

Michigan SILC

Fiscal Policies and Procedures

Revised 11/21/2022

Contents

[**Introduction:** 2](#_Toc123804190)

[**Board and Staff Responsibilities:** 2](#_Toc123804191)

[**Segregation of Responsibilities:** 4](#_Toc123804192)

[**Expense Allocations:** 4](#_Toc123804193)

[**Internal Controls:** 4](#_Toc123804194)

[**Safe-Guarding Assets:** 5](#_Toc123804195)

[**Policies and Procedures on Expenditures:** 5](#_Toc123804196)

[**Cash Receipts:** 5](#_Toc123804197)

[**Cash Disbursements:** 6](#_Toc123804198)

[**Supporting Documentation:** 6](#_Toc123804199)

[**Allowability of Costs (based on Uniform Guidance 200.403):** 6](#_Toc123804200)

[**Reasonable Costs (based on Uniform Guidance 200.404):** 7](#_Toc123804201)

[**Allocable Costs (based on Uniform Guidance 200.405)** 7](#_Toc123804202)

[**Debit and Credit Card Procedures:** 8](#_Toc123804203)

[**Bank Statement Reconciliation:** 9](#_Toc123804204)

[**Management Information Systems:** 9](#_Toc123804205)

[**Bank Account Transfers:** 10](#_Toc123804206)

[**Non-Expendable Property:** 10](#_Toc123804207)

[**Property, Equipment and Furniture Accounting Policy:** 11](#_Toc123804208)

[**Purchase Thresholds:** 11](#_Toc123804209)

[**Compliance with all Federal and State Laws and Regulations:** 13](#_Toc123804210)

[**Annual Budget Process:** 13](#_Toc123804211)

[**Record Retention Policy** 14](#_Toc123804212)

**Introduction:**

The Michigan Statewide Independent Living Council, known as the SILC throughout this manual, is established to develop and monitor the State Plan for Independent Living (SPIL). Mandated under the Rehabilitation Act of 1973 as amended in 1992, the SILC must maintain its autonomy from any state agency. The governing body of the SILC, hereafter referred to as the Board, is composed of nineteen individuals, fourteen voting members appointed by the Governor of Michigan based on recommendations provided by the Board after a nominations and review process, and five ex-officio, non-voting members representing various state agencies and/or providers.

A majority of the board members are individuals with disabilities who are not employed by any state agency or a Center for Independent Living. Funding for the SILC is federal funding from the Rehabilitation Services Administration (RSA) provided by Title I of the Rehabilitation Act through Opportunities for Michiganders with Disabilities and the State of Michigan. In all other respects, the SILC is an independent entity. Additional funding includes grants, donations, and funds generated by SILC activities. All policies governing the activities and operations of the SILC are made by the Board. The Board appoints the Executive Director who is directly responsible for managing the SILC office and conducting the work of the Board.

The SILC is governed by federal, state and local laws, bylaws, and these policies. These policies may be amended at any time by action of the Board. The Board and staff shall receive thirty (30) days’ notice of changes.

The SILC is grounded in and guided by the “independent living philosophy”, a set of values, principles, and beliefs that people with disabilities have the right to live and work independently in the community, having choice/control over acceptable options for doing so. Personal choice and control are key to independent living. The independent living philosophy is one of consumer control, peer support, self-help, self-determination, equal access, and individual and systems advocacy in order to maximize the leadership, empowerment, independence, and productivity of individuals with disabilities, and the integration and full inclusion of individuals with disabilities into the mainstream of society. This philosophy dictates that individuals have protection under the law and shall not be discriminated against on the basis of their disability. Laws protecting people with disabilities include the Civil Rights Acts, the Americans with Disabilities Act, the Rehabilitation Act, the Air Carriers Access Act, the Human Rights Act, and the Fair Housing Amendment.

**Board and Staff Responsibilities:**

*Board of the SILC (and Committees)*

* Set, oversee, and clearly articulate the organization’s vision, mission, and values.
* Provide leadership and strategic direction for the mission, budget, and development initiatives that sustain the SILC.
* Set a proper tone for the SILC by articulating a code of ethics, mandating compliance with the code, showing no tolerance for dishonesty, questioning unusual transactions or activities, and supporting appropriate training.
* Review and approve the annual budget prior to the beginning of the fiscal year, and any subsequent budget modifications
* Appoint board members who will have signing authority and establish the limits or circumstances that require dual signatures with the Executive Director.
* At least two board members will be authorized signers of all SILC bank accounts at all times.
* Review periodic financial and programmatic reports. Conduct such reviews no less frequently than once each quarter
* Review the Executive Director's performance annually and establish salary increases if appropriate.
* Review and approve internal controls and accounting policies and procedures.
* Serve as a resource to the Executive Director in implementing internal controls
* Assess risk periodically, determine the adequacy of internal controls and determine the types and amounts of insurance coverage required for the organization.
* Assign a member(s) to co-sign any check in excess of a dollar amount established by the board, or when a check is made out to the Executive Director.
* Assign a member(s) to review and approve all expenses reimbursable to the Executive Director or charged directly by the Executive Director
* Review the SILC’s compliance annually and assure that whistleblower protection policies are in place for anyone reporting suspected illegal acts, waste, fraud, or abuse of funds.
* Verify the SILC is not involved in any impermissible political activities or lobbying activities.

*Executive Director*

* Provide continuous leadership in the implementation of the mission, strategic direction, budget, and objectives set by the Board of the SILC.
* Ensure that a comprehensive, accurate budget and subsequent modifications are developed annually and presented to the Board of the SILC for review and approval.
* Review key monthly financial reports (such as balance sheet, income and expense report, and budget comparison).
* Present key financial and programmatic reports to the Board of the SILC. Present reports no less often than quarterly. Provide complete and accurate explanations of the reports. Describe any changes, discrepancies, or variances in any of the reports, including the budget comparison report. Highlight any aspects of the reports or the organization’s financial position of which the board should be aware in fulfilling its leadership role.
* Review and approve all program expenditures to verify that they are reasonable, allowable, and properly allocated.
* Review time sheets (reports of time worked and pay rates by individual) to ensure hours worked and rates are complete and accurate.
* Review bank statements, electronic payments, transfers, and other transactions to identify any irregularities
* Prepare monthly bank reconciliations to present to Board Treasurer for review and approval.
* Ensure adherence to all internal controls is thorough and complete

**Segregation of Responsibilities:**

The board and staff will ensure the appropriate level of segregation of duties at all times. The board and staff will accomplish that by following the policies and procedures included in this manual.

**Expense Allocations:**

Payroll and other costs that benefit a single program or cost objective shall be assigned solely to that program or cost objective. Most expenses that benefit more than one program or function (typically administration, rent and other occupancy costs, and minor expenditures such as shared supplies) are allocated to each program or department using a shared cost method.

All expenditures of federal funds must be adequately documented to be considered allowable.

**Internal Controls:**

The SILC Executive Director, in conjunction with the Board Chairperson and Treasurer, shall develop and maintain an accounting system which is in compliance with generally accepted accounting principles and any applicable state and federal regulations. The SILC’s financial records shall be maintained using the accrual basis of accounting.

Annually, the MiSILC Corporation will undergo a financial audit by a Certified Public Accountant. The finding of this examination and any accompanying recommendations shall be presented to the corporation board. The auditor will also be responsible to prepare and submit the annual corporation 990 filing. The Executive Director will be responsible to sign the 990 on behalf of the corporation.

The SILC’s financial and program records shall be audited upon funder requirement or board authorization, when federal funds exceed $750,000, by an independent auditor hired by the SILC for that purpose, who shall examine the SILC’s financial management system and report any and all findings, including those required by audits under the Office of Management and Budget (OMB) Circulars A-122 and A-133.

The Executive Director, in conjunction with the Chairperson and Treasurer, shall develop reliable and understandable financial statements in a format acceptable to the fullBoard. Once developed, these financial statement forms shall be used consistently throughout the year so that Executive Committee members understand the true financial position of the SILC at any given moment within the year. All board members have access to financial statements and other financial records. Changes to the financial statement format shall be made only at the beginning of a fiscal year, unless specifically requested by the Board.

**Safe-Guarding Assets:**

The SILC shall conduct a budget review and monthly comparison of actual expenses to budgeted expenses at regular Council meetings and at applicable Committee meetings.

All essential documents related to SILC contracts, financial records, proof of obligations fulfilled, or services performed, governance, and/or personnel shall be kept in a secure location.

**Policies and Procedures on Expenditures:**

All expenditures must have prior approval from the Executive Director and be in accordance with the approved annual budget. The SILC Executive Director must have approval from the Executive Committee for the expenditure of funds not included in the approved annual budget for any amount over $1,000. Such approval can be granted by the Executive Committee and shall be documented and maintained in the SILC office.

The accountant shall maintain, on file either physically or electronically, supporting documentation for expenses and shall present such documentation to the Executive Director or Operations Director who has overall responsibility for SILC programs and fiscal management. Expenses for an amount under $1,000 shall be approved by the Executive Director or Operations Director by email approving the payments to be processed.

After approval of an expenditure has been acquired, the accountant prepares payment by ACH, EFT, or electronic check to cover that expense drawn on an account established in the SILC’s name. Once the payment and approved documentation is prepared, it is presented to the Operations Director for electronic approval and payment.

Appropriate documentation is filed for future reference. All payments to legitimate accounts payable shall be written within 30 days of receipt.

**Cash Receipts:**

All mail shall be opened and stamped by the Office Manager, or other staff if needed. All cash and checks received shall be counted deposited into the appropriate SILC bank account.

All receipts shall be deposited in the bank on a timely basis, generally within two days of receipt by the Executive Director or Accountant. The accountant shall record all receipts in the accounting records of the SILC.

A third individual, independent of the Executive Director and the Accountant shall review the reconciled bank statement containing these cash and check deposits. This review shall be performed and documented with the monthly bank statements.

Uncollected debts shall be pursued vigorously by the Executive Director or her/his designated representative. Contracts with vendors may include a clause which requires vendors who are late with payments to pay an additional percentage of the total value of the contract if they are more than 60 days late in making a payment due.

**Cash Disbursements:**

All disbursements shall be made by check, EFT, or credit/debit card and recorded by the accountant. Payment vouchers and purchase orders are used for all disbursements and shall be approved prior to the writing of checks for payment by the Executive Director. The accountant will present the checks, along with all supporting documentation (payment vouchers, invoices, receipts, etc.) to the Executive Director. The Executive Director shall obtain proper signatures and ensure that the checks are mailed to the payees. The accountant shall not be an authorized approver. The accountant shall update the accounting records for all disbursements.

All checks are pre-numbered. Unused checks are maintained in a locked, fireproof cabinet.

SILC staff will e-mail council members the day expense account checks are mailed. If Council members do not receive their checks within 2 weeks, the SILC office must be notified immediately.

To ensure efficient bookkeeping and prevent delays and errors in records, all checks must be cashed within 90 days of when they are issued. Checks not cashed within 90 days will be voided and will only be reissued under approval of the Executive Committee.

Voided checks are defaced to prevent subsequent use and retained by the SILC.

No checks shall be made payable to “Cash” or to “Bearer.”

The SILC requires a board member approval on all checks over $1,000, with exception to reoccurring expenses approved in the budget. Advance signing of checks is not permitted. The documentation of the approval will be maintained at the SILC office.

The SILC shall not maintain a petty cash fund.

**Supporting Documentation:**

It is the responsibility of the board and staff of the organization to ensure the MiSILC maintains adequate supporting documentation for all expenditures. Expenditures that lack adequate supporting documentation may be disallowed.

**Allowability of Costs (based on Uniform Guidance 200.403):**

To be allowable under an award, costs must meet the following general criteria:

1) Be reasonable for the performance of the award and be allocable thereto under these principles.

2) Conform to any limitations or exclusions set forth in these principles or in the award as to types or amount of cost items.

3) Be consistent with policies and procedures that apply uniformly to both federally financed and other activities of the organization.

4) Be accorded consistent treatment.

5) Be determined in accordance with generally accepted accounting principles (GAAP).

6) Not be included as a cost or used to meet cost sharing or matching requirements of any other federally financed program in either the current or a prior period.

7) Be adequately documented.

**Reasonable Costs (based on Uniform Guidance 200.404):**

A cost is reasonable if, in its nature or amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the costs. In determining the reasonableness of a given cost, consideration shall be given to the following:

1) Whether the cost is of a type generally recognized as ordinary and necessary for the operation of the non-Federal entity or the proper and efficient performance of the Federal award.

2) The restraints or requirements imposed by such factors as: sound business practices; arm's-length bargaining; federal, state, local, and other laws and regulations; and terms and conditions of the federal award.

3) Market prices for comparable goods or services for the geographic area.

4) Whether the individuals concerned acted with prudence in the circumstances considering their responsibilities to the non-federal entity, its employees, where applicable its students or membership, the public at large, and the Federal Government

5) Whether the non-federal entity significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the federal award's cost.

**Allocable Costs (based on Uniform Guidance 200.405)**

(a) A cost is allocable to a particular federal award or other cost objective if the goods or services involved are chargeable or assignable to that federal award or cost objective in accordance with relative benefits received. This standard is met if the cost:

(1) Is incurred specifically for the federal award.

(2) Benefits both the federal award and other work of the non-federal entity and can be distributed in proportions that may be approximated using reasonable methods; and

(3) Is necessary to the overall operation of the non-federal entity and is assignable in part to the federal award in accordance with the principles in this subpart.

(b) All activities which benefit from the non-federal entity's indirect (F&A) cost, including unallowable activities and donated services by the non-federal entity or third parties, will receive an appropriate allocation of indirect costs.

(c) Any cost allocable to a particular federal award under the principles provided for in this part may not be charged to other Federal awards to overcome fund deficiencies, to avoid restrictions imposed by Federal statutes, regulations, or terms and conditions of the federal awards, or for other reasons. However, this prohibition would not preclude the non-federal entity from shifting costs that are allowable under two or more federal awards in accordance with existing federal statutes, regulations, or the terms and conditions of the Federal awards.

(d) Direct cost allocation principles. If a cost benefits two or more projects or activities in proportions that can be determined without undue effort or cost, the cost must be allocated to the projects based on the proportional benefit. If a cost benefits two or more projects or activities in proportions that cannot be determined because of the interrelationship of the work involved, then, notwithstanding paragraph (c) of this section, the costs may be allocated or transferred to benefitted projects on any reasonable documented basis. Where the purchase of equipment or other capital asset is specifically authorized under a federal award, the costs are assignable to the federal award regardless of the use that may be made of the equipment or other capital asset involved when no longer needed for the purpose for which it was originally required. Also see Uniform Guidance §200.310 Insurance coverage through §200.316 Property trust relationship and §200.439 Equipment and other capital expenditures.

**Debit and Credit Card Procedures:**

Any Credit or Debit Card that SILC has will be subject to the following:

*Use of Cards by the Executive Director:*

The Executive Director of SILC is authorized to utilize debit, credit, and store charge cards, subject to an individual item limit of $1,000, for the purchase or payment of allowable costs/expenses related to the normal operation of the programs and services of the SILC. Amounts over $1,000 will be approved prior to the expenditure. This includes but is not limited to postage expense, travel expense, supplies expense, equipment purchase

The Executive Director will retain receipts and other documentation for all card purchases.

*Use of Cards by Other Staff:*

Other management staff may use cards for the purchase or payment of cost/expense related to the normal operation of the programs and services of the SILC with prior approval from the Executive Director subject to a $300 limit. Prior approval may be received in writing, by email, or over the phone. If approval is by phone, the date, time of approval, and type and amount of the expenditure approved will be noted by the Executive Director and made part of the supporting documentation.

As soon as possible after the expenditure, anyone using the cards will produce the original receipt and other documentation related to the expense for internal processing and submission to the Executive Director. The documentation and/or accompanying notes will explain the nature of the item(s) purchased in a way that permits verification that the item is reasonable, necessary, and allowable, and specify the program(s) or function(s) to which it should be allocated.

When not needed for purchasing purposes, all credit cards will be maintained by the Executive Director until the card is needed by other staff.

*Lost or Stolen Cards*

If a debit or credit card is lost or stolen, the person designated with responsibility for the card must report the loss or theft to the Executive Director immediately. The Executive Director will immediately contact the bank to cancel the card and request a different card. The Executive Director will document the circumstances and when the bank was contacted and determine if other steps are needed based upon the circumstances related to the lost or stolen card and the Board will be notified immediately.

*Credit Card Codes and Passwords*

No staff member is allowed to change the original code/password for the debit card that they utilize without permission from the Executive Director.

*Misuse of Credit or Debit Cards*

If staff abuse or misuse a card, the Executive Director will require the staff member to relinquish the card to the Executive Director. The Executive Director will determine if other steps are needed based upon the circumstances related to the misuse of the card, up to and including initiation of civil or criminal proceedings. If the Executive Director abuses or misuses a card, the card must be relinquished to the Board Chair or Treasurer. The Board will determine if other steps are needed based upon the circumstances.

**Bank Statement Reconciliation:**

The Executive Director will review the statement, canceled checks, and deposit tickets for any unusual or questionable items. Afterwards, the Accountant will reconcile the bank statement. Upon completion, the accountant will submit the reconciliation for review of the Executive Director and the Treasurer. Banks statements shall be reconciled in a timely manner.

Accountant shall have access to online banking accounts for review purposes, with restrictions preventing the transfer, distribution, or ability to alter accounts. SILC Treasurer will also have permissions to access accounting system and banking system for review purposes as needed.

**Management Information Systems:**

Time sheets are used to document hours worked, leave used, and holiday hours each pay period. Time sheets are not required to break down an employee’s hours per day if one funding source is covering that employee’s salary. An electronic management information system will be used by each employee to track activates reported on programmatic reporting. All PARs and time sheets will be maintained on file for a period consistent with contract requirements and record retention schedules.

Proper documentation is required for all expenditures. Such documentation shall include an approved purchase order, an invoice, and/or a receipt.

An adequate filing system shall be in place for all financial records. This filing system may change from time to time, depending on changes in the needs of the documentation or technology. The filing system must be organized to such a degree that a new person, totally unfamiliar with the SILC, could understand and locate a specific file within a relatively short period of time. Financial records, along with other key SILC documents, are to be held in a safe, fire-proof, and locked place. The files must include records of services provided, billings, and receivables and must be efficiently and effectively organized for easy retrieval.

The SILC will maintain a computerized accounting system to manage financial and programmatic information. Such computer programs must be held confidentially within the office, must be backed-up regularly for protection, and must be capable of printing documents and reports as needed.

**Bank Account Transfers:**

On occasion, the SILC may have to transfer funds between bank accounts via electronic transfer or check. Such examples may include, but are not limited to, having access to funds for credit/debit card use.

The following will all be maintained as part of the documentation of the transfer:

1. Board authorization utilizing a Bank Transfer Authorization form.
2. Reason and purpose, with amount specified, detailed don the form.
3. Bank accounts impacted by the transfer.
4. Confirmation of the transfer.

**Non-Expendable Property:**

Competitive bidding is conducted on all substantial equipment purchases. Such purchases are for ten thousand dollars ($10,000) or more and three written bids shall be required in advance of any such purchase.

Depreciation is only tracked and recorded for equipment with a cost exceeding $1,000 (see Property, Equipment and Furniture Accounting Policy).

Property or equipment that no longer has any value may be recycled, sent to surplus property, or disposed of providing records are kept and details are included in the inventory.

Vouchers for in-kind contributions are kept (either capital or expendable items). This is particularly important when individuals who make contributions to the SILC or volunteers who contributed their expenses to the SILC report such contributions to the Internal Revenue Service (IRS). The IRS may later seek verification of such in-kind contributions from the SILC.

**Travel:**

Local Travel reimbursement will be in mileage reimbursements after the staff have provided the log of miles traveled for work related purposes. The mileage will be reimbursed at a rate set by the IRS Reimbursement Rate. Council members will be informed annually of the State of Michigan Travel Rules.

Travel outside of the local area can be reimbursed to staff. This includes travel necessary for participation in state/regional committees or task forces, attending workshops, conferences or other trainings, advocacy, development and/or networking activities.

*Reimbursement and Documentation*

Documentation for the cost of and purpose for travel must be submitted for reimbursement. A travel reimbursement request with supporting documentation must be submitted within 30 days of travel.

Reimbursement for approved business use of personal vehicles will be based on rates established by SILC that do not exceed the federal approved rate.

*Per Diem*

Meals for out-of-area travel will be reimbursed at rates that do not exceed the federal per diem rates that are documented on the U.S. General Services Administration Per Diem Rate [www.gsa.gov/travel/plan-book/per-diem-rates](http://www.gsa.gov/travel/plan-book/per-diem-rates) All meal reimbursements will follow the State of Michigan Travel Rules.

All reimbursable travel must be allowable, allocable, reasonable, and necessary to achieve the purposes of the SILC and the involved funding sources, in accordance with federal cost principles and the SILC’s approved budget and written travel policies and procedures. All out of state travel by the Executive Director must be approved by the Board of Directors.

**Property, Equipment and Furniture Accounting Policy:**

The organization capitalizes all acquisitions of property, equipment, and furniture in excess of $1,000.  These assets are carried at cost or, if donated, at the approximate fair value at the date of donation.  Depreciation is provided on the straight-line method over the estimated useful lives of the assets.

**Purchase Thresholds:**

Requirements vary based on the size of the purchase.

Micro purchases of supplies or services are those that do not exceed $10,000

Small purchase requirements apply when purchases are between $10,000 and $25,000

Micro purchases shall be distributed among qualified suppliers but don’t generally require competitive quotations.

Small purchases will be made only after price or rate quotations are obtained from an adequate number of qualified sources. Prices can be obtained from published or online price lists.

Purchases in excess of the Simplified Acquisition Threshold listed above, including services, equipment or supplies, purchases, leased or contracted for require a cost or price. These purchases shall be made only after receiving, whenever possible, quotations from at least three vendors. Selections shall be recommended to the Executive Director for approval with quotations attached. Recommendation and selection shall be based on the following criteria:

* A clear and accurate description of the product or service to be purchased
* Skill and experience of key personnel
* Experience providing products or services to SILC
* Any specific requirements we have included in our solicitation of bids
* Demonstrated commitment to the nonprofit sector

Information received from vendor references

* Commitment to our time deadlines
* Cost
* Woman- or minority-owned business or qualified small business
* Preference for products and services that conserve natural resources and protect the environment, to the extent possible

Construction services shall be procured by sealed bids following formal advertising.

Contracts shall be awarded to the responsible bidder whose bid conforms to all the material terms and conditions of the request for bids and is the lowest in price.

Vendor contracts shall include a written statement that they have not been suspended or debarred from doing business with any federal agency. Alternatively, the Organization shall check the SAM (System for Award Management) vendor database. Davis-Bacon prevailing wage requirements for construction contracts must be met if required by the federal award.

*Exceptions to Competitive Bidding*

Competitive bidding will not be required in certain limited circumstances including:

The item is available only from a single source.

An emergency or urgent need will not permit a delay for competitive selection.

Staff or client health, welfare, or safety does not permit a delay for competitive selection.

After solicitation from a number of sources, competition is deemed to be inadequate.

A written explanation shall be prepared and maintained whenever a normally required competitive selection is not used.

Documentation of the basis for contractor selection shall be retained when competitive bidding is performed. Documentation for why competitive bidding was not done shall be retained.

**Compliance with all Federal and State Laws and Regulations:**

The SILC shall comply with all federal and state laws and regulations regarding its fiscal management. Most notably, the SILC shall follow the specific accounting and program guidelines as detailed in any contract for funding.

**Annual Budget Process:**

The Executive Director and Treasurer of the Board shall prepare an initial budget to present to the applicable board committee and shall develop both a preliminary program and administrative budget for the entire fiscal year. Annually, employee benefit levels may be benchmarked against current state employee benefit levels and adjusted accordingly at the Council’s discretion.

The Executive Director and Treasurer shall prepare and present an annual income and expense budget to the Executive Committee for approval. The budget is reviewed by the Executive Committee and changes, revisions, additions, or subtractions are made, as needed. Once a draft is approved by the Executive Committee, the Executive Director and Treasurer (and/or Council Chair), will enter into budget negotiations with the DSE (and the Bureau for Services for Blind Persons if they receive Title VII Part B funds in that fiscal year). Once the budget is negotiated and approved by the funder, the Executive Director will present the budget to the full Council for approval during the September regular Council business meeting.

The full Board approves the fiscal year budget, including projected income, expenses, and fund balances. The approved budget authorizes the SILC Executive Director to make expenditures according to items projected in the expense side of the budget without additional approval from the Board with a check signed for any items of one thousand dollars or less. The budget is also used for points of comparison in regular, bi-monthly financial statements, ensuring that the Executive Committee members understand the SILC’s financial position in relationship to the planned budget. Financial statements shall be in a format which is consistent with the budget and its categories.

The Executive Committee reviews and revises the annual budget periodically during the fiscal year, making any needed requests for budget revisions of funding sources.

Annually, the Board shall review the budgetary planning process with the Executive Director to make any needed changes in this process.

Once approved, the budget is shared with and explained to the entire staff so they have a clear understanding of the fiscal parameters and restraints under which the SILC and they, as employees, must operate.

**Record Retention Policy**

MiSILC will follow these guidelines for the retention of records but will also comply with any longer retention requirements of funders.

If MiSILC has any active, pending or threatened litigation, audit findings or monitoring findings, records will be retained until all issues are fully resolved as determined by the board of directors.

Financial and programmatic records and supporting documents related to federal funding, compliance or performance shall be retained for a minimum of five years from the date in which the corresponding annual reports are submitted to RSA or HHS.

Paper and electronic records are subject to the same requirements.

This policy will be modified to accommodate any special requirements of funders or regulators.

At the end of the retention time frame, paper and electronic records will be destroyed.

A log of records that are purged and destroyed will be maintained.

|  |  |
| --- | --- |
| **Item** | **Useful life** |
| Accounts payable ledgers and schedules | 5 years |
| Accounts receivable schedules | 5 years |
| Bank reconciliations | 5 years |
| Bank statements | 5 years |
| Checks (cancelled, but see exception below) | 5 years |
| Checks (cancelled for important payments, i.e., taxes, purchases of property, special, contract, etc.) (Checks should be filed with the papers pertaining to the underlying transaction.) | Permanent |
| Contracts, mortgages, notes, and leases: |   |
| Expired | Permanent |
| Still in effect | 5 years |
| Deeds, mortgages, and bills of sale | Permanent |
| Depreciation schedules | Permanent |
| Duplicate deposit slips | 2 Years |
| Employee personnel records (after termination) | 5 years |
| Expense analyses/expense distribution schedules | 7 Years |
| Financial statements: Year-end | Permanent |
| Garnishments | 5 years |
| General ledgers | 5 years |
| Insurance policies (expired) | 3 years |
| Insurance records, current accident reports, claims, policies, etc. | Permanent |
| Vouchers for reimbursement | 5 years |
| Invoices from vendors | 5 years |
| Journals (receipts, disbursements) | 5 years |
| Minute books of directors and stockholders, including bylaws and charter | Permanent |
| Notes receivable ledgers and schedules | 7 Years |
| Payroll records and summaries | 7 Years |
| Personnel records (terminated) | 5 years |
| Property appraisals by outside appraisers | Permanent |
| Property records—including costs, depreciation reserves, end-of year trial balances, depreciation schedules, blueprints, and plans | Permanent |
| Sales records | 5 years |
| Subsidiary ledgers | 5 years |
| Annual filings | Permanent |
| Time sheets/cards/books | 7 Years |
| Vouchers for payments to vendors, employees, etc. (including allowances and reimbursement of employees, officers, etc. for travel and entertainment expenses) | 5 years |
| Withholding tax statements | 7 Years |