## Memphis – Shelby County Schools



# FEDERAL AND INTERNAL CONTROL OPERATING PROCEDURES MANUAL

Charter, Private and N & D Schools

Business Operations
Office of Asset Management

#### **INTRODUCTION**

The purpose of this handbook is to provide a systematic approach to managing the guidelines, policies, and procedures of all equipment purchased with federal funds. The information in this handbook will promote uniformity in operations and assist faculty and staff with compliance with all equipment purchased with federal funds. Policies and procedures are reviewed throughout the year with appropriate staff and developed in conjunction with Federal Programs to ensure uniformity. This handbook is subject to change at any time. Any questions not addressed in the handbook should be directed to Memphis Shelby County Schools Federal Program Inventory Manager.

The intent of Asset Management in junction with Federal Programs is to "help all children have the opportunity to obtain a high-quality education and reach proficiency on challenging state and academic standards and assessments." The purpose of Federal Programs is to "enable schools to provide opportunities for at-risk and disadvantaged children to acquire the knowledge and skills contained in the challenging State content standards and to meet the challenging State performance standards developed for all children." Federal Programs "supplement" and not supplant what the required Local and State funds provide.

THIS ENTIRE DOCUMENT DESCRIBES THE REQUIREMENTS FOR ALL FEDERAL PROGRAMS AND CARES ACT, CRRSA ACT, and ARP ACT IN THE MEMPHIS-SHELBY COUNTY SCHOOL SYSTEM (MSCS)

ALL SCHOOLS INCLUDE ALL TITLE I CHARTER AND PRIVATE SCHOOLS.

**Asset Management Contact Information:** 

Main Office 901.416.2830 Fax: 901.416.9964

Email: AssetManagement@scsk12.org

#### **TABLE OF CONTENTS**

MISSION STATEMENT & PURPOSE	4
EQUIPMENT AND REAL PROPERTY	5
<u>Definitions</u>	5
Goals and Objectives	5
Responsibilites	6
Requisition of Equipment	6
General Procedures	6
Change of Administrator	6
POLICY VIOLATION	6
Asset Inventory Designee	7
Acquirement & Receipt of Assets	
requirement & Receipt of Passets	
TAGGING OF NEW ASSETS	8
PHYSICAL INVENTORY	9
Off-Site Use of Equipment.	
Procedures for Dispostion of Equipment	
Various Equipment Dispostions	
Traded/Defective Equipment	
Disposal	
Broken/Lost Assets	
Theft of Equipment or Technology	
Stolen Equipment	
ESSA/ESSER/IDEA	
Personal Property	
Employee Leave/Retirement	
Monitoring of Equipment and Inventory	11
APPENDIX	12
SAMPLE FORMS	13-16

#### **MISSION STATEMENT**

The Office of Asset Management's mission is to ensure the fiscal integrity of Memphis-Shelby County Schools through the effective management of all its Fixed Assets. The Office of Asset Management aim is to provide prudent fiscal stewardship and maintain accurate, complete, and up-to-date records of all Fixed Assets.

To ensure that the schools have the necessary tools to improve student achievement by focusing on every student, in every classroom, every day to meet the District's goals.

#### **PURPOSE**

The purpose of Asset Management is to ensure all fixed assets are capitalized (\$5,000 and up) and non-capitalized equipment (computers, peripherals, band instruments, telecommunication equipment, etc.) owned by the District. In addition, it is also our mission to track the life cycle of all Memphis-Shelby County Schools assets from acquisition to retirement regardless of the funding source and to ensure compliance with all policies, federal and state guidelines. Integrity and personal responsibility are the hallmarks of our daily interactions.

#### **EQUIPMENT AND REAL PROPERTY**

These procedures apply to all Federal Programs, State and Local Funding.

Memphis-Shelby County Schools recognizes that the purpose of Federal Programs funds is to enable our schools to provide opportunities for at risk and disadvantaged children to acquire the knowledge and skill contained in the challenging state academic standards and to meet these standards. A process to maintain financial management systems that substantially comply with federal systems management requirements, adequate internal controls for the purchase, management, and inventory of equipment will ensure that the equipment is used, maintained, and disposed of according to State Law and Federal Regulations and Guidelines.

#### **DEFINITIONS**

#### **Equipment:**

Equipment is defined as "all items" used in an operation or activity and includes machinery, implements, tools, vehicles, band instruments and other apparatus with a minimum useful life expectancy of five (5) years. Sensitive minor equipment includes computers, external peripherals, weapons, etc., as indicated in Memphis-Shelby County Schools BOE Policy 3013 Inventory Management.

#### **Inventory:**

Inventory is maintained in an inventory database that identifies all the required components to identify each inventoried item. Physical inventories are conducted once a year. Supporting documentation of the physical inventory is kept at each school site's location and the Office of Asset Management.

The site's inventory should be current and available for review and audit as per 2 C.F.R. 200.311, 2 CFR 200.313 and 2 C.F.R. 200.439 states the following information must be included in the recipient's inventory records:

#### **GOALS & OBJECTIVES**

- Stewardship: Ensure personnel are accountable for assets/equipment within their immediate area of responsibility through professional development, internal communications, and accountability.
- Accuracy: Complete an annual wall-to-wall physical inventory to establish data tracking baseline for each fixed asset to ensure integrity, control redundancy, and data analysis.
- Efficiency: Develop and maintain data-driven operational procedures and timelines in collaboration with schools, key department staff, and external stakeholders.

#### Responsibilities:

Management personnel, i.e., school principals, administrators, secretaries, teachers, department managers/head, etc. are accountable for assets/equipment within their immediate area of responsibility. This accountability is inherent to the position. Accountability includes inventory, control, movement, and maintenance of all equipment in their immediate area of responsibility.

Responsibility lies with every individual utilizing district assets/equipment for the performance of his or her duties and must adhere to the following procedures regarding the reporting, control, and disposition of all district equipment.

All personnel shall maintain up-to-date records and submit required forms as necessary to fully inform the Office of Asset Management; with respect to the adds, transfers, loss, stolen, and damage and/or misuse of District property in order that the Office of Asset Management may properly carry out its responsibilities.

#### **Requisition of Equipment:**

All equipment purchases made with federal funds will be in accordance with all federal regulations and guidelines of the funding source, must be necessary, reasonable, allocable, and allowable. All equipment will be used based on the funding source that paid for such equipment.

#### **General Procedures:**

All equipment will be properly identified and labeled for inventory tracking. All equipment purchased with federal funds will be labeled to identify the funding source and the fiscal year of purchase along with an MSCS asset tag.

The school shall retain such property in a program as long as there is need for such property to accomplish the purpose of the program for which it was purchased. The inventory must be current and available for periodic cycle counts and/or physical inventory.

#### **Change Of Administrator:**

When there is a change of administrator who is responsible for fixed asset inventory at their site, a physical inventory of the equipment will be conducted by the new administrator. The results of the physical inventory audit are to be forwarded to the Office of Asset Management or emailed to AssetManagementAdministrators@scsk12.org.

#### **POLICY VIOLATION:**

Any property that is disposed of without following proper procedures is an indirect violation of the District's Inventory Management Policy 3013.

#### <u>Asset Inventory Designee-Federal Equipment:</u>

The principal and/or his designee will be responsible for reporting all newly acquired equipment to the Office of Asset Management on the Federal Inventory Receipt Form (FIRF) along with a copy of the Reimbursement form. All additions, transfers, moves, disposals, physical inventory findings, etc. must be reported to the Office of Asset Management within a timely manner.

- Description of inventory items
- Unit Cost
- Funding Source
- MSCS Asset Tag Number
- Acquisition Date
- Serial Number
- Model Number
- Purchase Order Number
- Location/Room Number
- Use of equipment and who is using the equipment
- Condition of Property (new, used, good)
- Disposition Date

Completion of inventory includes noting the condition of the equipment, identifying equipment for replacement or disposal, and adding new items. The inventory database must be updated as equipment items are disposed, transferred or new purchases are made.

Adequate safeguards must be in place related to the loss, damage, or theft of the equipment. Any loss, damage, or theft should be investigated and fully documented.

The following process will be followed:

- 1. Federal Guidelines states: Equipment (including pilferable items) purchased with federal funds will be marked with information on the program and purchase year. Significant technological items are now available for under \$500.00. For inventory purposes, in the Memphis-Shelby County Schools, all "Significant technological items" that cost \$100.00 will be inventoried. For example: digital cameras, iPads, Microsoft tablets, laptops, and computers that may be easily lost or stolen and are defined as having a useful life of more than one year.
- 2. A physical inventory of the property must be taken, and the results reconciled with the property records once per year. The Office of Asset Management will coordinate with school leaders regarding annual physical inventory. The inventory must also be signed and dated by the Principal/Administrator or Asset Management. A physical inventory must be conducted of property located in all Title I, Charter and Non-Public schools including N&D Facilities, annually.

3. All equipment must be disposed of according to guidance from The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Rewards (2 C.F.R. Part 200.313(e) and the ACSS disposition policy.

#### <u>Acquirement & Receipt of Assets:</u>

- The Office of Asset Management should be contacted by the school's designee within 3-5 business days after equipment is received in a school with an acquisition cost of \$100 -\$4999.
- Capitalized equipment (over \$5,000 per item) Asset Management should be contacted immediately by the school within one (1) business day.
- Schools must complete the Federal Inventory Receipt Form (FIRF) in its entirety for all newly received equipment purchased with federal funds.
- Forward the completed Federal Inventory Receipt Form (FIRF) along with Reimbursement Request to the Office of Asset Management via email at: AssetManagement@scsk12.org.
- Reimbursement Requests should include:
  - Reimbursement request number.
  - Copy of proof of payment (school check/CC Statement, etc.)
  - A detailed itemized list of items purchased on the Federal Inventory Receipt Form
- All newly purchased trackable equipment with federal funds must include description, model, serial number, P.O. number, funding source, unit cost, etc. Please refer to MSCS Inventory Procedures Manual.

#### **TAGGING OF NEW ASSETS:**

- The Charter, Private, N&D school site's Federal Programs POC should contact Asset Management within 3-5 business days of receiving new equipment.
- After receipt of the Federal Inventory Receipt Form and MSCS Reimbursement forms (supporting documentation), the Federal Programs Inventory Manager will schedule a time for a site visit.
- All equipment should be in a centralized area and separated by the MSCS Reimbursement Number(s) to ensure limited disruption to classroom instruction.
- After the item has been assigned an asset tag number by the Office of Asset Management, an MSCS asset tag is affixed to the equipment along with the federal project or program label.

Note: Each Charter School site should retain a copy of the Federal Inventory Receipt Form purchased with federal funds in the school file for monitoring purposes.

#### **PHYSICAL INVENTORY:**

Federal guidelines and state regulations dictate that a complete physical inventory of all equipment and sensitive items under each school's accountability be taken annually, and each school will be required to perform a physical inventory or as deemed necessary by the Chief Internal Audit. The responsibility for performing this task shall rest with each individual school with the assistance of Asset Management for which an inventory has previously been established.

These inventories shall then be subject to subsequent verification by the Office of Asset Management. Results of the physical inventory will be reconciled, coordinated, and reported to the Superintendent, Chief of Staff, Chief of Business Operations, Chief of Internal Audits, Chief of Finance, Deputy Superintendent of Academics, Associate Superintendent of Charter Schools, and/or Assistant Superintendent of School Operations.

#### **Prior to Physical Inventory**

- The Office of Asset Management (OAM) will schedule an annual physical inventory beginning in November-December with each charter school.
- OAM will contact the charter school's point of contact one month in advance to schedule an annual physical inventory via email.
- OAM will add inventory schedule into February- April's Charter Chatter newsletters for an additional reminder of physical inventory.
- Individual charter schools will be provided with a copy of their site's inventory to prepare
  for the physical inventory (i.e., update inventory, locate items on inventory and make sure
  their location aligns with the inventory, etc.)

#### **Day of Physical Inventory**

- The OAM team will arrive at the charter school according to the date and time previously scheduled.
- Charter POC will be prepared with supporting documentation from the inventory database.
- Charter POC will escort the OAM team rooms to verify equipment that is affixed to the wall, ceiling, etc. as listed on their inventory report.
- All movable equipment should be placed in a centralized area for the OAM team to scan and verify equipment listed on the site's inventory report.
- The OAM team and Charter POC will confirm that the equipment is in the area identified on the inventory and condition documented as good, fair, poor, etc.
- OAM Leadership and Charter POC will debrief and discuss any missing items, items deemed stolen or any new items that need to be added to the inventory.

#### After the Physical Inventory

- The OAM team will contact the Charter POC, School Leader and all required contacts including the Office of Charter Schools (OCS) in writing of inventory status within 10 days.
- If OAM finds the status of the physical inventory to be non-compliant, they will contact the OCS and include the missing items and total costs.
- The OCS will issue a memorandum of non-compliance to charter schools found to be non-compliant and copy all required contacts, OAM, and Budget and Finance
- Individual charter schools will follow up with OCS, OAM and Budget and Finance with the necessary steps outlined to become compliant by the date indicated on the memorandum of non-compliance.

#### **Off-Site Use of Equipment:**

Equipment to be used off site is checked out to the individual making the request for taking equipment to a different location even if within the school building. Equipment must be used according to its funding source.

#### **Procedures for Disposition of Equipment:**

Original or replacement equipment acquired with federal funds is no longer needed for the original project or program, the equipment may be retained, sold, or disposed, if it is not needed in any other Title I, Part A like or federally funded project or program. MSCS will ensure that records are kept and made available for monitors and auditors as to where the equipment was transferred.

The disposition of such items should be noted on the equipment inventory maintained by the recipient with date of disposal and sales price, or the method used to determine current fair market value.

#### **Various Equipment Dispositions:**

The Office of Asset Management will not delete, add, or adjust assets without written proof/explanation. The Office of Asset Management should be notified of all transfers of fixed assets between schools/buildings/personnel/etc. Examples of these transfers are:

- a) Transfer of equipment from school site/department for sale/disposal.
- b) Transfer of equipment from site to site.
- c) Transfer of equipment between personnel.

#### **Traded/Defective Equipment:**

Return of fixed assets to vendors for exchange/replacement, repair, or credit should be reported to Asset Management along with supporting documentation as soon as possible.

#### Disposal:

Charter, Private and N&D school personnel <u>WILL NOT</u> dispose of any Fixed Assets purchased with federal funds. All Disposals MUST be approved by the Office of Asset Management. All property will be picked up by MSCS Inventory Control personnel ONLY for proper disposal.

A Disposal Request Form must be completed and submitted to the Office of Asset Management for approval prior to the removal of equipment earmarked for disposal from your site. All documents must be emailed to <a href="mailto:AssetManagement@scsk12.org">AssetManagement@scsk12.org</a> for review. The equipment disposal process will follow all regulations based on Code of Federal Equipment 200.313(e).

#### **Broken/Lost Assets:**

If a fixed asset assigned specifically to a Charter, Private and N&D school employee (iPad, laptop, etc.) is broken or lost due to employee negligence or improper safe keeping, the employee should be responsible for replacing the asset.

#### Theft/Stolen of Equipment or Technology Funded by Federal Funds:

In the event Federal Programs equipment or technology is stolen and/or lost the following procedure will be followed:

- Immediately notify the Memphis Police Department (MPD) to file a police report.
- Within one (1) day of the acknowledgement of the theft, contact the Office of Asset Management at 901-416-2830 or via email at <u>AssetManagement@scsk12.org</u>.
- The School Break-In, Theft and Damage Report Form must be completed and forward to the Office of Asset Management and Federal Programs.
- The school should retain a copy of the completed form with the Police Report number.
- A full and thorough audit of the inventory will be conducted to bring the school site into compliance.

#### **ESSA/ESSER/IDEA:**

Departments such as Federal Programs ESSA/ESSER or Exceptional Children (IDEA) have special requirements in terms of managing fixed assets, particularly regarding disposal of equipment. All equipment purchased with federal dollars labels must identify: Project Name, Date of purchase and Project year.

#### **Personal Property:**

Personally, owned property is not included in the school's fixed asset inventory records. There is no insurance coverage in the case of loss, theft, or damage for this type of personal property. All personal property must be clearly identified as such to include the owner's name, school/dept. name and telephone number. This information should be visible on each personal item.

#### **Employee Leave/Retirement:**

Charter, Private and N&D schools' principals and/or their designee(s) are responsible for collecting iPads, laptops, cell phones, etc. from employees at their schools who transfer to another site, leave, or retire. The fixed assets **MUST** be returned on or before the employee's last day of service. All returned devices must be reset to manufacturer's setting.

#### Monitoring/Tracking of Equipment and Inventory

The principal or his/her designee at each respective school site is responsible for managing the day-to-day operations of the grant and its supported activities to ensure that the requirements of the grant are met. The monitoring and tracking include the purchasing, use and disposal of fixed assets. These federal regulations and requirements also require the state educational agency (SEA) to monitor the implementation of program requirements and expenditures of federal funds.

### **APPENDIX**

#### **Asset Management Forms**

#### **TDE 2702-Inventory & Equipment Policy**

This policy outlines the requirements for charter and non-public sites receiving federal funds for the purchase of equipment.

#### **Federal Inventory Equipment Form**

This form should be used to report newly purchased equipment with federal funds.

#### **Asset Disposition Form**

This form should be used to request a transfer of equipment from site to site, disposal pick up request and when equipment is reported stolen. Please ensure you check the correct disposition box.

#### School Break-In, Theft and Damage Form

This form should be used to report when equipment is reported stolen. A police report number must be included on the form.

\*\*Missing equipment should not be reported as stolen.\*\*

#### **Missing Equipment Control Form**

This form should be completed when equipment is unaccounted for and/or not found during a routine cycle count and/or physical inventory.

TENNESSEE PUBLIC CHARTER SCHOOL COMMISSION					
INVENTORY AND EQUIPMENT 2702					
ADOPTED:	REVISED:	MONITORING: Review: Annuall	у		

Each authorized charter school shall establish accurate inventory and equipment policies and procedures for all school real and personal property, in compliance with the Tennessee Internal School Uniform Accounting Policy Manual.

Equipment Procured with Federal Dollars. The school shall comply with all regulations tied to such federal funds, including 2 C.F.R. Part 200 - Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, ESSA, IDEA, and any other applicable federal or state laws.1 The school's equipment and inventory policies and procedures shall include a definition of equipment (that is the same as or more restrictive than the State of Tennessee's definition) and property records which include all equipment purchased with federal funds. Policies and procedures shall ensure that any equipment purchased with federal dollars is essential to and purchased for the benefit of the program from which it was funded. Additionally, policies and procedures shall include the tracking and usage of sensitive minor equipment. Property records of equipment purchased with federal dollars must be maintained and include a description of the property; a serial number or other identification number; the source of property; the titleholder; the acquisition date; the cost of the property; the percentage of federal participation in the cost of the property; the location, use and condition of the property; and any ultimate disposition data including the date of disposal and sale price of the property. A physical inventory of the property must be taken and the results reconciled with the records at least annually. Procedures shall provide for adequate maintenance of property and a control system to prevent loss, damage or theft.

Additional information regarding inventory and equipment requirements can be found in the State Board's Operating Policies and Procedures for Implementation and Administration of Federal Education Programs document.

Cross References:

Tennessee Internal School Uniform Accounting Policy Manual; Section 4-23, Section 4-25

Legal References:

<sup>&</sup>lt;sup>1</sup> EDGAR 34 Subtitle A Part 80.32; 2 C.F.R. Part 200

#### Federal Inventory Report Form (Charter & Private Sites only)

	School 20 SY Federal Inventory Receipt Form (FIRF)												
	20 SY Federal Inventory Receipt Form (FIRF) Funding Source:												
Date Irdered	Item Description	Serial Number	Model Number	Purchase Order Number	Program/Project	Budget Codes	Acquisition Date	Acquisition Cost	Vendor	Quantity Ordered	Location/ Campus	Condition of Equipment: Excellent/ Good/ Fair/Poor	Disposition (New)
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#### School Break-In, Theft and Damage Report Form

Memphis-Shelby County Schools Form No. 14671 Asset Disposition Form										
From	ı:		Loc.	To:			Lo	oc		
From:										
Add		ndicate Type al D Stolen [	□ Traded □	Office Use Only           Date Received						
Qty.	Asset Description	SCS ID No.	Serial Number/ Model No.	Manufacturer	P.O. Number/ Accounting Code	Program/ Project	Date Purchased	Original Cost		
	School/Division Authorization Receipt Authorization									
8	Shipper's Name		Date	Delivered b	у		Da	te		
F	Received by		Date	Receiver's N	ame (please print)					

#### School Break-In, Theft and Damage Report Form



#### Memphis-Shelby County Schools Office of Asset Management School Break-In, Theft and Damage Report

~		Oct	noor Dream in, I need a	no Damage Re	pore				
School Nar			Loc. Code:		Date of Theft/Damage: Police Report #:				
Check one: The items listed below are to be replacedyea/no or are being reported for accounting purposed/no replacement. Time and Date Security Notified									
	Police Department MUST BE NOT apon diacovery of a break-in.	TFIED in ALL	cases of burglary or loss of e	quipment <u>as a res</u> y	(t.of larceny. Te	lephone the Ot	Mice of Sec	surity Serrices, 416-5773,	
	to be completed and submitted to the discovery of the loss.	Office of Asset	Management, 1384 Farmy	ile Road, Mempl	iis. TN 38122, L	oc. 8223, <u>na le</u>	ster than t	he first school day	
INCIDENT TYPE	Detailed Description (Manufacturer, Laptop, etc.)	MSCS Barcode	Serial#	Model #	Acquisition Date	Project/ Program	Rm #	Contact Person	
Under "Type Incident" indicate Burglary (treak-in); Larceny (theft during school hours): Amon, Vandalism and Danage due to water, figs or other causes (State cause).  Comments:  Send copy of completed form to Security Services, Koom 143  Principal's Signature/Date:									
Duplicate form a Senteed 01/22	s meeded[								

**17** | Page



#### MISSING EQUIPMENT CONTROL FORM

DATE	
SCHOOL NAME	CAMPUS/LOC. CODE:
PLEASE ANSWER THE FOLLOWING QUES	TIONS IN DETAIL.
1) What was the last known location/room no.	of the missing equipment?
2) When was the missing equipment last seen	?
3) Was the missing equipment vital to the open	ration of your school? YESNO
4) When was the equipment last used?	
5) Who was the equipment assigned to at the t	time it was declared missing:
6) Please describe what steps have been taken	n to locate the missing equipment:
7) Is faculty/staff familiar with the Inventory Pro	ocedures Manual? YES NO
8) Have the Faculty/Staff been educated in way	ys to avoid future losses? YESNO
9) Was the equipment purchased with federal	funds (ESSA, ESSER, IDEA, or other)? YESNO
If so, please indicate:	
10) Please describe steps that have been take	n to prevent equipment loss from occurring in the future:
PLEASE OBTAIN THE FOLLOWING SIGNATURE MANAGEMENT, ATTN: FEDERAL PROGRAM	URES. UPON COMPLETION, PLEASE RETURN TO THE OFFICE OF ASSET INVENTORY MANAGER, LOC. 8223
Signature of Teacher/Support Staff	Date
Signature of Principal/Administrator	Date
Signature of Office of Charter Schools Director	Date

#### **FAQs**

- 1. What's the board policy number for Inventory?
  - Memphis-Shelby County Schools Board Policy #3013
- 2. What is equipment?
  - Equipment is defined as "all items" used in an operation or activity and includes machinery, implements, tools, furniture, vehicles, band instruments and other apparatus with a minimum useful life expectancy of five (5) years. Sensitive minor equipment included computers, external peripherals, weapons, etc.
- 3. When is a physical inventory conducted?
  - Annually, federal guidelines and state regulations dictate that c complete physical inventory of all equipment and sensitive items under each school/department's accountability be taken annually. The Office of Asset Management shall be responsible for establishing and announcing each physical inventory period.
- 4. Should I keep a record of my school inventory?
  - Yes, schools should keep an accurate record of all equipment at the school. The record should include: MSCS asset tag number, description, model number, serial number, P.O. number, funding source, unit cost, quantity, and acquisition date.
- 5. What should I do when I receive new equipment?
  - Complete the <u>Federal Equipment Inventory Form</u> on all new equipment costing \$100 or more within two (2) business days. The completed form(s) should be emailed to <u>AssetManagement@scsk12.org</u> along with the "Reimbursement" supporting documentation.
- 6. What's the location of the Office of Asset Management?
  - 1384-A Farmville Road, Memphis, TN 38122, Loc. #8223
- 7. What should I do if equipment is stolen?
  - When equipment is stolen, immediately notify the Office of Asset Management at 416-2830 and the Memphis Police Department to file a report. The MSCS School Break-in, Theft & Damage Report Form including the Police Report Number must be completed and submitted to the Office of Asset Management and Federal Programs within one (1) day of the acknowledgement of the theft. Schools must retain a copy of the completed form with the Police Report number.