

**Bay Aging, Bay Aging Apartments and
Bay Aging Foundation
Accounting & Financial
Policies and Procedures Manual**

Fiscal Year 2022

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INTRODUCTION

The following accounting manual is intended to provide an overview of the accounting policies and procedures for BAY AGING and Bay Aging Apartments, which shall be referred to as “BAY AGING” or “the Organization” throughout this manual.

BAY AGING is incorporated in the state of Virginia. BAY AGING is exempt from Federal income taxes under IRC Section 501(c)(3) as a nonprofit corporation. BAY AGING’s tax-exempt mission is to:

Provide services designed to help people as they age to live independently and safely in our communities. Our secondary mission is to do all we can to help improve the general quality of life in our communities.

This manual shall document the financial operations of the Organization. Its primary purpose is to formalize accounting policies and selected procedures for the accounting staff and to document internal controls.

The contents of this manual were approved as official policy of the Organization by the Board of Directors, President, and CFO. All BAY AGING staff are bound by the policies herein, and any deviation from established policy is prohibited.

Effective Date(s) of Accounting Policies

The effective date of all accounting policies described in this manual is July 1, 2011. If a policy is added or modified subsequent to this date, the effective date of the new/revised policy will be indicated parenthetically immediately following the policy heading.

Revised 9/2015

Revised 9/2017

Revised 9/2019

Revised 9/2020

Revised 9/2021

GENERAL POLICIES

ORGANIZATIONAL STRUCTURE

The Role of the Board of Directors

BAY AGING is governed by its Board of Directors, which is responsible for the oversight of the Organization by:

1. Planning for the future and establishing strategic direction.
2. Establishing broad policies, including financial and personnel policies and procedures
3. Approving all new programs
4. Reviewing and approving the annual audit
5. Reviewing financial information
6. Identifying and proactively dealing with emerging issues
7. Interpreting the Organization's mission to the public
8. Soliciting prospective contributors
9. Hiring, evaluating, and working with the President
10. Establishing and maintaining programs and systems designed to assure compliance with terms of contracts and grants
11. Authorizing establishment of all bank accounts and check signers.

The President shall be responsible for the day-to-day oversight and management of BAY AGING.

Committee Structure (9/2015)

The Board of Directors shall form committees in order to assist the board in fulfilling its responsibilities. These committees are responsible for the review of particular programs and providing recommendations to the full board. Standing board-level committees of BAY AGING consist of the following:

1. Executive Committee (Audit Committee is a function of Executive Committee)
2. Finance Committee

The following committees maybe established as needed:

3. Nominating Committee
4. Personnel Committee
5. Planning and Evaluation Committee
6. Fundraising Committee

See the Organization's by-laws for board and committee details. However, roles of committees with direct responsibilities for the financial affairs of the Organization are further described in this manual. These committees shall be referred to in appropriate sections of this manual.

Finance Committee Responsibilities

The Finance Committee is responsible for direction and oversight regarding the overall financial management of BAY AGING. Functions of the Finance Committee include:

1. Review and recommendation of the Organization's annual budget (prepared by the staff) for final approval by the full board
2. Long-term financial planning
- 3.

4. Evaluation and approval of facilities decisions (i.e., leasing, purchasing property)
5. Monitoring of actual vs. budgeted financial performance
6. Oversight of reserve funds
7. Review of financial procedures

The review of the Organization's financial statements shall not be limited to the Finance Committee, but shall involve the entire Board of Directors.

Audit Committee Responsibilities

The Audit Committee hires an independent CPA firm and communicates directly with the CPA firm for an annual audit, as described in the Organization's by-laws. The Audit Committee shall review and approve the final audited financial statements, and any other communications received from the auditor regarding internal controls, illegal acts, or fraud.

The Audit Committee's role in the annual audit is more fully explained in the section of this manual covering the annual audit.

The Roles of the President and Staff

The Board of Directors hires the President, who reports directly to the board. The President is responsible for hiring and evaluating Department Heads for each of the Organization's divisions. Each Department Head reports to the President. For details regarding hiring of staff below the President, please see the agency Personnel Manual.

ACCOUNTING DEPARTMENT OVERVIEW

Organization

The accounting department consists of the following positions that manage and/or process financial information for BAY AGING.

- Chief Financial Officer (CFO)
- 2 Deputy Chief Financial Officers (DCFO)
- Payroll Administrator
- Fiscal Administrator
- 3 Fiscal Assistants

Other officers and employees of BAY AGING who have financial responsibilities are as follows:

- President
- Department Directors
- Human Resources Officer
- Finance Committee – Board level
- Audit Committee – Board level
- Executive Committee – Board level
- Full Board of Directors

Responsibilities

The primary responsibilities of the accounting department consist of:

- General ledger
- Budgeting
- Cash and investment management
- Asset management
- Grants and contracts administration
- Purchasing
- Accounts receivable and billing
- Cash receipts
- Accounts payable
- Cash disbursements
- Payroll and benefits
- Financial statement processing
- External reporting of financial information
- Bank reconciliation
- Reconciliation of subsidiary ledgers
- Compliance with government reporting requirements
- Annual audit
- Leases
- Insurance

Standards for Financial Management Systems

In accordance with OMB Uniform Guidance, BAY AGING maintains a financial management system that provides for the following. Specific procedures to carry out these standards are detailed in the appropriate sections of this manual.

1. Accurate, current, and complete disclosure of the financial results of each Federally-sponsored project or program in accordance with the reporting requirements of OMB Uniform Guidance and/or the award.
2. Records that identify adequately the source and application of funds for Federally-sponsored activities. These records shall contain information pertaining to Federal awards, authorizations, obligations, un-obligated balances, assets, outlays, income, and interest.
3. Effective control over and accountability for all funds, property, and other assets. BAY AGING shall adequately safeguard all such assets and assure they are used solely for authorized purposes.
4. Comparison of outlays with budget amounts for each award. Whenever possible, financial information shall be related to performance and unit cost data.
5. Written procedures to minimize the time elapsing between the transfer of funds to BAY AGING from the U.S. Treasury and the issuance or redemption of checks, warrants, or payments by other means for program purposes by the recipient.
6. Written procedures for determining the reasonableness, allocability and allow ability of costs in accordance with the provisions of the applicable Federal cost principles and the terms and conditions of the award.
7. Accounting records including cost accounting records that are supported by source documentation.

The accounting system utilized by Bay Aging to meet the requirements of fund accounting is Blackbaud Financial Edge NXT (October 2020). The system handles all aspects of the accounting function other than Payroll. Payroll is processed using ADP Workforce Now (October 2020). (Bay Aging Apartments and Bay Aging Foundation use QuickBooks.)

BUSINESS CONDUCT

Practice of Ethical Behavior

Unethical actions, or the appearance of unethical actions, are unacceptable under any conditions. The policies and reputation of BAY AGING depend to a very large extent on the following considerations.

Each employee must apply her/his own sense of personal ethics, which should extend beyond compliance with applicable laws and regulations in business situations, to govern behavior where no existing regulation provides a guideline. Each employee is responsible for applying common sense in business decisions where specific rules do not provide all the answers.

In determining compliance with this standard in specific situations, employees should ask themselves the following questions:

1. Is my action legal?
2. Is my action ethical?
3. Does my action comply with BAY AGING policy?
4. Am I sure my action does not appear inappropriate?
5. Am I sure that I would not be embarrassed or compromised if my action became known within the Organization or publicly?
6. Am I sure that my action meets my personal code of ethics and behavior?
7. Would I feel comfortable defending my actions on the 6 o'clock news?

Each employee should be able to answer "yes" to all of these questions before taking action.

Each director, manager and supervisor is responsible for the ethical business behavior of her/his subordinates. Directors, managers and supervisors must carefully weigh all courses of action suggested in ethical, as well as economic terms, and base their final decisions on the guidelines provided by this policy, as well as their personal sense of right and wrong.

Compliance with Laws, Regulations, and Organization Policies

BAY AGING does not tolerate:

- The willful violation or circumvention of any Federal, state, local, or foreign law by an employee during the course of that person's employment;
- The disregard or circumvention of BAY AGING policy or engagement in unscrupulous dealings.

Employees should not attempt to accomplish by indirect means, through agents or intermediaries, that which is directly forbidden.

The performance of all levels of employees will be measured against implementation of the provisions of these standards.

CONFLICTS OF INTEREST

Introduction

In the course of business, situations may arise in which an Organization decision-maker has a conflict of interest, or in which the process of making a decision may create an appearance of a conflict of interest.

All directors and employees have an obligation to:

1. Avoid conflicts of interest, or the appearance of conflicts, between their personal interests and those of the Organization in dealing with outside entities or individuals,
2. Disclose real and apparent conflicts of interest to the Board of Directors, and
3. Refrain from participation in any decisions on matters that involve a real conflict of interest or the appearance of a conflict.

What Constitutes a Conflict of Interest?

Examples of conflicts of interest include, but are not limited to, situations in which a director or employee:

1. Negotiates or approves a contract, purchase, or lease on behalf of the Organization and has a direct or indirect interest in, or receives personal benefit from, the entity or individual providing the goods or services;
2. Negotiates or approves a contract, sale, or lease on behalf of the Organization and has a direct or indirect interest in, or receives personal benefit from, the entity or individual receiving the goods or services;
3. Employs or approves the employment of, or supervises a person who is an immediate family member of the director or employee;
4. Sells products or services in competition with the Organization;
5. Uses the Organization's facilities, other assets, employees, or other resources for personal gain;
6. Receives a substantial gift from a vendor, if the director or employee is responsible for initiating or approving purchases from that vendor.

Please refer to the Personnel Policy Manual for more information regarding conflict of interest.

POLICY ON SUSPECTED MISCONDUCT

Introduction

This policy communicates the actions to be taken for suspected misconduct committed, encountered, or observed.

Like all organizations, BAY AGING faces many risks associated with fraud, abuse, and other forms of misconduct. The impact of these acts collectively referred to as misconduct throughout this policy, may include, but not be limited to:

- Financial losses and liabilities
- Loss of current and future revenue and customers
- Negative publicity and damage to the Organization's good public image
- Loss of employees and difficulty in attracting new personnel
- Deterioration of employee morale
- Harm to relationships with clients, vendors, bankers, and subcontractors
- Litigation and related costs of investigations, etc.

Our Organization is committed to establishing and maintaining a work environment of the highest ethical standards. Achievement of this goal requires the cooperation and assistance of every employee and volunteer at all levels of the Organization.

Definitions

For purposes of this policy, misconduct includes, but is not limited to:

1. Actions that violate the Organization's Code of Conduct (and any underlying policies) or any of the accounting and financial policies included in this manual
2. Fraud (see below)
3. Forgery or alteration of checks, bank drafts, documents or other records (including electronic records)
4. Destruction, alteration, mutilation, or concealment of any document or record with the intent to obstruct or influence an investigation, or potential investigation, carried out by a department or agency of the Federal government or by the Organization in connection with this policy
5. Disclosure to any external party of proprietary information or confidential personal information obtained in connection with employment with or service to the Organization
6. Unauthorized personal or other inappropriate (non-business) use of equipment, assets, services, personnel or other resources
7. Acts that violate Federal, state, or local laws or regulations
8. Accepting or seeking anything of material value from contractors, vendors, or persons providing goods or services to BAY AGING. Exception: gifts with value less than \$20.00.
9. Impropriety of the handling or reporting of money in financial transactions.
10. Failure to report known instances of misconduct in accordance with the reporting responsibilities described herein (including tolerance by supervisory employees of misconduct of subordinates).

Fraud is further defined to include, but not be limited to:

- Theft, embezzlement, or other misappropriation of assets (including assets of or intended for the Organization, as well as those of our clients, subcontractors, vendors, contractors, suppliers, and others with whom the Organization has a business relationship)
- Intentional misstatements in the Organization's records, including intentional misstatements of accounting records or financial statements
- Authorizing or receiving payment for goods not received or services not performed
- Authorizing or receiving payments for hours not worked
- Forgery or alteration of documents, including but not limited to checks, timesheets, contracts, purchase orders, receiving reports

BAY AGING prohibits each of the preceding acts of misconduct on the part of employees, officers, executives, volunteers and others responsible for carrying out the Organization's activities.

Reporting Responsibilities (9/2015)

Bay Aging (BA) requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the Agency must practice honesty and integrity in fulfilling their responsibilities and comply with all BA policies and procedures and all laws and regulations applicable to BA. When reporting believed violations of BA policies and procedures or applicable laws and regulations, employees must follow the Problem Resolution Procedure in the Bay Aging Employee Handbook prior to contacting the Compliance Officer. Board Directors should contact the Compliance Officer or the Board Chairman.

Whistleblower Protection (9/2015)

NO RETALITION: No director, officer, or employee who in good faith reports a violation shall suffer harassment, retaliation or adverse consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. A director or officer is subject to discipline up to and including removal. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Agency prior to seeking resolution outside of the Agency.

ACTING IN GOOD FAITH: Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the maliciously or knowingly false will be viewed as a serious disciplinary offense and could result in termination of employment or other disciplinary action.

Investigative Responsibilities (9/2015)

COMPLIANCE OFFICER: The Agency's Compliance Officer is responsible for investigation and resolving all reported complaints and allegations concerning violations and, at her discretion, shall advise the President/CEO. If there is a conflict with the President/CEO, the Compliance Officer has direct access to the Executive Committee and is required to report to the Executive Committee at least annually on compliance activity. The Agency's Compliance Officer is the Human Resources Manager, except when there is a conflict with Human Resources the Compliance Officer shall be the Board Chairman.

Protection of Records – Federal Matters

BAY AGING prohibits the knowing destruction, alteration, mutilation, or concealment of any record, document, or tangible object with the intent to obstruct or influence the investigation or proper administration of any matter within the jurisdiction of any department or agency of the United States government, or in relation to or contemplation of any such matter or case.

Violations of this policy will be considered violations of the Organization's Code of Ethics and subject to the investigative, reporting, and disclosure procedures described earlier in this Policy on Suspected Misconduct.

Disciplinary Action

Based on the results of investigations into allegations of misconduct, disciplinary action may be taken against violators. Disciplinary action shall be coordinated with appropriate representatives from the Human Resources Department. The seriousness of misconduct will be considered in determining appropriate disciplinary action, which may include:

- Reprimand
- Probation
- Suspension
- Demotion
- Termination
- Reimbursement of losses or damages
- Referral for criminal prosecution or civil action

This listing of possible disciplinary actions is for information purposes only and does not bind the Organization to follow any particular policy or procedure.

Confidentiality

The Compliance Officer will treat all information received confidentially. Any employee who suspects dishonest or fraudulent activity will notify the Compliance Officer immediately, and should not attempt to personally conduct investigations or interviews/interrogations related to any suspected fraudulent act (see **Reporting Procedures** section above).

Great care must be taken in the investigation of suspected improprieties or irregularities so as to avoid mistaken accusations or alerting suspected individuals that an investigation is under way. Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect BAY AGING from potential civil liability.

An employee who discovers or suspects fraudulent activity may remain anonymous. All inquiries concerning the activity under investigation from the suspected individual(s), his or her attorney or representative(s), or any other inquirer should be directed to the Compliance Officer or legal counsel. No information concerning the status of an investigation will be given out. The proper response to any inquiry is "I am not at liberty to discuss this matter." Under no circumstances should any reference be made to "the allegation," "the crime," "the fraud," "the forgery," "the misappropriation," or any other specific reference.

The reporting individual should be informed of the following:

1. Do not contact the suspected individual in an effort to determine facts or demand restitution.
2. Do not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by the BAY AGING legal counsel or the Compliance Officer.

Disclosure to Outside Parties

Allegations of and information related to allegations of suspected misconduct shall not be disclosed to third parties except under the provisions described in this policy (such as disclosure to outside investigators hired by the Organization to aid in an investigation).

However, all known frauds involving the President, senior management, or members of the Board of Directors, as well as all material frauds involving employees below the senior management level, shall be disclosed by the Executive Committee to the Organization's external auditors.

SECURITY

Accounting Department

Locks will be maintained on the doors leading into the BAY AGING Accounting Department. These doors shall be closed and locked in the evenings and whenever the an office is vacant. The keys to these locks will be provided to each office occupant and the President, and other personnel as approved by the President. The lock will be changed whenever any of these individuals leaves the employment of BAY AGING.

BAY AGING's blank check stock shall be stored in a fireproof file cabinet in the Accounting Department. This cabinet will be locked with a key that is kept in the Accounting Department. Access to this file cabinet shall be by keys in the possession of the CFO.

Access to Electronically Stored Accounting Data

BAY AGING utilizes passwords to restrict access to accounting software and data. Only duly authorized accounting personnel with data input responsibilities will be assigned passwords that allow access to the system.

Accounting personnel are expected to keep their passwords secret and to change their passwords on a regular basis. Administration of passwords shall be performed by the CFO.

Each password enables a user to gain access to only those software and data files necessary for each employee's required duties.

Storage of Back-Up Files

BAY AGING maintains back-up copies of electronic data files off-site in a secure, fire-protected environment. Access to back-up files shall be limited to individuals authorized by management. Multiple copies of backup media are utilized so as to not overwrite the most recent backup.

The Organization should have a regularly scheduled test of its capability to restore from backup media.

Storage of Sensitive Data

In addition to accounting and financial data stored in the Accounting Department, other sensitive data, such as social security numbers of employees or clients, etc. may be stored in areas other than the accounting department, such as in Human Resources offices, program offices, etc. Therefore, the Organization:

1. Minimizes the storage of sensitive data outside the Accounting Department by shredding documents with such data or deleting the sensitive data from documents that are stored outside the Accounting Department whenever possible; and
2. Requires that all sensitive data that is stored in areas other than the Accounting Department be secured in locked filing cabinets that are placed in offices that are locked after hours.

3. Maintains strict control over the passwords required to access sensitive data in cloud-based software packages.

Further, the Organization restricts access to sensitive data to Organization employees only (no temporary workers, contractors, or volunteers) and only to employees with a legitimate need for such access. The Organization also requires employees to claim print jobs which contain sensitive information immediately upon printing. All preceding files shall be locked in the records room with limited access by agency staff.

Destruction of Consumer Information

As stated earlier, all sensitive data must be securely stored and/or shredded when no longer needed. BAY AGING will also shred all consumer information obtained by the Organization for any reason. Shredding will be performed on a schedule determined by grants and contracts and the schedule shall be made a part of the Record Retention policy (see the "Fiscal Management" policies section of this manual).

TECHNOLOGY AND ELECTRONIC COMMUNICATIONS

Please refer to the Personnel Policy Manual for information regarding acceptable use of the Organization electronic equipment.

Disposal of Computer Equipment

BAY AGING will format all computer hard drives prior to disposing of computer equipment. This procedure shall be performed by BAY AGING's Information Technology staff person.

GENERAL LEDGER AND CHART OF ACCOUNTS

The general ledger is the collection of all asset, liability, net assets, revenue and expense accounts. It is used to accumulate all financial transactions and is supported by subsidiary ledgers that provide details for certain accounts. The general ledger is the foundation for the accumulation of data and production of reports.

Chart of Accounts Overview

The chart of accounts is the framework for the general ledger system and the basis for the accounting system. The chart of accounts consists of account titles and account numbers assigned to the titles. General ledger accounts are used to accumulate transactions and the impact of these transactions on each asset, liability, net asset, revenue, expense, and gain and loss account.

BAY AGING's chart of accounts is comprised of four types of accounts:

1. Assets
2. Liabilities
3. Revenues
4. Expenses

Each account number is comprised of five digits.

Distribution of Chart of Accounts

All BAY AGING employees involved with account coding or budgetary responsibilities will be issued a current chart of accounts. As the chart of accounts is revised, an updated copy of the chart of accounts shall be promptly distributed to these individuals.

Control of and Changes to the Chart of Accounts

The CFO monitors and controls the chart of accounts, including all account maintenance, such as additions and deletions. Any additions or deletions of accounts should be approved by the CFO, who ensures that the chart of accounts is consistent with the Organizational structure of BAY AGING and meets the needs of each division and department. **(Please note the software use for Bay Aging Apartments and Bay Aging Foundation is QuickBooks and the account definitions may vary. The Apartments use the HUD required Chart of Accounts.)**

Account Definitions

General Ledger

<u>Account Range</u>	<u>Category</u>	<u>Definition</u>
10000 - 19999	Assets	

Assets are probable future economic benefits obtained or controlled by the Organization as a result of past transactions or events. Assets are classified as current assets, fixed assets, contra-assets, and other assets.

Current assets are assets that are available or can be made readily available to meet the cost of operations or to pay current liabilities. Some examples are cash, temporary investments, and receivables that will be collected within one year of the statement of financial position date.

Fixed assets (property and equipment) are tangible assets with a useful life of more than one year that are acquired for use in the operation of the Organization and are not held for resale.

Contra-assets are accounts that reduce asset accounts, such as accumulated depreciation and reserves for uncollectible accounts receivable

Other assets include long-term assets that are assets acquired without the intention of disposing them in the near future. Some examples are security deposits, property and long-term investments.

20000 – 29999

Liabilities

Liabilities are probable future sacrifices of economic benefits arising from present obligations of the Organization to transfer assets or provide services to other entities in the future as a result of past transactions or events. Liabilities are classified as current or long-term.

Current liabilities are probable sacrifices of economic benefits that will likely occur within one year of the date of the financial statements or which have a due date of one year or less. Common examples of current liabilities include accounts payable, accrued liabilities, short-term notes payable, and deferred revenue.

Long-Term Liabilities are probable sacrifices of economic benefits that will likely occur more than one year from the date of the financial statements. An example is the non-current portion of a mortgage loan.

30000 – 39999

Equity

Project codes

40000 - 49999 **Revenues**

Revenues are inflows or other enhancements of assets, or settlements of liabilities, from delivering or producing goods, rendering services, or other activities that constitute an organization's ongoing major or central operations. Revenues include grants received from government agencies, private foundations and corporations, and contributions received from donors.

50000 - 89999 **Expenses**

Expenses are outflows or other activities using assets, or incurrence of liabilities from delivering or producing goods, rendering services, or carrying out other activities that constitute BAY AGING's ongoing major or central operations.

Fiscal Year of Organization

BAY AGING shall operate on a fiscal year that begins on Oct 1 and ends on Sept 30. Any changes to the fiscal year of the Organization must be ratified by majority vote of BAY AGING's Board of Directors.

Accounting Estimates

BAY AGING utilizes numerous estimates in the preparation of its interim and annual financial statements. Some of those estimates include:

1. Useful lives of property and equipment
2. Fair market values of investments
3. Fair market values of donated assets
4. Values of contributed services
5. Joint cost allocations
6. Allocations of certain indirect costs
7. Allocations of time/salaries

The CFO will reassess, review, and approve all estimates yearly. All key conclusions, bases, and other elements associated with each accounting estimate shall be documented in writing. All material estimates, and changes in estimates from one year to the next, shall be disclosed to the Finance Committee, the Audit Committee, and the external audit firm.

Journal Entries

All general ledger entries that do not originate from a subsidiary ledger shall be supported by journal vouchers or other documentation, including an explanation of each such entry. Examples of such journal entries are:

1. Recording of non-cash transactions
2. Corrections of posting errors
3. Nonrecurring accruals of income and expenses

Certain journal entries, called recurring journal entries, occur in every accounting period. These entries may include, but are not limited to:

1. Depreciation of fixed assets
2. Amortization of prepaid expenses
3. Accruals of recurring expenses

All journal entries not originating from subsidiary ledgers shall be authorized in writing by the CFO or DCFO by reviewing, initialing or signing the entries.

POLICIES ASSOCIATED WITH REVENUES AND CASH RECEIPTS

REVENUE

Revenue Recognition Policies

BAY AGING receives revenue from several types of transactions. Revenue from each of these types of transactions is recognized in the financial statements in the following manner:

1. **Grant income** - Monthly billing based on incurrence of allowable costs (for cost-reimbursement awards) or based on other terms of the award (for fixed price, unit-of-service, and other types of awards).
2. **In-Kind Contributions** – Recognized as income when received. (See below the section titled “Cost Sharing and Matching”).
3. **Program Income** – Includes refunds and other applicable credits, and is recognized in the period in which it is earned.
4. **Nongovernmental Cash Contributions** - Recognized as income when received, unless accompanied by restrictions or conditions (see the next section on contribution income).

Immaterial categories of revenue may be recorded on the cash basis of accounting (i.e., recorded as revenue when received) as deemed appropriate by the CFO.

Definitions

The following definitions shall apply with respect to the policies described in this section:

Contribution – An unconditional transfer of cash or other assets to the Organization, or a settlement or cancellation of the Organization's liabilities, in a voluntary nonreciprocal transfer by another entity or individual.

Condition – A donor-imposed stipulation that specifies a future and uncertain event whose occurrence or failure to occur gives the promisor a right of return of the assets it has transferred to the Organization or releases the promisor from its obligation to transfer its assets.

Restriction – A donor-imposed stipulation that specifies a use for the contributed asset that is either limited to a specific future time period or is more specific than the broad limits resulting from the nature of the Organization, the environment in which it operates, and the purposes specified in the Articles of Incorporation and Bylaws. Restrictions on the use of an asset may be temporary or permanent.

Nonreciprocal Transfer – A transaction in which an entity incurs a liability or transfers assets to BAY AGING without directly receiving value in exchange.

Promise to Give – A written or oral agreement to contribute cash or other assets.

Exchange Transaction – A reciprocal transaction in which BAY AGING and another entity each receive and sacrifice something of approximately equal value.

ADMINISTRATION OF FEDERAL AWARDS

Definitions

BAY AGING may receive financial assistance from a donor/grantor agency through the following types of agreements:

Grant: A financial assistance award given to the Organization to carry out its programmatic purpose.

Contract: A mutually binding legal agreement where the Organization agrees to provide supplies or services and the funder agrees to pay for them.

Cooperative Agreement (Collaboration): A legal agreement where the Organization implements a program with the direct involvement of the funder.

Throughout this manual, Federal assistance received in any of these forms will be referred to as a Federal "award."

Preparation and Review of Proposals

Individual departments are responsible for preparing proposals for projects that the department intends to pursue. However, all proposals shall be discussed and reviewed by the CFO and Program Director prior to submission to government agencies or other funding sources. Final proposals shall be reviewed and approved by the President. The full Board will approve acceptance of all new grants prior to signing of the contract.

Post-Award Procedures

After an award has been made, the following steps shall be taken:

1. Verify the specifications of the grant or contract. The Accounting Department shall review the terms, time periods, award amounts and expected expenditures associated with the award. A Catalog of Federal Domestic Assistance (CFDA) number shall be determined for each award. All reporting requirements under the contract or award shall be summarized.
2. The Accounting system will be configured such that each Federal program will be assigned to a unique element, and all federal awards received and expended will be assigned to the appropriate element. The descriptions of the elements and revenue accounts for Federal awards will include CFDA title and number, the Federal award ID number, the name of the Federal agency, and the name of any pass-through entities receiving funds.
3. Gather documentation. A file is established for each grant or contract. The file contains the proposal, all correspondence regarding the grant or contract, the final signed award document and all reports submitted to the funding sources. This file is maintained in the CFO's office.
4. Track and Confirm Allowability of Costs. Appropriate charges for each federal award will be allocated to the proper element and transaction code using the Bay Aging purchase order and

voucher process. The CFO or designee within the finance department will ensure that costs allocated to federal programs meet the terms and conditions of the award and are:

- A. Necessary and reasonable for the performance of the federal award (and be allocated to that use).
 - B. Conform to limitations or exclusions regarding type or cost.
 - C. Are consistent with the policies and procedures the organization would apply to non-federally financed work.
 - D. Are treated consistently with other comparable costs.
 - E. Are determined in accordance with US GAAP except as otherwise provided in the OMB Uniform Guidance
 - F. Are not used to meet cost-sharing or matching requirements of any other federally financed program.
 - G. Are adequately documented.
5. Sub-recipients. If a federal award is passed along to a sub-recipient, such awards will be clearly identified to the subrecipient as a subaward and will include all required information associated with the award. A risk analysis will be performed to evaluate and document the subrecipient's risk of noncompliance, which will guide appropriate monitoring of the subrecipient over the award lifecycle. Monitoring will be conducted by fiscal and program staff to ensure that subaward is used for authorized purposes, is in compliance with federal statutes and terms and conditions, and that performance goals are achieved. Subrecipient must undergo a financial audit as required by federal award standards.

A. Compliance with Laws, Regulations and Provisions of Awards

BAY AGING recognizes that as a recipient of Federal funds, the Organization is responsible for compliance with all applicable laws, regulations, and provisions of contracts and grants. To ensure that the Organization meets this responsibility, the following policies apply with respect to every grant or contract received directly or indirectly from a Federal agency:

1. For each Federal award, the Program Director of the department responsible for administering the award will be designated as "grant manager."
2. Each Director shall attend a training on grant management prior to beginning his/her role as a grant manager (or as early in their functioning as a grant manager as practical). Thereafter, all grant managers shall attend refresher/update courses on grant management every two years if trainings and funding are available.
3. The grant manager shall take the following steps to identify all applicable laws, regulations, and provisions of each grant and contract:
 - a. Read each award and prepare a summary of key compliance requirements and references to specific laws and regulations.

- b. Review the relevant OMB Uniform Guidance sections (updated annually) published by the Office of Management and Budget (OMB) for compliance requirements unique to the award and for compliance requirements common to all Federal awards.
 - c. Review the section of the Catalog of Federal Domestic Assistance (CFDA) applicable to the award.
 - d. The grants manager will communicate grant requirements to those who will be responsible for carrying them out, or impacted by them.
4. The Accounting Department shall forward copies of applicable laws regulations to the grant manager (such as OMB Circulars, pertinent sections of compliance supplements, and other regulations).
 5. The Accounting Department with input from the grant manager shall identify and communicate any special changes in policies and procedures necessitated by Federal awards as a result of the review of each award.
 6. The grant manager shall take all reasonable steps necessary to identify applicable changes in laws, regulations, and provisions of contracts and grants. Steps taken in this regard shall include, but not be limited to, reviewing subsequent grant and contract renewals, reviewing annual revisions to the OMB Uniform Guidance and communications with Federal awarding agency personnel.
 7. The grant manager shall inform the independent auditors of applicable laws, regulations, and provisions of contracts and grants. The grant manager shall also communicate known instances of noncompliance with laws, regulations, and provisions of contracts and grants to the auditors.

Close Out of Federal Awards

BAY AGING shall follow the close out procedures described in OMB Uniform Guidance and in the grant agreements as specified by the granting agency.

BAY AGING and all sub-recipients shall liquidate all obligations incurred under the grant or contract within 90 days of the end of the grant or contract agreement.

COST SHARING AND MATCHING (IN-KIND)

Overview

BAY AGING values contributed services and property that are to be used to meet a cost sharing or matching requirement at their fair market values at the time of contribution, unless award documents or Federal agency regulations identify specific values to be used.

BAY AGING shall claim contributions as meeting a cost sharing or matching requirement of a Federal award only if all of the following criteria are met:

1. They are verifiable from BAY AGING records.
2. They are not included as contributions for any other Federally-assisted project or program.
3. They are necessary and reasonable for proper and efficient accomplishment of project or program objectives.
4. They are allowable under OMB Uniform Guidance.
5. They are not paid by the Federal government under another award, except where authorized by Federal statute to be used for cost sharing or matching.
6. They are provided for in the approved budget when required by the Federal awarding agency.
- 7.
8. In the case of donated space, (or donated use of space), the space is subject to an independent appraisal to establish its value.

Valuation and Accounting Treatment

In-kind typically falls into one of the following categories:

- Space, buildings, land and equipment
- Volunteer time and services
- Supplies
- Transportation

The following sections discuss the valuation and accounting treatment for each category.

Space, Buildings, Land and Equipment

Buildings and Land

If the purpose of the contribution is to assist the Organization in the acquisition of equipment, building, or land, the total value of the donated property may be claimed as matching with prior approval of the awarding agency.

If the purpose of the donation is to support activities that require the use of equipment, buildings or land, depreciation or use charges (e.g. rent) may be claimed as matching, unless the awarding agency has approved using the full value as match.

Equipment, buildings or land are valued at its fair market value as determined by an independent appraiser. Information on the date of donation and records from the appraisal will be maintained in a property file.

Space:

- Will be valued at the fair rental value of comparable space as established by an independent appraisal of comparable space and facilities in a privately-owned building in the same locality
- Information on the date of donation and records from the appraisal will be maintained in a property file
- If less than an arms-length transaction, will be valued based in actual allowable costs not to exceed fair market value

Volunteer Time and Services

Volunteer services furnished by professional and technical personnel, consultants, and other skilled and unskilled labor will be included in in-kind if the services are an integral and necessary part of the program.

Volunteer services will be valued at rates consistent with those paid for similar work in the Organization. For skills not found in the Organization, rates will be consistent with those paid for similar work in our labor market. Rates should include gross hourly wages plus fringe benefits calculated based on fringe benefits received by employees in similar positions, or on agency average.

Volunteers must possess qualifications and perform work requiring those skills in order to be valued at greater than an unskilled labor rate.

BAY AGING requires volunteers to document and account for their contributed time in a manner similar to the timekeeping system followed by employees. Each program that uses volunteers will provide the volunteers a sign-in sheet which collects the following information:

- Date service was performed
- Volunteer name and address
- Hours donated
- Service provided
- Signature of volunteer

The sign-in sheets will be delivered to the Accounting Department monthly so they can be tallied, valued, and recorded as in-kind in the accounting records.

Supplies

Donated supplies must be used in the program and shall be valued at fair market value at the time of donation. Supplies can be counted as match only if the program would have purchased such items itself.

Transportation

Transportation of agency clients by other programs or people when transportation is provided by the agency will be counted as in-kind. If the provider of the transportation, such as a school system, has a cost per client figure that will be the amount used to value the donation. Otherwise, the prevailing rate per mile paid by the agency will be used.

CONTRIBUTIONS RECEIVED

Overview

BAY AGING shall accept charitable contributions of all types of assets from any type of donor, with the following exceptions:

1. Contributions of non-liquid assets or assets possessing legal or other characteristics rendering the asset difficult to sell or convert to liquid assets, as determined by the President and/or CFO;
2. Contributions with donor-imposed restrictions that provide excessive control to the donor over future uses of the donated asset(s), as determined by the President and/or CFO;
3. Contributions with donor-imposed restrictions that violate or involve uses that go beyond the Organization's current mission statement and tax-exempt purpose, as determined by the President and/or CFO; and
4. Contributions from donors involved in businesses or activities that are deemed inconsistent with BAY AGING's mission, as determined by the President.

Distinguishing Contributions from Exchange Transactions

BAY AGING receives income in the form of contributions, revenue from exchange transactions, and income from activities with characteristics of both contributions and exchange transactions. BAY AGING shall follow the guidance published in FASB Accounting Standards Update 2018-08 when making the determination of revenue recognition:

In determining whether a transfer of assets is an exchange transaction in which a resource provider receives commensurate value in return for the resources transferred or a contribution, the type of resource provider shall not factor into the determination and an entity shall evaluate the terms of an agreement and consider the following:

1. The resource provider is not synonymous with the general public. A benefit received by the public as a result of the assets transferred is not equivalent to commensurate value received by the resource provider. Therefore, if the resource provider receives indirect value in exchange for the assets transferred or if the value received by the resource provider is incidental to the potential public benefit from using the assets transferred, the transaction shall not be considered commensurate value received in return
2. Execution of the resource provider's mission or the positive sentiment from acting as a donor shall not constitute commensurate value received by the resource provider for the purposes of determining whether the transfer of assets is a contribution or an exchange
3. If the expressed intent asserted by both the recipient and resource provider is to exchange resources for goods or services that are of commensurate value, the transaction shall be indicative of an exchange transaction. The transaction shall be indicative of a contribution if the recipient solicits assets from the resource provider without the intent of exchanging goods or services of commensurate value.
4. If the resource provider has full discretion in determining the amount of the transferred assets, the transaction shall be indicative of a contribution. If both the recipient and the resource provider agree on the amount of assets transferred in exchange for goods or services that are of commensurate value, the transaction shall be indicative of an exchange transaction.

5. If the penalties assessed on the recipient for failure to comply with the terms of the agreement are limited to the delivery of assets or services already provided and the return of the unspent amount, the transaction is generally indicative of a contribution. The existence of contractual provisions of economic forfeiture beyond the amount of assets transferred by the resource provider to penalize the recipient for nonperformance generally indicates that the transaction is an exchange of commensurate value.

1.

Receipts and Disclosures

BAY AGING and its donors are subject to certain disclosure and reporting requirements imposed under the Internal Revenue Code and the underlying regulations. To comply with those rules, BAY AGING shall adhere to the following guidelines with respect to contributions received by the Organization.

The Office Manager shall provide a receipt to the donor for every separate contribution received. All receipts shall include the following information:

1. The amount of cash received and/or a description (but not an assessment of the value) of any non-cash property received;
2. A statement of whether BAY AGING provided any goods or services to the donor in consideration, in whole or in part, for any of the cash or property received, and
3. If any goods or services were provided to the donor by BAY AGING, a description and good faith estimate of the value of those goods or services.

All estimates of the fair market value of goods or services provided by BAY AGING shall be prepared by the Accounting Department.

BAY AGING complies with all current Federal and state rules regarding solicitation and collection of charitable contributions, whether specifically addressed in this manual or not, as well as all future revisions to those rules.

BILLING/INVOICING POLICIES

Overview

The Organization's primary sources of revenue are:

- Reimbursement grants – billed monthly, or as funders require, based on allowed, incurred expenses
- Fee-for-service income – billed according to contract requirements based on number of units of services provided

Other lesser sources of income such as fees for rental space will be collected and recorded when the services are provided.

Responsibilities for Billing and Collection

BAY AGING's Accounting Department is responsible for the invoicing of funding sources and the collection of outstanding receivables. (Note: Cash receipts, credit memo, and collection policies will be discussed in subsequent sections.)

Billing and Financial Reporting

BAY AGING strives to provide management, staff and funding sources with timely and accurate financial reports applicable to Federal awards. These reports include monthly and cumulative expenditures, a project budget, and a balance remaining column.

BAY AGING shall prepare and submit financial reports as specified by the financial reporting clause of each grant or contract award document. Preparation of these reports shall be the responsibility of the CFO, subject to review and approval by the President and/or Program Directors.

The following policies shall apply to the preparation and submission of billings to Federal agencies under awards made to BAY AGING:

1. BAY AGING will request reimbursement after expenditures have been incurred on a monthly basis, unless an award specifies another method.
- 2.
3. Each award normally specifies a particular billing cycle. Therefore, a schedule is established for each grant and contract to ensure that reimbursement is made on a timely basis along with any other reporting that is required in addition to the financial reports.
4. Requests for reimbursement of award expenditures will use the actual amounts as posted to the general ledger and reflected in the Revenue and Expense Reports as the source for all invoice amounts.
5. All financial reports required by each Federal award will be prepared and filed on a timely basis. To the extent BAY AGING's year-end audit results in adjustments to amounts previously

reported to Federal agencies, revised reports shall be prepared and filed in accordance with the terms of each Federal award.

BAY AGING shall maintain separate billing records in addition to the official general ledger accounting records. Billing records shall be reconciled to the general ledger on a monthly basis.

If a Federal award authorizes the payment of cash advances to BAY AGING, the CFO may require that a request for such an advance be made. Upon receipt of a cash advance from a Federal agency, BAY AGING shall reflect a liability equal to the advance. As part of the monthly close-out and invoicing process, the liability shall be reduced, and revenue recognized, in an amount equal to the allowable costs incurred for that period.

Cash Draw-downs Under Letters of Credit

Cash draw-downs under letters of credit from Federal agencies shall be made no less frequently than monthly in conjunction with the balances due on the Revenue and Expenditure Report. All Federal funds shall be deposited into an interest-bearing cash account under the cash receipts policies and procedures described in this manual. BAY AGING requires that Federal funds will be disbursed within 24 hours of receipt.

Final Invoices for Grants (7-1-07)

At the close of a grant year, any un-obligated funds under a reimbursement grant award will not be invoiced, and all revenues will be equivalent to expenditures for the grant period.

CASH RECEIPTS

Overview

Cash (including checks payable to the Organization) is the most liquid asset an organization has. Therefore, it is the objective of BAY AGING to establish and follow the strongest possible internal controls in this area.

Processing of Checks and Cash Received in the Mail

The following procedures will be followed:

- Cash receipts are received in a central location, rather than at remote sites, to ensure that cash received is appropriately directed, recorded, and deposited on a timely basis.
- Mail is opened and a listing of cash/checks received shall be logged by the receptionist and verified by one other non-finance staff member.
- The individual preparing the daily list of receipts shall be someone that is not involved in the accounts receivable or accounts payable process.
- A deposit slip is prepared the deposit is made and verified by two staff members and initialed in the daily log verifying any discrepancies.
- Deposits are prepared and taken to the bank, or submitted via remote deposit scanner, by an individual other than the employee who prepared the daily cash receipts listing.

Endorsement of Checks

All checks received that are payable to the Organization shall immediately be restrictively endorsed by the individual who prepares the daily receipts listing. The restrictive endorsement shall be a rubber stamp that includes the following information:

1. For Deposit Only
2. BAY AGING

Timeliness of Bank Deposits

Bank deposits will be made on a daily basis, unless the total amount received for deposit is less than \$1,500. In no event shall deposits be made less frequently than weekly.

Reconciliation of Deposits

On a periodic basis, the DCFO, who does not prepare the daily deposit, shall reconcile the listings of receipts to bank deposits on the monthly bank statement. Any discrepancies shall be immediately investigated.

Unspent Activity Funds

Any funds remaining from field trip monies, parent activity monies or other requested funds that are not used for the originally approved and stated purpose must be submitted to the Finance Office to be re-deposited. At no time should funds requested for one purpose be utilized for another.

POLICIES ASSOCIATED WITH EXPENDITURES AND DISBURSEMENTS

PURCHASING POLICIES AND PROCEDURES

Overview

THE POLICIES DESCRIBED IN THIS SECTION APPLY TO ALL PURCHASES MADE BY BAY AGING.

BAY AGING requires the practice of ethical, responsible, and reasonable procedures related to purchasing, agreements and contracts, and related forms of commitment. The policies in this section describe the principles and procedures that all staff shall adhere to in the completion of their designated responsibilities.

The goal of these procurement policies is to ensure that materials and services are obtained in an effective manner and in compliance with the provisions of applicable Federal statutes and executive orders.

Responsibility for Purchasing

All department heads or their designees shall have the authority to initiate purchases on behalf of their department, within the guidelines described here. The Accounting Department shall be responsible for tracking purchase orders. The President has approval authority over all purchases and contractual commitments, and shall make the final determination on any proposed purchases where budgetary or other conditions may result in denial. (Bay Aging Apartment purchase orders are tracked by the Site Coordinators and then sent to Fiscal to process.)

Code of Conduct in Purchasing

Ethical conduct in managing the Organization's purchasing activities is absolutely essential. Staff must always be mindful that they represent the Board of Directors and share a professional trust with other staff and the general membership.

- Staff shall discourage the offer of, and decline, individual gifts or gratuities of value in any way that might influence the purchase of supplies, equipment, and/or services.
- Staff shall notify their immediate supervisor if they are offered such gifts.
- No officer, board member, employee, or agent shall participate in the selection or administration of a vendor if a real or apparent conflict of interest would be involved. Such a conflict would arise if an officer, board member, employee or agent, or any member of his/her immediate family, his/her spouse/partner, or an organization that employs or is about to employ any of the parties indicated herein, has a financial or other interest in the vendor selected.
- Officers, board members, employees, and agents shall neither solicit nor accept gratuities, favors, or anything of monetary value from vendors or parties to sub-agreements.
- Unsolicited gifts with a value of \$20.00 or less may be accepted.

Competition

In order to promote open and free competition, purchasers will:

- Be alert to any internal potential conflicts of interest.
- Be alert to any noncompetitive practices among contractors that may restrict, eliminate or restrain trade.
- Not permit contractors who develop specifications, requirements or proposals to bid on such procurements.
- Award contracts to bidders whose product/service is most advantageous in terms of price, quality and other factors.
- Issue solicitations that clearly set forth all requirements to be evaluated.
- Reserve the right to reject any and all bids when it is in the Organization's best interest.

Non-Discrimination Policy

All vendors/contractors who are the recipients of Organization funds, or who propose to perform any work or furnish any goods under agreements with BAY AGING, shall agree to these important principles:

1. Vendors/contractors will not discriminate against any employee or applicant for employment because of race, religion, color, sexual orientation or national origin, except where religion, sex, or national origin is a bona fide occupational qualification reasonably necessary to the normal operation of the vendors/contractors.
2. Vendors/contractors agree to post in conspicuous places, available to employees and applicants for employment, notices setting forth the provisions of this nondiscrimination clause. Notices, advertisement and solicitations placed in accordance with Federal law, rule, or regulation shall be deemed sufficient for meeting the intent of this section.

Procurement Procedures

The following are BAY AGING's procurement procedures:

1. BAY AGING shall avoid purchasing items that are not necessary for the performance of the activities required by a Federal award.
2. Where appropriate, an analysis shall be made of lease and purchase alternatives to determine which would be the most economical and practical procurement for the Federal government. This analysis should only be made when both lease and purchase alternatives are available to the program.
3. Some form of cost or price analysis shall be made for every procurement. Price analysis may be made in various ways, including comparison of price quotations submitted or market prices. Cost analysis is the review and evaluation of each element of cost to determine reasonableness, allocability, and allowability.
4. Documentation of the cost and price analysis associated with each procurement decision shall be retained in the procurement files pertaining to each Federal award.
5. For all procurements in excess of the small purchase acquisition threshold, procurement records and files shall be maintained and include all of the following:
 - a. The basis for contractor selection.

- b. Justification for lack of competition when competitive bids or offers are not obtained.
 - c. The basis for award cost or price.
- 6. BAY AGING shall make all procurement files available for inspection upon request by a Federal awarding agency.
 - 7. All contracts with vendors shall require the vendor to certify in writing that it has not been suspended or disbarred from doing business with any Federal agency. (Alternatively, the Organization may research potential vendors on the Excluded Parties List at the GSA\ website.)
 - 8. BAY AGING shall not utilize the “cost-plus-a-percentage-of-costs” method of contracting.

All staff members with the authority to approve purchases will receive a copy of and be familiar with federal cost principles published in the OMB Uniform Guidance.

Use of Purchase Orders

BAY AGING utilizes a purchase order system. A properly completed purchase order shall be required for each purchase decision with the exception of travel advances and expense reimbursements, which require the preparation of a separate form described elsewhere in this manual. Ongoing monthly charges, such as utility bills, contractual installments, rent, or immediate-needs based purchases such as gasoline, do not require a purchase order.

A properly completed purchase order shall contain the following information, at a minimum:

- 1. General description or statement of services required
- 2. Vendor name
- 3. Program project and element codes
- 4. Delivery or performance schedules (if applicable)
- 5. Delivery, packing and transportation requirements (if applicable)
- 6. Special conditions (if applicable)
- 7. Number of Units
- 8. Net price per unit, less discount, if any
- 9. Total amount of order
- 10. Authorized signature
- 11. Date purchase requisition was prepared

Purchase orders shall be numbered by using the day, month, and two-digit year, followed by the purchaser’s initials and the number 1. If the same purchaser issues more than one purchase order in

a day, the trailing digit will be increased by 1 for each PO. Purchase orders shall be signed by both the preparer and the Department Head, and should be forwarded to Finance Office after order is placed.

As BAY AGING continues to implement Financial Edge NXT the Purchase Order process will move to an online generation and approval work flow, while following the approval processes described above.

Purchase Orders **MAY NOT** be used for more than one vendor nor for more than one purchase of goods or services from a vendor. If it is decided to procure the purchase from an alternate vendor after the Purchase Order has been issued, the Finance Office must be notified immediately.

Authorizations and Purchasing Limits

Bay Aging follows the Commonwealth of Virginia Procurement policy unless the Federal procurement regulations override. All completed purchase requisitions must be signed by the preparer and approved by the Department Head. The following table displays required approvals and solicitations:

Amount of Purchase	Required Approvals	Required Solicitation
< \$1,000	Department Head	
\$1,000 ≤ \$5,000	Department Head	
\$5,000 ≤ \$10,000	Department Head	3 written bids
> \$10,000	Department Director	3 written bids

The President is the only employee authorized to enter into any contract on behalf of BAY AGING. This policy shall also apply to renewals of existing contracts.

The Treasurer of the Board of Directors receives a listing of all checks written in the amount of \$1,000 or more on a monthly basis. This listing includes check date, check number, Payer/Vendor and amount. Checks over \$5,000 also have a description.

Required Solicitation of Quotations from Vendors

Solicitations for goods and services (requests for proposals or RFPs) should provide for all of the following:

1. A clear and accurate description of the technical requirements for the material, product or service to be procured. Descriptions shall not contain features which unduly restrict competition.
2. Requirements which the bidder/offeror must fulfill and all other factors to be used in evaluating bids or proposals (see the next section entitled "Evaluation of Alternative Vendors" for required criteria)
3. Technical requirements in terms of functions to be performed or performance required, including the range of acceptable characteristics or minimum acceptable standards.
4. The specific features of "brand name or equal" descriptions that bidders are required to meet when appropriate.

5. The acceptance, to the extent practical, of products and services dimensioned in the metric system of measurement.
6. Preference, to the extent practical, for products and services that conserve natural resources and protect the environment and are energy efficient.
7. Preference for recycled products pursuant to EPA guidelines.
8. A description of the format, if any, in which proposals must be submitted, including the name of the person to whom proposals should be sent.
9. The date by which proposals are due.
10. Required delivery or performance dates/schedules.
11. Clear indications of the quantity(ies) requested and unit(s) of measure.

Extensions of Due Dates and Receipt of Late Proposals

Solicitations should provide for sufficient time to permit the preparation and submission of offers before the specified due date. However, an extension may be granted if a prospective offeror so requests.

Vendor proposals are considered late if received after the due date and time specified in the solicitation. Late proposals shall be so marked on the outside of the envelope and retained, unopened, in the procurement folder. Vendors that submit late proposals shall be sent a letter notifying them that their proposal was late and could not be considered for award.

Evaluation of Alternative Vendors

Vendors shall be evaluated on a weighted scale that considers the following criteria:

1. Adequacy of the proposed methodology
2. Skill and experience of key personnel
3. Demonstrated experience
4. Other technical specifications designated by department requesting proposals
5. Compliance with administrative requirements of the request for proposal (format, due date, etc.)
6. Vendor's financial stability
7. Vendor's demonstrated commitment to the nonprofit sector
8. Results of communications with references supplied by vendor
9. Ability/commitment to meeting time deadlines
10. Cost
11. Minority- or women-owned business status of vendor
12. Other criteria (to be specified by department requesting proposal)

Not all of the preceding criteria may apply in each purchasing scenario. However, the department responsible for the purchase shall establish the relative importance of the appropriate criteria prior to requesting proposals and shall evaluate each proposal on the basis of the criteria and weighting that have been determined.

After a vendor has been selected and approved by the Department Director, the final selection shall be approved by the President prior to entering into a contract.

Affirmative Consideration of Minority, Small Business & Women-Owned Businesses

Positive efforts shall be made by BAY AGING to utilize small businesses, minority-owned firms, and women's business enterprises, whenever possible. Therefore, the following steps shall be taken:

1. Ensure that small business, minority-owned firms, and women's business enterprises are used to the fullest extent practicable.
2. Make information on forthcoming opportunities available and arrange time frames for purchases and contracts to encourage and facilitate participation by small business, minority-owned firms and women's business enterprises. 3. Consider in the contract process whether firms competing for larger contracts tend to subcontract with small businesses, minority-owned firms and women's business enterprises.
4. Encourage contracting with consortiums of small businesses, minority owned firms and women's business enterprises when a contract is too large for one of these firms to handle individually.
5. Use the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Department of Commerce's Minority Business Development Agency in the minority-owned firms and women's business enterprises.

Availability of Procurement Records

BAY AGING shall, on request, make available for the Federal awarding agency, pre-award review and procurement documents, such as requests for proposals, when any of the following conditions apply:

- The process does not comply with the BAY AGING's procurement standards
- The procurement is expected to exceed the small purchase threshold and is to be awarded without competition or only one bid is received
- The procurement exceeds the small purchase threshold and specifies a "name brand" product
- The proposed award exceeds the small purchase threshold and is to be awarded to other than the apparent low bidder under sealed bid procurement.
- A proposed contract modification changes the scope of a contract or increases the contract amount by more than the amount of the small purchase threshold.

Provisions Included in All Contracts

BAY AGING includes all of the following provisions, as applicable, in all contracts charged to Federal awards (including small purchases) with vendors and sub-grants to grantees:

1. **Equal Employment Opportunity:** All contracts shall contain a provision requiring compliance with E.O. 11246, "Equal Employment Opportunity," as amended by E.O. 11375, "Amending Executive Order 11246 Relating to Equal Employment Opportunity," and as supplemented by regulations at 41 CFR part 60, "Office of Federal Contract Compliance Programs, Equal Employment Opportunity, and Department of Labor."
2. **Copeland "Anti-Kickback" Act (18 U.S.C. 874 and 40 U.S.C. 276c):** All contracts and sub-grants in excess of \$2,000 for construction or repair awarded by BAY AGING and its sub-recipients shall contain a provision for compliance with the Copeland "Anti-Kickback" Act (18 U.S.C. 874), as supplemented by Department of Labor regulations 29 CFR part 3, "Contractors and Subcontractors

on Public Building or Public Work Financed in Whole or in Part by Loans or Grants from the United States.” This Act provides that each contractor or sub-recipient shall be prohibited from inducing, by any means, any person employed in the construction, completion, or repair of public work, to give up any part of the compensation to which he or she is otherwise entitled. BAY AGING will report all suspected or reported violations to the Federal awarding agency.

3. **Davis-Bacon Act, as amended (40 U.S.C. 276a to a-7):** If included in the Federal agency’s grant program legislation, all construction contracts of more than \$2,000 awarded by BAY AGING and its sub-recipients shall include a provision for compliance with the Davis-Bacon Act (40 U.S.C. 276a to a-7) and as supplemented by Department of Labor regulations (29 CFR part 5, “Labor Standards Provisions Applicable to Contracts Governing Federally Financed and Assisted Construction”). Under this Act, contractors are required to pay wages to laborers and mechanics at a rate not less than the minimum wages specified in a wage determination made by the Secretary of Labor. In addition, contractors shall be required to pay wages not less than once a week. BAY AGING will place a copy of the current prevailing wage determination issued by the Department of Labor in each solicitation and the award of a contract shall be conditioned upon the acceptance of the wage determination. BAY AGING shall also obtain reports from contractors on a weekly basis in order to monitor compliance with the Davis-Bacon Act. BAY AGING shall report all suspected or reported violations to the Federal awarding agency.
4. **Contract Work Hours and Safety Standards Act (40 U.S.C. 327-333):** [Where applicable] All contracts awarded by BAY AGING in excess of \$2,000 for construction contracts and in excess of \$2,500 for other contracts that involve the employment of mechanics or laborers shall include a provision for compliance with Sections 102 and 107 of the Contract Works Hours and Safety Standards Act (40 U.S.C. 327-333), as supplemented by Department of Labor regulations (29 CFR part 5). Under Section 102 of the Act, each contractor is required to compute wages of every mechanic and laborer on the basis of a standard work week of 40 hours. Work in excess of the standard work week is permissible provided that the worker is compensated at a rate of not less than 1-1/2 times the basic rate of pay for all hours worked in excess of 40 hours in the work week. Section 107 of the Act is applicable to construction work and provides that no laborer or mechanic shall be required to work in surroundings or under working conditions that are unsanitary, hazardous, or dangerous. These requirements do not apply to the purchases of supplies or materials or articles ordinarily available on the open market, or contracts for transportation or transmission of intelligence.
5. **Clean Air Act (42 U.S.C. 7401 et seq.) and the Federal Water Pollution Control Act (33 U.S.C. 1251 et seq.), as amended:** Contracts and sub-grants of amounts in excess of \$100,000 shall contain a provision that requires the recipient to agree to comply with all applicable standards, orders or regulations issued pursuant to the Clean Air Act (42 U.S.C. 7401 et seq.) and the Federal Water Pollution Control Act, as amended (33 U.S.C. 1251 et seq.). Violations shall be reported to the Federal awarding agency and the Regional Office of the Environmental Protection Agency (EPA).
6. **Byrd Anti-Lobbying Amendment (31 U.S.C. 1352):** For all contracts or sub-grants of \$100,000 or more, BAY AGING shall obtain from the contractor or sub-grantee a certification that it will not and has not used Federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any Federal contract, grant or any other award covered by 31 U.S.C.

1352. Likewise, since each tier provides such certifications to the tier above it, BAY AGING shall provide such certifications in all situations in which it acts as a sub-recipient of a sub-grant of \$100,000 or more.

7. **Debarment and Suspension (E.O.s 12549 and 12689):** For all contracts in excess of the small purchase threshold fixed at 41 U.S.C. 403(11) (\$100,000 in 2005), BAY AGING shall obtain from the contractor a certification that neither the contractor nor any of its principal employees are listed on the General Services Administration's *List of Parties Excluded from Federal Procurement or Non-procurement Programs*.
9. **Remedies:** All contracts in excess of the small purchase threshold fixed at 41 U.S.C. 403(11) (\$100,000 in 2005) shall contain contractual provisions or conditions that allow for administrative, contractual, or legal remedies in instances in which a contractor violates or breaches the contract terms.
10. **Termination:** All contracts in excess of the small purchase threshold fixed at 41 U.S.C. 403(11) (\$100,000 in 2005) shall contain suitable provisions for termination by BAY AGING, including the manner by which termination shall be effected and the basis for settlement. In addition, such contracts shall describe the conditions under which the contract may be terminated for default as well as conditions where the contract may be terminated due to circumstances beyond the control of the contractor.

Special Purchasing Conditions

Emergencies:

Where equipment, materials, parts, and/or services are needed, quotations will not be necessary if the health, welfare, safety, etc., of staff and protection of Organization property is involved.

Single Distributor/Source:

Sole source purchases will be made only when solicitation of multiple vendors is not feasible and one of the following conditions applies:

- The item or service is only available from one source,
- The situation is a public emergency,
- The awarding agency approves the purchase, or
- Competition is deemed inadequate (insufficient bidders)

A cost/price analysis is required and approval from the funding agency may be necessary if the purchase is over the small purchase threshold.

Right to Audit Clause

BAY AGING requires a "Right to Audit" clause in all contracts between the Organizations and vendors that either:

1. Take any form of temporary possession of assets directed for the Organization, or
2. Process data that will be used in any financial function of the Organization.

This Right to Audit clause shall permit access to and review of all documentation and processes relating to the vendor's operations that apply to BAY AGING, as well as all documents maintained or processed on behalf of BAY AGING, for a period of three years. The clause shall state that such audit procedures may be performed by BAY AGING employees or any outside auditor or contractor designated by the Organization.

Vendor Files and Required Documentation

The Accounting Department shall assign a vendor number and create a vendor folder for each new vendor from whom BAY AGING purchases goods or services.

The department making a purchase, or the Accounting Department, will obtain Tax Identification Numbers for 1099 reportable payments. All new vendors with 1099 reportable payments will have their tax ID entered into GMS prior to receiving payment.

Receipt and Acceptance of Goods

The purchaser shall inspect all goods received. Upon receipt of any item from a vendor, the following actions shall immediately be taken:

1. Review bill of lading for correct delivery point
2. Verify the quantity of boxes/containers with the bill of lading
3. Examine boxes/containers for exterior damage and note on the bill of lading any discrepancies (missing or damaged boxes/containers, etc.)
4. Sign and date the bill of lading
5. Remove the packing slip from each box/container
6. Compare the description and quantity of goods per the purchase order to the packing slip
7. Examine goods for physical damage
8. Count or weigh items, if appropriate, and record any discrepancies on the purchase order.

This inspection must be performed in a timely manner to facilitate prompt return of goods and/or communication with vendors.

POLITICAL INTERVENTION

Prohibited Expenditures

Consistent with its tax-exempt status under Section 501(c)(3) of the Internal Revenue Code, BAY AGING shall not incur any expenditure for political intervention. For purposes of this policy, political intervention shall be defined as any activity associated with the direct or indirect support or opposition of a candidate for elective public office at the Federal, state or local level. Examples of prohibited political expenditures include, but are not limited to, the following:

1. Contributions to political action committees
2. Contributions to the campaigns of individual candidates for public office
3. Contributions to political parties
4. Expenditures to produce printed materials (including materials in periodicals) that support or oppose candidates for public office
5. Expenditures for the placement of political advertisements in periodicals

Endorsements of Candidates

BAY AGING will not endorse any candidates for public office in any manner, either verbally or in writing. This policy extends to the actions of management and other representatives of BAY AGING, when these individuals are acting on behalf of, or are otherwise representing, the Organization.

Prohibited Use of Organization Assets and Resources

No assets or human resources of the Organization shall be utilized for political activities, as defined above. This prohibition extends to the use of Organization assets or human resources in support of political activities that are engaged in personally by board members, members of management, employees, or any other representatives of BAY AGING. While there is no prohibition against these individuals engaging in political activities personally (on their own time, and without representing the Organization), these individuals must at all times be aware that Organization resources cannot at any time be utilized in support of political activities.

LOBBYING

Introduction

Unlike political intervention, described in the preceding section, expenditures by a section 501(c)(3) public charity for lobbying activities are allowable under the Internal Revenue Code. However, **no** lobbying expenditures may be charged directly or indirectly to any Federal award (i.e., the charity must have a non-Federal source of income to which such lobbying costs can be cited as the source of the activity).

Definition of Lobbying Activities

Lobbying activities conducted by the Organization may be either direct or indirect. Direct lobbying activities consist of attempts to influence legislation through communication with any member or employee of a legislative body (Federal, state, or local levels) or, if the principal purpose of the communication is lobbying, with any government official or employee who may participate in the formulation of the legislation. Direct lobbying occurs when employees of the Organization or paid lobbyists communicate directly in attempts to influence legislation. Lobbying is distinguishable from advocacy activities, which involve efforts to advocate certain positions which may have legislative implications, as long as a nonpartisan analysis of the relevant facts is performed.

Lobbying occurs only when there is a specific piece of legislation or legislative proposal pending that the Organization is attempting to influence. Therefore, lobbying is considered to have taken place only if both of the following elements are present:

1. The communication refers to specific legislation (legislation that has been introduced or a specific legislative proposal that the Organization supports or opposes), and
2. The communication reflects a view on the legislation (supporting or opposing it).

Indirect lobbying involves communications with the general public (rather than directly with legislators, etc.) where the communication includes the same two preceding characteristics, plus it encourages the recipient of the communication to take action with respect to the specific legislation (by contacting legislators, etc.).

Segregation of Lobbying Expenditures

Lobbying expenditures are allowable for charities under the Internal Revenue Code. However, lobbying may not represent a substantial portion of the Organization's overall activities. The Organization's tax exemption would be at risk if lobbying becomes a substantial portion of the Organization's activities.

Accordingly, BAY AGING segregates all direct and indirect lobbying expenditures in a separate section of the chart of accounts in the general ledger. Where appropriate, lobbying expenditures shall also be allocated their fair and reasonable share of employee benefits and other indirect costs in accordance with cost allocation policies described elsewhere in this manual.

Lobbying Election

As a public charity, the Organization has two options with respect to the Internal Revenue Code's restriction against lobbying being a "substantial" portion of its activities. One option is to make a formal lobbying election, which results in the Organization following a specific mathematical formula to determine its lobbying limitations. Exceeding the limitation would result in an excise tax assessed to the Organization. Exceeding the limitation by 50-percent or more over a four-year period would result in loss of the Organization's overall tax exemption. The other option is to not make the election, resulting in an entirely judgmental assessment of its lobbying activities by the IRS. If it is deemed by the IRS to have engaged in substantial lobbying for any period, the Organization would lose its overall tax exemption under this option.

If BAY AGING incurs lobbying expense, it will make the Internal Revenue Code section 501(h) lobbying election by filing Form 5768, and leave that election in place. As a result, the Organization shall report its lobbying expenditures by completing the section for "Electing Charities" on Schedule A that accompanies its annual Form 990 information return filed with IRS.

CHARGING OF COSTS TO FEDERAL AWARDS

Overview

BAY AGING charges costs that are reasonable, allowable, and allocable to a Federal award directly or indirectly. All unallowable costs shall be appropriately segregated from allowable costs in the general ledger in order to assure that unallowable costs are not charged to Federal awards.

Segregating Unallowable from Allowable Costs

The following steps shall be taken to identify and segregate costs that are allowable and unallowable with respect to each Federal award:

1. The budget and grant or contract for each award shall be reviewed for costs specifically allowable or unallowable.
2. Accounting personnel shall be familiar with the allowability of costs provisions according to OMB Uniform Guidance, particularly:
 - a. The list of specifically unallowable costs found in Attachment B (Selected Items of Cost), such as alcoholic beverages, bad debts, contributions, fines and penalties, lobbying, etc.
 - b. Those costs requiring advance approval from Federal agencies in order to be allowable in accordance with OMB Uniform Guidance, such as foreign travel, equipment purchases, etc.
3. No costs shall be charged directly to any Federal award until the cost has been determined to be allowable under the terms of the award and/or OMB Uniform Guidance.
4. For each Federal award, an appropriate set of general ledger accounts (or account segments) shall be established in the chart of accounts to reflect the categories of allowable costs identified in the award or the award budget.
5. All items of miscellaneous income or credits, including the subsequent write-offs of un-cashed checks, rebates, refunds, and similar items, shall be reflected for grant accounting purposes as reductions in allowable expenditures if the credit relates to charges that were originally charged to a Federal award or to activity associated with a Federal award. The reduction in expenditures shall be reflected in the year in which the credit is received (i.e., if the purchase that results in the credit took place in a prior period, the prior period shall not be amended for the credit).

Criteria for Allowability

All costs must meet the following criteria from OMB Uniform Guidance, in order to be treated as allowable direct or indirect costs under a Federal award:

1. The cost must be “reasonable” for the performance of the award, considering the following factors:
 - a. Whether the cost is of a type that is generally considered as being necessary for the operation of the Organization or the performance of the award;

- b. Restraints imposed by such factors as generally accepted sound business practices, arm's length bargaining, Federal and state laws and regulations, and the terms and conditions of the award;
 - c. Whether the individuals concerned acted with prudence in the circumstances;
 - d. Consistency with established policies and procedures of the Organization, deviations from which could unjustifiably increase the costs of the award.
2. The cost must be "allocable" to an award by meeting one of the following criteria:
 - a. The cost is incurred specifically for a Federal award;
 - b. The cost benefits both the Federal award and other work, and can be distributed in reasonable proportion to the benefits received; or
 - c. The cost is necessary to the overall operation of the Organization, except where a direct relationship to any particular program or group of programs cannot be demonstrated.
3. The cost must conform to any limitations or exclusions of OMB Uniform Guidance or the Federal award itself.
4. Treatment of costs must be consistent with policies and procedures that apply to both Federally financed activities and other activities of the Organization.
5. Costs must be consistently treated over time.
6. The cost must be determined in accordance with generally accepted accounting principles.
7. Costs may not be included as a cost of any other Federally financed program in the current or prior periods.
8. The cost must be adequately documented.

Direct Costs

Direct costs include those costs that are incurred specifically for one award or non-Federal function. BAY AGING identifies and charges these costs exclusively to each award or program.

Each invoice shall be coded with the appropriate account number reflecting which program received direct benefit from the expenditure. Invoices are approved by the appropriate project director and reviewed by the CFO.

Time sheets, personnel activity reports, or salary allocations within the ADP system are also submitted on a regular basis, reflecting employees' work and which programs directly benefited from their effort. Time sheets or personnel activity reports shall serve as the basis for charging salaries directly to Federal awards and non-Federal functions. See the Payroll section of this manual for detailed procedures.

Equipment purchased for exclusive use on a Federal award and reimbursed by a Federal agency shall be accounted for as a direct cost of that award (i.e., such equipment shall not be capitalized and depreciated).

Indirect and Joint Costs

Indirect costs are those that have been incurred for common or joint objectives and cannot be readily identified with a particular grant or program. Joint costs benefit more than one, but not necessarily all, awards. Indirect costs, but not joint costs, may be allocated to benefiting grants through the use of an indirect cost rate.

Examples of indirect costs are:

- The Accounting Department
- The Human Resources Department
- The Administrative Staff of the Organization

Examples of joint costs are:

- Shared space
- Trash Removal
- Vehicle insurance

Per Federal guidelines, each grant will be charged its fair share of costs. Any costs not reimbursed by a particular funding source will be charged to corporate or other funds that may cover indirect or joint costs after the allocation process is complete.

Indirect Cost Rate

BAY AGING maintains an annual indirect cost budget. Each year a new indirect cost rate application is prepared and submitted to BAY AGING's Cognizant Agency for approval. The actual indirect cost rate from the previous year receives final approval, and that rate is also approved as a provisional rate for the current fiscal year. This provisional rate is used when determining the overhead applied to each Federal award.

BAY AGING's Indirect Cost Pool consists of the salaries and fringe of the administrative staff, including but not limited to the President, COO, CFO, HR Director, Fiscal and IT Staff.

The Indirect Cost Rate application is prepared by the CFO using the format recommended by the Cognizant Agency. The Indirect Cost application packet includes the audit from the fiscal year pertaining to the proposal. After completion, the Indirect Cost Application is reviewed by the President and the Finance Committee. The Indirect Cost Application is due to the Cognizant Agency by March 31 of each year.

Cost Pools

Direct and joint costs are allocated to the benefiting programs using cost pools under the following methodology:

1. Costs will be allocated to all programs on an equitable basis regardless of any limits imposed by funding sources.
2. As much as possible, costs will be charged directly to benefiting programs.
3. All remaining shared costs will be allocated on the most meaningful measures. The following basis will be used:

- a. Facilities and related costs will be allocated based on square footage occupied
- b. Telephone costs will be based on space occupied
- c. Internet service cost will be based on space occupied
- d. Insurance costs will be prorated by program using the most meaningful distribution method (building insurance based on square footage if occupied by multiple programs),

Accounting for Specific Elements of Cost

BAY AGING shall utilize the following methods of charging specific elements of cost to Federal awards as direct or indirect costs:

Salaries and Wages – Salaries and wages shall be charged directly and indirectly based on the functions performed by each employee, as documented on each employee’s timesheet, as follows:

Direct costs – The majority of the employees of BAY AGING charge their time directly since their work is specifically identifiable to specific grants or other (non-Federal) programs or functions of the Organization.

Indirect costs – The following staff charge 100 percent of their salary costs indirectly:

President
 CFO
 Deputy CFO (But not DCFO working in the Apartments Division)
 HR Director
 Fiscal Administration (Payroll, Accounts Payable, Fiscal Assistant)
 IT Generalist
 Office Manager

Mixed charges – The following employees may charge their salary costs to both direct and indirect activities:

Executive Administrative Assistant
 IT Director
 Development Director
 Planner
 Fiscal Administrator-Transit

Compensated absences (vacation leave earned, sick leave used, holiday pay, etc.) are considered part of salary costs. The cost of compensated absences is allocated in the same manner as Employee Benefits.

Employee Benefits – BAY AGING incurs costs for the following statutory and non-statutory employee benefits:

- FICA
- Unemployment insurance
- Worker’s compensation
- Health & Dental insurance
- Contributions to pension plan 401(k)
- Life and Disability Insurance

- FSA

The total cost of all of the preceding employee benefits shall be determined by adding the costs associated with each benefit. This total employee benefit costs shall then be allocated directly and indirectly in the same proportions as salaries and wages.

Credits – The applicable portion of any credits resulting from cash discounts, volume discounts, refunds, write-off of stale outstanding checks, trade-ins, scrap sales or similar credits shall be credited directly or indirectly in the same manner as the purchase that resulted in the credit.

Agency Vehicles – There are mileage sheets in each vehicle owned or controlled by the agency that are to be completed by the driver using the vehicle. This log includes the date, purpose, and odometer readings. At the end of the month (collected bi-monthly), the sheets are tallied by the person responsible for collecting and verifying the logs and turned into the Transit Office.

ACCOUNTS PAYABLE MANAGEMENT

Overview

BAY AGING strives to maintain efficient business practices and good cost control. A well-managed accounts payable function can assist in accomplishing this goal from the purchasing decision through payment and check reconciliation. The following are general policies for accounts payable:

- Assets or expenses and the related liability are recorded by an individual who is not responsible for ordering and receiving.
- The amounts recorded are based on the vendor invoice for the related goods or services.
- The vendor invoice should be supported by an approved purchase order where necessary, and should be reviewed and approved by a Department Director prior to being processed for payment.

The primary objective for accounts payable and cash disbursements is to ensure that:

1. Disbursements are properly authorized
2. Invoices are processed in a timely manner
3. Vendor credit terms and operating cash are managed for maximum benefits

Recording of Accounts Payable

All valid accounts payable transactions, properly supported with the required documentation, shall be recorded as accounts payable in a timely manner.

Accounts payable are processed on at least a weekly basis. Information is entered into the system from approved invoices or disbursement vouchers with appropriate documentation attached.

Only original invoices will be processed for payment unless duplicated copies have been verified as unpaid by researching the vendor records. No vendor statements shall be processed for payment.

Accounts Payable Cut-Off

For purposes of the preparation of the Organization's monthly financial statements, all vendor invoices that are received, approved and supported with proper documentation by 11th of the following month shall be recorded as accounts payable as of the end of the immediately preceding month if the invoice pertains to goods or services delivered by month-end and is dated for the previous month.

Preparation of a Voucher Package

Prior to any accounts payable being submitted for payment, a package called a "voucher package" shall be assembled. Each voucher package shall contain the following documents:

1. Vendor invoice
2. Packing slip (where appropriate)
3. Purchase order as required by procurement policies
4. Any other supporting documentation deemed appropriate
5. Payment voucher

Processing of Voucher Packages

The following procedures shall be applied to each voucher package by the Fiscal Administrator:

1. Check the mathematical accuracy of the vendor invoice.
2. Compare the nature, quantity and prices of all items ordered per the vendor invoice to the purchase order, packing slip and receiving report.
3. Document the general ledger distribution, using the Organization's current chart of accounts.
4. Verify the review and approval of the Department Director (or their designee) associated with the goods or services purchased.

Approvals by Department Heads indicate their acknowledgement of satisfactory receipt of the goods or services invoiced, agreement with all terms appearing on the vendor invoice, agreement with general ledger account coding, and agreement to pay vendor in full. Approvals shall be documented with initials or signatures of the approving individual.

Payment Discounts

To the extent practical, BAY AGING takes advantage of all prompt payment discounts offered by vendors. When such discounts are available, and all required documentation in support of payment is available, payments will be scheduled so as to take full advantage of the discounts.

Employee Expense Reports

Reimbursements for travel expenses, business meals, or other approved costs will be made only upon the receipt of a properly approved and completed expense reimbursement form (see further policies under "Travel and Business Entertainment"). All required receipts must be attached, and a brief description of the business purpose of trip or meeting must be noted on the form. Expense reports will be processed for payment within 30 days of submission for payment.

Reconciliation of A/P Subsidiary Ledger to General Ledger

At the end of each monthly accounting period, the total amount due to vendors per the accounts payable subsidiary ledger shall be reconciled to the total per the accounts payable general ledger account (control account). All differences are investigated and adjustments are made as necessary. The reconciliation and the results of the investigation of differences are reviewed and approved by the CFO.

Management of Accounts Payable Vendor Master File

Only the President has the authority to open new charge accounts with new vendors.

On an annual basis, vendors that have not been utilized over the preceding 12 month period shall be purged (or made inactive) from the master vendor file. In addition, on an annual basis an internal audit

shall be performed of the master vendor file and of payment histories made to each vendor. This analysis shall consist of the following procedures, at a minimum:

1. Cross-checking of vendors with matching street or P.O. Box addresses
2. Review of payment histories for signs of repeat invoice numbers or other indications of duplicate payments

Any unexplained deviations or irregularities noted in connection with the preceding internal audit procedures shall be reported to the chair of the Audit Committee.

Request for Funds

Occasionally, vendors do not have charge account capabilities. In this case, a PO or Voucher must be completed, properly approved and submitted to the Finance Office on Monday to receive a check on or after Friday of the same week. This process is prohibited in the case where an item can be obtained from a current vendor at an equal price or when a purchase will be made from a current vendor. A receipt showing the purchase is required to be turned into the Finance Office to back up the Request for Funds. (Not applicable for Bay Aging Apartments.)

TRAVEL AND BUSINESS ENTERTAINMENT

Field Trips

When staff takes clients on trips, funds for the trip are obtainable by requesting a check in advance through use of the Voucher system. The voucher, when completed and authorized by the Program Director, needs to be submitted to the Finance Office at least two weeks prior to the date of the trip. The check will be given to the staff person as soon as practical. All receipts and any remaining funds are to be submitted to the Finance Office within 5 business days after the conclusion of the trip

Local Travel

Local travel using a personal vehicle for Agency related business is reimbursable at a rate per mile specified by the Board of Directors. Mileage reimbursement will be approved by the employee's supervisor upon submission of a mileage sheet detailing the date and purpose of the travel and the total miles traveled as documented by beginning and ending odometer readings.

Travel Advances

Funds will be advanced for upcoming travel only upon receipt of a completed and properly approved request for travel advance. Travel expenses are to be made in accordance with the Organization's travel policies as explained later in this section. Travel request forms should be submitted to the Finance Department at least one week before the trip and need to include an itinerary/agenda for the meeting, documentation for mileage (such as a MapQuest printout), and the supervisor's signature showing approval. All travel advances will be available as soon as practical.

Employees receiving travel advances are required to sign for the advance signifying their acknowledgement of, and agreement to, these policies. Employees receiving travel advances must submit an expense report within 5 days of returning from travel.

Other Travel

The President's approval is required for travel overnight or travel outside of our service area, in addition to the Supervisor's approval.

Employee and Director Business Travel

At the conclusion of a BAY AGING business trip, an employee or member of the Board of Directors that has incurred business-related expenses should complete a Statement of Travel form in accordance with the following policies:

1. Identify each separately incurred business expense (i.e., do not group all expenses associated with one trip together).
2. With the exception ,reimbursed mileage and per diems, all business expenses must be supported with invoices/receipts. If receipts are available for these items they should be obtained and attached.
3. Vendor receipts/invoices must be submitted for all lodging and any expenditure other than meals. Credit card charge slips do not represent adequate supporting documentation – a hotel receipt must be obtained to substantiate all lodging expenditures.

4. For airfare, airline-issued receipts should be obtained. If a traveler fails to obtain a receipt, other evidence must be submitted indicating that a trip was taken and the amount paid (for example, a combination of an itinerary, a credit card receipt, and boarding passes).
5. Mileage may be reimbursed at the rate approved by the Board of Directors.
6. The business purpose of each trip must be adequately explained on each report.
7. General ledger account coding must be identified for all expenditures.
8. For all meals and other business expenditures where associates are entertained, the following must be clearly identified:
 - a. Names, titles, organizations, and business relationships of all persons entertained
 - b. The business purpose of the meal or other business event (topics discussed, etc.)
9. All expense reports must be signed and dated by the employee.
10. All expense reports must be approved by the employee's Program Director.
11. Only one expense report form should be prepared for each trip.

An employee will not be reimbursed for expense reports not meeting the preceding criteria. If the expense report results in a balance due to BAY AGING (as a result of receiving a travel advance greater than actual business expenditures), the employee must attach a check.

No further travel advances will be issued to any employee who has an outstanding balance due to BAY AGING from previous business trips.

Reasonableness of Travel Costs

BAY AGING shall reimburse travelers only for those business-related costs that are reasonably incurred. Accordingly, the following guidelines shall apply:

1. Suites and other upgraded rooms at hotels shall not be allowed. Travelers should stay in standard rooms.
2. Ask hotels for any available discounts – nonprofit, government or corporate rates.
3. When utilizing rental cars, travelers should rent midsize or smaller vehicles. Share rental cars whenever possible.
4. Foreign travel charged to Federal grants must be approved in writing by the funding source prior to travel.

Special Rules Pertaining to Air Travel

The following additional rules apply to air travel:

1. Air travel should be at coach class or the lowest commercial discount fare at the time the ticket is purchased except when this fare would:
 - a. Require circuitous routing
 - b. Require travel during unreasonable hours
 - c. Excessively prolong travel
 - d. Result in additional costs that would offset the transportation savings, or
 - e. Offer accommodations not reasonably adequate for the traveler's medical needs.
2. First class air travel shall not be reimbursed unless there is a documented medical reason, and such use must be documented.
3. Memberships in airline flight clubs are not reimbursable.
4. Cost of flight insurance is not reimbursable.
5. When returning on a Sunday or departing on a Saturday in order to obtain a cost savings in airfare due to the Saturday-night stay-over, travelers should provide a total cost comparison (showing that the lower airfare plus extra night lodging, meals & incidentals is less costly than airfare without the Saturday night stay-over).
6. Cost of upgrade certificates is not reimbursable.
7. Cost of canceling and rebooking flights is not reimbursable, unless it can be shown that it was necessary or required for legitimate business reasons (such as changed meeting dates, etc.).
8. Travelers must identify and pay for all personal flights, even if such flights are incorporated into a flight schedule that serves business purposes (i.e., BAY AGING will not reimburse for the personal legs of a trip).

Spouse/Partner Travel

BAY AGING does not reimburse any employee or board member for separate travel costs (air fare, etc.) associated with his/her spouse or partner. Room costs in excess of the amount for a single occupant are not reimbursable expenses.

CASH DISBURSEMENTS (CHECK-WRITING) POLICIES

Check Preparation

BAY AGING prints vendor checks and expense reimbursement checks on at least a weekly basis. Checks shall be prepared by persons independent of those who initiate or approve expenditures, as well as those who are authorized check signers.

All vendor and expense reimbursement checks shall be produced in accordance with the following guidelines:

1. Expenditures must be supported in conformity with purchasing, accounts payable, and travel and business entertainment policies described in this manual.
2. Timing of disbursements should generally be made to take advantage of all early-payment discounts.
3. Generally, all vendors shall be paid within 30 days of submitting a proper invoice upon delivery of the requested goods or services.
4. Total cash requirements associated with each check run is monitored in conjunction with available cash balance in bank prior to the release of any checks.
5. All supporting documentation is attached to the corresponding check prior to forwarding the entire package to an authorized check signer.
6. Checks shall be utilized in numerical order and unused checks are stored in a fire proof locked safe in the accounting department.
7. Checks shall never be made payable to "bearer" or "cash."
8. Checks shall never be signed prior to being prepared.
9. Upon the preparation of a check, vendor invoices and other supporting documentation shall immediately be canceled in order to prevent subsequent reuse.
10. All A/P checks issued are furnished to Citizens and Farmer Bank through online banking prior to being released. Checks presented to the bank for payment are validated against Bay Aging's issued check records. If a check is flagged as an exception, it is referred to Bay Aging for a decision to pay the item or return it.

Check Signing

Checks equal to or more than \$5,000 require two signatures from the list of signers authorized by the Board of Directors (resolution dated 09/28/2017). The authorized check signers for Bay Aging are the President/CEO, Director of Single Family Housing, Vice President Advocacy Resources, Development Director, Vice President of Housing Administration, Senior Counselor to the President, and the Administrative Assistant to Community Living Programs. Bay Aging Apartments authorized signers are the President/CEO, Development Director, VP Advocacy Resources, VP Housing Administration, Quality Control Specialist, and Senior Counselor to the President. No check shall be signed prior to the check being completed in its entirety (no signing of blank checks). No member of the Finance Office staff is an authorized signatory on the agency bank accounts.

Checks shall be signed by an individual other than the one who approved the transaction for payment.

Check signers should examine all original supporting documentation to ensure that each item has been properly checked prior to signing a check. Checks should not be signed if supporting documentation appears to be missing or there are any questions about a disbursement.

Checks that have been written but await distribution are held in the Finance Office in the locked safe.

Use of Check Signing Machine

Payroll checks for employees of both Bay Aging, and the Veterans Directed Home & Community Based Services Financial Management Program (VD-HCBS), are signed using a check signing machine and secure signature. The machine, signature plate, and key to open the machine, are all kept in three separate locations and locked in the fiscal department. The check signing machine contains a counter that is used to track use of the machine and create an additional level of fraud prevention. A log is kept in the finance department and is completed each time the machine is used. The log is completed by, and initialed or signed by, the employee using the signature machine and verified by one other employee. A copy of the log is attached. The check signing machine may be used in periods of emergency operations, in lieu of physical signatures.

Electronic Voucher and Payment Approval

BAY AGING will continue to implement various modules within Financial Edge NXT, including the electronic approval of vouchers and subsequent payment via Electronic Funds Transfer. These online workflows will follow the same control protocols described above, but using the online capabilities of our GL software, which include audit trails of each transaction.

Voided Checks and Stop Payments

Checks may be voided due to processing errors by making proper notations in the check register and defacing the check by clearly marking it as "VOID". All voided checks shall be retained to aid in preparation of bank reconciliations.

Stop payment orders may be made for checks lost in the mail or other valid reasons. Stop payments may be processed either by telephone instruction, or online by authorized accounting personnel, with signature approval made by an authorized check signer. Copies of stop payment documents are maintained in the Accounting Department.

Recordkeeping Associated with Independent Contractors

BAY AGING shall obtain a valid Tax Identification Number from all vendors to whom 1099 reportable payments are made (see "Accounts Payable Management" policies). A record shall be maintained of all vendors to whom a Form 1099 is required to be issued at year end. Payments to such vendors shall be accumulated over the course of a calendar year.

CREDIT CARDS

Issuance of Corporate Credit Cards

With the approval of the President, appropriate BAY AGING staff may be issued agency credit cards to be used for travel or necessary program purchases, to include, but not limited to, fuel, medical supplies and client prescriptions. Cardholders will be required to sign a statement acknowledging that the card shall be used exclusively for legitimate Organization-related business purposes and that the cardholder agrees to take reasonable precautions to protect the card from loss or theft by storing it in a secure location. Upon approval from the credit card company, a card will be issued bearing the names of both the individual and BAY AGING.

All credit card issuance requests, and cards, are to go to the DCFO.

All credit cards, credit card bills and correspondence, are to be mailed to P.O. Box 610, Urbanna, VA 23175

A list of cards is maintained by the DCFO and is reviewed at least annually by the President. The board annually approves the credit card policy.

Cardholder Responsibilities

Personal use of corporate credit cards is strictly prohibited. Any personal use will subject the employee to the Organization's disciplinary actions discussed earlier in this manual and in the Personnel Manual.

Authorized Purchaser should complete a purchase order form and check the box indicating that the purchase is being placed on the agency credit card. The purchase order is submitted to the Finance Department for tracking purposes. When the purchase is made, all the same information required in the policy regarding voucher packages is to be completed and submitted to the Finance Department. When the statements arrive, all documentation is matched to the card statement.

Cardholders shall report the loss or theft of a corporate credit card immediately by notifying the Deputy CFO who shall report the loss or theft immediately to the credit card company.

Revocation of Corporate Credit Cards

Failure to comply with any of these policies associated with the use of BAY AGING's corporate credit cards shall be subject to possible revocation of credit card privileges. The President shall determine whether credit cards are to be revoked.

PAYROLL AND RELATED POLICIES

Payroll Administration

BAY AGING operates on a semi-monthly payroll. A personnel file is established and maintained for all employees with current documentation, as described in BAY AGING's Personnel Manual. BAY AGING strongly recommends current staff using direct deposit for their wages. All new employees are required to enroll in direct deposit by completing a Direct Deposit Authorization form. In the event an employee does not have, or does not wish to use an existing personal account, A VISA PayCard will be issued. If payday falls on a holiday or weekend, employees will be paid on the last working day before the holiday.

Changes in Payroll Data

All of the following changes in payroll data are to be authorized in writing:

1. New hires
2. Terminations
3. Changes in salaries and pay rates
4. Voluntary payroll deductions
5. Changes in income tax withholding status
6. Court-ordered payroll deductions

New hires, terminations, and changes in salaries or pay rates shall be authorized in writing by the appropriate Department Director. Pay rates must be approved by the President and the CFO to assure the rate is within established salary ranges and that the program budget can support the rate. The President must give final approval to all pay rates.

Voluntary payroll deductions and changes in income tax withholding status shall be authorized in writing by the individual employee.

Documentation of all changes in payroll data shall be maintained in each employee's personnel file.

Payroll Taxes

The hiring manager ensures that new employees complete and submit initial tax forms as part of the new hire package. The Fiscal Department is responsible for ensuring that these forms are submitted and the all required taxes are withheld and paid with each payroll cycle

Timesheets

BAY AGING follows the guidelines found in the OMB Uniform Guidance, as well as requirements in specific grants. Therefore, salaries and wages charged to Federal grants will be supported as follows:

1. Charges will be based on documented payrolls approved by responsible officials of the Organization.
2. Every hourly staff member whose compensation is charged, in whole or in part, directly or indirectly to Federal awards, will complete a timesheet within ADP that accounts for the total activity for which the employee is compensated.

3. The timesheet will reflect an after-the-fact determination of the actual activity of each employee. Budget estimates will not be used as support for charges to awards.
4. Salaried employees do not complete a timesheet for hours worked, only for PTO taken. Within the ADP system Salaried employees have a standard of 86.67 hours per pay period, and their cost allocations to various programs are maintained by the CFO in consultation with Department Heads and Supervisors
5. The reports will be prepared on the same basis as the pay periods (semi-monthly).
6. Charges for non-exempt employees will also be supported by records required by the Fair Labor Standards Act.
7. Salaries and wages of employees used in meeting cost sharing or matching (in-kind) are supported in the same manner as salaries and wages charged to Federal awards.

Preparation of Timesheets

Each BAY AGING employee must submit a timesheet via ADP no later than 4:30 pm two working days after the pay period ends. If this day is a weekend or holiday then 12:00 pm the following working day. Please refer to the Yearly Pay Schedule that is distributed each year. Timesheets shall be prepared in accordance with the following guidelines:

1. Each timesheet shall reflect all hours worked during the pay period (time actually spent on the job performing assigned duties), whether compensated or not.
- 2.
4. Employees shall identify and record hours worked based on the nature of the work performed;
5. Compensated absences (vacation, holiday, sick leave, etc.) should be clearly identified as such;
6. Timesheets approved by the relevant supervisor or delegated alternate, or a responsible manager, prior to the deadline above.

Processing of Timesheets

The Payroll Administrator will process the timesheets by checking them for mathematical accuracy before processing through the electronic payroll system.

Tampering with, altering, or falsifying timesheets, recording time on another employee's timesheet or willfully violating any other timesheet policy or procedure may result in disciplinary action, up to and including termination.

Review of Payroll

Upon production of all payroll reports and checks, the Deputy Chief Financial Officer reviews payroll prior to its distribution to employees.

Distribution of Payroll

Payroll payments (or check stubs for electronic deposits) shall be available online or mailed on payday.

Payroll Advances

Payroll advances are not allowable under Federal guidelines. In the case of hardship, the President may allow payment of hours already worked and due to the employee prior to a normal payroll date.

POLICIES PERTAINING TO SPECIFIC ASSET ACCOUNTS

CASH AND CASH MANAGEMENT

Cash Accounts

General Checking Account (operating account):

The primary operating account provides for routine business check disbursements. All cash deposits are made to this account.

In addition, all advances of Federal funds shall be deposited in an interest-bearing account and interest earned will be spent within the program area that it was received.

Other Accounts

The Organization also maintains savings positions in various Bank CDs. As these CDs come due the President has authority to maintain the funds in a new CD at the given Bank, or to reallocate funds to another CD or back to the Bay Aging operating account.

FMS Account

In accordance with guidance from the Lewen Group and the Department of Veteran's Affairs, all funds paid out to Veteran FMS clients are maintained in a separate operating account. Funds are transferred to this account each month to cover outgoing expenditures.

Authorized Signers

The following BAY AGING personnel are authorized to sign checks drawn on the general operating account:

President/CEO, Director of Single Family Housing, , Vice President Advocacy Resources, Development Director, , Vice President of Housing Administration, Senior Counselor to the President, and the Administrative Assistant to Community Living Programs.

Checks written in the amount of \$5,000 or more require two signatures. The CFO will promptly notify the Organization's financial institutions of changes in authorized signatures upon the departure of any authorized signer. Refer to the section titled "Check Signing" for procedures.

Authorized signers will also have rights within Financial Edge to approve vouchers for EFT payments, according to these same limits and responsibilities.

Bank Reconciliations

When the Bay Aging main checking account bank statement is available online, the bank statement is printed by the Vice President Advocacy Resources, who looks for any signs of fraudulent activity. Once reviewed, a reconciliation between the bank balance and general ledger balance is prepared by the DCFO who is not an authorized check signer. The bank reconciliation process will be completed within 30 days of the end of the month.

The main account bank reconciliation is reviewed and signed by the CFO and Board Treasurer.

Bank reconciliations, cancelled checks, and copies of resulting journal entries are filed in the Fiscal Department files.

Cash Flow Management

The CFO and DCFO monitors cash flow needs on a weekly basis to eliminate idle funds and to ensure that payment obligations can be met. Cash transfers between accounts are performed on an as-needed basis.

BAY AGING adheres to the requirements of its grants which may prohibit loaning funds between programs, therefore, cash management and reporting is performed at the program level as well as for the Organization as a whole.

Stale Checks

For un-cashed checks that are more than 6 months old and that exceed \$50, contact will be made with the payee to resolve the issue.

All stale checks that are written off within the same fiscal year as they were written shall be credited to the same program or asset account that was debited when the check was written, or the expenditure incurred.

BAY AGING will also comply with Virginia laws regarding unclaimed property. Accordingly, if un-cashed checks are subject to a state reporting and transfer requirement, the Organization shall file all appropriate forms and remit unclaimed property to the appropriate jurisdiction.

Petty Cash

BAY AGING will provide funds for valid, minor office expenditures (not for travel, employee advances, fines, parking tickets, or check cashing), and to periodically replenish these funds up to its authorized balance. The Department Head is responsible for ensuring that the petty cash fund is locked at all times.

All disbursements from the petty cash fund must be accompanied by a completed and approved petty cash voucher. Receipts are required for all disbursements from petty cash.

The DCFO shall prepare a reconciliation of the petty cash account on a periodic basis. Petty cash reconciliations are subject to review by the President, who may also perform periodic surprise cash counts and reconciliations.

INVENTORY OF MATERIALS

Description of Inventory

BAY AGING maintains an inventory of materials used for home weatherization and transit facilities. Examples of such items include:

- Caulk
- Doors
- Insulation
- Oil & Filters
- Tires
- Wiper Blades

Accounting for Inventory

BAY AGING accounts for purchased inventory items at cost, using the average cost method of valuation. Unit cost shall be computed by adding freight, insurance and other shipping costs to the actual cost of purchased inventory, dividing this total amount by the number of units purchased.

Physical Counts

A physical count of inventory will be performed on a monthly basis. Any inventory items that appear damaged, obsolete or otherwise unable to be sold shall be excluded from the counts. A detailed record of the physical count shall be kept by the individuals involved in taking the inventory.

At the conclusion of the physical count, the inventory count sheets shall be extended by applying the most recent unit costs to the physical quantities of each item on hand. The general ledger balance shall be adjusted to reflect the total inventory on hand as determined by the physical count.

Contributed Inventory

Inventory items donated to BAY AGING shall be recorded as assets of the Organization at the fair market value as of the date of the contribution, unless the Organization is acting as an agent in connection with a contribution by a donor through the Organization to another charity specifically identified by the donor. Contributed inventory items shall be subject to the same physical counting and other policies as purchased inventory items.

PREPAID EXPENSES

Accounting Treatment

BAY AGING treats payments of expenses that have a time-sensitive future benefit as prepaid expenses and will amortize these items over the corresponding time period. For purposes of this policy, payments of less than \$100 shall be expensed as paid and not treated as prepaid expenses, regardless of the existence of a future benefit.

Prepaid expenses with future benefits that expire within one year from the date of the financial statements shall be classified as current assets. Prepaid expenses that benefit future periods beyond one year from the financial statement date shall be classified as non-current assets.

Procedures

As part of the account coding process performed during the processing of accounts payable, all incoming vendor invoices shall be reviewed for the existence of time-sensitive future benefits. If future benefits are identified, the payment shall be coded to a prepaid expense account code.

The Accounting Department shall maintain a schedule of all prepaid expenses. The schedule shall indicate the amount and date paid, the period covered by the prepayment, the purpose of the prepayment, and the monthly amortization. This schedule shall be reconciled to the general ledger balance as part of the monthly closeout process. (This only applies to Bay Aging Apartments at year end closeout.)

INVESTMENT POLICIES

Introduction

BAY AGING treats all assets of the Organization, including those funds that are legally unrestricted, as though they are held in a fiduciary capacity for the purpose of accomplishing the Organization's tax-exempt mission. As such, the policies described in this section are to be interpreted in light of that overall sense of stewardship, and the investment standards shall be those of a prudent investor.

Funds to be invested do not include those from Federal awards. Such funds will be spent on program requirements as budgeted, or returned to the awarding agency. Any advances of Federal funds will be maintained in an interest-bearing account. Interest earned on such funds will be allocated to federal grants based on a percentage of funds received during the month.

Delegation of Authority

The Board of Directors of BAY AGING has delegated supervisory authority over its investing activities to the Bay Aging Foundation Board of Directors. The BAF Board is responsible for regularly reporting on the Organization's investments to the full Board of Directors.

The BAF Board is authorized to retain one or more Investment Counselors to assume the investment management function. In that regard, the BAF Board may enter into agreements with, delegate investment authority to, pay compensation to, and receive reports from one or more Investment Counselors.

Investment Objectives

BAY AGING's investment objectives are the preservation and protection of the Organization's assets, as well as the maintenance of liquid reserves to meet obligations arising from unanticipated activities, by earning an appropriate return on investments.

Accounting Treatment

All purchased investments shall initially be recorded at cost. All investments acquired by donation to BAY AGING shall initially be recorded at their fair market value as of the date of donation. Donated investments shall be recorded as unrestricted, temporarily restricted, or permanently restricted income and net assets based on the existence or absence of such restrictions, as defined earlier.

Adjustments to market value result in unrealized gains and losses on investments. Such gains and losses resulting from contributed investments (or from investments purchased with contributed funds) shall be classified as unrestricted, temporarily restricted, or permanently restricted based on the existence or absence of explicit restrictions on such appreciation and depreciation from the donor, as defined earlier. Such unrealized gains and losses from investments purchased with unrestricted funds shall be classified as unrestricted.

Procedures and Reporting

The following procedures will be followed to ensure that investments are properly managed and that these investment policies are consistent with the mission of BAY AGING and accurately reflect the current financial condition of the Organization:

1. The CFO and Investment Counselor shall prepare a schedule of investments for presentation on an annual basis for the BAF Board of Directors and the full Bay Aging Board.
2. The quarterly investment reports shall detail the portfolio's composition and performance for the quarter and year-to-date, along with a comparison to budget and to the prior year.
3. The annual investment report shall be presented to the BAF Board at the time the BAY AGING audit is presented, outlining in detail the investment portfolio's composition and performance for the fiscal year, along with a comparison to appropriate market indices. The report will show results for the most recently-completed fiscal year and for last three years.
4. Investment policies shall be reviewed annually by the President and the CFO, working with the BAF Board, to determine any appropriate modifications.
5. Recommendations for any revisions or modifications to the investment policy will be made by the BAF Board to the Board of Directors for their approval.

PROPERTY AND EQUIPMENT

Capitalization Policy

Physical assets acquired with unit costs in excess of \$1,000 are capitalized as property and equipment on the Organization's financial statements. Items with unit costs below this threshold shall be expensed in the year purchased.

If an awarding agency requires a lower amount for equipment, BAY AGING will adhere to that dollar amount only for that program or contract.

Capitalized property and equipment additions are accounted for at their historical cost and all such assets, except land, are subject to depreciation over their estimated useful lives, as described later.

Capitalized assets will be reported as expensed for grants if they were so budgeted in the grant application. However, for the Organization's financial statements, these assets will be capitalized and depreciated according to these policies.

Contributed Assets

Assets with fair market values in excess of \$1,000 (per unit) that are contributed to BAY AGING shall be capitalized as fixed assets on the financial statements. Contributed items with market values below this threshold shall be expensed in the year contributed.

Capitalized contributed assets are accounted for at their market value at the time of donation and all such assets, except land and certain works of art and historical treasures, are subject to depreciation over their estimated useful lives, as described later.

Equipment and Furniture Purchased With Federal Funds

BAY AGING may occasionally purchase equipment and furniture that will be used exclusively on a program funded by a Federal agency. In addition to those policies on Asset Management described earlier, equipment and furniture charged to Federal awards will be subject to certain additional policies as described below.

For purposes of Federal award accounting and administration, "equipment" shall include all assets with a unit cost equal to the lesser of \$5,000 or the capitalization threshold utilized by BAY AGING, described under Asset Management.

All purchases of "equipment" with Federal funds shall be approved by the Federal awarding agency in accordance with their existing purchasing rules. In addition, the following policies shall apply regarding equipment purchased and charged to Federal awards:

1. Adequate insurance coverage will be maintained with respect to equipment and furniture charged to Federal awards.
2. For equipment (or residual inventories of supplies) with a remaining per unit fair market value of \$5,000 or less at the conclusion of the award, BAY AGING shall retain the equipment without any requirement for notifying the Federal agency.

3. If the remaining per unit fair market value is \$1,000 or more, BAY AGING shall gain a written understanding with the Federal agency regarding disposition of the equipment. This understanding may involve returning the equipment to the Federal agency, keeping the equipment and compensating the Federal agency, or selling the equipment and remitting the proceeds, less allowable selling costs, to the Federal agency.
4. The Grant Manager shall determine whether a specific award with a Federal agency includes additional equipment requirements or thresholds and requirements that differ from those described above.
5. A physical inventory of all equipment purchased with Federal funds shall be performed at least once every two years. The results of the physical inventory shall be reconciled to the accounting records of and Federal reports filed by BAY AGING.

Establishment and Maintenance of a Fixed Asset Listing

All property and equipment excluding electronics with a value in excess of \$1000 shall be recorded in a property log. Anytime a funding source has a lower threshold for recording property, the limit imposed by the funding source will be followed. This log shall include the following information with respect to each asset:

1. Date of acquisition
2. Cost
3. Description (including color, model, and serial number or other identification number)
4. Source of the equipment, including the Federal award number, if applicable
5. Whether the title vests in the Organization or the Federal Government
6. Information to calculate the Federal share of the cost of the equipment, if applicable
4. Location of asset
5. Depreciation method
6. Estimated useful life
7. Condition

A physical inventory of all assets capitalized under the preceding policies will be taken on an annual basis by BAY AGING. This physical inventory shall be reconciled to the property log and adjustments made as necessary. All adjustments resulting from this reconciliation will be approved by the CFO.

Receipt of Newly-Purchased Equipment and Furniture

At the time of arrival, all newly-purchased equipment and furniture shall be examined for obvious physical damage. If an asset appears damaged or is not in working order, it shall be returned to the vendor immediately.

In addition, descriptions and quantities of assets per the packing slip or bill of lading shall be compared to the assets delivered. Discrepancies should be resolved with the vendor immediately.

Depreciation and Useful Lives

All capitalized assets are maintained in the special property and equipment account group. Property and equipment are depreciated over their estimated useful lives using the straight-line method.

In the year of acquisition, depreciation is recorded based on the number of months the asset is in service, counting the month of acquisition as a full month (Example: an asset purchased on the 15th day of the fifth month shall have eight full months of depreciation (eight-twelfths of one year) recorded for that year.)

Estimated useful lives of capitalized assets shall be determined by the Accounting Department in conjunction with the department or employee that shall utilize the asset. The following is a list of the estimated useful lives of each category of fixed asset for depreciation purposes:

Furniture and fixtures	Up to 10 yrs
General office equipment	5 yrs
Computer hardware and peripherals	3-5 yrs
Computer software	2-3 yrs
Leased assets	life of lease
Leasehold Improvements	remaining lease term
Office Buildings	30 years

Alternatively, at the direction of the CFO, capitalized assets may be depreciated over useful lives expressed in terms of units of production or hours of service in place of the preceding useful lives expressed in terms of time.

For accounting and interim financial reporting purposes, depreciation expense will be recorded on a monthly basis.

Changes in Estimated Useful Lives

If it becomes apparent that the useful life of a particular capitalized asset will be less than the life originally established, an adjustment to the estimated useful life shall be made. All such changes in estimated useful lives of capitalized assets must be approved by the CFO.

When a change in estimated useful life is made, the new life is used for purposes of calculating annual depreciation expense. In the year in which the change in estimate is made, the cumulative effect of the change shall be reflected as depreciation expense in the Organization's statement of activities.

For example, if in the fourth year of an asset's life, it is determined that the asset will last five years instead of the original estimate of seven years, depreciation expense for that year shall be equal to the difference between 4/5 of the asset's basis (accumulated depreciation at the end of year four) and 3/7 of the asset's basis (accumulated depreciation at the beginning of the year).

Repairs of Property and Equipment

Expenditures to repair capitalized assets shall be expensed as incurred if the repairs do not materially add to the value of the property or materially prolong the estimated useful life of the property.

Expenditures to repair capitalized assets shall be capitalized if the repairs increase the value of property, prolong its estimated useful life, or adapt it to a new or different use. Such capitalized repair

costs shall be depreciated over the remaining estimated useful life of the property. If the repairs significantly extend the estimated useful life of the property, the original cost of the property shall also be depreciated over its new, extended useful life.

Dispositions of Property and Equipment

Prior to the sale of vehicles/equipment/ assets/property the applicable funding source is notified and written approval is received approving the disposition. Assets that are sold, funds received will be returned to the funder or utilized per contractual obligations. The CEO approves the disposition of the property and equipment. If equipment is sold, scrapped, donated or stolen, adjustments need to be made to the fixed asset listing and property log. If money is received for the asset, then the difference between the money received and the "book value" (purchase price less depreciation) of the asset will be recorded as a loss (if the money received is less than the book value) or a gain (if the money received is more than the book value).

Write-Offs of Property and Equipment

The CFO approves the disposal of all capitalized fixed assets that may be worn-out or obsolete. Property that is discovered to be missing or stolen will be reported immediately to the CFO. If not located, this property will be written off the books with the proper notation specifying the reason.

LEASES

Classification of Leases

BAY AGING classifies all leases in which the Organization is a lessee as either capital or operating leases. BAY AGING shall utilize the criteria described in Statement of Financial Accounting Standards No. 13 in determining whether a lease is capital or operating in nature. Under those criteria, a lease shall be treated as a capital lease if, at the time of entering into the lease, any of the following factors are present:

1. The lease transfers ownership to BAY AGING at the end of the lease term;
2. The lease contains a bargain purchase option;
3. The lease term is equal to 75% or more of the estimated economic life of the leased property; or
4. The present value of the minimum lease payments is 90% or more of the fair value of the leased property (using, as the interest rate, the lesser of BAY AGING's incremental borrowing rate or, if known, the lessor's implicit rate).

All leases that do not possess any of the four preceding characteristics shall be treated as operating leases. In addition, all leases that are immaterial in nature shall be accounted for as operating leases.

Reasonableness of Leases

BAY AGING assesses the value of leases according to the requirements of OMB Uniform Guidance as follows:

- The rate is reasonable when compared to similar property in the same area,
- The rate of any alternatives, and
- The type, life expectancy, condition and value of the property leased.

Rental arrangements will be reviewed every 3 years to determine if circumstances have changed and other options are available.

Accounting for Leases

All leases that are classified as operating leases and immaterial capital leases shall be accounted for as expenses in the period in which the lease payment is due.

BAY AGING shall also maintain a control list of all operating and capital leases. This list shall include all relevant lease terms, including a schedule of future annual lease payments obligations.

SOFTWARE ACQUISITION AND DEVELOPMENT COSTS

Costs to be Capitalized

Currently, no costs associated with acquiring or developing software are capitalized.

Costs to be Expensed as Incurred

Costs associated with acquiring or developing internal-use software are to be expensed as incurred, rather than capitalized, including:

1. External and internal costs incurred in the preliminary project phases, such as costs associated with making decisions to allocate resources to the project, determining performance requirements and specifications, and reviewing and selecting vendors and consultants;
2. Research and development costs;
3. General and administrative costs;
4. Data conversion;
5. Training costs; and
6. Internal maintenance costs.

WEB SITE COSTS

Costs to Be Capitalized

With the current website setup, there are no expenses which are capitalized.

Costs to Be Expensed As Incurred

Currently all costs for the maintenance and upkeep of the Organization's website are expensed and include but are not limited to domain registration, administrative upkeep, etc.

POLICIES PERTAINING TO LIABILITY AND NET ASSET ACCOUNTS

ACCRUED LIABILITIES

Identification of Liabilities

The Accounting Department shall establish a list of commonly incurred expenses that may have to be accrued at the end of an accounting period. Some of the expenses that shall be accrued by BAY AGING at the end of an accounting period are:

- Salaries and wages
- Payroll taxes
- Vacation pay (see policy below)
- Rent
- Interest on notes payable

In addition, BAY AGING shall record a liability for deferred revenue (revenue received but not yet earned) in accordance with the revenue recognition policies described elsewhere in this manual. Adjustments to deferred revenue accounts shall be made monthly.

Accrued Leave

Personnel policies permit employees to carry forward unused leave from year to year (See Personnel Policies for exact amounts). Such unused leave may be payable to an employee upon termination of employment.

Accordingly, BAY AGING records a liability for accrued leave to which employees are entitled. The total liability at the end of an accounting period shall equal the total earned but unused hours of leave up to the maximum, multiplied by each employee's current hourly pay rate.

Leave that does not "vest" with employees (i.e., leave that is not paid to employees if unused at the time of termination of employment), such as sick leave, shall not be accrued as a liability.

NOTES PAYABLE

General Policy

BAY AGING requires that all notes payable be approved by the Board of Directors and signed by the President.

Recordkeeping

BAY AGING maintains a schedule of all notes payable, mortgage obligations, lines of credit, and other financing arrangements. This schedule shall be based on the underlying loan documents and shall include all of the following information:

1. Name and address of lender
2. Date of agreement or renewal/extension
3. Total amount of debt or available credit
4. Amounts and dates borrowed
5. Description of collateral, if any
6. Interest rate
7. Repayment terms
8. Maturity date
9. Address to which payments should be sent
10. Contact person at lender

Accounting and Classification

An amortization schedule shall be maintained for each note payable. Based upon the amortization schedule, the principal portion of payments due with the next year shall be classified as a current liability in the statement of financial position. The principal portion of payments due beyond one year shall be classified as long-term/non-current liabilities in the statement of financial position.

Demand notes and any other notes without established repayment dates shall always be classified as current liabilities.

Unpaid interest expense shall be accrued as a liability at the end of each accounting period.

A detailed record of all principal and interest payments made over the entire term shall be maintained with respect to each note payable. Periodically, the amounts reflected as current and long-term notes payable per the general ledger shall be reconciled to these payment schedules and the amortization schedules, if any, provided by the lender. All differences shall be investigated.

Non-Interest-Bearing Notes Payable

As a charitable organization, BAY AGING may, from time-to-time, receive notes payable that do not require the payment of interest, or that require the payment of a below-market rate of interest for the type of obligation involved. In such cases, BAY AGING will record contribution income for any unpaid interest.

For demand loans, recording of interest expense and contribution income shall be performed at the end of each accounting period, based on the outstanding principal balance of the loan during that period, multiplied by the difference between a normal interest rate for that type of loan and the rate, if any, that is required to be paid.

For loans with fixed maturities or payment dates, the note payable shall be recorded at the present value of the future principal payments, using as a discount rate the difference between a normal interest rate for that type of loan and the rate, if any, required to be paid. The difference between the cash proceeds of the note and the present value shall be recorded as contribution income in the period the loan is made. Thereafter, interest expense shall be recorded in each accounting period using the effective interest method, with the corresponding credit entry increasing the note payable account to reflect the amount(s) that shall be repaid.

NET ASSETS

Classification of Net Assets

Net assets of the Organization shall be classified based upon the existence or absence of donor-imposed restrictions, according to FASB ASU 2016-14 as follows:

Net Assets without donor restrictions - Net assets that are not subject to donor imposed stipulations.

Net Assets with donor restrictions - Net assets subject to donor imposed or governing board stipulations..

Net assets accumulated that are not subject to donor imposed restrictions, but which the Board of Directors of the Organization has earmarked for specific uses, shall be segregated in the accounting records as "board-designated" funds within the unrestricted category of net assets.

Restrictions may be associated with either a time period (e.g. a particular future time period) or a purpose (e.g. specific programs). A purpose stipulation will be considered a restriction only if it is more specific than the broad limits resulting from the nature of the Organization, the environment in which it operates, and the purposes specified in BAY AGING's Articles of Incorporation and Bylaws.

Reclassifications from Restricted to Unrestricted Net Assets

The Organization shall report in its statement of activities a reclassification from restricted to unrestricted net assets if any of the following events occur:

1. Fulfillment of the purpose for which the net assets were restricted (e.g. spending restricted funds for the stipulated purpose)
2. Expiration of time restrictions imposed by donors
3. Death of an annuity beneficiary
4. Withdrawal by the donor (or by a court) of a time or purpose restriction

If a donor stipulates multiple restrictions (such as a purpose and a time restriction), reclassifications from temporarily restricted to unrestricted net assets shall be reported only upon the satisfaction of the final remaining restriction.

Reclassifications from Unrestricted to Restricted Net Assets

If the Organization receives a restricted contribution from a donor who further stipulates that the Organization set aside a portion of its unrestricted net assets for that same purpose, the Organization shall report in its statement of activities a reclassification of net assets from unrestricted to temporarily or permanently restricted, based on the specific nature of the restriction.

Disclosures

The Organization discloses in a footnote to the financial statements the different types of temporary and permanent restrictions associated with the Organization's net assets as of the end of each fiscal year.

POLICIES ASSOCIATED WITH FINANCIAL AND TAX REPORTING

FINANCIAL STATEMENTS

Standard Financial Statements of the Organization

Preparing financial statements and communicating key financial information is a necessary and critical accounting function. Financial statements are management tools used in making decisions, in monitoring the achievement of financial objectives, and as a standard method for providing information to interested parties external to the Organization. Financial statements may reflect year-to-year historical comparisons or current year budget to actual comparisons.

The basic financial statements that are maintained on an organization-wide basis shall include:

1. **Statement of Financial Position** - reflects assets, liabilities, and net assets of the Organization and classifies assets and liabilities as current or non-current/long-term.
2. **Statement of Activities** - presents support, revenues, expenses, and other changes in net assets of the Organization, by category of net asset (unrestricted, temporarily restricted and permanently restricted), including reclassifications between categories of net assets.
3. **Statement of Cash Flows** - reports the cash inflows and outflows of the Organization in three categories: operating activities, investing activities, and financing activities.
4. **Statement of Functional Expenses** – presents the expenses of the Organization in a natural or objective format and by both nature and function (i.e., which program or supporting service was served).

Frequency of Preparation

The objective of the Accounting Department is to prepare accurate financial statements in accordance with generally accepted accounting principles and distribute them in a timely and cost-effective manner. In meeting this responsibility, the following policies shall apply:

the Statement of Functional Expenses shall be produced on a monthly basis, by the 15th of each month, and circulated to Department Heads to inform the preparation of grant reimbursement requests.

The standard full set of financial statements described in the preceding section shall be supplemented by the following schedules:

1. Individual statements of activities on a departmental and functional basis (and/or program/grant basis)
2. Comparisons of actual year-to-date revenues and expenses with year-to-date budgeted amounts

The monthly set of financial statements shall be prepared on the accrual method of accounting, including all receivables, accounts payable received by the 1st of the month, and actual depreciation expense.

Review and Distribution

All financial statements and supporting schedules shall be reviewed and approved by the CFO prior to being issued by the Accounting Department.

After approval by the CFO, a complete set of monthly financial statements, including the supplemental schedules described above, shall be distributed to the following individuals:

- President
- Department Directors and any other employee with budget-monitoring responsibilities

Financial statements may include an additional supplemental schedule prepared or compiled by the CFO. The purpose of this schedule is to provide concise information in a one page format to the Finance Committee.

Monthly Distribution

On a monthly basis, the Board of Directors will be provided with summary program and/or grant financial information. These statements will lag approximately 45 days from the end of the reporting month. (I.e., May reports will be for the period ending March 31). The CFO will report verbally to the board any transactions from the month immediately preceding that have a significant impact on the Agency's financial position.

Annual Financial Statements

A formal presentation of the Organization's annual financial statements shall be provided by the Independent Auditor to the Audit Committee. The Audit Committee will vote to recommend to the full Board to either accept or reject the annual financial statements. See separate policies regarding the annual audit under "Financial Management Policies."

GOVERNMENT RETURNS

Overview

To legitimately conduct business, BAY AGING must be aware of its tax and information return filing obligations and comply with all such requirements of Federal, state and local jurisdictions. Filing requirements of BAY AGING include, but are not limited to, filing annual information returns with IRS, annual reports for corporations, information returns for retirement plans, and payroll tax withholding tax returns.

Filing of Returns

The CFO shall be responsible for identifying all filing requirements and assuring that BAY AGING is in compliance with all such requirements. The Organization will file complete and accurate returns with all authorities and make all efforts to avoid filing misleading, inaccurate, or incomplete returns.

Filings made by BAY AGING include, but are not limited to, the following returns:

1. **Form 990** - Annual information return of tax-exempt organizations, filed with IRS. Form 990 for BAY AGING is due on the fifteenth day of the fifth month following year-end. An automatic 3-month extension of time to file Form 990 may be obtained filing Form 8868. Upon expiration of the first 3-month extension, a second 3-month extension may be requested using Form 8868. This form is completed by the auditors and approved by the Organization.
2. **Form 990-T** - Annual tax return to report BAY AGING's unrelated trade or business activities (if any), filed with IRS. Form 990-T is due on the fifteenth day of the fifth month following year-end. An automatic 6-month extension of time to file Form 990-T may be obtained by filing Form 8868.
3. **Form 5500** - Annual return for BAY AGING's employee benefits plans. Form 5500 is due July 31, but a request for extension of time to file may be filed.
4. **W-2's and 1099's** - Annual report of employee and non-employee compensation, based on calendar-year compensation, on the cash basis. These information returns are due to employees and independent contractors by January 31 and to Federal Government by February 28.
5. **Form 941** - Quarterly payroll tax return filed with IRS to report wages paid to employees and Federal payroll taxes. Form 941 is due by the end of the month following the end of each quarter, or 10 days later if all payroll tax deposits have been made in a timely manner during the quarter.

BAY AGING's fiscal and tax year-end is September 30. All annual tax and information returns of BAY AGING are filed on the accrual basis of reporting.

Federal and all applicable state payroll tax returns are prepared by the Payroll Administrator.

BAY AGING complies with all state payroll tax requirements by withholding and remitting payroll taxes to the state of residency of each BAY AGING employee.

Public Access to Information Returns

Under regulations that became effective in 1999, BAY AGING is subject to Federal requirements to make the following forms "widely available" to all members of the general public:

1. The three most recent annual information returns (Form 990), excluding the list of significant donors (Schedule B) that is attached to the Form 990, but including the accompanying Schedule A, and
2. BAY AGING's original application for recognition of its tax-exempt status ([Form 1023 or Form 1024](#)), filed with IRS, and all accompanying schedules and attachments.

BAY AGING adheres to the following guidelines in order to comply with the preceding public disclosure requirements:

1. Anyone appearing in person at the offices of BAY AGING during normal working hours making a request to inspect the forms will be granted access to a file copy of the forms. The CFO shall be responsible for maintaining this copy of each form and for making it available to all requesters.
2. For all written requests for copies of forms received by BAY AGING, the Organization shall require prepayment of all copying and shipping charges. For requests for copies that are received without prepayment, BAY AGING will notify the requester of this policy via phone call or by letter within 7 days of receipt of the original request.
3. The copying cost charged for providing copies of requested forms shall be \$1.00 for the first page copies and \$0.15 for each subsequent page. All copies shall be shipped to requesters via Priority Mail, thus, shipping charges will be a standard \$3.00 per shipment.
4. After payment is received, all requested copies shall be shipped to requesters within 30 days. Making of all copies and shipping within the 30-day time period shall be the responsibility of the Accounting Department.
5. For requests for copies made in person during normal business hours, copies shall be provided while the requester waits.
6. BAY AGING shall accept certified checks and money orders for requests for copies made in person. BAY AGING shall accept certified checks and money orders as payment for copies of forms requested in writing.
7. The relevant forms are posted to the BAY AGING Website.

UNRELATED BUSINESS ACTIVITIES

Identification and Classification

BAY AGING properly identifies and classifies income-producing activities that are unrelated to the Organization's tax-exempt purpose using the guidelines described in the Internal Revenue Code and underlying regulations. Such income accounts shall be segregated in separate accounts in the general ledger in order to facilitate tracking and accumulation of unrelated trade or business activities.

Allocation of Expenses to Unrelated Activities

In addition to segregating income associated with activities that are unrelated to BAY AGING's exempt purpose, the Organization's general ledger shall also provide accounts for expenses associated with each such unrelated activity. These expenses shall be offset against unrelated business revenue in arriving at unrelated business taxable income. Expenses that shall be offset against gross unrelated business income shall be limited to those expenses directly associated with the production of such income, including reasonable allocation of indirect costs that benefit each activity, in accordance with expense allocation policies described elsewhere in this manual.

Reporting

BAY AGING will file IRS Form 990-T to report taxable income from unrelated trade or business activities. Form 990-T is not subject to any public access or disclosure requirements. Accordingly, it is the policy of BAY AGING not to distribute copies of Form 990-T to anyone other than management of the Organization.

BAY AGING shall also report taxable income from unrelated trade or business activities that are subject to state or local income or franchise taxes on the appropriate return for the state of Virginia.

FINANCIAL MANAGEMENT POLICIES

BUDGETING

Overview

Budgeting is an integral part of managing any organization in that it is concerned with the translation of organizational goals and objectives into financial and human resource terms. A budget should be designed and prepared to direct the most efficient and prudent use of the Organization's financial and human resources. A budget is a management commitment of a plan for present and future organizational activities that will ensure survival. It provides an opportunity to examine the composition and viability of the Organization's programs and activities simultaneously in light of the available resources.

Budgets are also prepared for funding sources and each grant manager must be aware of budget modification requirements. Awarding agencies may or may not require approval for changes in line items. BAY AGING will document and follow all such requirements.

Preparation and Adoption

BAY AGING will prepare an annual budget on the accrual basis of accounting. The CFO gathers proposed organization-wide budget information from all new and/or refunding applications that have been submitted to funding sources and prepares the first draft of the budget.

After appropriate revisions and a compilation of all department budgets by the CFO, a draft of the Organization-wide budget based on individual department budgets, is presented to the President for discussion, revision, and initial approval.

The revised draft is then submitted to the Finance Committee, and finally to the entire Board of Directors for adoption.

It is the policy of BAY AGING to adopt a final budget within 30 days of the beginning of the Organization's fiscal year. The purpose of adopting a final budget at this time is to allow adequate time for the Accounting Department to input the budget into the accounting system and establish appropriate accounting and reporting procedures (including any necessary modifications to the chart of accounts) to ensure proper classification of activities and comparison of budget versus actual once the year begins.

Budgets for programs that are not on the Organization's fiscal year will be prepared in accordance with awarding agency requirements.

Monitoring Performance

BAY AGING monitors its financial performance by comparing and analyzing actual results with budgeted results. This function shall be accomplished in conjunction with the monthly financial reporting process described earlier.

On a monthly basis, financial reports comparing actual year-to-date revenues and expenses with budgeted year-to-date amounts shall be produced by the Accounting Department and distributed to each employee with budgetary responsibilities. These individuals shall be responsible for responding with a written explanation of all budget variances in excess of 20% on a quarterly basis.

Budget and Program Revisions

BAY AGING will request prior approval from Federal awarding agencies for any of the following program or budget revisions:

1. Change in the scope or objective of the project or program, even if there is no associated budget revision requiring prior written approval.
2. Change in a key person (Project Director, etc.) specified in the application or award document.
3. The absence for more than three months, or a 25 percent reduction in time devoted to the project, by the approved Project Director or principal investigator.
4. The need for additional Federal funding.
5. The transfer of amounts budgeted for indirect costs to absorb increases in direct costs, or vice versa, if approval is required by the Federal awarding agency.
6. The inclusion, unless waived by the Federal awarding agency, of costs that require prior approval in accordance with OMB Uniform Guidance.
7. The transfer of funds allotted for training allowances (direct payment to trainees) to other categories of expense.
8. Unless described in the application and funded in the approved awards, the subaward, transfer or contracting out of any work under an award. (However, this provision does not apply to purchases of supplies, materials, equipment or general support services.)

Budget Modifications

After a budget has been approved, any changes to the budget will be discussed by the Program Director and the CFO, and the President will be informed of necessary changes. If applicable, the budget modification will be submitted to the funding source for approval. Any major budget modifications that affect the agency wide budget approved by the Board will be submitted to the Finance Committee for review.

Over-expenditure of Budgets (7-1-07)

Any program that will exceed the grant award in a given year may request, upon realizing that the award will be overspent, funds from the allocation set aside by the Board of Directors for such occasions. To access these funds, Department Head's will submit a request in writing explaining why they need the funds, how much they anticipate needing, and if this is a one time occurrence or an ongoing need. Expenditures over the budgeted amounts should be determined in advance and will be covered by any available discretionary funds as approved by the President.

ANNUAL AUDIT

Role of the Independent Auditor

BAY AGING will arrange for an annual audit of the Organization's financial statements to be conducted by an independent accounting firm. The independent accounting firm selected by the Board of Directors will be required to communicate directly with the Organization's Audit Committee upon the completion of their audit. In addition, members of the Audit Committee and Executive Committee are authorized to initiate communication directly with the independent accounting firm.

Audited financial statements, including the auditor's opinion thereon, will be submitted and presented to the Board of Directors at the next scheduled meeting, after the financial statements have been reviewed and approved by the Audit Committee.

How Often to Review the Selection of the Auditor

BAY AGING shall review the selection of its independent auditor in the following circumstances:

1. Anytime there is dissatisfaction with the service of the current firm
2. When a fresh perspective and new ideas are desired
3. Every 3 years to ensure competitive pricing and a high quality of service (this is not a requirement to change auditors every three years; simply to re-evaluate the selection)

Selecting an Auditor

The selection of an accounting firm to conduct the annual audit is a task that should be taken very seriously. The following factors shall be considered by BAY AGING in selecting an accounting firm:

1. The firm's reputation in the nonprofit community
2. The depth of the firm's understanding of and experience with not-for-profit organizations and Federal reporting requirements under OMB Uniform Guidance
3. The firm's demonstrated ability to provide the services requested in a timely manner
4. The ability of firm personnel to communicate with Organization personnel in a professional and congenial manner

If BAY AGING decides to prepare and issue a written Request for Proposal (RFP) to be sent to prospective audit firms, the following information shall be included:

1. Period of services required
2. Type of contract to be awarded (fixed fee, cost basis, etc.)
3. Complete description of the services requested (audit, management letter, tax returns, etc.)
4. Identification of meetings requiring their attendance, such as Board of Director meetings
5. Organization chart of BAY AGING
6. Chart of account information

7. Financial information about the Organization
8. Identification of need to perform audit in accordance with OMB Circular A-133
9. Other information considered appropriate
10. Description of proposal and format requirements
11. Due date of proposals
12. Overview of selection process (i.e., whether finalists will be interviewed, when a decision shall be made, etc.)
13. Identification of criteria for selection

Minimum Proposal Requirements from prospective CPA firms shall be:

1. Firm background
2. Biographical information (resumes) of key firm member who will serve BAY AGING
3. Client references
4. Information about the firm's capabilities
5. Firm's approach to performing an audit
6. Copy of the firm's most recent quality/peer review report, including any accompanying letter of findings
7. Other resources available with the firm
8. Expected timing and completion of the audit
9. Expected delivery of reports
10. Cost estimate including estimated number of hours per staff member
11. Rate per hour for each auditor
12. Other information as appropriate

Sealed proposals shall be delivered to the CFO who will bring them to the Audit Committee to be opened and reviewed.

Preparation for the Annual Audit

BAY AGING shall be actively involved in planning for and assisting with the Organization's independent accounting firm in order to ensure a smooth and timely audit of its financial statements. In that regard, the Accounting Department shall provide assistance to the independent auditors in the following areas:

Planning - The CFO is responsible for delegating the assignments and responsibilities to accounting staff in preparation for the audit. Assignments shall be based on the list of requested schedules and information provided by the independent accounting firm.

Involvement - Organization staff will do as much work as possible in order to assist the auditors and, therefore, reduce the cost of the audit.

Throughout the audit process, BAY AGING will make every effort to provide schedules, documents and information requested by the auditors in a timely manner.

Concluding the Audit

Upon receipt of a draft of the audited financial statements of BAY AGING from its independent auditor, the CFO shall perform a detailed review of the draft, consisting of the following procedures:

1. Carefully read the entire report for typographical errors
2. Trace and agree each number in the financial statements and accompanying footnotes to the accounting records and/or internal financial statements of BAY AGING
3. Review each footnote for accuracy and completeness

Any questions or errors noted as part of this review shall be communicated to the independent auditor in a timely manner and resolved to the satisfaction of the CFO.

It shall also be the responsibility of the CFO to review and respond in writing to all management letter or other internal control and compliance report findings and recommendations made by the independent auditor.

In addition, the Single Audit Clearinghouse form shall be completed and a copy submitted to the Audit Committee.

Audit Committee Responsibilities

In accordance with the BAY AGING by-laws, there shall be an Audit Committee.

See the "Board Governance" section of this manual, as well as the Audit Committee Charter, for a detailed description of the Audit Committee's responsibilities and its authority.

INSURANCE

Overview

It is fiscally prudent to have an active risk management program that includes a comprehensive insurance package. This will ensure the viability and continued operations of BAY AGING.

BAY AGING maintains adequate insurance against general liability, as well as coverage for buildings, contents, computers, fine arts, equipment, machinery and other items of value.

Coverage Guidelines

As a guideline, BAY AGING will arrange for the following types and levels of insurance as a minimum:

<u>Type of Coverage</u>	<u>Amount of Coverage</u>
Commercial General Liability	\$2,000,000
Automobiles for Employees	\$1,000,000
Commercial Umbrella Liability	\$7,000,000
Directors and Officers	\$1,000,000
Employee Dishonest	\$300,000
Errors and Omissions	\$1,000,000
Workers' Compensation	To the extent required by law

BAY AGING shall maintain a detailed listing of all insurance policies in effect. This listing shall include the following information, at a minimum:

1. Description (type of insurance)
2. Agent and insurance company, including all contact information
3. Coverage and deductibles
4. Premium amounts and frequency of payment
5. Policy effective dates
6. Date(s) premiums paid and check numbers

Insurance Definitions

Workers' Compensation and Employer's Liability

Contractors are required to comply with applicable Federal and state workers' compensation and occupational disease statutes. If occupation diseases are not compensated under those statutes, they shall be covered under the employer's liability insurance policy, except when contract operations are so commingled that it would not be practical to require this coverage.

Fidelity Bond

For all personnel handling cash, preparing or signing checks, BAY AGING shall obtain insurance that provides coverage in a blanket fidelity bond. The specific needs of the Organization will determine the dollar limit of this coverage.

Comprehensive Liability

This type of coverage may include directors, officers and employee general liability insurance, buildings, contents, computers, fine arts, boilers and machinery.

RECORD RETENTION

Policy (7-1-07)

BAY AGING retains records as required by law and destroys them when appropriate. The destruction of records must be approved by the CFO. The formal records retention policy of BAY AGING is as follows:

Accident reports/claims (settled Cases)	7 Years
Accounts payable ledgers and schedules	7 Years
Accounts receivable ledgers and schedules	7 Years
Audit reports	Permanently
Bank reconciliations	3 Years
Bank Statements	3 Years
Chart of Accounts	Permanently
Cancelled Checks	7 Years
Client Files	7 Years
Contracts, mortgages, notes and leases:	
Expired	7 Years
Still in effect	Permanently
Correspondence:	
General	3 Years
Legal and important matters only	Permanently
Routine with customers and/or vendors	3 Years
Deeds, mortgages and bills of sales	Permanently
Depreciation schedules	Permanently
Duplicate deposit slips	3 Years
Employment applications	3 Years
Expense analyses/expense distribution schedule	7 Years
Financial statements:	
Year end	Permanently
Other	Optional
Garnishments	7 Years
General ledgers/year end trial balance	Permanently
Insurance policies (expired)	3 Years
Insurance records (policies, claims, etc.)	Permanently
Internal audit reports	3 Years +
Internal reports	3 Years
Inventories of products, materials and supplies	7 Years
Invoices (to customers, from vendors)	7 Years
Journals	Permanently
Minute books of directors, bylaws and charters	Permanently
Notes receivable ledgers and schedules	7 Years
Payroll records and summaries	7 Years
Personnel records (terminated)	7 Years
Petty cash vouchers	3 Years
Physical inventory tags	3 Years
Property records (incl. depreciation schedules)	Permanently

Purchase orders:	
Finance department copy (yellow)	7 Years
Other copies	3 Year
Receiving sheets	3 Year
Retirement and pension records	Permanently
Requisitions	3 Year
Sales records	7 Years
Subsidiary ledgers	7 Years
Tax returns and worksheets, examination reports and other documents relating to determination of income tax liability	Permanently
Time sheets/cards	7 Years
Trademark registrations and copyrights	Permanently
Training manuals	Permanently
Voucher register and schedules	7 Years
Withholding tax statements	7 Years
MCO related documents	10 Years
Compliance training completion records	
FWA training completion records	
Documentation of OIG and GSA (SAM) screenings	

Any contracts will be adhered to which requires records to be maintained for a longer period of time than the lengths stated above.

BOARD GOVERNANCE

AUDIT COMMITTEE

Purpose

The primary responsibility for the Organization's financial reporting and internal controls rests with senior operating management, as overseen by the Organization's Board of Directors (the "Board"). The purpose of the Audit Committee (the "Committee") is to assist the Board in fulfilling this responsibility by providing oversight of the Organization's audit functions (external and internal), as well as other investigations (external and internal).

Authority

The Audit Committee has authority to:

- Retain the Organization's external auditors.
- Investigate any matter brought to its attention with complete and unrestricted access to all books, records, documents, facilities, and personnel of the Organization.
- Retain outside counsel, auditors, investigators, or other experts in the fulfillment of its responsibilities.

The Committee shall be provided with the resources necessary to discharge its responsibilities. The Board shall review the adequacy of this Charter on an annual basis. The Committee may form and delegate authority to subcommittees and may delegate authority to one or more members of the Committee.

Membership

The Audit Committee shall be a standing committee of the Board of Directors. Members of the Committee shall:

1. Have no relationship to the Organization that may interfere with the exercise of their independence from management and the Organization;
2. Not be members of the Organization's Finance Committee, a separate committee of the Board of Directors;
3. Be financially literate regarding the specialized matters of Organization or shall acquire such financial literacy within a reasonable time period after appointment to the Committee.

In addition, at least one member of the Committee shall be a financial expert possessing the following characteristics:

1. An understanding of generally accepted accounting principles applicable to the Organization and financial statements;
2. The ability to assess the application of generally accepted accounting principles in connection with accounting for estimates, accruals, and reserves of the Organization;

3. Experience preparing, auditing, analyzing, or evaluating financial statements of comparable complexity to those of the Organization;
4. Understanding of internal controls and procedures for financial reporting; and
5. Understanding of audit committee functions.

Responsibilities

The Committee's role is one of oversight, recognizing that the Organization's management is responsible for preparing the Organization's financial statements and that the external auditors are responsible for auditing those financial statements. The Committee recognizes that the Organization's internal financial management team, as well as the external auditors, have more time and detailed information about the Organization than do Committee members. Consequently, in discharging its oversight responsibilities, the Committee is not providing expert advice or any assurances as to the Organization's financial statements or any professional certification as to the external auditor's services.

The Committee shall have certain responsibilities in the areas of financial reporting, internal control, and organizational governance.

In the areas of financial **reporting and internal control**, the Committee shall:

- Oversee the external audit process, including nomination of the external audit firm, auditor engagement letters and fees, timing and coordination of audit fieldwork visits, monitoring of audit results, review of auditor's performance, and review of non-audit services provided by the external audit firm for compliance with professional independence standards;
- Review auditor opinions and management letters;
- Determine that all required tax and information return filings with Federal, state and local government agencies are current and in compliance with reporting requirements;
- Receive and review any other communications from the external auditors that the external auditors are required to submit to the Board or Committee under currently applicable professional auditing standards;
- Review and discuss with management the findings and recommendations communicated by the external auditor;
- Inquire about the existence and nature of significant audit adjustments proposed by the external auditors and significant estimates made by management;
- Meet privately with the external auditors to discuss the quality of management, financial, accounting, information technology and internal audit personnel, and to determine whether any restrictions have been placed by management on the scope of their external audit or if there are any other matters that should be discussed with the Committee;
- Review the letter of management representations provided to the external auditors as part of the annual audit and inquire as to whether any difficulties were encountered in obtaining the representation letter;
- Prepare a report, signed by the chair of the Committee, for presentation to the full Board of Directors, describing the activities and responsibilities of the Committee.
- Direct special investigations into significant matters brought to its attention within the scope of its duties;
- Review this Charter on an annual basis and propose any recommended changes to the Board.

In the area of Organizational **governance**, the Committee shall:

- Review Organization policies regarding compliance with laws and regulations, ethics, employee conduct, conflicts of interest, and the investigation of misconduct or fraud;
- Review current and pending litigation or regulatory proceedings impacting Organizational governance in which the Organization is a party;
- Establish and monitor Organization procedures for receiving and handling complaints about accounting and auditing matters;
- Review significant cases of employee or director conflict of interest, misconduct or fraud;
- Discuss with the external audit firm the reliability of the Organization's information technology system and any specific security measures in protecting the Organization against fraud and abuse;
- Meet when necessary with the Organization's general counsel to discuss legal matters that may have a significant impact on the Organization.

The Committee shall meet on a regular basis and call special meetings as deemed necessary in fulfilling the responsibilities described in this Charter.

FINANCE COMMITTEE

Purpose

The primary responsibility for the Organization's financial reporting and management rests with senior operating management, as overseen by the Organization's Board of Directors (the "Board"). The purpose of the Finance Committee (the "Committee") is to assist the Board in fulfilling this responsibility by providing oversight of the financial management and financial reporting function.

Authority

The Finance Committee shall have the resources and authority necessary to discharge its duties and responsibilities. The Committee has sole authority to retain and terminate outside counsel or other experts or consultants, as it deems appropriate, including sole authority to approve the firms' fees and other retention terms. The Committee may form and delegate authority to subcommittees and may delegate authority to one or more members of the Committee.

Membership

The Finance Committee shall be a standing committee of the Board of Directors, comprised of not less than three members of the Board. Members of the Committee shall:

1. Have no relationship to the Organization that may interfere with the exercise of their independence from management and the Organization; and
2. Not be members of the Organization's Audit Committee, a separate committee of the Board of Directors.

Responsibilities

The Finance Committee's role is one of oversight, recognizing that the Organization's management is responsible for financial management and for preparing the Organization's financial statements. The Committee shall have oversight responsibilities in certain areas of financial management and reporting as follows:

- Oversee the Organization's assets, including policies associated with safekeeping and protection of those assets;
- Review and evaluate the Organization's financial viability;
- Review the annual budget and recommend it to the full Board for approval;
- Review new initiatives involving requests for funding;
- Review the Organization's cash flow management;
- Review the financial impact of agenda items being considered by the full Board;
- Monitor budget implementation and accounting and financial policies and procedures;
- Review monthly and quarterly financial reports and monitor financial performance against budget;
- Prepare a report, signed by the chair of the Committee, for presentation to the full Board of Directors, describing the activities and responsibilities of the Committee;
- Review overall organizational risk management and adequacy of insurance carried by the Organization (and report annually to the Audit Committee on the Organization's risk management function);

- Review all borrowing arrangements of the Organization;
- Review annual income tax and information returns filed with the Internal Revenue Service and State government agencies;
- Review this Charter on an annual basis and propose any recommended changes to the Board;
- Review the Financial Policies and Procedures manual.

The Committee shall meet on a regular basis and call special meetings as deemed necessary in fulfilling the responsibilities described in this Charter.