

## **East Noble School Corporation (ENSC)**

Disclaimer (No Legal/Tax/Financial Advice). These procedures are adopted for ENSC governance and risk-management purposes only. They do not constitute legal, tax, or financial advice to any School-Connected Organization (SCO) or its members. SCOs should consult their own legal counsel, tax professionals, and financial advisors as appropriate.

### **Procedures & Required Forms for School-Connected Organizations**

Booster Clubs, Parent-Teacher Organizations (PTO/PTA), and Support Groups

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# East Noble School Corporation and School Connected Organization Procedures

## 1. Purpose & Scope

East Noble School Corporation (ENSC) encourages families and community members to form School-Connected Organizations (SCOs) to support students and school programs. Unlike Extra-Curricular Accounts (ECAs), which are managed directly by ENSC and must comply with the financial procedures and recordkeeping standards set by East Noble School Corporation and the Indiana State Board of Accounts, SCOs are independent entities and are not legally affiliated with ENSC. To use East Noble names and logos or to be officially recognized by ENSC, SCOs must adhere to the following procedures, which are divided into required actions and strongly recommended best practices. These procedures establish clear expectations for governance, fundraising, financial controls, and approvals, so SCOs can operate transparently, lawfully, and in alignment with the values of ENSC. **All “Required” items in this document are conditions for ENSC recognition and for permission to use ENSC names/logos and facilities; they are not stated as universal statutory mandates for all informal parent groups.**

## 2. Definitions (School-Connected Organizations)

A School-Connected Organization (SCO) is an independent group (booster club, PTO/PTA, performing arts parent group, etc.) that raises funds or provides support for an ENSC school, team, activity, or program.

SCOs are separate legal entities from ENSC and may not use ENSC bank accounts, tax ID/EIN, purchasing accounts, tax exempt status, or credit cards. SCO funds must never be commingled with school activity funds or corporation funds.

## 3. Required Approval & Annual Renewal

No SCO may represent itself as supporting an ENSC school, team, or program—use East Noble’s names or logos—or conduct fundraising on that basis—until the SCO is approved by the building principal and the Superintendent/designee. Approval is granted for one school year and must be renewed annually by submitting annual reports to the building principal prior to the end of the fiscal year on June 30<sup>th</sup>. ENSC employees may participate in an SCO, provided they do not hold any position with financial authority, are not listed on the bank account or other legal financial documents of the SCO, and do not perform SCO duties during time for which they are being compensated by East Noble School Corporation. Any ENSC employee who participates in an SCO must complete and sign the ENSC Employee SCO Conflict of Interest Acknowledgement and Agreement in Appendix E annually, or upon beginning participation. Any arrangement inconsistent with these requirements will be considered a conflict of interest and grounds for denial or revocation of approval.

## 4. Standard Governance Requirements and Strongly Recommended Best Practices

### Required:

- Incorporate as a Nonprofit Organization with the Indiana Secretary of State
- Obtain a Federal Employer Identification Number from the IRS
- Maintain reporting compliance with the State of Indiana and the IRS
- Establish Officer Slate: President, Vice President, Secretary, Treasurer

- Governing document (bylaws/constitution) including purpose, membership, elections, meetings, officer duties, fiscal year, and dissolution clause
- If ENSC staff participate in the SCO, they may do so only in non-financial roles and may not exercise financial authority on behalf of the SCO
- ENSC staff participating in the SCO must not perform SCO duties while being compensated for performing duties for East Noble School Corporation

## Recommended:

- Separation of duties: no single person should control authorization, custody of funds, and recordkeeping
- Meeting minutes documenting approvals for budgets, fundraising events, and expenditures
- Annual budget and periodic financial reporting to members
- Annual internal financial review or audit (by non-signers) and transition procedures for new treasurers
- Obtain and maintain 501(c)(3) charitable status and tax-exempt status as appropriate, including timely filings and renewals with the IRS and the State of Indiana
- Secure a gambling license if the organization conducts raffles, bingo, or other gaming activities, and ensure compliance with all state and local regulations regarding charitable gaming

## 5. Financial Management & Cash Handling Standards

### Required:

- Bank account in the SCO's legal name using the SCO's FEIN (not the school's).
- ENSC employees shall not be listed as authorized signers, account holders, or otherwise hold any position with financial authority over the SCO's bank account or financial transactions

### Recommended:

- Bank account having two unrelated authorized signers
- Two-person count for all cash collections; completed cash count sheet signed by both counters
- Deposits intact and timely (target: within 1–2 business days of receipt)
- No cash payments; disbursements by check or electronic payment with documentation
- Dual authorization for payments (e.g., Treasurer prepares; President approves; two-signature checks when available)
- Accounts receivable log when invoices/pledges are issued, accounts payable file for invoices and reimbursement requests
- Pre-numbered receipt books or electronic receipt for cash collections
- Monthly bank reconciliation by someone other than the primary check signer when feasible; treasurer report to membership

- Documentation retention (recommended: 7 years for financial records)
- Optional but recommended: fidelity bond/employee dishonesty coverage for officers handling funds

## 6. Purchases & Authorized Purchasers

SCO purchases must be made under SCO authority and paid for by SCO funds. ENSC staff may not obligate SCO funds without SCO approval. Each SCO must maintain a list of Authorized Purchasers who may initiate purchases, and a separate list of Authorized Approvers who approve payment.

Recommended control: Authorized Purchasers submit a purchase request; Treasurer confirms budget and documentation; President (or designee) approves before ordering; Treasurer processes payment after receiving itemized invoice/receipt.

## 7. Fundraising & Use of ENSC Name/Facilities

SCO fundraising must be pre-approved by the building principal and or superintendent (and may require additional approvals for food, raffles/games of chance, use of logos/mascots, or facility use and a separate building usage form would need to be completed, approved and supported with proper certificate of liability listing ENSC as additionally insured.). Advertising should clearly identify the SCO as the sponsor.

## 8. Insurance, Risk, and Contracts

SCOs should maintain general liability insurance appropriate to their activities. Contracts must be signed by SCO officers (not ENSC employees) unless the contract is an ENSC contract approved through ENSC processes.

## 9. Start – Up Checklist

Recommended: Attend an ENSC information session/training for SCO officers (if offered) covering these procedures, cash-handling controls, facility use, and brand/disclaimer requirements.

### Required:

- Form an organizing committee and define the mission (athletics, performing arts, building support).
- Select a proposed name; the use of ENSC names and logos are only authorized if the SCO is compliant with all required procedures and proper forms have been filed and approved with the building administration and or the superintendent (e.g., “East Noble HS Band Boosters”).
- Draft bylaws (use the required elements checklist below).
- Elect officers and adopt conflict-of-interest and financial policies.
- Apply for an EIN (IRS) to open a bank account.
- Open a bank account in the SCO name and establish signers.
- Submit the ENSC SCO Application Packet (Appendix A) for Principal + Superintendent approval.

- File annual compliance documents; complete annual internal financial review and officer transition steps.

## Recommended:

- If seeking 501(c)(3) status: incorporate (recommended) and file IRS Form 1023 or 1023-EZ; then apply for Indiana sales tax exemption (NP-20A) once IRS determination letter is received.
- If conducting raffles/bingo/pull tabs: complete Indiana Gaming Commission qualification and licensing steps before the event.

### 10. Bylaws Elements Checklist

- Name and purpose (charitable/educational; support of specific ENSC program)
- Membership (who can join; dues if any)
- Officers, terms, elections, vacancies, duties
- Meetings (regular/annual; quorum; voting)
- Committees (optional)
- Financial controls (budget approval, signers, reimbursements, audits)
- Conflict of interest policy
- Dissolution clause (assets to another 501(c)(3) or governmental unit)
- Amendment process

## APPENDIX A — ENSC School-Connected Organization (SCO) Application

Complete this application for initial approval and for annual renewal prior to fiscal year end June 30<sup>th</sup>. Attach required documents listed at the end.

Organization Name	[Type here]
Type (Booster / PTO / Performing Arts / Other)	[Type here]
School/Program Supported	[Type here]
Primary Purpose (1–2 sentences)	[Type here]
School Year for Approval	[Type here]
Mailing Address	[Type here]
Website/Social Media (if any)	[Type here]

### Officers

President (Name, Phone, Email)	[Type here]
Vice President (Name, Phone, Email)	[Type here]
Secretary (Name, Phone, Email)	[Type here]
Treasurer (Name, Phone, Email)	[Type here]

### Authorized Purchasers & Approvers

List individuals authorized to initiate purchases and those authorized to approve payment (recommended: different people).

Authorized Purchasers (names/titles)	[Type here]
Authorized Payment Approvers (names/titles)	[Type here]
Bank Authorized Signers (names)	[Type here]

### Financial Information

EIN (required for bank account; do not use ENSC EIN)	[Type here]
Bank Name	[Type here]
Last 4 digits of account number	[Type here]
Fiscal Year End (month/day)	[Type here]
Expected annual revenue (estimate)	[Type here]

### Compliance Acknowledgements (check all)

- We understand the SCO is independent and not an agent of ENSC.
- We will not commingle SCO funds with ENSC funds or store SCO funds in school safes.
- We will follow two-person cash counts and maintain supporting documentation for all deposits and payments.
- We will provide an annual financial report and an internal financial review/audit summary to the principal.
- We will obtain required licenses/approvals for raffles or other charity gaming before the event.
- We will not represent purchases as tax-exempt unless properly qualified and permitted by law.

We understand that ENSC staff may participate in the SCO only if they do not hold any position with financial authority, are not listed on SCO bank accounts or other financial documents, and do not perform SCO duties while being compensated for performing duties for East Noble School Corporation.

**Attachments Required (initial & renewal)**

- Current bylaws/constitution (signed & dated)
- Current officer roster and contact information
- Financial policies (cash handling, reimbursements, approvals)
- Most recent annual financial report (renewals)
- Proof of insurance (if applicable/available)
- IRS determination letter (if 501(c)(3) recognized)

**Approvals**

Principal / Building Administrator (Name)	[Type here]
Principal Signature / Date	[Sign / Date]
Superintendent / Designee (Name)	[Type here]
Superintendent Signature / Date	[Sign / Date]

## **APPENDIX B — 501(c)(3) & Indiana Tax Steps (Checklists)**

### **D1. Federal EIN (IRS) Checklist**

- Choose responsible party (officer)
- Gather legal name, address, organizer info
- Apply for EIN (IRS Form SS-4 / online)
- Record EIN and keep confirmation letter
- Use EIN to open bank account

### **D2. Incorporation (Recommended) Checklist — Indiana Secretary of State**

- Name availability search
- Prepare Articles of Incorporation with 501(c)(3) language (purpose + dissolution)
- File Articles of Incorporation and retain stamped copy
- Adopt bylaws and conflict of interest policy
- Hold organizational meeting; approve banking resolutions; minutes filed

### **D3. IRS 501(c)(3) Recognition Checklist**

- Determine whether eligible for Form 1023-EZ; if not, use Form 1023
- Prepare narrative of activities and financial projections (Form 1023)
- Create/confirm required governing document clauses (purpose + dissolution)
- Create conflict of interest policy
- Submit application via Pay.gov and pay user fee
- Retain IRS determination letter once approved
- File annual IRS Form 990-series return as required

### **D4. Indiana Sales Tax Exemption (DOR) Checklist**

- Receive IRS determination letter (required)
- Apply through Indiana DOR INTIME using Form NP-20A
- Maintain records; file NP-20R (periodic report) as required to keep registration
- Understand sales tax collection thresholds for nonprofit sales/fundraising

## APPENDIX C — Charity Gaming (Raffles/Bingo) Steps & Worksheet

If the SCO plans raffles, bingo, pull-tabs, casino nights, or other “charity gaming,” review Indiana Gaming Commission (IGC) requirements. Complete this worksheet before planning the event.

### E1. Event Planning Worksheet

Proposed Activity Type (raffle/bingo/etc.)	[Type here]
Event Date(s) and Location	[Type here]
Total prize value per activity (estimate)	[Type here]
Total prize value for calendar year (estimate)	[Type here]
Will tickets/chances be sold online? (must comply with IGC rules)	[Yes/No]
Dedicated charity gaming bank account established?	[Yes/No]

### E2. Licensing Path Checklist (IGC)

- Confirm organization is a “qualified organization” under IGC rules
- Submit CG-QA Qualification Application with required attachments
- Determine license type: Annual (CG-AL), Single (CG-SL), Festival (CG-FES) or Exempt Notification (CG-EN) if eligible
- Submit required Schedules (e.g., Schedule A operators; Schedule B workers) as applicable
- Maintain required records and file reports after event as required by license type

## **APPENDIX D — Standardized Language & Templates (ENSC Requirements)**

D1. Standard Independence Disclaimer (required on fundraising materials, websites/social media, ticketing pages, and sponsorship solicitations):

“This organization is independent of East Noble School Corporation (ENSC) and is not an agent of ENSC. ENSC does not control or supervise this organization’s funds or operations.”

D2. Standard Contract Clause (required in SCO vendor/sponsorship/rental contracts):

“The School-Connected Organization is the sole contracting party. East Noble School Corporation (ENSC) is not a party to this agreement, has no payment or indemnity obligation under it, and no agency relationship is created or implied.”

D3. Sample Dissolution Clause (recommended for governing documents submitted with application/renewal):

“Upon dissolution of the organization, assets shall be distributed for one or more exempt purposes within the meaning of section 501(c)(3) of the Internal Revenue Code, or to the federal government, or to a state or local government, for a public purpose, as determined by the organization’s governing body and consistent with applicable law.”

D4. Facility Use Agreement (summary). For SCO events on ENSC property, a facility use agreement may be required and may include insurance requirements, additional insured status, and hold-harmless/indemnification provisions as determined by ENSC.

## APPENDIX E — ENSC Employee SCO Conflict of Interest Acknowledgement and Agreement

This acknowledgement and agreement is intended to prevent real or perceived conflicts of interest and to protect the integrity of both the School-Connected Organization (SCO) and East Noble School Corporation (ENSC). Any current ENSC employee who participates in or provides volunteer support to an SCO shall sign this form annually, or upon beginning such participation, to confirm understanding of and agreement to the requirements below. These expectations are intended to preserve clear separation between an employee’s duties to ENSC and any voluntary involvement with an SCO, consistent with conflict-management principles recognized in nonprofit governance guidance and Indiana public-sector ethics materials.

1. **Separate Roles.** I understand that my role as an East Noble School Corporation employee is separate from my voluntary role with the SCO.
2. **No SCO Duties During Work Time.** I will not perform SCO duties while working for ENSC or during any time for which I am being compensated by ENSC. This includes, but is not limited to, planning SCO activities, sending SCO communications, collecting money, organizing fundraisers or events, maintaining SCO records, or performing other SCO-related tasks during my ENSC work time.
3. **No Financial Authority.** I will not hold any position with financial authority in the SCO and will not serve as a signer, account holder, treasurer, or other person responsible for SCO funds or financial records.
4. **No Use of ENSC Position.** I will not use my ENSC position, title, time, or resources in a way that creates a real or perceived conflict of interest with the SCO.
5. **Disclosure of Conflicts.** I will promptly disclose any actual, potential, or perceived conflict of interest to the building principal and SCO leadership.
6. **Consequences.** I understand that a violation of this agreement may result in removal from the SCO and may also result in corrective action by East Noble School Corporation.
7. **Acknowledgement.** By signing below, I confirm that I have read, understand, and agree to comply with this acknowledgement and agreement.

### Employee Acknowledgement

Employee Name	[Print Name]
Position / School / Department	[Print Position / School / Department]
SCO Name	[Print SCO Name]
Employee Signature	_____
Date	_____

### Review and Approval

Title	Printed Name	Signature / Date
SCO President or Vice President	_____	_____
Building Principal	_____	_____
Superintendent or Designee	_____	_____

## Board Summary of Revisions Made on May 14, 2026

This summary is provided for Board review to outline the revisions made to the East Noble School Corporation Procedures and Required Forms for School-Connected Organizations. The revisions are intended to clarify the role of East Noble School Corporation employees in School-Connected Organizations, reduce the risk of real or perceived conflicts of interest, and strengthen administrative oversight and accountability.

### 1. Employee Participation in School-Connected Organizations

The document was revised to allow current East Noble School Corporation employees to participate in School-Connected Organizations in limited, non-financial roles. The revised language makes clear that ENSC employees may participate only if they do not hold any position with financial authority, are not listed on SCO bank accounts or other financial documents, and do not perform SCO duties during time for which they are being compensated by East Noble School Corporation.

### 2. Revisions to Sections 3, 4, and 5

Section 3 was revised to reflect that employee participation in an SCO is permitted only under the restrictions described above and to require completion of Appendix E by any ENSC employee who participates in an SCO. Section 4 was revised to clarify that ENSC staff may participate only in non-financial roles and may not exercise financial authority on behalf of an SCO. Section 5 was revised to state that ENSC employees may not be authorized signers, account holders, or otherwise hold financial authority over an SCO bank account or financial transactions.

### 3. New Appendix E

A new Appendix E, titled **ENSC Employee SCO Conflict of Interest Acknowledgement and Agreement**, was added to the document. This appendix establishes a signed annual acknowledgement for current ENSC employees who participate in or support an SCO. It states that the employee's ENSC role must remain separate from SCO activities, prohibits SCO duties during compensated ENSC time, prohibits financial authority within the SCO, requires disclosure of actual, potential, or perceived conflicts of interest, and states that violations may result in removal from the SCO and possible corrective action by East Noble School Corporation.

### 4. Signature and Approval Requirements

Appendix E was revised so that the acknowledgement is signed by the participating ENSC employee and formally reviewed and approved by the SCO President or Vice President, the Building Principal, and the Superintendent or Designee. The signature section was also simplified and reformatted to present the acknowledgement as a more formal administrative document.

### 5. Purpose and Intended Impact

Together, these revisions are intended to allow appropriate staff participation in School-Connected Organizations while protecting the independence of SCO operations, reducing the likelihood of actual or perceived conflicts of interest, strengthening financial safeguards, and providing a clear process for annual acknowledgement and administrative oversight.