What is the process for making changes to financial policies?

**Employee manual:**

**3.12  Outside Employment & Board Limitations**

Employees may hold outside jobs as long as the employee meets the performance standards of their job description with Fairbanks Youth Advocates.  Unless an alternative work schedule has been approved by the Executive Director, employees will be subject to FYA’s scheduling demands, regardless of any existing outside work assignments.

Fairbanks Youth Advocates’ office space, equipment, and materials are not to be used for outside employment.  
  
Employees may not hold positions on Fairbanks Youth Advocates governing Board of Directors.

**Financial Policy and Procedures: additions to**

1. ‘use of consultants and consultant fees’ quote from grant docs
   1. Professional services and consultants can be obtained to provide expertise on a given topic, on a temporary basis. These services and fees will be agreed upon on a case-by-case basis and agreeable to both parties.
2. A daily per diem allowance of  $50  to cover the costs of food, and incidentals will be the agreed upon allowance, per day, for business travel outside of Fairbanks for FYA employees . (established by the board of directors, in lieu of the State of Alaska standard per diem rate.)
3. Payroll Procedures
   1. Pay periods will be the 1-15, and the 16 through the end of each month.
   2. ~~Electronic~~ Signed time cards are due the first workday following the end of the pay period.
   3. ~~The electronic~~ time card must be submitted by the employee ~~as in PDF format~~ to their supervisor. Supervisors approve by sending them onto the ED. The ED forwards them to the Payroll preparer.
   4. Payroll is prepared from time card information.
   5. ~~Staff sign time cards in person when they pick up their paychecks.~~ Paychecks will not be hand carried to staff.
   6. Paychecks are to be distributed no later than five (5) working days following the end of the pay period.
   7. Federal payroll taxes are required to be paid monthly by EFTPS no later than by the 15th of the following month. Payroll taxes should be paid the same day as the paychecks are prepared to avoid missing a due date and incurring penalties and interest.
4. Purchases of $5000 or more
   1. For purchases of non-expendable personal property with a value of $5000 or more, or for the award of a contract of $5000 or more, Fairbanks Youth Advocates will require three competitive price quotations from potential suppliers (where available) and complete a cost price analysis (if practicable).
      1. Awards shall be made to the bidder or offeror whose bid or offer is responsive to the solicitation and is most advantageous to FYA, price quality and other relevant factors considered.
      2. Records of price quotations and cost price analysis will be retained and include:
         1. Specifications
         2. Suppliers names and addresses
         3. Prices quoted
         4. The basis for the award
         5. Written justification and approval
5. **Credit Card Procedures (Correction needed)**
   1. ~~Currently, FYA does not have a credit card but is pursuing that option and procedures are being discussed.~~
   2. We recently acquired a credit card – accidentally. Dave Bates has had a Alaska Airlines Business Visa for years that he has used solely for Clearwater Counseling. With my traveling, I asked that he call and get one in my name. Then sent one in my name and it has a completely new number. Presently I have used it 1x. It remains in the office in a locked file cabinet. I don’t plan, at this time, to carry it with me unless we are purchasing items. No procedures have been established.
6. **Accounts Payable (Correction needed)**
   1. All bills will be entered into QuickBooks on receipt using the date ~~of the invoice not the date~~ the bill is entered.  Make sure the due date generated by QuickBooks matches the due date on the bill. (Interim Procedures- date of check will be used until bill payment and recording functions are consolidated with a bookkeeper.)

**CONFLICT OF INTEREST POLICY**

**Article I: Purpose**

This conflict of interest policy is designed to foster public confidence in the integrity of [Name of Organization] (the “Organization”) and to protect the Organization’s interest when it is contemplating entering a transaction (defined below) that might benefit the private interest of a director, a corporate officer, the top management or top financial official, or a key employee (defined below). [Note to Organization: Compliance with this Sample Policy A will not insure compliance with Code Section 4958 or CCC Section 5233 or 9243. Although the range of interests covered by this policy may be broader than those covered by law, the range of covered persons is more narrow. Additional procedures may apply to transactions covered by Code Section 4958 or CCC Section 5233 or 9243.]

**Article II: Definitions**

The following are considered *insiders* for the purposes of this policy:

1. Each member of the Board of Directors or other governing body.
2. The president, chief executive officer, chief operating officer, treasurer and chief financial officer, executive director, or any person with the responsibilities of any of these positions (whether or not the person is an officer of the Organization under the Organization’s Bylaws and the California Corporations Code).
3. Any *key employee*, meaning an employee whose total annual compensation (including benefits) from the organization and its affiliates is more than $150,000 **and** who (a) has responsibilities or influence over the organization similar to that of officers, directors, or trustees; **or** (b) manages a program that represents 10% or more of the activities, assets, income, or expenses of the organization; **or** (c) has or shares authority to control 10% or more of the organization’s capital expenditures, operating budget, or compensation for employees.

*Interest* means any commitment, investment, relationship, obligation, or involvement, financial or otherwise, direct or indirect, that may influence a person’s judgment, including receipt of compensation from the Organization, a sale, loan, or exchange transaction with the Organization.

A *conflict of interest* is present when, in the judgment of the Board of Directors, an insider’s stake in the transaction is such that it reduces the likelihood that an insider’s influence can be exercised impartially in the best interests of the Organization.

*Transaction* means any transaction, agreement, or arrangement between an insider and the Organization, or between the Organization and any third party where an insider has an interest in the transaction or any party to it. **[Note to Organization: If the Organization has a separate Compensation Policy that addresses the receipt of compensation by an insider in his or her capacity as an insider (e.g., compensation paid to the President for her services to the Organization as its President), please include the following sentence: “*Transaction* does not include compensation arrangements between the Organization and a director, officer, or other insider that are wholly addressed under the Organization’s Compensation Policy.”]**

**Article III: Procedures**

*1. Duty to Disclose*

Each insider shall disclose to the Board all material facts regarding his or her interest in the transaction, promptly upon learning of the proposed transaction.

*2. Determining Whether a Conflict of Interest Exists*

With regard to an insider, the Board shall determine if a conflict of interest exists. The insider(s) and any other interested person(s) involved with the transaction shall not be present during the Board’s discussion or determination of whether a conflict of interest exists, except as provided in Article IV below.

*3. Procedures for Addressing a Conflict of Interest*

The Board shall follow the procedures set forth in Article IV in order to decide what measures are needed to protect the Organization’s interests in light of the nature and seriousness of the conflict, to decide whether to enter into the transaction and, if so, to ensure that the terms of the transaction are appropriate.

**Article IV: Review by the Board**

The Board may ask questions of and receive presentation(s) from the insider(s) and any other interested person(s), but shall deliberate and vote on the transaction in their absence. The Board shall ascertain that all material facts regarding the transaction and the insider’s conflict of interest have been disclosed to the Board and shall compile appropriate data, such as comparability studies, to determine fair market value for the transaction.

After exercising due diligence, which may include investigating alternatives that present no conflict, the Board shall determine whether the transaction is in the Organization’s best interest, for its own benefit, and whether it is fair and reasonable to the Organization; the majority of disinterested members of the Board then in office may approve the transaction.

**Article V: Records of Proceedings**

The minutes of any meeting of the Board pursuant to this policy shall contain the name of each insider who disclosed or was otherwise determined to have an interest in a transaction; the nature of the interest and whether it was determined to constitute a conflict of interest; any alternative transactions considered; the members of the Board who were present during the deliberations on the transaction, those who voted on it, and to what extent interested persons were excluded from the deliberations; any comparability data or other information obtained and relied upon by the Board and how the information was obtained; and the result of the vote, including, if applicable, the terms of the transaction that was approved and the date it was approved.

**Article VI: Annual Disclosure and Compliance Statements**

Each director, each corporate officer, the top management official, the top financial official, and each key employee of the Organization, shall annually sign a statement on the form attached, that:

* affirms that the person has received a copy of this conflict of interest policy, has read and understood the policy, and has agreed to comply with the policy; and
* discloses the person’s financial interests and family relationships that could give rise to conflicts of interest.

**Article VII: Violations**

If the Board has reasonable cause to believe that an insider of the Organization has failed to disclose actual or possible conflicts of interest, including those arising from a transaction with a related interested person, it shall inform such insider of the basis for this belief and afford the insider an opportunity to explain the alleged failure to disclose. If, after hearing the insider’s response and making further investigation as warranted by the circumstances, the Board determines that the insider has failed to disclose an actual or possible conflict of interest, the Board shall take appropriate disciplinary and corrective action.

**Article VIII: Annual Reviews**

To ensure that the Organization operates in a manner consistent with its status as an organization exempt from federal income tax, the Board shall authorize and oversee an annual review of the administration of this conflict of interest policy. The review may be written or oral. The review shall consider the level of compliance with the policy, the continuing suitability of the policy, and whether the policy should be modified and improved.

Continued . . .

**[NAME OF ORGANIZATION]**

# CONFLICT OF INTEREST POLICY:

# ACKNOWLEDGMENT AND FINANCIAL INTEREST DISCLOSURE STATEMENT

[Name of Organization] (the “Organization”) follows a conflict of interest policy designed to foster public confidence in our integrity and to protect our interest when we are contemplating entering a transaction or arrangement that might benefit the private interest of a director, a corporate officer, our top management official and top financial official, or any of our key employees.

**Part I. Acknowledgment of Receipt**

I hereby acknowledge that I have received a copy of the conflict of interest policy of [Name], have read and understood it, and agree to comply with its terms.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature Date

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Printed Name

**Part II. Disclosure of Financial Interests**

We are required annually to file Form 990 with the Internal Revenue Service, and the form we file is available to the public. To complete Form 990 fully and accurately, we need each officer, director and key employee to disclose the information requested in this Part II.

A “conflict of interest,” for purposes of Form 990, arises when a person in a position of authority over an organization, such as an officer, director, or key employee, may benefit financially from a decision he or she could make in such capacity, including indirect benefits such as to family members or businesses with which the person is closely associated.

Part II Please check ONE of the following boxes:

* My interests and relationships have not changed since my last disclosure of interests.

[Proceed to signature block below. Do not complete the tables.]

**OR**

🞏 I hereby disclose or update my interests and relationships that could give rise to a conflict of interest: [Complete the table below. Use additional pages as needed.]

|  |  |
| --- | --- |
| **Family Relationships** | **Names of those presenting a potential conflict of interest** |
| Include spouse/domestic partner, living ancestors, brothers and sisters (whether whole or half blood), children (whether natural or adopted), grandchildren, great grand-children, and spouses/ domestic partners of brothers, sisters, children, grandchildren, and great grandchildren |  |

|  |  |
| --- | --- |
| **Type of interest** | **Description of interest that could lead to a conflict of interest** |
| Transactions or arrangements with the Organization |  |
| Transactions or affiliations with other nonprofit organizations |  |
| Substantial business or investment holdings |  |
| Transactions or affiliations with businesses not listed above |  |

I am not aware of any financial interest involving me or a family member that could present a conflict of interest that I have not disclosed either above or in a previous disclosure statement.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature Date

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Printed Name