



Fiscal Policy

BUDGET IMPLEMENTATION

The Board places the responsibility of administering the budget, once adopted, with the Board President/Executive Director. S/He shall keep the Board informed as to problems or concerns as the budget is being implemented.

The Board President/Executive Director shall be authorized to proceed with making financial commitments, purchases, and other expenditures within limits provided in the budget, limitations stated in Board policies, and within legal authority expressed in State statutes.

An appropriate financial report shall be submitted by the treasurer to the Board at regular meetings to keep members informed as to the status of the budget and overall financial condition of Willow Tree.

If, during the fiscal year, it appears to the Board President/Executive Director that actual revenues are less than estimated revenues, including the available equity upon which the appropriations from the fund were based, the Board President/Executive Director shall present to the Board recommended amendments to the budget that will prevent expenditures from exceeding revenues. Such recommendations shall be in accordance with requirements of the law and provisions of negotiated agreements.

PROJECT BUDGETS

Committees or Projects with their own budget will keep and maintain accurate, complete, and separate Project Budget in accordance with generally accepted accounting principles, showing all Project assets, liabilities, income, and expenditures. The Committee/Project will prepare a project balance sheet and income/expense statement for delivery to the Board President/Executive Director within thirty (30) days of the close of the project. For ongoing projects or committees, the Committee will prepare quarterly and a fiscal year-end Project balance sheet and income/expense statement for delivery to the Board President/Executive Director within thirty (30) days after the close of the period. The Board of Directors through its authorized

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representatives, may inspect any Project records at any reasonable time with the consent of the Committee/Project, which consent will not be unreasonably withheld.

ANTI-FRAUD

This policy is implemented to advise employees about activities which may be fraudulent, illegal or otherwise unethical. Willow Tree Family Center will not tolerate such activities and disciplinary measures will be implemented as appropriate.

Scope

This policy applies to any fraud, or suspected fraud, involving employees as well as consultants, vendors, contractors, outside agencies doing business with employees of such agencies, and any other parties with a business relationship with Willow Tree Family Center.

Policy

Fraud and fraudulent activity is strictly prohibited.

Each employee or agent of Willow Tree Family Center shall be responsible for reporting any observed or suspected fraud or fraudulent activity to the Business Office, the Executive Director or the Board President.

All administrators shall be vigilant for any conduct that may appear to constitute fraud within the areas of their responsibility.

All reporting and investigation shall be done in accordance with the District's Whistleblower's Guideline.

Fraud – Definitions

Fraud is defined as the intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon his/her injury.

The following are examples of prohibited acts:

- A. falsification of any Willow Tree Family Center record with the intent to conceal information to the Willow Tree Family Center 's detriment or the individual's advantage, particularly financial records
- B. forgery of a check, bank draft, wire transfer or any other Willow Tree Family Center

financial document

- C. unauthorized alteration of a financial document or account belonging to the Willow Tree Family Center
- D. misappropriation of funds, supplies or other assets of the Willow Tree Family Center
- E. impropriety in the handling or reporting of money or financial transactions
- F. disclosing confidential and proprietary information to outside parties for personal gain (either directly or indirectly)
- G. asking for or accepting anything of material value from contractors, vendors or persons providing services or materials to the Willow Tree Family Center, except as provided in gift policies
- H. unauthorized destruction, removal, or use of records, furniture, fixtures and/or equipment for personal gain (either directly or indirectly)
- I. misuse of Grant funds for other than their designated purposes

This list is meant to illustrate the types of activities that are prohibited. It is not comprehensive. Other misconduct of a similar nature is similarly prohibited.

Confidentiality

Willow Tree Family Center will maintain confidentiality with regard to the reports of suspected misconduct and the investigation, to the extent consistent with the conduct of an appropriate investigation and its obligations under the Freedom of Information Act. However, absolute confidentiality for reporting witnesses and investigation results cannot be guaranteed.

Except as authorized by the Board President/Executive Director or his/her designee, the reporting witness and others interviewed are not to discuss the allegations or investigation with other Willow Tree Family Center employees or officials, vendors or contractors. Such discussions may interfere with the investigation. Further, because of the nature of the alleged misconduct, unsubstantiated allegations which are not privileged could harm an innocent individual's reputation and result in potential civil liability.

Non-Retaliation

Those who, in good faith, report suspected fraudulent activity will not be subject to any retaliation as a result of bringing the suspected misconduct forward. They will be subject to protection of the District's Whistleblower's Policy.

USE OF CREDIT/DEBIT CARDS

The Board of Education recognizes the convenience and efficiency afforded by the use of District credit and/or debit cards. Such cards, however, shall not be used in order to circumvent the general purchasing procedures established by State law and Board policy. As such, employees are required to abide by the following guidelines when using a District credit/debit card.

- A. All credit/debit cards issued to and in the name of the Willow Tree Family Center shall be supervised by the Board President/Executive Director with the assistance of the Treasurer.
- B. Board member(s) and administrative staff may use credit/debit cards only in connection with Board-approved or program-related activities and in accordance with established, pre-approved single purchase limits, monthly spending limits, funds availability, and the appropriation of a particular building or department budget, or grant provision. The Board Member who is chair of a specific committee may authorize payments for the purpose of a committee event that does not exceed 2/3 of the profit made from the event. Any purchases that leave less than 1/3 of the profit from the event OR require funding from the general budget must be approved by the Board President/Executive Director.
- C. Subject to the discretion of the Board and the approval of the Board President/Executive Director, credit/debit cards may be used for eligible goods and services including:
 1. transportation reservations and expenses;
 2. conference registrations;
 3. hotel reservation guarantees and expenses;
 4. reasonable meal expenses (both in-town and out-of-town), including a maximum gratuity of twenty percent (20%), but excluding alcoholic beverages, since the purchase of such beverages clearly fails to serve a valid and proper public purpose;

5. purchases from vendors who do not accept purchase orders or vouchers, with prior approval from the Board President/Executive Director;
 6. other purchases approved by the Board President/Executive Director on a case-by-case basis.
- D. Credit/Debit cards shall not be used for personal purchases or expenditures not allowed under this guideline. In particular, credit/debit cards shall not be used for expenses that are not incurred in connection with Board-approved or program-related activities, are not for the benefit of the Organization, and do not serve a valid and proper public purpose. Use of credit/debit cards in an unauthorized or illegal manner may result in revocation of credit/debit card privileges, disciplinary action and/or, where appropriate, may require the user to pay any and all inappropriate charges, including finance charges and interest assessed in connection with the purchase.
- E. Employees requiring the use of credit/debit cards shall request (in writing) such cards from the Board President/Executive Director.
- F. Each request for use of a credit/debit card shall contain the following:
1. date needed
 2. date to be returned
 3. purpose
 4. authorization
- G. The Organization is a nonprofit political subdivision of the State of Michigan. Tax exemption forms shall be utilized and are available at the Willow Tree Family Center's Office.

- H. When using a credit/debit card, employees shall:
1. Inform merchant that the purchase is for "official Willow Tree Family Center business" and is not subject to State or local sales tax. However, if the merchant fails to waive the tax, the employee shall pay it. For large purchases where the merchant refuses to waive the tax, the employee shall present a tax exemption form.
 2. Maintain credit/debit cards in a secure fashion and prevent unauthorized charges to the account.
 3. Maintain sufficient documentation of all purchases, including, but not limited to, charge receipts, original cash register slip or other detailed receipt, and invoices.
 4. Provide documentation of all purchases to the Board President/Executive Director or Treasurer in a timely manner to ensure prompt payment.
 5. Immediately notify the Board President/Executive Director if the card is lost or stolen.
 6. Refrain from allowing anyone else to use the credit/debit card or account number.
 7. Refrain from splitting the costs of an invoice or purchase in order to circumvent the credit/debit card process and established, pre-approved single purchase limits, monthly spending limits, and/or funds availability.
 8. When using the card for over-the-counter purchases:
 - a. Identify the purchase needed and determine funds availability.

- b. Determine if the purchase amount is within his/her pre-approved single purchase limit. If yes, proceed to the next step. If no, check with his/her supervisor for details on how to proceed.
 - c. Provide the merchant with the card and inform the merchant that the purchase is for "official Willow Tree Family Center business" and is not subject to State or local sales tax. If the merchant refuses to waive the sales tax, the employee shall pay it.
 - d. Retain receipts, including cash register receipt and credit/debit card charge slip.
 - e. Give receipt and supporting documentation to the Board President/Executive Director.
- l. When using a card for telephone orders:
- 1. Identify the purchase needed and determine funds availability.
 - 2. Determine if the purchase amount is within his/her pre-approved single purchase limit. If yes, proceed to the next step. If no, check with his/her supervisor for details on how to proceed.
 - 3. Contact the merchant and place the order.
 - 4. Provide the merchant with the card and inform the merchant that the purchase is for "official Willow Tree Family Center business" and is not subject to State or local sales tax. If the merchant refuses to waive the sales tax, the employee shall pay it.

5. Provide merchant with all pertinent information, including the name of the Cardholder, shipping address, etc.
6. Upon arrival of merchandise, inspect and verify order accuracy, quality, and price and retain shipping documents and receipts received with the merchandise.
7. Give all related documents to the Board President/Executive Director or Treasurer, but retain copies of invoices and receipts for two (2) years in related program files.

J. When using a card for Internet orders:

1. Identify the purchase needed and determine funds availability.
2. Determine if the purchase amount is within his/her pre-approved single purchase limit. If yes, proceed to the next step. If no, check with his/her supervisor for details on how to proceed.
3. Locate the merchant's website and place the order.
4. In purchasing goods and/or services, enter card number and expiration date only if the site indicates it is using secure software for collection of data. Indicate that the purchase is tax exempt if the website does not automatically recognize that the purchase is tax exempt.
5. Provide all pertinent information to supplier, including the name of the Cardholder, shipping address, etc. Note: employee shall print out the electronic confirmation and include it with the transaction documentation, particularly when downloading a product from the internet.
6. Upon arrival of merchandise, employee(s) shall inspect and

verify order accuracy, quality, and price and retain shipping documentation received with merchandise.

7. Give all related documents to the Board President/Executive Director or Treasurer, but retain copies of the order and confirmation for two (2) years in related program files.
- K. After use, District credit/debit cards are to be returned to the Board President/Executive Director along with appropriate receipt copies of all charges within five (5) business days upon completion of any approved use.
1. Employees, when possible, shall include an original cash register slip or other detailed receipt (i.e., a receipt from a restaurant itemizing all purchases made), in addition to the receipt copy of all charges. In addition, employees shall include, shipping documents and receipts received with the merchandise.
 2. Employees shall specify on the back of the receipt the following information:
 - a. a brief description of the purpose of the purchase
 - b. the names and affiliation of each attendee if a purchase is made on behalf of a group of individuals
- L. Failure to return credit/debit cards and/or receipts within the above-referenced time period may result in the suspension of credit/debit card privileges and/or charges being deemed unrelated or unsubstantiated.
1. Employees shall be responsible for any and all unrelated or unsubstantiated purchases and shall be required to make full reimbursement to Willow Tree Family Center within thirty (30) business days.

2. If an employee(s) reimburses Willow Tree Family Center for an unsupported purchase, it shall be documented in the monthly credit/debit card reconciliation.
- M. The Treasurer will keep a record/activity log of all credit/debit card uses and review and approve all purchases to verify that the expenses are incurred in connection with Board-approved or program-related activities, are for the benefit of the Organization, and serve a valid and proper public purpose prior to disbursing public funds for payment of such expenses.
 - N. Upon receipt of the appropriate documentation, credit/debit card expenditures will be paid through the Business Office.
 - O. The Treasurer will monitor the credit/debit card account(s) and reconcile all credit/debit card accounts on a monthly basis.
 - P. If the employee is terminated or resigns, then s/he must return the credit/debit card and remain responsible for any inappropriate use.

PUBLIC GIFTS TO THE ORGANIZATION

To be acceptable, a gift or donation must have a purpose consistent with those of Willow Tree Family Center, be offered by a donor acceptable to the Board, and become Willow Tree Family Center property.

In addition, a gift or donation must not:

- A. begin a program which the Board would be unwilling to take over when gift and grant funds are exhausted;
- B. bring undesirable or hidden costs to Willow Tree Family Center;
- C. place restrictions on the Willow Tree Family Center;
- D. be inappropriate or harmful to the programs of the Willow Tree Family Center;
- E. imply endorsement of any business or product;
- F. be in conflict with any provision of the General School Laws or public laws.

A letter of appreciation, signed by the Board President/Treasurer shall be sent to the donor, including the estimated value of the gift.

GIFTS, GRANTS, AND BEQUESTS

The Board is duly appreciative of public interest in and good will toward Willow Tree Family Center manifested through gifts, grants, and bequests. The Board reserves the right, however, to specify the manner in which gifts are made; to define the type of gift, grant, or bequest which it considers appropriate; and to reject those which it deems inappropriate or unsuitable. If accepted, the Board will attempt to carry out the wishes of the donor.

All accepted gifts, grants, or bequests shall be acknowledged by the Board.

Gifts, grants, and bequests shall become the property of the Board and will be subject to use by Willow Tree Family Center as determined by the policies and administrative guidelines applying to all properties, equipment, materials, and funds owned by the Board.

Any equipment purchased for a program for use at Willow Tree Family Center or at a Willow Tree Family Center-related event shall be submitted to the Board, prior to purchase, so it can determine if Willow Tree Family Center would incur any liability by its use.

The Board reserves the right to not accept such liability and thus deny the use of the equipment by volunteers or employees.

GRANT FUNDS

It is the objective of the Board to provide equal opportunities for all programs within the Organization. Government agencies, as well as foundations, businesses, and individuals, periodically offer both human and material resources to the Organization that would benefit the programs. Therefore, it is the intent of the Board to consider grant proposals and applications for their potential to enhance opportunities, the environment, and the benefit of each program participant.

The Board President/Executive Director shall review new Federal education legislation and prepare proposals for programs s/he deems would be of aid to the participants of Willow Tree Family Center. The Board President/Executive Director shall approve each such proposal prior to its submission, and the Board shall be informed of (and approve if liability is involved) all grants resulting from such proposals.

Grant Proposal Development

- A. All grant proposals must support at least one (1) Willow Tree Family Center goal or priority.
- B. For projects where grant funds will not cover the entire cost of project implementation, additional fund sources must be identified, documented, and approved during the internal review process.

Grant Proposal Internal Review

Each grant proposal shall be reviewed and approved by the Board President/Executive Director prior to submission to the funding source.

Grant Administration

- A. The administration of grants will adhere to all applicable Federal, State, and grantor rules and regulations as well as Willow Tree Family Center policies and administrative guidelines.
- B. The Board President/Executive Director (solely or through the assistance of appointed personnel) is responsible for the efficient and effective administration of grant awards through the application of sound management practices.
- C. The Board President/Executive Director (solely or through the assistance of appointed personnel) is responsible for administering grant funds in a manner consistent with underlying agreements, program objectives, and the terms and conditions of the grant award.
- D. The Organization, in recognition of its unique combination of staff, facilities, and experience, shall employ the organizational and management strategies necessary to assure proper and efficient administration of grant awards.
- E. All Federal funds received by the Organization will be used in accordance with the applicable Federal law. The Board President/Executive Director (solely or through the assistance of appointed personnel) shall require that each draw of Federal

monies is as close as administratively feasible to the related program expenditures and that, when restricted, such monies are used to supplement programs and funding and not to supplant or replace existing programming or current funding.

- F. The Board President/Executive Director (solely or through the assistance of appointed personnel) is authorized to sign related documents for grant administration, including documents required for submittal of grant proposals.
- G. Employee positions established through the use of grant funding shall terminate if and when the related grant funding ceases.
- H. Program reports including but not limited to audit, site visits and final reports shall be submitted to the Board President/Executive Director for review and distribution to appropriate parties.

Fiscal Management

The financial management of grant funds shall be in compliance with all applicable Federal, State, and grantor rules, regulations, and assurances as well as Willow Tree Family Center policies and administrative guidelines.

The Board President/Executive Director (solely or through the assistance of appointed personnel) shall provide for the following:

- A. Accurate, current, and complete disclosure of the financial results of each Federally-sponsored project in accordance with the reporting requirements of the grant.
- B. Effective control over and accountability for all funds, property, and other assets in their use solely for authorized purposes.
- C. Recordkeeping and written procedures as may be required by Federal, State, and grantor rules and regulations pertaining to the grant award and accountability, including such provisions as may be applicable as cost sharing and matching requirements, budget revisions, audit requirements, reasonableness, allocability, and

allowability of costs, procurement, property management and disposition, and payment/repayment requirements.

- D. Insurance coverage for real property and equipment, if applicable, equivalent to such property owned by Willow Tree Family Center.