

# **PUTNAM COUNTY CHAMBER OF COMMERCE POLICY FORMATION AND DEVELOPMENT**

## *Preface*

These statements will be the Chamber's reference for financial management, for courses of action, and general operations. The Board of Directors shall have the responsibility to determine the eligibility and suitability of policy proposals.

## **CHAMBER POLICY DEVELOPMENT**

Official Chamber policy is developed through the committee system and Board of Directors. Most policy statements are developed by Chamber committees, after in-depth study. Following a committee recommendation, proposed policies are reviewed by the Executive Committee when approved, are forwarded to the Board of Directors, which has the final responsibility for determining and adopting chamber policy.

No Chamber member, committee member, committee chairman, officer, Board member or Chamber management person has the authority to speak for the Chamber, nor represent the Chamber on a policy issue, unless the Board (or Executive Committee acting for the Board in an emergency situation) has adopted a policy on the matter.

Policy statements are to be reviewed continually to ensure compatibility with the Chamber's overall position. If it appears a policy statement requires revision or updating, committees have the responsibility for recommending appropriate changes to the Executive Committee.

The following guidelines have been adopted for the development of Chamber policy. These guidelines may be used by committees, the Executive Committee or the Board of Directors in reaching policy decisions.

1. What is the economic impact on the community?
2. What is the economic impact on the business and professional community?  
(if different from above)
3. What is the environmental impact on the community?
4. How does the issue relate to community goals?
5. How does the issue relate to Chamber goals?
6. Is the final policy recommended consistent with other Chamber policies?

## **Basic Policy Statement**

**The Putnam County Chamber of Commerce (Chamber) is committed to responsible financial management. The entire organization including the Board of Directors, Executive Committee, Committees, President and staff will work together to make certain that all financial matters of the organization are addressed with care, integrity, and in the best interest of the Chamber.**

The policies and procedures contained in this section are designed to:

1. Protect the assets of the Chamber;
2. Ensure the maintenance of accurate records of the Chamber's financial activities;
3. Provide a framework of operating standards and behavioral expectations;
4. Ensure compliance with federal, state, and local legal and reporting requirements.
5. Exceptions to written policies may only be made with the prior approval of the Executive Committee. Changes or amendments to these policies may be approved by the Executive Committee or Board of Directors at any time. A complete review of the Financial Policies and Procedures Manual shall be conducted annually in June.
6. The President has the responsibility for administering these policies and ensuring compliance with procedures that have been approved by the Board of Directors. The President shall have primary responsibility for ensuring that proper Financial Management procedures are maintained and that the policies of the Board are carried out. Every Director and every Administrator with financial related responsibility is expected to be familiar with and operate within the parameters of these policies and guidelines.

## **A. Line of Authority**

1. The Chamber Board of Directors is responsible for the formulation of its policies, the direction of its programs and the control of its property and finances. All statements of policy shall originate with the Board of Directors. Only the Board of Directors, or the Executive Committee acting on their behalf, can authorize the President to incur any debt or pledge any assets as collateral on behalf of the Chamber for any purpose.
2. The Executive Committee has the authority to order disbursements for necessary expenses and may grant to any committee a reasonable amount of money for special work provided said amount does not exceed the approved budgeted allowance for such work. Recommendations for expenditures outside the budget shall be submitted to the Executive Committee whose recommendations shall be submitted to the Board.
3. The Treasurer presents the monthly and annual financial reports to the Board, oversees the preparation and presentation of the annual budget, and is a member of the Finance Committee.
4. The Finance Committee is responsible for oversight and monitoring the financial health, fiscal policies and investments of the Chamber including assistance and consultation with the President on matters of audit, budget, and performance of stated objectives. The Finance Committee will be comprised of the Treasurer, Chairman of the Board, Chair Elect and President. They shall at least annually review the Chamber Financial Policies and Procedures and Investment Policy Statements and made recommendations to the Board for approval.
5. The President has the authority to make spending decisions within the parameters of the approved budget, enter into contractual agreements within board designated parameters, make decisions regarding the disposition of investments within the parameters of the investment policy; make fixed asset purchase decisions and make decisions regarding the allocation of expenses. The President does not have the authority to make major purchases outside the scope of the Chamber operational needs per the budget.
6. The President, at his/her discretion, has the authority to give employee bonuses based on performance, salary and length of service or any combination of the three.
7. The President, at his/her discretion, has the authority to approve employee loans up to the equivalent of that employee monthly's wage. Employee loan requests for any amount over that would need approval of the Executive Committee.

## **B. Investment Policy**

1. Money paid to the Chamber shall be placed in a general operation fund. Excess /Reserve funds will be placed in an interest-bearing account, established at local financial institution.
2. Reserve Policy. The Chamber of Commerce recognizes that it relies on revenue sources which may be variable beyond its control, but provides services that must be consistently delivered. In order to ensure continuity of the Chamber's function in all departments, the Chamber will make every effort to maintain a reserve. The reserve shall be reflected on the Chamber's balance sheet as a long-term asset.
3. Investment policy is designed to create the framework for a well-diversified asset mix that can be expected to generate acceptable long-term returns at a level of risk suitable for the Chamber.
4. The Finance Committee of the Chamber shall present to the Board of Directors of the Chamber of Commerce, at least annually, a report that lists all assets held, values for each asset and all transactions affecting assets, including additions and withdrawals. In conjunction with the report, the Finance Committee shall also annually present to the Chamber Board its review of the investment Policy and any recommendations for modification.

### **C. Financial Controls and Operating Procedures**

1. The President is responsible for overseeing the bookkeeping and banking of the Chamber's financial activities and for the timely and accurate reporting of these transactions to the designated responsible parties.
2. Signatories according to Chamber by-laws are: President and one other corporate officer or any two corporate officers. All checks over \$750 require the signature of the President and one other officer or two corporate officers and all checks less than \$750 can be signed with one signature, either the President or one officer. Also the Treasurer will review the bank statements and reconciliations each month for all transactions.
3. The President may initiate fund transfers only with the treasurer or other authorized account signatory.
4. To the extent possible, given available personnel, steps will be taken to separate employee duties so that no one individual has access to both physical assets and the related accounting records, or to all phases of a transaction.
5. The Finance Committee will supervise the audit and review the audit report and the annual income tax return (Form 990) prior to the Board of Directors' report.
6. Non budgeted expenses are not permitted except as expressly approved by the President, and, as necessary, by the Executive Committee.
7. Contracts between The Chamber and any vendor may be signed only by the President.
8. No debt or obligation may be created by any employee or agent for the organization without the expressed written authorization from the President.

### **D. Financial Reporting General Guidelines**

Accounts will be maintained and reports prepared on an accrual basis of accounting, as approved by the Board of Directors.

#### **Reporting**

1. Financial reporting period is Calendar Year.
2. An annual report of the review or audit will be made to the Board of Directors.
3. Annual budgets are prepared by the President and Treasurer with the Finance Committee in consultation. The Board of Directors will approve the annual budget no later than December each year.
4. Monthly Financial Reports including budget variances are presented by the Treasurer to the Executive Committee and Board of Directors.

#### **Internal Controls and Confidentiality**

1. The President is responsible for maintaining a system of internal controls adequate to safeguard Chamber assets.
2. The Chamber shall safeguard the privacy of financial records pertaining to its staff by assuring that only the President and Bookkeeper have access to payroll information.
3. The Chamber shall maintain the security of any passwords for online banking in a secure location accessible only to the President and Bookkeeper.
4. The Chamber shall safeguard the security of member credit card information by blacking out credit card detail from membership applications and other documents. The Chamber does not keep member credit cards on file.
5. The independent auditor will have access to all detailed general ledger reports and will include any areas of concern in the annual report to the Finance Committee.
6. Bank statements are promptly reconciled on a monthly basis. Any discrepancies are immediately reported to the President.

7. Chamber financial records including bank statements, tax filings, financial reports, and invoices are retained in accordance with the Records Retention Policy in a safe and secure area. Audits are indefinitely retained.
8. All member and financial data shall be backed up electronically on a regular basis and stored in an offsite secure location.
9. Chamber members' information will not be sold or distributed electronically. The Chamber does sell member addresses on labels for one-time usage by contract.

### **E. Financial Procedures**

The Chamber will bid out its financial services to all Chamber member financial institutions and select the most responsive to Chamber needs. Every two years will be a review process for possible extension, re-bidding and accepting proposals. The Chamber could rebid if institution changed any part of the account services, institution drops their membership, or if the Chamber is not happy with the services provided.

### **Cash Receipts Procedure:**

The following procedure applies to any incoming cash/checks received by the Chamber. These monies include, but are not limited to: membership dues, contributions, and event payments, sponsorship payments and miscellaneous invoices. The responsibility for controlling cash receipts and their subsequent deposits is a shared responsibility of the administrative staff including the President.

1. The person opening the mail does the following: all monies received are given to the President who records in the daily log and then gives to the bookkeeper who stamps "for deposit only" and posts the payments to the member records. The Bookkeeper creates a bank deposit slip.
2. The President does the following: receives the unopened bank statement and does a month end comparison of the deposits made and checks paid, signs and dates the statement and returns to the Bookkeeper for reconciliation.
3. The President does a comparison of the check log to the general ledger on a weekly basis.
4. Bank deposits are made by the President or the Bookkeeper.
5. The bank deposit receipt is filed with The Chamber's copy of the deposit slip.
6. The Chamber has an auto debit system to provide its members with the opportunity to pay dues or join by auto debit. This service will have an \$8 fee if used quarterly or a \$24 fee is used monthly. These fees are subject to change by Executive Committee approval.

### **Cash Receipts at Events**

1. If cash is needed at an event, the staff person responsible for the event must request a petty cash check from the President no later than seven days prior to the event. The staff person needs to provide the cash breakdown needed to the President so the proper change is available at the event.
2. The event staff is responsible for manning the payment table during the event. There must be a staff person handling the payments or supervising volunteers *at all times*.
3. After the event, it is the event staff person's responsibility to count the payments and beginning cash bank with another staff person/volunteer as witness initialing the total and maintaining the security of the payments received until returned to the President's office.
4. If credit card payments are to be accepted at an event, Chamber staff is responsible for the accuracy of the number, expiration date, security code, telephone number and billing statement zip code. This information is to be secured until the Bookkeeper can process the payment and then the credit card numbers are shredded.

**Cash Disbursement Procedure:**

1. Invoices, receipts and expense reports are received by the President, who checks that it is a budgeted item, codes it for payment to its proper account. Each invoice is stamped with an approval code, date and authorizing signature line.
2. Completed and approved invoices are entered in the Accounts Payable system. Checks are prepared and sent to the President for signature.
3. All checks over \$750 require the signature of the President and one other officer or two corporate officers and all checks less than \$750 can be signed with one signature, either the President or one officer. Any unusual or questioned items are resolved prior to signature or, if unresolved, are taken to the Executive Committee for resolution.
4. Checks are given to the Bookkeeper for disbursement. They are then filed.

**Payroll Procedures:**

1. Timesheets for hourly employees are signed by employees and submitted to the President for approval.
2. Commission sheets are prepared and signed by the staff then submitted for review and approval to the President.
3. Payroll checks and payroll taxes are prepared, issued electronically through direct deposit, personal distribution and/or mail.
4. Upon completion of each cycle, all journal entries are posted to the General Ledger.
5. Payroll taxes are deposited within three business days of the effective date of payroll using the IRS' EFTPS system.
6. Quarterly tax returns are prepared and submitted on a timely basis.

**Invoice Payments and Employee Expenses:**

1. Checks as a general rule are written twice a month in the weeks alternating with payroll. Invoices should be submitted as soon after receiving them as possible, but not later than seven working days in advance of expected payment. Only the President may approve invoices for payment.
2. Employee expense reimbursements are to be listed on the expense forms. Any expenditure for meals, toll and other cash must be accompanied by a receipt. Mileage is to be noted at the time it is accumulated. Expense forms should be submitted monthly. Expenses will be reimbursed every monthly unless special approval is obtained from the President. These forms must be submitted to the president seven working days in advance of expected payment.
3. No employee should ever promise a vendor that payment will be made upon delivery or within one or two days. Vendors need to be advised that The Chamber has a regular payment schedule. Most invoices will be paid within 14 days of receipt by the President.
4. The Chamber seeks to maintain the highest possible credit standards by setting the example in prompt payment of its obligations. All bills, invoices, or shipping documents will be delivered promptly to the President for approval and payment.

**Committee Project Money**

If a major project or special situations occur during the year that have not been anticipated and require an expenditure in excess of \$500.00 the President may elect to allocate seed monies from The Chamber account in anticipation of it's being repaid by the committee through some fund raising effort, or present it to the Board of Directors for their consideration as an additional operating expense.

## **Purchasing Procedure**

1. Staff is responsible for all purchases made by volunteers, committees, task forces, etc. as pertinent to the approved budget. Non-staff members (i.e. volunteers) making purchases should submit the receipt to the assigned staff person for approval. The staff person must obtain prior approval from the President to ascertain that the purchase is consistent with the objective and that they have determined that the best price available has been obtained; and the purchase is being made from a member of The Chamber in accordance with the Vendor Policy. The volunteer will then be reimbursed directly for the purchase.
2. Vendor Policy: It shall be the policy of The Putnam County Chamber of Commerce to purchase its supplies, equipment and services only from Chamber members in good standing. Exceptions to this policy would be if the Chamber has no member within the category, or if the cost savings realized by using a non-member exceed 20 percent. In such cases, non-members would be asked to join the Chamber in exchange for receiving the business. It shall also be the policy of the Chamber to rotate vendors for other services whenever possible in order to patronize a broader cross-section of membership. The Chamber reserves the right to contract with any Chamber member for goods and services as long as all specifications are met.
3. Ordering: All office supplies are ordered by the Bookkeeper with approval from the President. A list of desired items should be turned into that office. Any item not in the monthly budget must have a written explanation. Computer supplies and other vendor services are ordered by the President.

## **E. Disaster Recovery**

Existing policies and procedures must be reviewed annually to insure that plans and provisions for all financial records to be adequately safeguarded during any period of natural disaster, access to financial during any extended period of recovery is predetermined, and permanent records are retained in such a manner providing protection in the best possible method so as not to hamper ongoing and future operations.

**F. Conflict Of Interest Policy.** The Putnam County Chamber of Commerce has established policy which: (1) defines conflicts of interest; (2) identifies classes of individuals within the Organization covered by this policy; (3) facilitates disclosure of information that may help identify conflicts of interest; and (4) specifies procedures to be followed in managing conflicts of interest. (Adopted December 18, 2008)

**G. Mileage Reimbursement Policy.** The Putnam County Chamber of Commerce shall tie mileage reimbursement to the current IRS reimbursement amount. (Adopted January 8, 2007)

**H. Whistleblower Policy:** The Putnam County Chamber of Commerce has established a policy that (1) encourages staff and volunteers to come forward with credible information on illegal practices or serious violations of adopted policies of the Organization; (2) specifies that the Organization will protect the person from retaliation; and (3) identifies where such information can be reported. (Adopted December 18, 2008)

**I. Political Policy.** The Chamber will not endorse any local candidates or engage in local political activities of support. The Chamber will often be involved in political issues that affect business at the local, state and federal level.

**J. Affinity Programs/Endorsements.** The Chamber will not participate in affinity programs using the chamber name to sell other company's products or services. Affinity programs oftentimes offer percentages of revenue paid back to the Chamber for their endorsement and the Chamber will not accept revenue nor participate. Our policy is to refer all Chamber members equally.

### **K. Records Retention**

Document retention is vital to the efficient operation of the Chamber. Accordingly, all records shall be retained according to the schedules listed below. All retention requirements shall be treated as minimum retention periods. Retention for longer periods may be authorized by the President if there is reason to believe that a record may be required beyond the minimum retention period for the efficient operation of the Chamber.

#### **INSTITUTIONAL AND LEGAL RECORDS**

Articles of Incorporation, Bylaws, Minutes of Executive Committee Meetings, Minutes of Board Meetings, Deeds & Titles, State Qualification of Doing Business (Permanent)

Leases (while active + 6 years)

#### **FEDERAL TAX RECORDS**

Form 990, IRS Exemption Application & Determination Letter, State Tax Exemptions (Permanent)

#### **ACCOUNTING & FINANCIAL RECORDS**

Accounts Receivable and Subsidiary ledgers, Uncollected Accounts, Accounts Payable and Subsidiary ledgers, 1099 and other federal forms, Check Registers, Description of Accounting System (10 Years)

General Ledgers & Operating Ledgers, Program Annual Financial Reports (while active + 9 years)

Annual Financial Statements & Audit Reports (Permanent)

#### **LITIGATION RECORDS**

Claims, Court Documents & Records, (while active + 9 years)

#### **INSURANCE RECORDS**

Property & Liability Policies, Insurance Claims Documentation (while active + 12 years)

#### **BANK RECORDS**

Bank Statements, Bank Reconciliation's & Support, (7 years)

#### **PERSONNEL FILES**

Personnel Files including: I-9 records, applications & resumes, performance Evaluations, Personnel Action Forms, cobra notice, proprietary agreement etc. Benefit Plans (while active + 6 years)

EEO Records While active + 3 years

Application of non-selected Candidates 2 years

#### **ALL OTHER COMMUNICATIONS AND RECORDS NOT IDENTIFIED IN THIS LISTING**

The terms "records" and "record retention" shall include hard paper copy, computer files, disks, digitized copies, and other electronic media as used in the operations of the Chamber. Outside service providers may also be used for retention of certain records as applicable. Document Destruction provisions of the Sarbanes-Oxley Act make it a crime for a nonprofit organization to destroy, alter, cover up, or falsify (or to persuade someone else to do so), a document to prevent its use in an official proceeding. Any individual with knowledge of pending litigation, a pending investigation or other inquiry shall immediately inform the President and the disposal of any relevant records shall cease immediately.

Reviewed and Accepted by:

Adopted by the Putnam County Chamber of Commerce Board of Directors

Date: October 17, 2011, amended August 17, 2015