Financial Management Office five (5) days of the grant award. The GFMO will report information on all new school-based grants to the Board of Education on the next Consent Agenda.

Reportedly, the former and current principals were not aware of the requirement to notify GFMO of the grants received.

The school is noncompliant with BOE policies and procedures relative to grant reporting. GFMO is unable to accurately document and report all grant funds received when documentation is not provided.

Recommendations: The principal must ensure that all future grant funds are properly documented and reported to the GFMO. The school should submit the required Grant *Reporting Form* to GFMO for the FY '2025 College Park Community Grant Funds received.

2025.06 Unapproved Vending Company

The vending machine company currently used to provide vending services to the school is not an approved vendor.

The APM, Section 4.5.3.1 (3), *Use of Board Approved Vendors*, all vendors used must be selected from PGCPS Approved/Active vendor listing maintained by Purchasing and Supply Services.

The principal and recordkeeping staff were not aware that the current vending company was not an approved vendor. The former vending company, Bay Area Vending, was sold to the current vending company, CRH Catering Co., LLC, in 2021. The current vending company was not aware of the requirement to register with PGCPS to become an approved vendor.

The school risks unsatisfactory service without remedy from a vendor that has not

been properly vetted and approved by Purchasing and Supply Services.

Recommendations: The vending company vendor has since become an approved vendor and the school is currently in compliance. The principal or recordkeeping staff should continue to monitor all vendors to ensure that they are Board approved to remain in compliance with the requirements conducting business on behalf of the BOE.

2025.07Administration of Fund Transfers

There were at least 6 instances where there was no evidence that fund transfers were properly approved by the principal. Fund transfers were also inappropriately performed in the noted instances. Funds were transferred to the unrestricted PBIS fund account from the Community Grants to the PBIS Restricted accounts in 3 instances. Funds were also correctly transferred from the PSA Transfer-In account to the school's Furniture and Equipment account in one instance. There were also 2 inappropriate transfers to PSA Food and Staff Appreciation from the Community Grant and Restricted Donations account.

Per APM 4.5.4 *Transfer of Funds* states that transfers between restricted accounts are only authorized if reviewed and approved by the principal and the sponsor/students of the restricted accounts. Also, funds cannot be transferred from restricted to unrestricted. Funds should be posted to the applicable restricted account.

The recordkeeping staff was not aware that the principal is required to approve all fund transfers. The recordkeeping staff inadvertently selected the unrestricted PBIS account from the drop-down list when transferring funds to the restricted PBIS account. The recordkeeping staff was also unaware that restricted funds could not be used to supplement the school's PSA fund accounts.

The principal cannot make informed fiscal decisions when transfers are not approved and/or not allowed. Accounts are distorted when accurate recordkeeping is not completed due to inappropriate fund transfers. Funds that should be available to benefit students may be inappropriately used when inaccurate fund transfers occur. *This condition was noted during the previous audit for the period ended February 2018.*

Recommendations: The recordkeeping staff should review the APM and obtain training from the Accounting and Financial Reporting Office to become familiar with the financial reporting requirement specifically related to transfer of the school's SAF. The principal and recordkeeping staff should ensure that all fund transfers are reviewed and approved as required. The recordkeeping staff must be held accountable for compliance.

2025.08 Fundraiser Reports Not Completed

The school conducted 1 club and organization sponsored fundraiser and 26 school-wide fundraisers during the audit period March 2018 through August 2024; however, the fundraiser reports were not prepared as required. Fundraiser Request and Authorization Form and a Fundraiser Completion Report were not prepared for the sponsored fundraiser. In addition, the annual reports summarizing the school's fundraising activities for FY 2018 through FY 2024 were not completed to support compliance with the fundraising reporting requirements.

Administrative Procedure 5135.1, *Fundraising* requires schools to complete the Fundraiser Request and Authorization Forms and Fundraiser Completion Reports for sponsored fundraisers. Annual reports summarizing fundraising activities for all fundraisers are also required. These documents must be maintained on file for public and auditor review upon request.

The former principal and recordkeeping staff did not follow the fundraiser reporting requirements. The current principal, recordkeeping staff and fundraiser sponsor were not aware of the fundraiser reporting requirements. The sponsoring staff was not held accountable to complete the request for authorization of the fundraiser and the completion report for the sponsored fundraiser.

Failure to complete fundraiser reports constitutes non-compliance with BOE policies and procedures. In addition, it decreases the transparency of fundraising activities and the associated profits to interested parents and community members. It could not be readily determined whether the school's fundraisers yielded overall profits. Also, pertinent financial information for the school's administrators to make fiscal decisions was not available. *This condition was noted during the previous audit for the period ended February 2018.*

Recommendations: The principal and recordkeeping staff must review the APM to become familiar with the requirements for administering fundraisers. Specifically, Fundraiser Request and Authorization Forms and Fundraiser Completion Reports must be prepared and approved where applicable for all sponsored fundraisers. In addition, the principal or a designee should complete reports at the end of the school year summarizing fundraising activities held. The required reports must be maintained on file for public and auditor review.

STATUS OF PRIOR AUDIT FINDINGS

The previous audit report for Hollywood Elementary School was issued for the period ended February 28, 2018. During the previous audit, the current principal and the current recordkeeping staff were not on staff. There were 9 findings noted as a result of that audit of which 8 findings still exist, and all are summarized below:

- Mismanagement of Funds Received Condition still exists. See Finding 2025.02 regarding Mismanagement of Funds Received: Delinquent Deposits.
- Mismanagement of Disbursements Condition still exists. See Finding 2025.03 regarding Mismanagement of Disbursements: Delinquent Reimbursements and/or Vendor Payments.
- Depository Safe Not on Premises Condition still exists. See Finding 2025.04 regarding Depository Safe Not on Premises.
- Transactions Not Properly Recorded Condition still exists. See Finding 2025.03 regarding Mismanagement of Disbursements: Transactions Not Properly Recorded.
- Unauthorized Transfer of Funds Condition still exists. See Finding 2025.07 regarding the *Unauthorized/Unallowable Transfer of Funds*.
- Administration of Voided Checks Condition still exists. See Finding 2025.03 regarding Mismanagement of Disbursements: Administration of Voided Checks.
- Year-End Monetary Transmittal Envelope Process Condition still exists. See Finding 2025.01 regarding Financial Records Not on File.
- Fundraiser Reports Not Completed Condition still exists. See Finding 2025.08 regarding *Financial Reports Not Completed*.

ACKNOWLEDGEMENT

We would like to thank the principal and staff of Hollywood Elementary School for their cooperation and assistance extended during the audit.

Prince George's County Public Schools Internal Audit Department

School/Office: Hollywood Elementary School

Response Due Date: <u>March 26, 2025</u>

	Findings	Recommendations	Concur Non-Conc ur Partially Concur	Action Plan	Corrective Action Date	Status Implemented Partially Implemented Not Implemented
2025.01	Administration of Financial Record	The principal must implement and enforce internal controls to include a provision for record retention and retrieval of all financial records. Establishing a standardized and consistent records management system will help to ensure that all financial documents are retained and made available during transition periods. The principal should complete a periodic review of financial records to determine proper organization and retention.		The principal will have monthly meetings with the recordkeeper to go over financial records. Review policies annually to ensure alignment with best practices and regulatory changes. Conduct periodic reviews to assess the organization and retention of financial records.	10/15/2024	Implemented

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2025.02	Mismanagement of Funds Received	The principal must require timely remittance and deposit of funds. The staff members and recordkeeping staff must be held accountable for compliance. The principal should perform periodic reviews of deposit records to ensure compliance with the requirement for timely deposits. The recordkeeping staff should review the APM Section 8.3, Sales Tax Procedures to understand which items are taxable and ensure that the appropriate sales tax is assessed. This information must be shared with staff during staff development at the beginning of the school year.	The principal and record keeper had a meeting on 10/15/2024 on the policies of receiving funds. We also have been studying the APM to become familiar.	10/15/2024	Implemented
2025.03	Mismanagement of Disbursements	The principal and recordkeeping staff must implement and enforce internal controls to ensure appropriate documentation is attached to the SFEF to substantiate expenditures. The recordkeeping staff should ensure that all financial transactions are accurately posted in SFO. The principal should review monthly financial reports for accuracy.	The principal and record keeper had a meeting on 10/15/2024 on the policies of the disbursement approval process of the money. We will cross-check all financial transactions against supporting documents to ensure accuracy.	10/15/2024	Implemented

Department Head Signature	CM. Johnson
Date 02/28/25	

2025.02	Mismanagement of Funds Received	The principal must require timely remittance and deposit of funds. The staff members and recordkeeping staff must be held accountable for compliance. The principal should perform periodic reviews of deposit records to ensure compliance with the requirement for timely deposits. The recordkeeping staff should review the APM Section 8.3, Sales Tax Procedures to understand which items are taxable and ensure that the appropriate sales tax is assessed. This information must be shared with staff during staff development at the beginning of the school year.	The principal and record keeper had a meeting on 10/15/2024 on the policies of receiving funds. We also have been studying the APM to become familiar. Also, all the information mentioned in section 2025.2 was mentioned to staff about deposits and Sales Taxes. Showed examples and gave information to read on the process of Funds Received.	10/15/2024	Implemented
2025.03	Mismanagement of Disbursements	The principal and recordkeeping staff must implement and enforce internal controls to ensure appropriate documentation is attached to the SFEF to substantiate expenditures. The recordkeeping staff should ensure that all financial transactions are accurately posted in SFO. The principal should review monthly financial reports for accuracy. The recordkeeping staff should ensure	The principal and record keeper had a meeting on 10/15/2024 on the policies of the disbursement approval process of money. We will cross-check all financial transactions against supporting documents to ensure accuracy. Also, all the information mentioned in section 2025.3 was mentioned to recordkeeping staff and staff. I've also mentioned the time	10/15/2024	Implemented

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		that all invoices are paid in a timely manner. Reimbursements and invoices are required to be paid within 30 days of receipt or by the invoice due date. The principal must hold the staff and recordkeeping staff accountable for compliance.	frame on checks, reimbursements and invoices processing. Showed examples and gave information to read on the process of disbursements.		
		The recordkeeping staff should ensure that checks voided are properly defaced by the removal of the signature and account lines. The principal should perform a periodic review of voided checks to ensure compliance with BOE policies and procedures related to defacement.			
2025.04	Depository Safe Not on Premises	The principal must ensure that a drop safe is purchased and installed to facilitate staff members' ability to remit funds when the recordkeeping staff is unavailable.	Drop safe was ordered and we are waiting for the delivery. Document was sent to Ms. Alicia Robinson.	2/26/2025	Partially Implemented

Department Head Signature	(M. Johnson
Date 03/26/2025	

2025.05	Administration of Grant Funds	The principal must ensure that all future grant funds are properly documented and reported to the GFMO. The school should submit the required Grant Reporting Form to GFMO for the FY '2025 College Park Community Grant Funds received.	The principal and recordkeeper will ensure accuracy and completeness when filling out the required Grant Reporting Form. The principal will review the report before submission. Review grant management procedures annually to ensure compliance with best practices and evolving regulations.	10/15/2024	Implemented
2025.06	Unapproved Vending Company	The vending company vendor has since become an approved vendor and the school is currently in compliance. The principal or recordkeeping staff should continue to monitor all vendors to ensure that they are Board approved to remain in compliance with the requirements conducting business on behalf of the BOE.	Set reminder emails for each school year to check on the vendor being approved.	10/7/2024	Implemented

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2025.07	Administration of Funds Transfers	The recordkeeping staff should review the APM and obtain training from the Accounting and Financial Reporting Office to become familiar with the financial reporting requirement specifically related to transfer of the school's SAF. The principal and recordkeeping staff should ensure that all fund transfers are reviewed and approved as required. The recordkeeping staff must be held accountable for compliance		The principal and recordkeeper will have monthly meetings on the procedures and policies for funds transfers. We also have been studying the APM to become better familiar with the process.	10/15/2024	Implemented
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2025.08	Fundraiser Reports Not Completed	The principal and recordkeeping staff must review the APM to become familiar with the requirements for administering fundraisers. Specifically, Fundraiser Request and Authorization Forms and Fundraiser Completion Reports must be prepared and approved where applicable for all sponsored fundraisers. In addition, the principal or a designee should complete reports at the end of the school year summarizing fundraising activities held. The required reports must be maintained on file for public and auditor review.		The principal and record keeper had a meeting on 10/15/2024 about fundraiser forms. Fundraiser forms will be completed each time current and future fundraisers occur.	10/15/2024	Implemented
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