

**SOUTH CENTRAL IOWA  
COMMUNITY ACTION PROGRAM, INC.  
(SCICAP)**

**FISCAL PROCEDURES MANUAL**

**Revised March 28, 2018**

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## **GENERAL**

The SCICAP Fiscal Procedures Manual has been developed with the intent of establishing and implementing a clear and concise set of guidelines for recording and controlling the receipt, custody, and disbursement of all agency assets. To this end, the SCICAP By-laws and Employee Manual are incorporated herein by reference.

SCICAP supports public disclosure and transparency of financial information. The annual audit is published on the agency website. All contractual financial requirements shall be met. Any public request for financial information, allowed by federal, state and agency guidelines, will be provided. A copy fee may be charged.

The Fiscal Officer will review the financial procedures annually, and update policies as needed in the Fiscal Procedures Manual with the approval of the Executive Director and Governing Board prior to implementation. The Governing Board voted to adopt the requirements of the Super Circular (2CFR) issued by the federal government effective July 2015.

The Governing Board will have oversight responsibilities for the financial management of the agency's funds.

The Fiscal Officer shall be responsible for the training and cross-training of all fiscal personnel, and must be capable of actually performing the duties of absent fiscal personnel.

Fiscal duties and responsibilities shall be separated as possible so that no one employee has sole control over cash receipts, disbursements, payroll, reconciliation or bank accounts, etc.

All reports generated from within the Fiscal Department shall be reviewed and approved by the Fiscal Officer, the Executive Director or their designee prior to release.

The Executive Director shall designate signature authority if needed. In addition, contract language may allow for designated signees. The agency will comply with all contract language.

## **CODE OF CONDUCT**

1. Employees of SCICAP, Inc. and delegate agencies are prohibited from accepting gifts, money and gratuities from persons receiving benefits of service under the SCICAP program or performing services under contract or otherwise in a position to benefit from an employee action. No employee, officer or agency of South Central Iowa Community Action Program, Inc. shall participate in the selection, award or administration of a contract or procurement in which federal funds are used, where to the employee's knowledge he / she or their immediate family or partners has a financial interest or with who he / she is negotiating or has any arrangements concerning prospective employment. SCICAP, Inc. officers, or agents, shall neither solicit nor accept gratuities, favors or anything of monetary value from contractors or potential contractors.

2. Any employee or agent found in violation of this section is subject to immediate suspension without pay until a complete investigation of the case is reviewed by the Executive Director, Board Chairperson and Personnel Committee. If the employee is found guilty of said violation, termination of employment by SCICAP, Inc. will result. This is not intended to preclude bona-fide agency fund-raising activities.
3. All board members and all staff with purchasing authority will sign conflict of interest forms. Forms will be kept in appropriate manner.<sup>1</sup>

## **EMPLOYEE PROTECTION POLICY**

SCICAP believes that in order for the agency to engage in its mission, its financial practices and management must be free from any activities that may be illegal or constitute fraud and abuse. To that end, SCICAP encourages employees who have a reasonable belief that there has been a violation of law or rule, mismanagement, a gross abuse of funds, an abuse of authority, or a substantial and specific danger to public health or safety may have occurred to contact the Executive Director. If the employee for any reason feels reporting to the Executive Director is not possible, employee should contact the Board Chairman. The employee may make such a report anonymously. Any report should contain sufficient information to permit an appropriate internal investigation to occur. The investigation shall be conducted in as confidential a manner as permitted under the circumstances. Based upon the results of the investigation, appropriate corrective action will be taken, including but not limited to appropriate discipline of the employees involved in the improper conduct and implementation of systematic controls and procedures to reduce the risk of a similar situation occurring. The reporting employee will be notified of the conclusion of the investigation; however, due to confidentiality concerns, the reporting employee will not be privy to the results of the investigation or the resulting discipline, if any, of individuals involved in the improper conduct.

Any employee who makes a report shall not be subject to adverse employment action by SCICAP for making the report, even if the report is investigated and proved to be unfounded. Such adverse employment action shall include firing, demotion, suspension, harassment or failure to consider the employee for promotion.

### Oversight Agencies Contact Numbers:\*

**SCICAP**  
 1711 Osceola Ave.  
 Chariton, IA 50049  
 641-774-8133  
 Fax: 641-774-8139

**Office of Citizens' Aide**  
 Ola Babcock Miller Building  
 1112 East Grand  
 Des Moines, IA 50319  
 (515) 281-3592  
 1-888-426-6283  
 Fax 515 242-6007

Email: [ombudsman@legis.state.ia.us](mailto:ombudsman@legis.state.ia.us)

**Iowa Department of Human Rights  
 Division of Community Action Agencies**  
 Lucas State Building-2<sup>nd</sup> Floor  
 321 East 12<sup>th</sup> Street  
 Des Moines, IA 50319  
 515-242-5655  
 Fax 515-242-6119

**Auditor of State**  
 State Capitol Building  
 1007 East Grand Ave  
 Des Moines, IA 50319-0001  
 515-281-5834  
 Fax: 515-242-6134  
 Email: [info@auditor.state.ia.us](mailto:info@auditor.state.ia.us)

**Attorney General**  
 1305 E. Walnut Street  
 Des Moines, IA 50319  
 515-281-5164  
 Fax: 515-281-4209

All SCICAP employees will receive Whistleblower Protection Policy training during new employee orientation. This same policy is provided in the employee handbook.

Employees with any questions regarding this policy should contact the Payroll Manager.\* Any finding of improper action shall be reported to the SCICAP Board of Directors. This policy is intended to incorporate the whistle-blower provisions of the Sarbanes-Oxley Act.

## **Governing Board Fiscal Oversight**

The Governing Board will be prepared to manage Board responsibilities and oversight in regard to agency programming with the assistance of the Executive Director. The following procedures are designed to enhance the Board's oversight.

A primary Governing Board responsibility is to see an annual independent audit is conducted in accordance with program directives including 45CFR 1301.12. The audit committee of the board shall meet in order to insure that the proper planning, implementation, and audit follow-up are achieved. The audit committee shall report to the Governing Board and the board will take action as necessary to insure that the audit is conducted. The Governing Board will review the final audit and follow up as required. The Governing Board will direct and monitor the Executive Director's role in this process, and its completion. The Governing Board will evaluate the Executive Director annually. The Governing Board's calendar will contain the appropriate dates needed to achieve this process.

To ensure that appropriate internal controls are established and implemented in accordance with 45 CFR 1301.13 is another primary Governing Board responsibility. The agency will secure the services of a Certified Public Account (CPA) in order to assist in the internal preparation of financial statements that conform to generally accepted accounting principles (GAAP). The CPA will also provide support to fiscal staff in regard to training and procedure review. These services will be contracted and reviewed annually by the Governing Board.

The Board will create and follow a Governing Board calendar. The calendar will establish dates which will support all the various program's requirements. The calendar will establish meeting dates for the board and its various committees. Those dates will coincide with all necessary planning, implementation, and follow-up activities. The planning and evaluation committee will be responsible for developing the calendar with input from the Executive Director, Head Start Director, various program directors, Policy Council, and all relevant sources. The planning and evaluation committee shall present the calendar for full board approval. The calendar will be completed by April 30<sup>th</sup> of each year. The calendar may be up-dated as needed by the board. The Governing Board will direct and monitor the Executive Director's role in this process and its completion. The Governing Board will evaluate the Executive Director annually.

The Governing Board will be responsible for monitoring the Head Start Community assessment process and the achievement of goals resulting from the assessment/planning process. A planning calendar will establish a time frame to monitor progress. The Head Start Director and Executive Director will report to the Governing Board on progress.

Governing Board training will be a responsibility of the board with assistance of the Executive Director. The Executive Director will determine board training based on program needs. The Executive Director will provide the training or secure the services of appropriate trainers. Board training will be provided at each board meeting as outlined in the board calendar. These opportunities will be announced by

program directors and the Executive Director. Where possible, those trainings will be part of the board calendar. The Governing Board will review the board calendar at each board meeting.

In cases of specific program training (fiscal training), the Governing Board shall monitor the plan for training. The board shall direct and monitor the Executive Director's role in this process.

## **Conflict of Interest**

### **Purpose/Policy**

SCICAP conducts business ethically and avoids conflicts of interest including the appearance of such conflicts. All persons involved in the Organization operations have an equal obligation to avoid conflicts of interest.

### **Procedure**

1. Employees/Governing Board Members are expected to report conflicts of interest to Executive Director immediately upon discovery or suspicion of the conflict. Examples of conflicts of interest are listed below (but are not limited only to these items):
  - a. An outside business interest that competes with the activities of the Organization.
  - b. An outside business that is a purchaser or supplier of goods or services to the Organization.
  - c. An outside business involvement or employment that interferes with the ability to devote necessary attention to the responsibilities at the Organization.
  - d. A relative or person with a significant relationship employed by, or has a business interest in companies that compete with, sell to, or buy from the Organization.
  - e. Purchase inducements (gifts, premiums, money, goods, or services) from vendors that benefit the employee personally (directly or indirectly) or are unauthorized or questionable in nature.
2. Personal gifts and favors from people with whom the Organization has a business relationship are prohibited. Minor gifts of more than nominal value \$20.00 or normal cost of a meal should be tactfully declined or returned, to avoid any appearance or suggestion of improper influence.
3. Members of the Board of Directors, Governing board or Administering Board of any public, private or nonprofit organization funded by SCICAP, or members of any major policy advisory bodies, are not eligible for employment with the Organization. Former members of these Boards and advisory bodies are eligible for employment following their resignation.
4. When the Board votes and a Board of Director member has a vested interest in the vote (e.g., it is their company, they have family members involved, etc.) that Board member is to leave the room during the entire discussion where conflict may arise and refrain from voting by stepping outside of the room while a vote occurs.
5. SCICAP expects employees to conduct business in accordance with relevant policies, procedures, and laws and to refrain from any illegal, dishonest, or unethical conduct.
6. Disregarding or failing to comply with this standard of business ethics and conduct could lead to disciplinary action, up to and including possible termination of employment.

*Regulation- 45 CFR Part 1304.50 (b) (6) No grantee or delegate agency staff (or members of their immediate families) may serve on Policy Councils or Policy Committees except parents who occasionally substitute for regular Early Head Start or Head Start staff. In the case of Tribal grantees, this exclusion applies only to Tribal staff who work in areas directly related to or which directly impact upon any Early Head Start or Head Start administrative, fiscal or programmatic issues.*

*45 CFR Part 74.42- The recipient shall maintain written standards of conduct governing the performance of its employees engaged in the award and administration of contracts. No employee, officer or agent shall participate in the selection, award or administration of a contract supported by Federal funds if a real or apparent conflict of interest would be involved. Such a conflict would arise when the employee, officer or agent, or any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected for an award. The officers, employees, and agents of the recipient shall neither solicit nor accept gratuities, favors, or any of monetary value from contractors, or parties to sub agreements. However, recipients may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. The standards of conduct shall provide for disciplinary actions to be applied for violations of such standards by officers, employers, or agents of the recipients.*

## **REPORTS**

1. Monthly and Quarterly financial reports, as determined per contract will be prepared by the Fiscal Department.
2. The Executive Director, or Executive Director Designee, will review and approve all reports to funding sources.
3. The Executive Director, or Executive Director Designee, will sign all reports to funding sources.
4. Monthly and Quarterly financial reports will be reviewed by the appropriate Program Director and Finance Director.
5. The Fiscal Department will prepare and maintain a listing of reports and due dates on a current basis.
6. It will be the responsibility of the Fiscal Department to insure that all reports are submitted on a timely basis



## **CASH / CHECK RECEIPTS**

1. All cash & checks received in the administrative office will be immediately forwarded to the Administrative Assistant or Receptionist, who will record the receipt on the cash /check register.
2. All checks will be stamped on the back showing endorsement.
3. A deposit slip will be completed in duplicate by the fiscal department. The deposit slip will include the source and amount of each receipt.
4. Documentation for all receipts (copy of check, letter, etc.) will be attached to the duplicate deposit slip after bank employee stamps the date of deposit and initials it.
5. All deposits will be made daily or as needed by the Accounts Payable Clerk or designee.
6. The duplicate deposit slip, along with the documentation, is forwarded to the Fiscal Office.
7. The Fiscal officer will record all cash receipts in the agency's accounting software on the computer, which posts the transactions to the General Ledger.
8. The duplicate deposit slip, along with the attached documentation, will be filed by month.
9. In the event that cash or checks are received at an office other than administrative:
  - a.) All receipts (cash or check) will be acknowledged by issuing a numbered receipt that identifies the payer, amount, date and reason for payment.
  - b.) Checks will be forwarded to the administrative office along with a copy of the receipt issued for recording in the general ledger.
  - c.) Monthly a copy of all receipts issued by external offices will be faxed/mailed to the fiscal office for reconciliation.

## **CASH DISBURSMENTS**

1. The Program Director, or their designee, will compare the purchase order with the packing slip and invoice. The invoice(s) will be stamped, account distribution noted, approved by the Program Director and forwarded to the fiscal department for processing.
2. Upon receipt of invoice(s) approved by Program Director for payment, the Fiscal Department will double check the mathematical accuracy of the invoice, that goods and / or services billed were received, and verify that the account distribution of the charge is correct.
3. At the end of a grant period, the Program Director will coordinate with the Fiscal Officer to determine what expenditures or invoices are still outstanding. The Fiscal Officer will make a journal entry to the General Ledger to record the expense as a payable or a prepaid expense.

4. The Fiscal Department will be responsible for all blank checks which will be kept under lock and key.
5. Accounts Payable clerk will write the check, accompanied by supporting documentation, which will be signed by the Executive Director or designee.
6. Check vouchers will be distributed as follows:
  - Original check with stub - mailed to payee by the Accounts Payable clerk.
  - Accounting copy of stub stapled to invoice documentation.
7. The Fiscal Officer will post the transactions to the General Ledger on the computer.
8. Voided checks will have “**Void**” boldly stamped across the face of the check and the signature portion of the original check. The voided checks are filed numerically with the bank statement.

## **BANK RECONCILIATIONS**

1. Unopened bank statements are received directly by the Executive Director, who initials and dates, showing reviewed.
2. Paid check copies will be examined for any irregularities by the Fiscal Officer.
3. The Fiscal Officer prepares the bank reconciliations monthly.
4. The reconciled bank balance will be compared to the Cash In Bank account in the General Ledger by the Fiscal Officer.
5. Deposits will be compared to the cash / check register.
6. Fiscal Officer will take appropriate action on checks outstanding 90 or more days.
  - The check recipient will be contacted to determine reason for not cashing check.
  - A letter of notification is sent to check recipient with date of stop payment.
  - The check shall be voided one hundred twenty (120) days after it is written.

## **COST ALLOCATION PROCEDURES**

for  
**SCICAP, Inc.**

**ADMINISTRATIVE (INDIRECT) COSTS**

Human

- agency negotiates an indirect cost rate with their cognizant grantor, currently the Dept. of Health and Services
- this rate is applied to the various programs on the basis of all direct salaries, including vacation, holiday, sick leave, and other paid absences, but excludes all other fringe benefits. To insure accuracy and cover any adjustments made to the wage base, the indirect cost charge will be calculated on a YTD basis each month, subtracted from the previous month's YTD, with the balance being booked as the current month's charge.
- Fiscal Officer submits an Indirect Cost Proposal based on actual costs of the agency for the prior fiscal year as reflected in the audit report (Statement of Functional Expense Statement)

**PERSONNEL**

- (Direct) - employees working for multiple programs allocate their time according to actual hours worked for each program as indicated on employee's timesheet. (Ex. actual hours worked to provide Wrap Around child care before and/or after the core HS/EHS program are charged directly to Wrap Around whereas, the hours worked for HS/EHS are charged to the core program)

**FRINGE**

- (Direct) - calculated each payroll based on actual hours worked and expensed to the applicable program by the payroll processing company.
- if an employee works more than one program, leave is expensed to the applicable programs on percentage based on the actual worked hours in each program per pay period. This is calculated by the payroll processing company.

<b><u>LEAVE TIME</u></b>	(Direct)	<ul style="list-style-type: none"> <li>- accrued annual vacation liability is determined each payroll based on actual hours worked and expensed to the applicable program by the payroll processing company and charged to the accrued annual vacation pool account</li> <li>- accrued annual vacation is expensed when earned and paid out of the accrued vacation pool account when leave is taken</li> <li>- accrued vacation in the payroll data base is reconciled to accrued vacation liability pool account annually at end of fiscal year</li> <li>- sick leave and holiday are expensed to applicable programs when used</li> <li>- if an employee works more than one program, leave is expensed to the applicable programs on a percentage basis. Unless indicated otherwise, sick and holiday hours are charged to employees home department.</li> </ul>
<b><u>TRAVEL</u></b>	(Allocated)	- travel incurred for multiple programs will be allocated on the basis of funded participants (ex. HS/EHS based on number of funded slots)
	(Direct)	- travel incurred for a single program will be charged to the applicable program
<b><u>EQUIPMENT</u></b>	(Allocated)	- equipment purchased for use by multiple programs will be allocated on the basis of funded participants (ex. HS/EHS based on number of funded slots)
	(Direct)	- travel incurred for a single program will be charged to the applicable program
<b><u>CONTRACTUAL</u></b>	(Direct)	- contractual expenses are charged directly to the program that incurs them
<b><u>FACILITIES / CONSTRUCTION</u></b>	(Direct)	- cost incurred for facilities/construction expense is charged directly to the applicable program. If facilities are shared between programs, space costs are allocated based upon average time spent in programs by personnel assigned there.
<b><u>REPAIRS / MAINTENANCE</u></b>	(Direct)	- cost incurred for repairs/maintenance expense at a single program facility is charged directly to the

applicable program

**COPIES**

- (Direct) - main copier located in admin building at 1711 Osceola Avenue, Chariton, IA has preset codes for each program
- outreach offices manually record # of copies made for each program
- at month end, the applicable programs are charged for their actual copier use by the Fiscal Officer
- programs owning or leasing copiers pay for all costs associated to those copiers

**POSTAGE**  
Osceola

- (Direct) - postage meter located in admin building at 1711 Avenue, Chariton, IA has preset codes for each program
- at month end, the applicable programs are charged for their actual postage use by the Fiscal Officer
- postage requests, charged directly to the applicable programs, are also used to obtain a check to purchase postage from post offices in the outlying areas

**TELEPHONE**

- (Allocated) - monthly charge for main phone lines in admin building are broken out and charged to applicable programs by a percentage based on number of phones
- (Direct) - Outreach offices are charged to programs utilizing the equipment per the attached chart. This chart will be updated when any significant change in usage occurs.
- Cell Phones - Cell phones will be charged to the program that requests them. Employees will be reimbursed for company usage of their personal cell phones at the rate of \$40/month for full-time employees. Costs will be reviewed yearly.

**UTILITIES**

- (Direct) - cost incurred for utilities at a single program facility is charged directly to the applicable program
- (Allocated)- utilities expense for the admin building located at 1711 Osceola Avenue, Chariton, IA is addressed in Occupancy costs. Outreach offices charge

programs utilizing the site via the attached chart which recognizes the space consumed by program. This chart will be updated when any significant change in usage occurs.

**INSURANCE**

- (Direct) - costs incurred that can readily be identified to a single program is charged directly to that particular program (Ex. property & vehicle insurance)
- (Allocated) - insurance costs based on participant information will be charged to applicable programs using participant numbers as a basis (Ex. child liability).

**OCCUPANCY**

at  
actual  
is

- (Allocated) - occupancy expense for programs located in admin office 1711 Osceola Avenue, Chariton, IA is based on utilities, repairs & custodial expense. This expense divided per sq. ft. of occupied space based on floor plan layout. Common use areas are not included.

See attached	

pay

- (Direct) - Outreach offices charge rent to programs CSBG, FaDDS, and PAT. which recognizes the space consumed by each program
- all programs are charged rent on a monthly basis
- programs other than HS/EHS operating during the summer in a HS/EHS facility will be required to pay utilities incurred as a result of operation

**SUBSCRIPTIONS**

- (Direct) - total amount is charged to program when invoice is paid, regardless if program ends during paid period
- only one charge per grant year for yearly subscription

## **SUPPLIES**

- (Direct) - program is charged when invoice is paid unless at end of grant year or end of fiscal year  
- if at the end of grant year or end of fiscal year, program is charged and set up as a payable expense  
- or an invoice is paid and set up as a pre-paid expense and the program not charged until later (ex. rent due prior to the first of the new grant year)
- (Allocated) - supplies utilized by multiple programs will be allocated on the basis of funded participants (ex. HS/EHS based on number of funded slots)

## **TRAINING / REGISTRATION**

- (Allocated) - training/registration fees incurred for multiple programs will be allocated on the basis of funded participants (ex. HS/EHS based on number of slots)
- (Direct) - training/registration fees incurred for a single program will be charged to the applicable program

## **HEAD START CASH DRAW DOWNS**

- draw downs are made 2-3 times a month by the Fiscal Officer on a reimbursement basis based on expenditures of Head Start / EHS at the time of draw down

### **Procurement Procedure for Supplies, Equipment and Services**

SCICAP purchases only goods and services which are reasonable and necessary to carry out the mission of the organization and the requirements of its grants, contracts and donors. Purchases of goods and services which will be charged to federal and state grants and contracts (including through the allocation of indirect costs) must be allowable and allocable in accordance with the terms of the grants and contracts. SCICAP will follow the methods of procurement described in Code of Federal Regulations, specifically 2CFR200.320.

- Micro-purchase means a purchase of supplies or services using simplified acquisition procedures, the aggregate amount of which does not exceed the micro-purchase threshold (currently \$3,000). Simplified acquisition procedures state that purchases may be awarded without soliciting competitive quotations if the agency considers the price to be reasonable. SCICAP will define micro-purchases as those that aggregate less than \$1,000.
- Procurement by small purchase procedures are those relatively simple and informal procedure methods for securing services, supplies and other property that do not cost more than the simplified acquisition threshold (currently \$25,000). If small purchased procedures are used, price or rate quotations must be obtained from at least two qualified sources. SCICAP will use the “small purchase procedures” for expenditures between \$1,000 and \$24,999.
- For procurement in excess of \$25,000, one of the following methods shall be used:

- Procurement by sealed bids (formal advertising). Bids are publically solicited and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming to all material terms and conditions of the invitation for bids, is the lowest in price. See section 2CFR200.320 for further conditions of a sealed bid.
  - Procurement by competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed price or cost-reimbursement type of contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids. If this method is used, the following requirements apply:
    - Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests must be considered to the maximum extent practical.
    - Proposals must be solicited from an adequate number of qualified sources.
    - The agency must have a written method for conducting technical evaluations of the proposals received and for selecting recipients.
    - Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program with price and other factors considered.
  - Procurement by non-competitive proposals is procurement through solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:
    - The item is available only from a single source.
    - The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation.
    - The Federal awarding agency or pass through entity expressly authorizes noncompetitive proposals in response to a written request from the agency.
    - After solicitation of a number of sources, competition is determined to be inadequate.
  - SCICAP also requires that:
    - All non-repetitive purchases (such as utility bills, phone bills, bills covered by a contract, etc.) will be accompanied by a purchase order.
    - The Executive Director will approve all purchases in excess of \$1,000.
    - The Board of Directors will approve all purchase of real property (land, building and building improvements) and any purchase in excess of \$25,000.
6. Approved pre-numbered Purchase Orders will be distributed as follows:
    - a. Original – sent to vendor if required, otherwise kept by receptionist
    - b. Duplicate – kept by Receptionist to be filed in a pending purchase order file; filed in numeric order.
    - c. Triplicate – kept by department ordering, who will receive deliveries from suppliers and attach to packing slips and invoices before forwarding to Accounts Payable.
  7. All Purchase Orders including those VOIDED or Unused must be returned to Receptionist.
  8. Disapproved purchase orders will be marked “DISAPPROVED” and returned with a statement in writing as to the reason for disapproval to Receptionist, who will notify Program Director.



9. The Receptionist will account for all pre-numbered Purchase Orders.
10. All purchase order files will be reviewed monthly with follow-up on items or invoices that have not been received.
11. All Program Contract requirements will be followed.
12. If there are no discrepancies, the Accounts Payable clerk will prepare the check authorization and attach all backup. If there are discrepancies, the vendor will be immediately notified by Accounts Payable.
13. Vendor Files shall be maintained by the fiscal department for all vendors used by the agency, which will include a completed W-9 form. Annually, or when a new vendor is established, the fiscal department will check the national website for persons or entities suspended or barred from doing business with the federal government.
14. SCICAP fiscal policies require that the procurement and disposition of assets adhere to the individual grantors guidelines in regard to prior approval. Some grantors require that all purchases over \$5,000/unit must be prior approved before procurement is committed. It is SCICAP's policy to adhere to the individual grantor requirements, including annual summary of assets for Head Start.

In the case of disposition, grantors have varying requirements for prior approval. For example, Head Start requires prior notification if the disposition value of the item exceeds \$5,000. State grants may carry a lesser value per unit. It is SCICAP's policy to adhere to the individual grantor requirements.



## Credit Cards and Store Accounts Policy

### SAM's Card:

The SCICAP Sam's card will be kept by the Financial Department. Only authorized personnel are allowed to make purchases. There will be a log out and log in form to be sign by personnel using card.

### Gas Purchases:

Gas cards that are used for agency purposes are assigned and kept by the employees who normally drive on agency business. Employees that are purchasing gas are to sign receipt and return receipt to fiscal department.

### Grocery and Department Stores:

Purchasing locations are determined in our 5 country area by the Executive Director. Employees are to get permission and a purchase order number from their supervisor to purchase items. When purchasing items, employees are to sign receipt and return receipt to their supervisor.

### Dollar General Card:

The SCICAP Dollar General Card is kept in the Fiscal Department. Only authorized personnel are allowed to make purchases. Card is logged out/in by the personnel using the card.

### Company Credit Card:

The agency has one company credit card issued in the name of the executive director. The fiscal department maintains possession of the card at all times. The executive director may allow company purchases to be made via

the card after the normal approval process has been followed. All receipts will be delivered to the fiscal office. The card statement is mailed directly to the fiscal office, whose personnel will reconcile all charges to receipts and pay the balance on a monthly basis. No cash advances are allowed from this card.

### **DISPOSAL:**

The Program Director shall determine the need for disposal of program assets and show justification for such action. Executive Director shall approve request for disposal of program assets.

Assets will be disposed of in the most cost effective manner. If it is cost effective to use sealed bids the same afore mentioned sealed bid procedure for procurement shall be used. Bids will be forwarded to the Fiscal Department.

Any generated revenue from the disposed assets shall follow all contract regulations.

## **POLICY ON EXECUTIVE COMPENSATION**

### **Purpose**

The Internal Revenue Service can penalize a charitable organization whenever unreasonable or excessive compensation is paid to high-level employees. The perception of excessive compensation can be damaging to a specific philanthropic organization as well as the whole field of philanthropy. Over and above any legal requirements or public scrutiny, as good stewards of philanthropic resources we should go the extra mile to be certain that levels of compensation are reasonable.

### **Responsibilities**

It is the policy of SCICAP in reviewing and approving the total executive compensation paid to all high level employees, to

1. Provide reasonable compensation as defined as what similar persons in similar positions with similar duties at similar organizations are paid.
2. Approve any compensation arrangements in advance by the Board of Directors, exclusive of any members who have a conflict of interest with respect to the compensation arrangements
3. Obtain and rely upon appropriate data as to comparability prior to setting compensation. This may include, but is not limited to, compensation levels paid by similarly situated organizations for functionally comparable positions, compensation studies or surveys, and written offers from similar institutions competing for services of the person under consideration.
4. Document the decision concurrently (within 60 days of the decision or the date of the next meeting of the Board, whichever is later). Such documentation shall include:
  - a. the terms of the compensation and the date it was approved
  - b. the members of the Board who were present during the debate on the compensation that was approved and those who voted on it
  - c. the comparability data obtained and relied upon and how the data were obtained
  - d. any actions taken with respect to the decision by anyone who is otherwise a member of the Board but who had a conflict of interest with respect to the compensation decision.

## **WAGE ANALYSIS FOR COMPLIANCE OF HEAD START COMPENSATION CAP**

1. The Governing board, through the Personnel Committee and the Executive Director, will review, annually after wage increases, if any, the total compensation paid to all personnel, either all or in part from Head Start funds, to assure compliance to the Compensation Cap requirement in accordance with the Federal Regulation ACYF-PI-HS-05-01 which was implemented 3/22/2005.
2. Total compensation includes both salary and fringe benefits. Salary includes base salary, any overtime wages and any bonuses paid to an employee. Fringe benefits are allowances and services paid by employers and may include employer contributions or expenses for social security, employee insurance, workmen's compensation insurance, unemployment compensation and pension plan costs. Other forms of compensation may be the use of agency owned vehicles and associated travel allowances.
3. Head Start funds in whole or in part may not be used for any portion of the compensation which is in excess of the statutorily mandated cap.

### **PAYROLL PROCEDURES**

1. A change of status form will be completed by the Payroll Manager and must be approved by Program Directors and Executive Director.
2. The Payroll Manager will be responsible for all new employees to complete the following:
  - a. Form W-4, Employee Withholding Certificate, Federal and State.
  - b. All Benefit forms, including Insurance application forms, IPERS beneficiary or declining forms, and Pension application forms.
  - c. I-09 Immigration Form.
3. The Payroll Manager will be responsible for all new employees receiving the following information:
  - a. Personnel Policies
  - b. Insurance, IPERS and pension info packets
  - c. Time sheet instructions.
4. The Human Resource Manager\* will set up a personnel file for each new employee. The change of status form, employment application, Form W-4, copy of employee's social security card, and benefit forms will be placed in the employee's personnel file. The Head Start Administrative Assistant\* will be responsible for Head Start employee's files.

### **TIME CARDS AND PAYROLL PROCESSING**

1. Each employee will be responsible for completing a time card and making it available to his/her supervisor at the close of the pay period for approval.
2. Incomplete, inaccurate, or late time cards may result in an employees pay being inaccurate, with corrections being made the following pay period.
3. Supervisors will verify the accuracy of the time cards by the date advised by the Payroll Manager. The Payroll Manager performs a final review of time cards and submits them to the payroll processor.
4. After processing, the payroll register, payroll reports general ledger entries, and proposed tax payments are reviewed prior to payment.
5. Once approved, the payroll processor delivers hard copies of the payroll reports, and direct deposit forms to the agency for signature and distribution.

6. All time cards, payroll registers, labor distributions, and employee data files are stored electronically by the payroll processor. All files are accessible on-line by authorized agency personnel.
7. The fiscal department prepares the journal entry to enter wage, tax and benefit information into the general ledger. Direct deposits and tax payments are charged to the agency bank account and the payroll processor. The payroll processor has the liability and responsibility to submit all taxes and tax forms when due. Copies of tax forms are provided to the agency.

## **LOCAL TRAVEL**

1. Reimbursement for mileage will be based upon a Board approved rate per mile.
2. Mileage to designated worksite from residence will not be paid by the agency.
3. Every employee shall have a designated office from which mileage shall be calculated. In cases where it is a cost benefit to pay mileage from an employee's home to the job site or allowance will be made provided proper documentation is made on the travel expense statement.
4. The cost of meals will only be reimbursed when an employee is out of the local areas (Clarke, Decatur, Lucas, Monroe, and Wayne Counties). Meal reimbursement is based upon the per diem basis. The source of per diems shall be the GSA.GOV published rates. Receipts for group meals should indicate the reason for the meeting.
5. At the end of the month, the travel expense statement will be totaled, signed by the employee, signed by the supervisor, and submitted on a timely basis for payment by the last working day of the month. Anything submitted later will be paid in the following month.
6. Reimbursement will be based upon actual expenses. Receipts other than for meals must be attached to the expense statement. Meal reimbursement is based upon the GSA.GOV published rates.
7. Incomplete travel vouchers will be returned to the supervisors for completion before paying.
8. The Program Director will verify the travel expense statements and calculate the amount of the travel reimbursement.
9. Employees required to drive agency owned vehicles as part of their employment duties shall maintain insurability and a valid driver's license. Payroll Manager will monitor for compliance.
10. Employees using personal owned vehicles for agency business are required to furnish proof of automobile liability coverage and valid driver's license. Failure to do so will result in non-reimbursement of mileage. Payroll Manager will monitor for compliance.
11. Non-employees incurring expenses while carrying out duties for the agency shall use the same agency guidelines.
12. Failure to maintain a valid driver's license and insurability may result in termination of position.

13. Each company vehicle shall maintain a log of all miles driven. Personal usage of company vehicles is not allowed.

## **OUT OF AREA TRAVEL**

1. Occasionally travel outside the area is required for training and other purposes. The following guidelines are intended to provide general information regarding reimbursement for such travel and steps required for documentation. This policy is effective for employees, governing board, policy council and all committee members traveling to SCICAP, Inc.

2. Meals – Per Diem meals costs will be based on GSA regulations as spelled out at GSA.GOV which is expected to cover the cost of meals. The first and last day of travel is covered at 75% of the per diem amounts for meals. Daily meal cost out of area will also be reimbursed at GSA.GOV rate for individual meals that do not require overnight stay.

3. Lodging – Lodging will be paid with receipt required.

4. Mileage – Mileage for use of personal vehicles will be reimbursed at the agency approved rate, currently 39 cents/mile.

5. Other Expenses – Other expenses may occur while traveling such as parking, luggage fees, transportation and any other non-meal expenses; these are reimbursed with receipt required.

6. Travel Advance – Employees may with the approval of the department head request a travel advance to cover the cost of per diem and other expenses. This advance must be submitted to the accounting department 10 days prior to travel with the necessary approval.

7. Expense Report – It will be necessary to turn in receipts for travel, lodging and other expenses excluding meals; all items will be recorded on the expense report but no receipts are required for meals. Any unused portion of the travel advance will be returned to the agency. All expense reports will be submitted within 10 days of return with receipts attached.

All mileage and travel expenses will be paid on the next billing cycle and claim for such pay must be submitted in writing on an expense form signed by the employee and approved by the employee's supervisor.

## **CONSULTANTS**

1. Consideration will be made of in-house capabilities to accomplish services before contracting for them.

2. Written contracts clearly defining work to be performed will be maintained for all consultant and contract services.

3. The qualifications of the consultant and reasonableness of fees will be considered in hiring consultants.

4. The Executive Director will approve proposed contracts.

5. Consultant services will be paid for as services are billed.
6. Accounts Payable Clerk will request W-9 to be filled out by consultant and filed in the Fiscal office.
7. Accounts Payable Clerk will annually prepare 1099 miscellaneous for Consultants that meet guidelines.
8. The Board of Directors will approve audit and other significant contracts in excess of \$25,000.
9. Delegate agency contracts will be approved by the appropriate funding source.

### **VEHICLE INVENTORY**

1. A vehicle inventory will be maintained for all motor vehicles owned by the agency. Agency employees will park all vehicles at agency sites.

### **SUPPLIES**

1. Supplies / Equipment will be inventoried and controlled by each program director.

### **RENTAL AGREEMENT LEASES**

1. The Executive Director will review and approve all rental agreement leases.
2. Any contractual lease for more than two (2) years shall be Governing Board approved.
3. Leases will correspond to program years whenever possible.
4. Copies of all leases will be immediately forwarded to the Fiscal Officer and kept on file for auditing purposes.
5. If possible, all leases will contain wording to allow lease cancellation if funding for payment is discontinued.

### **EQUIPMENT INVENTORY**

1. Equipment shall be defined at all times (purchased, government excess or donated) with a unit cost of \$5,000.00 or more and a useful life of more than one year, unless the specific funder requires a lesser amount, then that amount will prevail.
2. Program Directors are responsible for recording acquisition, transfers and disposals of equipment.
3. Equipment records shall be maintained accurately and shall include the following information:
  - A description of the equipment
  - Manufacturers' serial number, model number, Federal stock number, national stock number, or other identification number.
  - Source of the equipment, including the award number

- Whether title vests in the recipient or the Federal government
  - Acquisition date (or date received, if the equipment was furnished by the Federal government) and cost
  - Information from which one can calculate the percentage of Federal participation in the cost of the equipment (not applicable to equipment furnished by the Federal government)
  - Location and condition of the equipment and the date the information was reported
  - Unit acquisition cost
  - Ultimate disposition data, including the date of disposal and sales price or the method used to determine current fair market value where a recipient compensates the Federal awarding agency for its share
4. Each Program Director will be notified of all cases of loss, damage, or destruction of equipment. He / She will, in turn, make a report to the Fiscal Officer who will notify the insurance carriers if necessary and / or the regional property administrator.

### **INSURANCE**

1. Insurance policies will be maintained by the Fiscal Officer or a designated Accountant.
2. Insurance policies will be carefully reviewed by the Fiscal Officer before renewal.
3. Coverage will be maintained for motor vehicle, other property, liability insurance and others as recommended by the agency insurance broker.
4. The Fiscal Officer will produce the reports and process the invoices for workers compensation and all other insurance correspondence.
5. All insurance claims including compensation and property claims will be reported to the Fiscal Officer. The Fiscal Officer will then turn the claim into the insurance company on a timely basis.
6. The Fiscal Officer will inform the Executive Director of all claims.
7. Insurance expense for vehicles, property and liability will be direct charged, based on program ownership or use thereof.

### **NON-FEDERAL IN-KIND CONTRIBUTIONS**

Each Program Director is responsible for the generation of the non-federal requirement of his / her program.

The employee who receives the contribution will prepare the in-kind voucher, have the donor sign it, and submit documentation to the Fiscal Officer by the end of the month.

The Fiscal Officer will review all vouchers and prepare a journal entry to record in-kind in the current accounting software system when submitted by Program Directors.

Examples of donated time, space, and supplies are calculated as follows:

1. Donated services are valued at fair market value at the time of service and / or supported by contract language.
2. Donated space is valued at fair market.
3. Donated supplies are valued at fair market value at the date of donation.

## Cost Estimating Policies

### A. Responsibility for Cost Estimating

Cost estimates for the Agency's grant proposals to funding sources are prepared by the program managers and fiscal officer. The Executive Director, Fiscal Officer and Program Managers will set a timeline and work frame for developing the budgets.

### B. Authorized Cost Estimating Techniques

Cost are based upon an estimate of actual costs projected for a specified grant period. The previous twelve month actual costs are used for comparison.

All cost estimating is periodically reviewed for its accuracy and reliability, and appropriate adjustments are made as deemed necessary.

### C. Cost Accounting System Support for Estimating

The Agency's accounting system provides detailed financial data for cost estimating purposes. All costs are accounted for by fund and if appropriate, broken down by departments within each fund.

Cost breakdowns are available for:

1. Personnel costs (wages/fringe)
2. Travel (in-area/out-of-area/Board)
3. Equipment (purchase/rental/maintenance)
4. Other (telephone/printing/postage/publications/dues/registration/fees/micellaneous/advertising)
5. Construction/renovation (building improvements)
6. Contractual (consultants/purchased transportation)
7. Indirect (Agency-wide administrative costs)
8. Client service dollars

### D. Estimating Labor Costs

The Agency uses actual direct labor expense as the method of estimating labor costs.

### E. Using Factors And Allowances

To facilitate cost estimating, the Agency employs an indirect cost rate.

For all factors and allowances used in cost estimating, actual costs are utilized.

### F. Rebates And Credits



Returns, rebates or credits are allocated and credited to the applicable funding source.

1. Rebates are applied to the year in which the purchase was made if still open. If the year is closed when the rebate arrives, apply to the current fund year either as miscellaneous revenue or apply against the line item from which the rebate purchase was made.

#### G. Estimating indirect costs

Indirect cost proposals are prepared annually (if required) using actual historical costs for the previous twelve months. The approved indirect cost rate is used for grant proposals.

#### H. Cost Proposal Support

For each cost proposal submitted to the funding sources, the Agency has detailed documentation supporting the following information:

1. The basis for establishing the source and reasonableness of price for all acquisitions of materials, property and equipment.
2. A breakdown of the labor hours, rates and expenses per department and funding source
3. Indirect cost rate and the basis of allocation, by fiscal year
4. Basis for expensing all other direct costs
5. Copies of all quotations and bid proposals received, whether accepted or not.

### **BUDGETS**

1. Financial budgets will be prepared by the Executive Director, Program Director and Fiscal Officer.
2. The Fiscal Officer will insure that budgets are on file for all grants and contracts.
3. Changes to the budgets will be submitted to the Fiscal Officer as soon as they are known.

### **GRANTS AND CONTRACTS**

1. One copy of all grants and contracts will be immediately forwarded to the Fiscal Officer.
2. The Fiscal Officer will list each award on the grant contract register.
3. The Fiscal Officer will carefully review each award to insure that all financial provisions will be complied.
4. The Executive Director will carefully review each award to insure that all provisions will be complied.

### **CHILD SUPPORT SERVICES POLICY**

SCICAP is required to provide information to families we serve about child support services in Iowa.

The State of Iowa has a Child Support Recovery Unit which can assist children in receiving child support from their parents. Some of the services they provide include:

- Locating parents;
- Establishment of paternity;
- Obtaining orders for support;
- Process support payments and maintain payment records.

Iowa has established a process by which families are paid first when the state and family are due payments under this process.

Further information can be obtained by contacting the Child Support Recovery Unit at 1-888-229-9233 toll free in the U.S. or 1-515-242-5530 in the greater Des Moines area. You may also visit the website at [www.Childsupport.dhs.state.ia.us](http://www.Childsupport.dhs.state.ia.us).

Staff will inform families that they work with about this service. It is important to the future of children and families.

## **LIMITED ENGLISH PROFICIENCY POLICY**

SCICAP is committed to providing equal opportunity in all programs and services to ensure full compliance with all civil rights laws, including Title VI of the 1964 Civil Rights Act, which requires non-discrimination on the basis of national origin. Equal opportunity includes physical and program access for persons with disabilities and program access for persons with limited English proficiency (LEP). Program and physical access for persons with disabilities is covered in the Americans with Disabilities Act of 1990 and the Rehabilitation Act of 1973 as amended, Section 504.

It is the policy of this agency to provide language access services to populations of persons with limited English proficiency (LEP) who are eligible to be served or likely to be directly affected by our programs. Such services will be focused on providing meaningful access to our programs, services and/or benefits.

Any individual eligible for programs/services at SCICAP who cannot speak, read, write or understand the English language at a level that permits them to interact effectively with our staff has the following rights:

- A right to qualified interpreter services at no cost to them.
- A right not to be required to rely on their minor children, other relatives, or friends as interpreters.
- A right to file a complaint about the language access services provided them. See policy regarding client appeal procedures.

## **CLIENT APPEAL PROCEDURE**

Applicants and participants in SCICAP programs have the ability to file a complaint or an appeal. For programs and services that have appeal procedures dictated to SCICAP by contract, statute, regulation or similar requirement, the procedure for that program will be followed. An applicant or program participant

will only be entitled to utilize a single appeal procedure for a single situation. SCICAP staff will direct an appeal or complaint to the appropriate process.

Applicants and participants in SCICAP programs may file an appeal or complaint if (a) you are denied assistance or (b) if you believe that your benefits or services received were not accurately determined or (c) if you have a complaint of any other nature.

The complaint must be filed within twenty (20) calendar days from the date of the approval or denial, or when the service was provided.

Appeals must be made in writing, submitted to the SCICAP Executive Director, P.O. Box 715, Chariton, IA 50049. The appeal must:

1. Include your contact information – name, address, phone number and email address if applicable;
2. State the program, service or type of assistance that you were seeking or received;
3. The basis or reason for the appeal (why you believe you should have received services or how they should have been different); and
4. Include the desired action to be taken.

The agency will act on your request and notify you of the result within ten (10) calendar days from the date the appeal is received by SCICAP. The notification will be in writing and either hand delivered to you or mailed to you at the address specified in your appeal; the date of notification will be the date the document was handed to you or the postmark date, whichever is applicable.

If you still do not agree with the decision reached, you may write the agency again within seventeen (17) calendar days of the agency's decision date (postmark date if sent in mail) and request that a state hearing be held. This request must be addressed to the SCICAP Executive Director at above address. The request must include an explanation of why you disagree with the agency's decision and include any information that might affect the hearing decision.

The agency will then forward all information about your request for a hearing to the state and a hearing will be scheduled. You will receive written notice of a state scheduled hearing from the state program administrator. The notice will include the date, time and place of hearing and the following rights, which you have before and at the hearing to the state hearings may be held by telephone at a mutually convenient time.

If you wish, prior to the hearing the agency will provide an opportunity for you to review the case file and any written evidence that will be used in the hearing.

A representative may accompany you to the hearing; you and/or the representative are allowed to:

- Present oral and written statements and other evidence;
- Have witnesses subpoenaed;
- Cross examine witnesses; and
- Bring an interpreter if needed.

All testimony is given under oath. The hearing is recorded and the decision is based on the record. State hearings shall be conducted before the Administration of the Division of Community Action Agencies unless delegated to an administrative law judge pursuant to Iowa Code 17A.11. You will receive written notification of any final or proposed decision.

If you still do not agree with the decision reached, you may request a hearing within twenty (20) days of issuance of the state's decision. Your request must state the specific grounds for requesting and must be addressed to Division Administrator, Division of Community Action Agencies, Lucas State Office Building, Des Moines, IA 50319. If a request is not received within twenty (20) days, the case shall be considered closed.

## **Retention of Records Policy**

It is the policy of SCICAP to retain records as required by law and to destroy them when appropriate.” This policy covers paper and electronic documents. Paper documents to be destroyed will be sorted and disposed according to local ordinances. Sensitive material will be shredded. Electronic documents will be deleted from all servers, jump drives, and other storage devices. The destruction of records must be approved by the Financial Director, and logged into the Organization's Destroyed Records Log. The formal records retention policy of SCICAP is as follows:

### **Records Retained Permanently:**

- Audit reports
- Chart of Accounts
- Contracts, mortgages, notes and leases:
  - Still in effect
- Correspondence:
  - Legal and important matters only
- Deeds, mortgages and bills of sales
- Depreciation schedules
- Year end Financial statements
- General ledgers/year end trial balance
- Insurance records (policies, claims, etc.)
- Journals
- Minute books of directors, bylaws and charters
- Property records (incl. depreciation schedules)
- Retirement and pension records
- Tax returns and worksheets, examination reports
  - and other documents relating to determination of income tax liability
- Trademark registrations and copyrights
- Training manuals

### **Records Retained for five (5) years:**

- Accident reports/claims (settled Cases)
- Accounts payable ledgers and schedules
- Accounts receivable ledgers and schedules
- Bank reconciliations

Bank Statements  
Cancelled Checks  
Contracts, mortgages, notes and leases:  
  Expired  
Correspondence:  
  General  
  Routine with customers and/or vendors  
  Duplicate deposit slips  
  Employment applications  
  Expense analyses/expense distribution schedule  
  Financial statements other than Annual  
  Garnishments  
  Insurance policies (expired)  
  Internal reports  
  Inventories of products, materials and supplies  
  Invoices (to customers, from vendors)  
  Notes receivable ledgers and schedules  
  Payroll records and summaries  
  Personnel records (terminated)  
  Petty cash vouchers  
  Physical inventory tags  
  Purchase orders  
  Receiving sheets  
  Requisitions  
  Sales records  
  Subsidiary ledgers  
  Time sheets/cards  
  Voucher register and schedules  
  Withholding tax statements

## **OTHER**

Loans from outside sources (banks, other agencies, etc.) will be approved by the Governing Board and funding source, if applicable.

Accurate minutes of all meetings of the Governing Board will be prepared by the Administrative Assistant. The Executive Director, Fiscal Officer, and all current Board members will receive a copy of the minutes. The Fiscal Officer will note all items in the minutes relating to finance and take appropriate action.

Each program will pay for direct costs relating to that program. In addition, some programs may be charged costs based on a cost allocation affecting their program.

Program related income will be used for the total cost of the program generating the income.

Donations of cash and non-program related income will be accounted for separately.

In all cases where telephone approval is given by a funding source, a letter confirming that conversation and its contents will be immediately prepared and sent to the funding source.

The Form 990 will be prepared by the Certified Public Accounting firm and signed by the Executive Director.