

Internal Controls

Procedures for FAVHR Operations

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Foundation for Advancing Veterans' Health Research, Inc.
PROCEDURES & INTERNAL CONTROLS

CONTENTS

Section	Topic	Page
Section 1	INTERNAL CONTROLS	
	Mail Procedures	2
	Accrued Revenues.....	2
	Receipt of Revenue.....	2
	Purchase Requests	3
	Disbursements.....	4
	Subject Payment	6
	Payroll.....	7
	Voided Checks.....	8
	Banking.....	8
	Fixed Assets.....	9
Section 2	BOARD CONTROLS	
	Documentation of Board Actions.....	11
	Audits.....	11
	Budgets.....	11
	Financial Reporting.....	12
	Review of IRS 990.....	12
	Document Disclosure to Public.....	12

Foundation for Advancing Veterans' Health Research, Inc.
PROCEDURES & INTERNAL CONTROLS

<u>SECTION 1</u>	<u>INTERNAL CONTROLS</u>
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(Financial procedures established to prevent fraud)

OVERVIEW

- The safeguarding of assets and the reliability of financial records are the primary objectives of the internal controls.
- Tasks will be alternated as much as possible considering limited number of employees to ensure segregation of financial duties to the extent practical in a small organization.
- Organization staff incorporate auditor suggestions and attend available fraud training in an effort to continually seek improvement in its internal controls.
- New board members and Executive Directors take internal controls training. The Foundation Office maintains training certifications.
- The following procedures are designed to prevent fraud.

MAIL PROCEDURES

- Executive Director collects mail from PO Box
- Executive Director sorts mail separating checks and invoices. Invoices are immediately provided to the Bookkeeper for processing
- Checks are processed via the "Revenue" description below

ACCRUED REVENUE

- **Patient Visits**
 - Coordinators supply Administrative Office with patient visit data for the previous month.
 - Accountant or Clinical Trials Manager reviews patient visits in Clinical Trials Management System and records accrued revenues as invoices in QuickBooks

1.

RECEIPT OF REVENUE

- **Mailed Revenue / Physical Checks:**
 - Executive Director Picks up mail from the Post Office; opens all post office mail
 - Executive Director Receives and opens all mail sent through the street address/PO Box. (If the sponsor sends check directly to investigator, they are directed to turn in to Executive Director.) Separates out the payments.
 - Executive Director Records checks received in the Checks Received Log, recording date, payer, check date, check number, amount, and receiving program

Foundation for Advancing Veterans' Health Research, Inc.
PROCEDURES & INTERNAL CONTROLS

- Executive Director Stamps back of original check with endorsement stamp that includes full name of foundation, account number, and "For Deposit Only."
- Executive Director Stamps attached documentation indicating receiving account, and indirect costs to be charged, and the invoice # the check is to be received against.
- Executive Director Reconciles study check payments against logged patient visits in Clinical Trial Management System
- Executive Director provides original Check and associated documentation to Bookkeeper for deposit
- Bookkeeper prepares deposit and passes copy of check with supporting documentation to the Accountant to deposit in the Accounting System
- Accountant enters deposit into Accounting system per allocation provided by Executive Director. Inputs receipts into accounting system, crediting individual investigator accounts and transferring any charges as required (e.g., overhead charge, human research charge)
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- **Deposit Preparation:**
 - Bookkeeper attempts to deposit checks the same day as received. If not possible, Bookkeeper keeps endorsed checks in locked cabinet until deposit can be mailed or hand carried to the bank.
 - Makes copy of check while any stub is still attached
 - Prepares any required acknowledgment letters for Executive Director signature (including IRS donation information as required).
 - Prepares an Excel deposit document (which also identifies account), listing all checks received; all checks are deposited, no checks are held pending inquiries
 - Makes copy of deposit document to attach to each check file copy
 - Files copy of check, attached to original documentation, in investigator account file and CRADA file if applicable
 - Attaches original checks to deposit document and places in Frost Bank investment account envelope
 - Provides Executive Director copy of deposit list and the Frost deposit envelope
 - Maintains copy of deposit list for comparison with deposit receipt and statement reconciliation
 - Bookkeeper mails check deposit to Bank
- **EFT Deposits**
 - Sponsors may opt to deliver funds via EFT deposit.
 - Bookkeeper runs weekly report from Bank system to record all EFT deposits from prior week.
 - Report is provided to Clinical Trials Manager/Executive Director to reconcile payment with recorded subject visits/invoiceable costs
 - Payment reconciliation confirms all subject visits have been recorded in the Clinical Trials Management System and are assigned to an associated invoice entered into the accounting system.
 - Payment reconciliation report containing payment allocation by accounting system invoice number is provided to Accountant for "Deposit of funds" inside the Accounting system

PURCHASE REQUESTS

- Purchase Requests are submitted to the Bookkeeper for processing
- Bookkeeper verifies request is complete and all required information is provided. If information is missing, Bookkeeper follows up with study staff to assist in completion of paperwork. Bookkeeper ensures investigator signs orders the investigator has authorized a specific individual(s) authority to place orders. Orders totaling over \$1000

Foundation for Advancing Veterans' Health Research, Inc.
PROCEDURES & INTERNAL CONTROLS

require Investigator signature and orders over \$20,000 or single items/services over \$5,000 have 3 bids or a justification for sole source

- Bookkeeper provides request to Executive Director (or Grants Manager if federal funds) for approval
- If complete, the bookkeeper places the order using the standard method for the company involved – phone, fax, email, online.
- Bookkeeper annotates purchase request to indicate changed information from vendor – change in Item number, sizes, cost, shipping costs; person contacted, projected delivery date
- If there is a substantial change from what investigator indicated, investigator is contacted to confirm that order is wanted under the available conditions (Grant Administrator also approves changes to purchases funded by federal Institutions)
- At time of purchase confirmation from Vendor, the Bookkeeper will enter payable for orders placed into accounting system. If necessary adjustments for any variation will be made in the following month.
- Bookkeeper records Program ID, Vendor name, Invoice Number, and other identifiable information as part of Memo for all payables as part of entry into accounting system.
- Bookkeeper files purchase requests until invoice arrives for payment. Request is provided as supporting documentation for payment of invoice.
- Bookkeeper runs an “Unpaid Bills Detail” to review the accuracy of the entries
- The bookkeeper maintains a Purchase Order Log
 - Purchase Orders are pre-numbered and issued in sequence
 - Date of order, investigator name, name/number of person placing order will be entered (In the absence of the bookkeeper, this log will advise who to call for item pickup)
 - If a partial delivery is received, the received item(s) is noted on the purchase order, the packing slip is attached. The purchase order remain open until all items are received or cancelled.
- **Deliveries**
 - The warehouse will bring the order to the Foundation Office, requesting delivery signature
 - The bookkeeper will call the investigator's contact person to pick up the order
 - The investigator/staff will sign the packing slip to document that they received the item.
 - The bookkeeper will place delivery paperwork with purchase order to confirm delivery for payment
 - The bookkeeper will document receipt of partial orders, follow-up as needed, and confirm receipt of complete order before payment. See payment section.

DISBURSEMENTS

- **General Policy Information**
 - Disbursements will be made by pre-numbered check unless the vendor requires payment by debit or credit card or other circumstances approved by the Executive Director.
 - The Executive Director maintains the Foundations debit card and individually authorizes purchases.
 - No petty cash is maintained.
 - No blank checks are signed or checks written for Cash.
 - All checks \$2,000 or greater require two signatures. Checks \$0.01 - \$1,999.99 require only one signature.
 - The bank is immediately notified of changes of authorized check signers.
- **Disbursement by way of Amazon Business.**
 - Purchases made via Amazon Business are allowable only by authorized personnel set up by the Executive Director

Foundation for Advancing Veterans' Health Research, Inc.
PROCEDURES & INTERNAL CONTROLS

- All purchase requests submitted via Amazon Business are electronically routed to the Executive Director for approval prior to any funds commitment.
- Executive Director Rejects or approves purchase and prints confirmation for bookkeeping records
- Items purchased via Amazon Business are linked to bank debit card.
- Printed confirmation is provided to Bookkeeper to assist with bank reconciliation and filed as appropriate

- **Wire transfers**
 - Executive Director must approve wire transfer request prior to initiation.
 - Wire transfers can be executed electronically via the Bank's secured online system and require secondary approval from the Executive Director before funds are sent.
 - Wire Transfer requests must be approved within 24 hours or the request will cancel automatically
 - Wire Transfer Reports are printed from the Bank's secured system and filed with purchase request to document mechanism of funds transfer and approvals.

- **Checks**
 - Bookkeeper Assembles and compares packing slips and other shipping and receiving documentation (signed by requestor to acknowledge receipt) with purchase order and vendor invoices.
 - In the event a partial purchase order is fulfilled and invoiced, payment is issued only for those items received.
 - Bookkeeper Reviews invoice for math, description, prices, etc.
 - Duplicate invoices are destroyed
 - Requests for Payment and Requests for Reimbursement are checked to insure criteria is met and complete original documentation is attached
 - Bookkeeper gives questionable invoices to Executive Director for review
 - Bookkeeper runs an "Unpaid Bills Detail" to review the accuracy of the entries and select payments to be made.
 - Bookkeeper Prints checks, using pre-numbered, pre-printed, two-part voucher checks; blank checks locked in cabinet (Executive Director and Bookkeeper have access)
 - Bookkeeper Attaches stub of check to the original documentation for file after signature
 - Bookkeeper Attaches original check to any documentation that must be submitted with the check.
 - Bookkeeper ensures file documents are stamped "paid"
 - Bookkeeper ensures checks are complete prior to submitting for signature
 - Bookkeeper gives checks with all documentation (requests for payment/reimbursement with supporting documents and invoices with shipping documents) to Executive Director for review and signature
 - Executive Director Reviews the supporting documentation for each check for appropriateness and completeness.
 - If documentation is insufficient, Executive Director returns check with documentation to Bookkeeper to contact requestor for items required.
 - Executive Director Signs checks and returns to Bookkeeper; If necessary Bookkeeper forwards checks with supporting documentation to secondary approved signatory for second signature.
 - For all checks more than \$1,999.99: The Treasurer (or alternative signatory, in his/her absence) provides second review/signature of supporting documentation then signs checks and returns them to Foundation Office
 - Bookkeeper Files check stubs and supporting documentation in appropriate investigator/project folder
 - Prior to mailing checks, bookkeeper transfers funds from Investment account to Checking account to cover checks and attaches the Unpaid Bills Detail as backup documentation for the transfer.
 - Executive Director receives immediate notification of funds transfer as secondary security measure.
 - Bookkeeper Mails payments to vendors with appropriate/required documentation

Foundation for Advancing Veterans' Health Research, Inc.
PROCEDURES & INTERNAL CONTROLS

SUBJECT PAYMENTS

• **Pre-Paid Gift Cards**

- Pre-paid Gift cards are maintained in a locked cabinet in the Foundation Administrative office.
- The Study Coordinator will obtain no more than a 30-day supply of the cards based upon a submitted distribution schedule.
- Documentation of the transfer of the cards is maintained in the Foundation Administrative Office.
- The Study Coordinator will maintain and provide the Administrative office a log of the card numbers.
- Within 2 business days after the end of each calendar month, the Study Coordinator will provide Foundation administration with a detailed, comprehensive list of all gift cards activated and distributed.
- The list will identify the end recipient using their study id number.
- Receipt of an updated list is required to trigger distribution of new/additional gift cards.

• **ClinCards**

Subject Payments for research milestone visits should be distributed via the ClinCard system

- Upon R&D approval of a study providing participant reimbursements, the Foundation administrative staff will upload the participant compensation schedule into the ClinCard system and assign access authorizations to all appropriate personnel (PI, coordinators, etc.)
- ClinCards are stored in a locked cabinet within the Foundation offices
- Coordinators can obtain ClinCard from the Foundation administrative office upon submission of a "Clincard Card Request form" documenting the study information, coordinator/employee receiving the cards, and the card numbers.
- Identification numbers for ClinCards received are also entered into the ClinCard Log
- ClinCards have no value until payment is authorized within the ClinCard System
- After completion of qualifying subject visit, authorized coordinator will request subject payment with in Clincard System for specific visit.
- Secondary approval must be obtained within the ClinCard system from the Study PI, Executive Director, or other approved personnel to trigger distribution of funds to study participant via ClinCard System
- Coordinator must submit a Subject Payment form to the Bookkeeper after the subject's first visit to document the subject's required information to facilitate annual 1099/1096 reporting to the IRS.
- Monthly, The Accountant downloads a report of Clincard Activity by study to complete accounting entry recording administrative expenses (\$1/transaction) and subject funds distribution (program expense).
- Upon notification of low funds from ClinCard, a wire transfer is completed to provide additional funds supporting subject stipend payments.
- The Clincard system holds these funds in escrow and allocates said funding to individual ClinCards as distributions are approved within the ClinCard system.
- Any unused cards at the end of the study are returned to Foundation administrative office.

• **Checks**

Occasionally study requirements or subject needs dictate the distribution of subject payments via standard check instead of the preferred ClinCard payments

- Prior to Subject visit, Coordinator will confirm approval of subject payment via check.
- Coordinator will submit a request for payment form to bookkeeper for processing (with secondary approval signature from PI)
- Bookkeeper will provide document to Executive Director or Grants & Contracts Specialist for approval
- Approved Payment will be entered payables system

Foundation for Advancing Veterans' Health Research, Inc.
PROCEDURES & INTERNAL CONTROLS

- Check will be created with other payables
- If not already entered in Clinical Trial Management System, Grants Accountant will be provided with a copy of the approved payment request to facilitate documentation of subject visit for payment reconciliation.

PAYROLL

- An outsourced company is used to process foundation payroll every two weeks, submits all payroll reports and taxes, and provides copies of complete payroll and reporting documentation to Foundation.
- Foundation uses direct deposit for all employees. New employees may receive a paper check from the payroll company for the first pay period while direct deposit is being set up.
- Changes of address/bank information are recorded into HR system directly by employee. Employee Bank information is not provided to Foundation staff.

- **Employee Time Entry**
 - Employees must complete/submit a timecard for each pay period – with time worked and paid leave recorded.
 - Employee timesheets require bulk hour reporting by project by day for every employee.
 - Any overtime hours must be approved in advance by project PI and/or employee's supervisor
 - Vacation leave (or anticipate absences) require PI approval in advance and may be required via email confirmation. Email should be provided to Bookkeeper prior to pay period end.

- **Time Cards**
 - The Bookkeeper compiles timecards at the end of each pay period.
 - Bookkeeper reviews timecards for computations, approvals, leave balance, completeness, etc. and contacts employee if necessary
 - Supervisor/PI review of timecards is required prior to payroll processing to identify any inaccurate or inappropriate time allocation charges. Corrections are made prior to payroll processing.
 - After Bookkeeper completes initial review, Grants & Contracts specialist review federal awards and Clinical Trials Manager/Executive Director reviews other programs to confirm completion. Questions or concerns are brought back to Bookkeeper to investigate and resolve.
 - With Final approval from Executive Director and Grants & Contracts Manager, Bookkeeper proceeds with payroll processing

- **Payroll Processing**
 - Bookkeeper processes payment for employee contributions to optional retirement savings
 - Bookkeeper submits payroll data to Payroll Company
 - Final Payroll Report is provided to Bookkeeper and Executive Director for review and approval
 - Upon Approval, Payroll company executes payroll
 - Bookkeeper transfers funds to Payroll account to cover payroll costs based upon payroll invoice provided by payroll company.

- **Payroll Entry to Accounting System**
 - The accountant pulls the payroll invoice and other associated reports from the third-party payroll website.
 - The accountant uses the data in the reports to create the payroll entries to be entered into the Accounting system for each project. The entries created are:
 - Standard payroll entry by Program (QB Class).
 - Leave taken entry by Program.

Foundation for Advancing Veterans' Health Research, Inc.
PROCEDURES & INTERNAL CONTROLS

- Leave earned entry by Program.

VOIDING CHECKS

It is the policy of the organization to maintain a Voided Checks Log and document every check that has been voided, regardless of the reason.

- The Bookkeeper documents every voided check regardless of reason.
- Bookkeeper attaches documentation explaining the reason for void.
- Bookkeeper routes voided check with documentation to Executive Director for review/initial
- If the voided checks are physically available, Bookkeeper stamps with a "VOID" stamp and cuts off the signature line if signed?
- Bookkeeper enters voided checks in the "Voided Checks Log."
- Bookkeeper files voided defaced check with documentation in a folder labeled "Voided Checks 20__" and files with current year canceled checks to be made available to auditors
- Bookkeeper ensures voided check file is kept with canceled check files when that year's filing is removed to storage.
- If voided checks are not physically available, copy of bank's stop-payment order is filed

BANKING

- **Receipt of Bank Statements**
 - Executive Director opens statements for all bank accounts
 - Executive Director reviews statements for duplicates, unnumbered checks, number gaps
 - Executive Director reviews for check changes (signatures, amounts, payees)
 - Executive Director signs and dates account statement
 - Executive Director provides to Bookkeeper for reconciliation

- **Multiple accounts are maintained at Frost Bank.**
 - Brokerage account – The Foundation has an agreement that authorizes Frost Bank to invest funds in government-insured fixed instruments and short-term accounts.
 - Checking account – a request to transfer funds from the operations account to the checking account is made when checks are issued.
 - Payroll account – Payroll company fees and payroll costs are paid from this account. Funds are transferred from the operations account each pay period to cover charges.
 - Operations Account – holding account for operating funds. Account receives EFT payments from sponsors and distributes funds to the Checking and Payroll accounts as needed. Balance will remain sufficient to cover operating costs for the next quarter. Additional funds are transferred to the Brokerage account for investment.
 - Federal Account – Additional account to support Federally funded, cost reimbursable grants. This requires a higher level of liquid funds and the account ensure we maintain a balance in each account below \$250,000
 - Amazon - Account number is provided to Amazon Smile and other organizations to receive charitable contributions. Account balance shall not exceed \$4,000 to protect against fraudulent activities.

- **Management of Brokerage Accounts**

Foundation for Advancing Veterans' Health Research, Inc.
PROCEDURES & INTERNAL CONTROLS

- Foundation investments are established based upon VA Handbook 1200.17 requirements and All investments must be fully insured.
 - The Executive Director works with our Bank's brokerage services to regularly review the current investment portfolio and discuss any new purchases.
 - Executive Director is contacted by the bank upon maturation of any existing investments
 - Based upon the current investment schedule, Executive Director will determine the most appropriate investment for recently released funds.
 - Purchase of new investments are structured to establish a laddered list of maturity dates while also considering interest rates.
 - When appropriate, based on current liquidity and anticipated future expenses, the Foundation re-invests all matured investments.
 - When necessitated by liquidity demands, Executive director will request funds from matured CD to be transferred to a Foundation Checking Account.
 - The Foundation's Investment portfolio/schedule is provided to the Finance Committee and Board of Trustees quarterly for review.
- **Bank Account Reconciliations**
 - Bookkeeper performs test reconciliation and attaches all original documentation for each transaction recorded on statement.
 - Bookkeeper compares bank statement deposits with deposit lists/receipts
 - Bookkeeper prints and attaches reconciliation report to original statements and appropriate documentation
 - Bookkeeper reconciles to Foundation accounting system.
 - Attach QB bank reconciliation to Bank Statement
 - Voided checks are filed in the "voided Checks" Log
 - Signs reconciliations and provides to Executive Director for review
 - Executive Director reviews reconciliation documentation and discusses any questions with bookkeeper, signs.
 - Bookkeeper files reconciliations with documentation: original statements, original documentation for each transaction (canceled checks, deposit slips), and reconciliation report
- **Funds Transfers**
 - Transfer requests are initiated by the Bookkeeper as needed to cover payroll or checking expenses after verbal approval from Executive Director.
 - The Executive Director receives electronic confirmation of funds transfer request as secondary security measure.
 - The Executive Director provides the Bookkeeper with confirmation of the transfer to be kept on file with the bank reconciliation statements.

FIXED ASSETS

- **Equipment & Software**
 - Equipment and software items valued over \$5,000 are capitalized and depreciated.
 - The Investigator submits a purchase order with current quote, justification and intended location consistent with purchase request process. Executive Director reviews all requests.

Foundation for Advancing Veterans' Health Research, Inc.
PROCEDURES & INTERNAL CONTROLS

- Bookkeeper purchases item per process above
 - The VA receiving warehouse delivers item(s) to the Foundation Office.
 - The Bookkeeper will tag Foundation property upon receipt and record information required for inventory tracking in the Foundation's inventory tracking log – serial numbers, description, location, costs
 - The purchaser picking up equipment must sign and date the receiving document.
 - If item is to be moved outside the VA (e.g., UT), Request to locate off site must be approved by Executive Director prior to equipment pickup.
 - Items purchased by an individual and reimbursed by Foundation must also be tagged and inventoried.
 - Donated property over \$1,000 will be capitalized in accordance with value stated in contributor's letter or appraised value.
 - Depreciation schedule and annual entries are prepared by accountant. Equipment is depreciated over the expected life of the equipment. Fully depreciated fixed assets will remain on statement of financial position until disposed.
 - The Accountant will provide auditors the inventory listing, identifying when new items were added and when items were disposed.
- **Computer Equipment**
 - All computer equipment (excluding printers and computer accessories) are tagged and inventoried but may not be capitalized/depreciated.
 - Computer Equipment to be utilized on the VA IT network **MUST** be donated to the VA via Voluntary Services.
 - Bookkeeper will coordinate computer donation with Voluntary Services
 - Upon approval by VA, computer equipment will be provided to IT for setup and placement on VA network.
- **Inventory**
 - The Foundation will annually request verification of the current location of the equipment.
 - All Computer equipment purchased by the Foundation (and donated to the VA) is included as part of the Research Service EIL and the Foundation will assist with their annual inventory efforts.
 - Investigators must certify the current location of each item assigned to them.
 - Executive Director will review and approve reports, and Administrative staff will enter updated information in equipment inventory list.
 - If investigator or Foundation Employee leaves VA, an inventory will be conducted and the investigator will be required to turn in equipment or have reassigned to another Foundation investigator.
 - The Executive Director will assess unused equipment that has been turned in for possible reassignment or disposal. The Executive Director may donate the unused equipment to the VA facility. Computers will be disposed of through the VA's excess equipment process which includes removal of hard drive data removal by IT.
 - The inventory list will be updated as items are purchased, disposed or reassigned. Fully Depreciated items, except for data storage devices such as computers or hard drives, are removed from the Inventory tracking list.

Foundation for Advancing Veterans' Health Research, Inc.
PROCEDURES & INTERNAL CONTROLS

SECTION 2

BOARD CONTROLS

DOCUMENTATION OF BOARD ACTIONS

It is the policy of the Foundation that the Board will document all actions. Normally these actions would be conducted during a convened meeting.

- The Board will maintain minutes of its Board meetings to create an official record of the events during the meeting.
- Minutes will record those present and the existence of a quorum and will document each agenda item and the action taken by the Board.
- For conflict of interest issues, abstentions or excusals will be reflected in the minutes.
- Tape recordings of meetings will serve only to insure accurate minutes and are not maintained after minutes are complete.
- After approval at the following meeting, the minutes become the legal record.
- Approved minutes will be kept in a safe location with other permanent records and loaded into the Security portal of the Foundation's website for Board member review/reference.

Occasionally an immediate requirement may necessitate Board action between scheduled meetings, requiring an email vote to approve such an action. These actions must also be documented. Any interim actions such as an email vote will be documented by inclusion in the minutes of the next scheduled meeting.

AUDITS

The Foundation contracts for an outside independent financial audit on an annual basis. Board members are provided copies of the audit and the audited financial statements for review prior to submission to the IRS. The same firm may also prepare the IRS Form 990. A change of firm is recommended every three to five years with a minimum of three CPA firms specializing in auditing non-for-profit organizations being considered.

After board approval of the Audited Reports and the IRS Form 990, permission will be provided to the auditors to submit the documents to the IRS.

BUDGETS

The Executive Director will work with the Finance Committee to develop an annual budget for the next fiscal year. A final budget will be presented to the board for approval no later than December 1 of each year. Due to changes in Foundation funding, Budgets may be revised periodically throughout the year. Revised budgets will be documented, reviewed by the Finance Committee, and formally approved by the Board of Trustees.

Foundation for Advancing Veterans' Health Research, Inc.
PROCEDURES & INTERNAL CONTROLS

FINANCIAL REPORTING

The Executive Director will regularly (no less than quarterly) provide a report of the Foundation's financial standing to the Finance committee for review and approval. The report will contain the following information:

- Profit/Loss statements (By Fund Category/Class)
 - Year to date comparative data vs previous Year/Quarter/Month
- Balance Sheet (By Fund Category/Class)
- Actual vs. Budget statements with variance analysis
- Summary of Cash in Bank
- Statement of Cash Flows
- Overview of Deficit or low balance accounts with explanation and plan for correction
- Forecasts and long term trends
- Graphic account of changes in Revenues & Expenses over time

Upon approval of the financial data, the Executive Director, with Finance Committee support, will develop a summary Financial statement for presentation to the board.

Financial Summary will be provided to the Board Quarterly as part of the Board Meeting preparatory documents. Detailed documentation will be available to all board members on the website or via request.

REVIEW OF IRS FORM 990

It is the policy of the Foundation to ensure that the IRS Form 990 reporting the financial status as of the end of the previous fiscal year is submitted in a timely manner in accordance with IRS 990 submission dates.

- The IRS Form 990 required by the IRS annually will be prepared by the auditing firm that conducts the annual Foundation audit.
- The preparer will initiate the 990 upon completion of the annual audit
- The 990 will reflect the same financial information as provided on the audited annual financial statements.
- Additional information will be provided by the Foundation Office as required by the preparer.
- The 990 will be provided in sufficient time for Foundation review.
- The draft 990 will be sent to the Executive Director for initial review.
- Upon completion of any changes or insertion of additional information requested, the final 990 will be provided to the Foundation Finance Committee for approval and recommendation to the Board of Trustees.
- After Finance Committee review, the 990 will be sent to board members for review.
- 990 Board Approval will be documented in the Board Meeting minutes
- 990 submission will be documented in the minutes of the next scheduled meeting.

DOCUMENT DISCLOSURE TO PUBLIC

Tax Exempt Documents. In 1996 Congress passed a law that requires tax-exempt organizations to provide copies of their last three annual information returns (IRS Form 990 or Form 990EZ), application for tax-exempt status (IRS Form 1023) and their Letter of determination to anyone who asks for copies by mail or in person. On April 9, 1999, the IRS issued implementation regulations that became effective on June 8. A summary of the requirements follows.

Covered documents

- Form 1023 and any supporting documents filed by or on behalf of the organization in connection with its application.

Foundation for Advancing Veterans' Health Research, Inc.
PROCEDURES & INTERNAL CONTROLS

- Any letter or document issued by the IRS in connection with the application.
- Annual information returns (such as Form 990, 990-EZ, 990-BL and Form 1065) that have been filed for the previous three years.

The tax-exempt organization's obligations if it gets a request for disclosure

- **In-person request to review covered documents:** The organization must make the documents listed above available free of charge at the organization's principal places of business and regional offices with three or more staff.
- **In-person requests for copies:** An organization must comply with in-person requests on the same business day unless there are "unusual circumstances" such as when key staff are attending an off-site meeting. In no event may the delay exceed 5 business days. The organization may charge up to \$1.00 for the first page and \$.15 for each additional page. It may require payment by cash or money order.
- **In-writing requests for copies:** The organization must respond to requests made in writing, whether by mail, electronic mail, fax or a private delivery service. Copies of the requested documents must be mailed within 30 days from the date the organization receives the request. If the organization requires payment in advance, copies must be sent within 30 days of the date it receives payment. However, within seven days of receiving the request, the organization must notify the requester that it has a prepayment policy and the amount due. The organization must accept payment by certified check, money order, personal check for requests received in writing. If the organization does not require payment in advance, it must notify the requester and receive consent before providing copies for which the fee will exceed \$20.

In accordance with IRS guidelines, the Foundation will make its 1023 and 990s available for public inspection on an "upon request" basis. Copy will be provided of any 990 (with contributor information extracted) for the previous three years that is not already available to the public on the Guidestar website. Requests made to the Foundation Office will be referred to the Executive Director for action.

Other Documents. The Foundation will also provide upon request copies of governing documents, conflict of interest policy, and financial statements. Requests received by the Foundation Office will be referred to the Executive Director for action.