

**Policy W.Va. 126CSR200, Policy 8100, Public School Finance
Comment Log**

May 8, 2024 through June 10, 2024

Action

A/S Comment was accepted and supports the proposed policy.

A/C Comment was accepted and resulted in changes to the proposed policy.

N Comment was not accepted.

Date	Commenter	Comments	Action	Rationale
§126-200-1. General.				
6/10/24	Karen Cummings	126-200-1 General - This policy should be out longer than 30 days since it is a complete repeal and replacement of a document that was from 1990. It is out for a comment period that is during one of busiest in all the finance offices across all school districts.	N	The comment is in relation to the policy's comment period term and not the contents of the policy.
6/7/24	Chris Campbell	126-200-1 General – Since state code changes very frequently, I would suggest considering whether state code should be referenced, instead of quoted. Possibly a separate handbook that could be updated with the relevant codes that would not have to go through official policy changes could be referenced in this policy.	N	W. Va. Code is referenced in the Authority subsection of the policy section. W. Va. Code is not quoted in this section. No change is necessary.
6/7/24	Chris Campbell	Handbook for School Finance in West Virginia, Section 2 Receipts and Deposits – Section 2.4 – Deposits must be made as frequently as necessary. I suggest you remove “and possible” since this is open to a lot of interpretation. I suggest Bank deposit must be made whenever total CASH collections on hand exceed \$500 (or \$1000)... Since most deposits made at the central office level are checks, it would be very cumbersome to make deposits daily in many instances.	A/C	The word “must” will be amended to “should” to remove any interpretation that the sentence is intended to be mandatory in nature. I disagree that the requirement should be specific to cash. County boards of education are not frequently collecting funds of any cash or equivalent type at the central office level for this to be burdensome.

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6/7/24	Chris Campbell	Handbook for School Finance in West Virginia, Section 4 Payroll/Reimbursements – Section 4.8 – I believe cell phones are excluded in IRS Publication 15 if they are provided primarily for a noncompensatory business reason, not under the De Minimum benefits rule.	A/C	The commentor presents a valid point that cell phone usage must be considered compensatory in order to be taxable; however, the de minimis provisions may still be applicable if considered to be compensatory. Clarity has been provided to the paragraph.
6/7/24	Chris Campbell	Handbook for School Finance in West Virginia, Section 4 Payroll/Reimbursements – Section 4.13 – The last sentence could give the impression that new employees could be required to utilize direct deposit. I would recommend removing the word existing.	A/C	It is a violation of W. Va. Code to mandate any employee to utilize direct deposit. A change to the policy will be made.
6/7/24	Chris Campbell	Handbook for School Finance in West Virginia, Section 4 Payroll/Reimbursements – Section 5.1 – I would recommend removing the sentence dealing with projected ending cash balance with the Municipal Bond Commission. This is not Unassigned and the only expenditures are those that are required by the MBC for principal and interest that year, along with the Bond Fee.	A/C	A change will be made by removing the word “unassigned.”
6/7/24	Chris Campbell	Handbook for School Finance in West Virginia, Section 4 Payroll/Reimbursements – Section 7.1 – The third sentence states that elections may be held in conjunction with a primary or general election. Since that is no longer permissible I suggest changing to “shall” or “must”.	A/C	This wording change will be made to the policy.
6/7/24	Chris Campbell	Handbook for School Finance in West Virginia, Section 4 Payroll/Reimbursements – Section 7.3e – The first sentence in the last paragraph is applicable to the county itself, not the school board. The commission is not involved in our bonds.	A/C	The wording has been updated to state that bonds issued by a county board of education shall be signed by the president of the Board of Education and countersigned by the Superintendent.

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6/7/24	Chris Campbell	Handbook for School Finance in West Virginia, Section 4 Payroll/Reimbursements – Section 7.4b – QZAB’s are not interest free. We have to pay interest and then get reimbursed supposedly at the full rate. However, every reimbursement of my QZAB’s in Putnam County was reduced due to sequestration so there was an interest cost to the Board. And the rules have changed several times since I have been involved in QZAB’s. I would suggest removing the last two sentences of the first paragraph.	A/C	Due to the inconsistent treatment eliminating this language is appropriate.
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