



Association of USFWS Retirees

EIN 02-0703765, Shepherdstown, WV

Fiscal Policies and Procedures

Approved by the Board of Directors, March 2025

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Fiscal Policies and Procedures

The policies and procedures of the FWS Retirees Association (Association) guide the Association's Board of Directors, specifically the Treasurer and Financial Review Committee. The Financial Review Committee will include two or more Board members who will review this document at least every three years and whenever the Board elects a new Treasurer. The Association was approved by the Internal Revenue Service (IRS) as a tax-exempt organization under Section 501(c)(3) of the Internal Revenue Code by letter dated March 15, 2004 (Appendix 1).

Internal Controls

The Association employs several safeguards to ensure that financial transactions are properly authorized, appropriated, executed and recorded. All members of the Board of Directors and Association contractors are expected to use good judgment, to adhere to high ethical standards, and to act in such a manner as to avoid any actual or potential conflict of interest. Both the fact and the appearance of a conflict of interest will be avoided. The Association's financial duties are distributed among multiple people to help ensure protection from fraud and error. The distribution of duties aims for maximum protection of the Association's assets while also considering efficiency of operations.

Lines of Authority

Policy:

- ➔ Only the Treasurer, or other designee authorized by the Board, may accept income or disburse funds.
- ➔ During the transition from one duly-elected Treasurer to another, the outgoing Treasurer may disburse and deposit funds until the new Treasurer has established access to deposit accounts, been assigned new credit cards and considers him/herself to be fully functional in these tasks.
- ➔ All disbursements must be in accordance with an approved budget or by an approved motion of the Board as recorded in Association minutes or decision email messages.

Procedures:

- The Association Board approves an annual budget by February 15 each year.
- Signature authority on the Association's banks accounts is vested with the Treasurer, the Board Chair and Vice-Chair and any other designee approved by the Board.
- Financial Review Committee members will step down from the Committee when acting as Treasurer.

Conflict of Interest

Policy:

- ➔ A conflict of interest occurs when the personal, professional, or business interests of a Board member or contractor conflict with the interests of the Association.

Procedures:

- Board members and contractors must disclose any interests in a proposed transaction or decision that may create a conflict of interest. After disclosure, the Board member will not be permitted to participate in the transaction or decision.
- Should there be any dispute as to whether a conflict of interest exists:
 - The Board Chair shall determine whether a conflict of interest exists for a contractor and shall determine the appropriate response.
 - The Board of Directors shall determine whether a conflict of interest exists for the Chair or a member of the Board and shall determine the appropriate response.

Segregation of Duties

Policy:

➔ Segregation of certain financial duties will be reviewed annually.

Procedures:

- The Treasurer has primary responsibility for all funds, including drawing funds from the ASAP system to pay for activities related to grants from the U.S. Fish and Wildlife Service.
- The Grant Coordinator, Treasurer and/or appropriate Committee chairs will maintain records related to grant transactions and invoices.
- The Database Manager maintains records related to the date though which a member's dues have been paid, the date of their last payment and the date their record was last updated.
- The Financial Review Committee members will have "view only" access to the bank accounts and statements. The Financial Review Committee will be composed of two Board members who will periodically review financial records and provide an annual report to the Board. A checklist for the annual report is included herein as Table 3.

Physical and Digital Security

The Association maintains physical security of its assets to ensure that only authorized people have access to accounts and other property.

Physical Assets

Policy:

➔ A list of all equipment, hardware, and software purchased by the Association will be maintained by the Treasurer and updated annually.

Procedures:

- The list will include when purchased, amount of purchase, and who has the item.
- When a physical asset is purchased, the Treasurer will inform the Financial Review Committee chair.
- The Financial Review Committee will periodically inventory the physical assets.

Updates to Accounts and Passwords

Policy:

- ➔ **The Treasurer is the keeper of all accounts that are opened on behalf of the Association.**

Procedures:

- The Treasurer will keep a master list of accounts to include: account name, web page, account number, update requirements, user name, password, contact information, and security questions/answers.
- The Board Chair will receive a Master List update annually by October 1.

Database Security

Policy:

- ➔ **Records of dues and other payments by members will be held in confidence by the Treasurer.**
- ➔ **The Retirees membership database will not be released to others and will only be shared among Board members unless a member explicitly gives permission to allow their personally identifiable information (PII) to be shared with certain individuals or organizations for specific purposes.**

Procedures:

- The Treasurer and Database Manager will secure all digital records.
- The Association Board will not share the digital member database to others unless explicit permission is given by a member to be released only to specific outside parties or other members.

Accounting Procedures

This section covers basic accounting procedures for the Association. The accounting procedures used by the Association are cash-basis-accounting which is generally used by small nonprofits and for personal finances. Accuracy of information, compliance with grant requirements, and Board decisions are ensured through periodic review by the Board's Financial Review Committee and following the procedures in this document.

Basis of Accounting

Policy:

- ➔ **The Retirees Association uses the cash basis of accounting.**

The cash method of accounting is focused on the inflows and outflows of cash. The fiscal year is the calendar year.

Procedures:

- Throughout the fiscal year, expenses are paid in a timely manner, generally within one month following their occurrence. The books are closed on the last day of the month. Invoices received

after closing the books will be counted as an expense when paid.

- At the close of the fiscal year, this rule is enforced. All expenses that have incurred in the prior fiscal year, but not paid, are reported in the subsequent fiscal year. Year-end books are closed at the end of the fiscal year.
- Revenue is deposited in a timely manner and recorded in the month in which it was deposited into an Association account.

Journal Entries

Policy:

- ➔ Quickbooks or similar software (e.g., Quicken) with capability to interface with the Association's bank and other accounts may be used, or alternatively using a spreadsheet system in Microsoft Excel.
- ➔ All expenses and income will be recorded using the chart of accounts developed for the Retirees Association to code transactions based on budget categories and to facilitate tax preparation (see Table 1) unless the Board approves category additions/changes as appropriate .

In the event that the accounting software is not used to interface with the bank, account reconciliation will be done within the accounting system being used or spreadsheet based on transaction data on the monthly statements.

Procedures:

- Transactions may be downloaded for reconciliation monthly to the accounting system being used, or reconciliation may be done manually against the monthly statements (Main Checking Account, Grants Checking Account, Credit Cards, PayPal and Automated Standard Application for Payments (ASAP)).
- Monthly code all income and expenses according to appropriate budget line item.

Bank Reconciliations

Policy:

- ➔ Bank and PayPal reconciliation will occur by the second Thursday of the month in time for the monthly Treasurer's Report to the Board.

Procedures:

- Bank and PayPal statements will be downloaded, reviewed and filed in that year's digital financial file system maintained by the Treasurer on the Association's shared Google drive.
- Cancelled checks will be reviewed online during reconciliation and cross-referenced/identified in the accounting system including by check number.
- Financial Review Committee members will review statements periodically to ensure balances are consistent with monthly reporting.

Monthly Close

Policy:

➔ **Monthly balances for all financial accounts will be submitted to the Board as part of the Treasurer's Report by the second Thursday of each month.¹**

Procedures:

- At the end of each month, the Treasurer will code all transactions and prepare a monthly report using a format that includes all transactions for the month. A balance sheet that is part of the accounting software used or in spreadsheet format will be prepared to verify the bank balances for the month. If an account statement is not available until after the Treasurer's report is due, a revised Treasurer's Report will be submitted within a week of being updated based on the missing statement.
- The Treasurer's monthly report to the Board will summarize income and expenses, compared to the approved budget, with supporting notes, as needed.

Recordkeeping

Policy:

➔ **The Board Treasurer will keep copies of all receipts, income, invoices, and reports.**

Procedures:

- Invoices and receipts will be maintained in a digital folder on the Association's shared Google drive by month and calendar year.
- Records of dues payments by mail and online (PayPal) will be maintained in a digital folder as described above and will include all records sent to the database manager each month.
- Records related to grant finances will be kept separately from the Association's main operating account but will be included in annual reporting for tax purposes and budgeting.
- An annual report of all transactions (bank accounts and PayPal) will be compiled and coded for budget and tax purposes.
- All other financial records will be stored in digital format as described above, including all tax records for each year.
- Records will be retained by the current Treasurer in accordance with the standards listed in Table 2.

Financial Planning and Reporting

The categories of income and expenses currently approved for use in the Association's budget planning and reporting are found in Table 1.

Budgeting Process

Policy:

➔ **The Association will have separate annual budgets (for operations and each grant) that are approved by the Board of Directors by February 15.**

- ➔ The budgets can be revised during the year only if approved by the Board of Directors.
- ➔ Grant budgets may be revised, but for each one-time revision, the dollar amounts moved between line items are limited to 10% of the total grant amount. Revisions approved by the Board must be submitted to the FWS's Federal Project Officer for the Grant for their review and concurrence.
- ➔ Reunion budgets will be kept separate from the operating budget.

Procedures:

- The Board Chair, Treasurer, and leadership for special projects will work together to ensure that the annual budgets are an accurate reflection of programmatic goals for the coming year.
- The Treasurer will ensure that budgets are developed using the Association's categories of income and expenses (Table 1).
- The Board Treasurer will present draft budgets to the Board at the January Board meeting.
- The operating budget shall show actual revenues and expenses for the previous year and clearly display end-of-year balances that carry over for the coming year. Forecasts for the coming year are projected.
- The Board of Directors will review the draft budgets at its January meeting and will approve the final budgets at its February meeting of that fiscal year.

Internal Financial Reports

- ➔ The Treasurer prepares regular financial reports monthly. All reports (for the prior month just ended) are finalized and provided to the Board no later than the second Thursday of each month.
- ➔ The report for December will serve as the annual financial report.

Procedures:

- The Treasurer's monthly report to the Board will summarize monthly as well as cumulative (year-to-date) income and expenses, compared to the approved budget, with supporting notes, as needed. The Treasurer will report during monthly Board conference calls.
- Notes will be made for the Board's review for categories of income and expenses that significantly exceed or fall short of the annual budget projections.
- The Treasurer's December budget reports serve as the final reports for the year.
- The Treasurer shall present a financial summary to the Association members during each Reunion, as required by the Association's Bylaws.

Financial Review Committee

To create a governance structure of accountability, there needs to be Board oversight of the finances and fiscal policies and procedures. According to the State and Federal statutes that govern nonprofit organizations, a formal audit is not required for the financial statements of this Association.¹ However, the National Council of Nonprofits (www.councilofnonprofits.org) recommends an internal financial

¹ **West Virginia** statute and description: WV Code 29-19-5(a)(6)(A)(B). Charitable organizations with annual contributions over \$500,000 must file an audited financial statement prepared by an independent CPA. Charitable organizations with annual contributions in excess of \$300,000 but not more than \$500,000 must file a financial statement reviewed by an independent CPA. According to the **Federal** Uniform Guidance, all non-federal government agencies and nonprofit organizations that expend \$750,000 or more in federal awards in a given year are required to obtain a Single Audit.

review by Board members, independent of the Treasurer.

Policy:

- ➔ **The Financial Review Committee will conduct an annual review of the previous year's books before April 15.**

Procedures:

- The Financial Review Committee will be composed of two Board members who will have "view only" access to the bank accounts and statements. They will periodically review financial records and provide an annual report during the May Board meeting.
- The Financial Review Committee will review the Association's *Fiscal Policies and Procedures* document at least every three years, and whenever the Board elects a new Treasurer.

Tax Compliance

Policy:

- ➔ **The Association will file the appropriate IRS Form 990, as required.**
- ➔ **The Association will register (file required annual report) annually with the West Virginia Secretary of State.**
- ➔ **Form 1099 will be issued to all contractors and honoraria recipients as required by the IRS.**
- ➔ **Acknowledgement letters/emails will be provided for all donations (includes dues payments) that exceed \$250.**

Procedures:

- All records of transactions and deposits for a calendar year will be compiled and filed in digital format on the Association's shared Google drive. These records will form the basis for the tax filing that is due by May 15.
- The Treasurer will file the appropriate exempt organization IRS reporting form online per information found at <https://www.irs.gov/charities-non-profits/form-990-series-which-forms-do-exempt-organizations-file-filing-phase-in>. When annual revenue from all sources exceeds \$50,000, assistance from a certified accounting firm familiar with non-profit accounting may be used for tax filing. This may include online self-services such as Tax990.com.
- The Treasurer will update the State of West Virginia registration by July 15 annually. <https://onestop.wv.gov/b4wvpublic/default.aspx>
- The Treasurer will draft a written acknowledgment to donors, for the Board Chair to sign, as required to substantiate a charitable contribution of \$250 or more. The letter will contain information required by the IRS. (<https://www.irs.gov/charities-non-profits/charitable-Associations/charitable-contributions-written-acknowledgments>)
- The Treasurer will file any required Forms 1099 with the IRS annually no later than January 31. (<https://www.irs.gov/forms-pubs/about-form-1099-misc>). Self-service online accounts, such as TaxBandits.com may be used for assistance with these.

Revenue and Accounts Receivable

The Association's revenue is primarily through the collection of member dues. The Association may apply for and receive funds from federal grants. Other sources of income are Reunion registrations and donations.

Dues

Policy:

- ➔ **Dues will be requested from each member.**
- ➔ **The dues amounts will be reviewed every six years or as recommended by the Treasurer.**

Procedures:

- The Treasurer will draft and request that the Secretary send an annual notice (by January 31) to all members to pay dues.
- Reminder messages will be sent by August 31.
- Dues will be collected online or by mailing a check to the designated address. The Treasurer may use his/her personal mailing address or may establish a separate post office box for the Association to receive checks and other mail.
- The Treasurer will inform the Database Manager of applications for membership and checks received via postal mail and will deposit all checks into the Association's main checking account.
- The Database Manager will download monthly membership applications and notifications of online payments of dues and will be responsible for maintaining the list of all current dues-paying members.
- The Treasurer will review income and expenses relative to the amount of the annual dues and make recommendations for changes at least every six years.

Federal Grant Income from the FWS

The Association may apply for Federal financial assistance in the form of Cooperative Agreement Awards. Two of these are currently administered by the Service's Historian at the National Conservation Training Center:

- 1) Supporting the Service's History Committee Strategic Plan, hereafter referred to as the "History Grant". Income to the Association from this Agreement has been used to support various Committee activities, such as costs associated with conducting oral history interviews and collecting artifacts. Mini-grants are selected to fund significant anniversaries at Service field stations. Final narrative reports are required to document accomplishments.
- 2) Supporting Career and Outdoor Skills for Youth, hereafter referred to as the "Youth" or "Conservation Career Awareness - Youth (CCA-Y)" Grant. Mini-grants are selected and paid from this Grant to Friends Groups to fund various youth conservation and career events. Final narrative reports are required to document accomplishments.

The Association's Grants Coordinator/Manager may apply for other grants from the FWS periodically as

approved by the Board.

The Association's base operating funds (from dues and auction income) also support a third mini-grant program that is available to fund Retirees' Special Projects at FWS Field Stations. Each of these three mini-grant programs have established eligibility and selection criteria, minimum/maximum funding amounts, and application procedures, posted at [FWSRetirees.org](https://www.fwsretirees.org). The Board established a Grant Committee (led by a Board member) to manage the mini-grant program, including: program marketing, reviewing proposals, making final selections, project monitoring, and writing program reports. The Board must approve any deviations to the established selection criteria, including overall changes to the mini-grant program.

Policy:

- ➔ Funding from FWS grants in ASAP will be withdrawn and transferred to the Grants checking account in the exact amounts needed to cover expenses authorized under the grants. The fund draws from ASAP should be made immediately prior to when each of those expenses are paid, or if that isn't possible, as soon as possible following payment of those expenses.
- ➔ The total amount of ASAP draws at the end of a grant's Project Period during a calendar fiscal year will constitute the income from that grant that should be reported on the Association's Form 990 report to the IRS for that year.
- ➔ Any balance for a grant remaining in ASAP at the end of a grant's Project Period will be de-authorized by the FWS.

Administration of Federal Funds

Policy:

- ➔ The Association may draw from ASAP an amount based on total expenditures from a grant and the overhead rate approved by the Board and specified in the grant Notice of Award. The difference between this ASAP withdrawal and the total of any reimbursements paid to the Grants Coordinator/Manager for time spent in the grant's management and any other indirect expenses paid from the grant, may be transferred from the Grants checking account to the Main checking account following acceptance of the grant's Final Federal Financial Report with Board approval.
- ➔ Expenses incurred for administration of a grant may be paid from the Grants checking account to the Association's Grants Coordinator/Manager.
- ➔ Billable time and expenses for administering a grant will be submitted by the Grants Coordinator/Manager on the form appended as Table 4 of this document and must be approved by the Board Chair before being paid by the Treasurer.
- ➔ Total reimbursement for a grant's administration can be up to the Indirect amount authorized based on the grant's Indirect rate and total expenditures, taking into account any other Indirect expenditures that may have already been paid. Therefore, the reimbursement for grant administration should be the last expenditure made before closing out a grant in order to avoid overspending the total award amount.
- ➔ The Indirect ASAP withdrawal is calculated as the amount of total expenditures paid out from the grant over the entire Project Period multiplied by the grant's indirect percentage rate. The Project Period may span one or more calendar fiscal years. Note that it may not be

possible to withdraw the entire amount of Indirect withdrawal authorized depending on the balance remaining in ASAP for the grant at that time (i.e., if the authorized withdrawal exceeds the ASAP balance).

- ➔ **The Grants checking account will maintain a \$1,200 net zero balance. In other words, when all ASAP withdrawals transferred into the account are equal to the expenses paid from the account, the balance in the account should be \$1,200.**
- ➔ **The hourly rate of reimbursement for administration of the grants is currently \$30 per hour.**

Procedures:

- The Grants Coordinator/Manager submits an invoice (see Table 4) for time or other expenses related to the grant's administration to the Treasurer for approval following the end of the Project Period of the grant.
- The Treasurer reviews the invoice with respect to the reimbursement limit based on total expenditures from the grant and coordinates with the Board Chair, or Vice Chair if the Chair is unavailable, for approval prior to reimbursing the Grants Coordinator/Manager.
- The Treasurer shall complete and submit the required interim and final grant Federal Financial Reports (FFR). The final FFR should be submitted after all grant payments, all matching ASAP withdrawals and the final Indirect withdrawal have been done. On the final FFR, the amount entered on lines 10b, 10e and 10g should each equal the amount shown on Line 10a. That amount should also equal the total of actual expenditures from the grant (Line 11d on the FFR), minus the total of any Indirect expenses actually paid from the grant, plus the Indirect withdrawal amount (Line 11e). The difference between the Indirect withdrawal and any Indirect expenses actually paid from the grant is considered by the FWS to be implied or presumed Indirect expenditures by the Association, even though we have not actually expended the money. The final FFR is due 120 days following the end of the Project Period shown on the Notice of Award for the grant.
- Following acceptance of the final FFR, the Treasurer shall transfer from the Grants checking account to the Main checking account any difference between the Indirect ASAP withdrawal and the actual Indirect expenses paid from the grant, after Board approval, leaving a \$1,200 net zero balance cushion in the Grants checking account (i.e., a balance of \$1,200 in the account when all ASAP withdrawals into the account equal all expenditures from the account).

Reunion Finances

Policy:

- ➔ **The budget for Reunions will be kept separate from the main operating budget of the Association.**

Procedures:

- A Board member will prepare a Reunion budget after conference space and hotel block room costs have been negotiated.
- The budget will consider the likelihood of donations and FWS sponsored expenses. Registration costs will be recommended based on this analysis and previous Reunion experiences.
- The Board will approve the registration fee, and field trip and any other fees prior to the Reunion registration being announced.

- Reunion registration revenue will be collected online, via mail to the Treasurer's designated address or on-site at reunions.
- Payments collected for raffle tickets will be by cash and check only because of the excessive time that is required for processing point of sale credit card payments at reunions.

Revenue Recognition

Policy:

- ➔ Revenues are classified based on the existence or absence of donor-imposed restrictions.
- ➔ All fund-raising events must have Board approval.
- ➔ Funds collected from the Greenwalt Walk for Wildlife or similar special events will be donated to the local supporting Friends entity.

Procedures:

- Deposit all checks received.
- Net assets of the Association are classified as unrestricted, temporarily restricted, or permanently restricted. For instance, any donations made for purposes of a memorial are considered restricted funds and can only be used for the designated memorial. Dues received are unrestricted funds.
- The Board will review all revenue in excess of \$5,000 to determine how the revenue will be recognized (as earned/contributed, conditional/unconditional and restricted/unrestricted).
- The Treasurer is responsible for entering all revenue into the accounting system currently being used by the Association, with documentation digitally filed along with other financial documents on the shared Google Drive.
- Acknowledgement letters or emails will be completed in accordance with tax reporting requirements.

Cash and Check Receipts

Policy:

- ➔ A written record will be maintained for all cash and checks received.

Procedures:

- Receipt records will be maintained for all cash and checks received (particularly at Reunions).
- A receipt will be given daily by the Treasurer to any person handling Reunion raffle and silent auction cash and checks upon receiving said cash and checks at the end of the day.

Deposits

Policy:

- ➔ If possible, cash will be deposited within five days of receipt.

Procedures:

- The Treasurer will secure cash daily at the Reunion.
- The Treasurer will deposit cash into the Association account as soon as possible after the Reunion.

Expenses and Accounts Payable

The Association has several types of expenses (Table 1). Base expenses include database management, website, postage and mailing, office supplies, and special projects. Other expenses are related to hosting the Reunion and implementing grant agreements.

Invoice Approval and Processing

Policy:

- ➔ **Payments can be made by credit card, bill pay or paper check.**
- ➔ **Contractors, vendors, honorarium, and members will submit invoices and be paid within 30 days of submitting an invoice.**
- ➔ **Invoices can be an email with receipts attached or a formal invoice that is judged to be suitable by the Treasurer. Table 4 is an invoice that may be used for claims for hourly reimbursement (e.g., for database management, website management, History grant management, oral history transcription, etc). Table 5 is an invoice that may be used for travel expense reimbursement.**
- ➔ **All meals and incidental expenses (M&IE) and private vehicle mileage reimbursements for travel must be within current GSA rates. Hotel reimbursement must be within the GSA lodging rate, or if hotels honoring that rate are not available in the area, efforts should be made to secure lodging as close to that rate as reasonably possible.**

Procedures:

- Non-recurring expenses to vendors are preferably paid by credit card.
- Recurring expenses to vendors are preferably paid via the appropriate credit card being placed on file with the vendor.
- When a credit card is not practicable, payment is made via the bank bill pay feature with either a check mailed to the vendor by the bill pay service or direct deposit.
- When credit card or use of bill pay is not possible, a paper check will be directly issued by the Treasurer.
- Invoices for Website and Data Management and travel for any Board member will be approved by the Board Chair prior to payment.
- Invoices for History Committee related expenses, including Committee travel, will be approved by the History Committee Chair. The History Committee Chair has delegated responsibility for approving oral history related travel, other oral history expenses (such as transcription services) and reimbursement for those to the Association's Oral History Coordinator. If the History Committee Chair is a Retiree, that person's expenses will be approved by the Board Chair.
- Mini-grants will be approved by various established Committees (such as Station Anniversaries, Youth projects, etc), following guidelines established by the Board.
- Requests for honoraria payments are normally made to the Association by the FWS Historian but will be approved by either the Grants Manager or the Board Chair.
- If an invoice for payment will result in exceeding the approved line-item amount in the budget, Board approval is required prior to payment.
-

Purchases and Procurement

Policy:

- ➔ Any expenditure in excess of \$1,000 for a single item should have bids from three (3) suppliers, if possible.

Procedures:

- The committee Chair requesting the procurement of any item exceeding \$1,000 will be responsible for obtaining three bids.
- The Treasurer will purchase the item with the lowest bid that meets Association requirements.

Cash Disbursements and Petty Cash

Policy:

- ➔ No petty cash will be kept except during reunions. Cash disbursements will be in extreme circumstances only.

Procedures:

- The Treasurer or cash custodians will keep Reunion cash in a hotel lock box along with the daily records of cash received.
- In instances that a Reunion vendor requires cash payment, the invoice will be marked as “paid with Reunion cash.”

Member Expense Reimbursements

Policy:

- ➔ Board and other member expenses must be invoiced and approved as described above under Invoice Approval and Processing.

Procedures:

- An email with attached receipts can serve as an invoice.
- Members and Association contractors may use standard forms found in Tables 4 and 5 or other invoice methods as described above under “Invoice Approval and Processing”.
- The current hourly reimbursement rate approved by the Board for the Association’s Database Manager, Webmaster and the Grants Coordinator/Manager is \$30 per hour.

Credit Cards

Policy:

- ➔ The Association’s Main and Grants credit cards will be issued to the Treasurer.
- ➔ Credit cards may be issued to other Board members or support staff if deemed necessary for efficiently conducting Association business and approved by the Board.

Procedures:

- To the extent practicable, credit card bills will be automatically paid using the bank's bill pay feature as direct withdrawals from the appropriate Association checking account.
- Otherwise, credit card bills received will be paid by the due date per monthly statement.
- The Financial Review Committee will annually review who has active credit cards.
- The Board will budget for needed expenses of the Database Manager and authorize the Treasurer to set appropriate limits on that credit card.

Asset Management

Cash Management and Investments

Policy:

- ➔ **The Association may keep a cash reserve fund, as determined by the Board.**
- ➔ **Cash reserves will be held in interest-bearing accounts or certificates of deposit.**

Procedures:

- The Treasurer will present to the Board the status of the cash reserves and alternatives.
- The Board will make the final determination on the selection of the interest-bearing account.

Capital Equipment

Policy:

- ➔ **The Association will have no capital equipment.**

Operating Reserve

Policy:

- ➔ **The target minimum operating fund for the Association is six (6) months of the average operating expenses for the previous 12 months rounded up to the nearest \$1,000 and will be held in the Main checking account.**

Procedures:

- The amount of the operating reserve will be calculated each year after approval of the annual budget. The calculation is: *((Total Operating Expenses for Previous 12 months/12) x 6) rounded up to nearest \$1,000.*
- If needs dictate that planned or mandatory expenditures will result in the main checking plus reserve account balances dropping below the operating reserve minimum the Treasurer will submit a request to the Board for the required expenses that would result in exceeding the minimum operating reserve. The request will include an analysis and determination that use of the funds is necessary and plans for replenishment. The Association's goal is to replenish the funds used within twelve (12) months to restore the operating reserve fund to the target minimum amount.

Table 1. Categories of Income and Expenses that have been recently used by Association of Retired US Fish and Wildlife Service Retirees cross-referenced to appropriate line on IRS Form 990 EZ (2023).²

Type	Category	Notes	IRS Form 990-EZ Line
Operating Budget			
Income	Base Account Support	Funds equivalent to spending that would result in dropping below the minimum Operating Reserve plus the amount in Cash Reserve funds as defined on pages 13-14. This amount is budgeted for management purposes, but because it is cash on hand, it is not considered income for IRS reporting.	Not Reported
Income	Contributions	Voluntary donations to help support the Association	1
Income	Dividends/Interest income		4
Income	Dues		3
Income	Lifetime Memberships		3
Income	Miscellaneous Income		8
Income	Special Project Income	Such as polo shirt sales or other income resulting from non-routine operational activities.	5a or 8
Expenses	Board Travel		16
Expenses	Legal and Professional Services		13
Expenses	Mail Service & Postage		15
Expenses	Miscellaneous Expenses		16
Expenses	Newsletter Printing and Mailing		15
Expenses	Office Supplies		16
Expenses	PayPal Fees/Expenses		16
Expenses	Regional Liaison Travel		16
Expenses	Special Project Expenses		5b or 16
Expenses	Website	Payments to compensate Webmaster as well as other expenses related to maintaining the website.	13 & 16
Grant Budgets			
Expenses	Contracts	All Grants	13
Expenses	Database Management	History Grant. Payments to compensate Database Manager.	13
Expenses	History Committee Supplies & Equipment	History Grant	16
Expenses	History Committee Travel	History Grant	16
Expenses	Grant Management (Indirect)	All Grants	16
Expenses	Museum Support	History Grant. Purchase of supplies, equipment or other items that contribute to preserving or interpreting the history of the FWS.	16
Expenses	Oral History Equipment/Supplies	History Grant	16
Expenses	Oral History Transcription	History Grant	13
Expenses	Oral History Travel	History Grant	16

² The Treasurer and Grants Manager should use these categories for developing budgets and grant proposals. The list may be amended/revised with approval of the Board of Directors.

Expenses	Station Anniversary Grants	History Grant	10
Expenses	Honoraria	Youth Grant	13
Expenses	Mini-Grants	Youth Grant	10
Expenses	Outreach Travel/Expenses	Youth Grant	16
Reunions			
Income	Auction		6b
Income	Donations Received - General	General donations to the Association that may be gathered through or during a Reunion.	1
Income	Donations Received – Greenwalt Walk for Wildlife		6b
Income	Donations Received – Reunion	Donations made specifically to support a reunion	6b
Income	Raffles		6b
Income	Registration Fees		6b
Expenses	Audiovisual/IT Assistance		6c
Expenses	Auction Expenses		6c
Expenses	Cancellation Refunds/Overpayments		6c
Expenses	Donation Paid – Greenwalt Walk for Wildlife	Paid to a FWS Friends Group	6c
Expenses	Field Trips	Including box lunches or other food/drinks while on field trips	6c
Expenses	Food/Drinks Service	For meetings, receptions and banquet	6c
Expenses	Hotel Fees/Charges	May include obligations for room commitments not used	6c
Expenses	Meeting Room Rental		6c
Expenses	Miscellaneous		6c
Expenses	Name Tags		6c
Expenses	PayPal Fees/Expenses		6c
Expenses	Raffles		6c
Expenses	Reunion Participant Bags	Including costs for items to include in the bags	6c
Expenses	Reunion Programs Setup/Printing		6c
Expenses	Travel Reimbursement – Invited Speakers		6c

Table 2. Summary of Annual Financial Records for FWS Retirees Association (summarized 2-8-2016)

Permanent Records include:

- Letter assigning Federal Employer Identification Number (FEIN), also known as EIN (Employer Identification Number)
- Audit reports of previous year
- General correspondence involving significant deposits or expenses
- Checks (canceled) for important payments, i.e., taxes, special contracts (checks should be filed with the papers pertaining to the transaction)
- Contracts and leases still in effect
- Corporation reports filed with the Secretary of State
- Insurance records, accident reports, claims, policies, certificates
- Accounting Reports
- Form 990/990-EZ or 990-N and all Schedules, as filed with IRS
- State tax information returns, as filed
- Form 990-T, if applicable, for unrelated business income
- Correspondence with IRS
- Other information returns filed with the government
- Charitable Solicitation Registration, if applicable
- Trademark registrations

Additional documents that should be kept for a set period of time

The IRS statute of limitations (assuming no fraud exists) is three years from the date a tax return is filed. For example, the 2012 tax return is filed by May of 2013; therefore, after May of 2016, the statute has run out. We therefore use as a minimum four years. Most states follow the federal guideline.

Document	Retention Period
Accounts payable record	7 years
Bank reconciliation	4 years
Cash receipt record	7 years
Checks (canceled)	7 years
Contracts and leases (expired)	7 years
Correspondence with customers or vendor	4 years
Correspondence (general)	4 years
Duplicate deposit slips.	4 years
Financial statements (year-end) and budget	10 years
Grant award letters of agreement	10 years
Inventories (products and materials)	7 years
Invoice	7 years
Petty cash voucher	7 years
Purchase order	7 years
Sales record	7 years
Vouchers for payments to vendors, officers, etc. (includes allowances and reimbursements to officers, members, etc., for travel and other expenses)	7 years

Are at least two Board members, acting as the Financial Committee, conducting this review? _____
Names of Financial Review Committee members: _____

Date of this review _____

Date of last review

Is the Association operating under a Board-approved budget for the current fiscal year? _____

Have bank statements been reviewed periodically by the Financial Review Committee? _____

Are balances consistent with monthly and annual reporting? _____

Are all physical assets known and being properly used and stored? _____

Have grants been administered consistent with their funding source and Association guidelines?

Have required tax documents been completed? _____

Have all donors of \$250 or more been acknowledged and IRS requirements been met? _____

Have annual notice(s) to all Association members regarding dues payments been made? _____

Have reunion budgets been kept separate and all expenses and payments documented? _____

Is there any evidence of potential conflict of interest in any Association activities? _____

Is it apparent who has Association credit card authority and that such authority is necessary? _____

Have purchases for over \$1,000 had at least 3 documented bids? _____

Does the Association have an acceptable cash reserve? _____

Are financial records being kept consistent with applicable policy and procedures? _____

Are there any specific concerns the Financial Review Committee has identified that require Board attention?

Explanations (from any of the above) Add additional sheets as required.

[illegible]

Signed _____ **Date** _____

Signed _____ **Date** _____

Table 5. FWS Retirees Association – Travel Reimbursement Voucher

An Excel spreadsheet version of this voucher can be obtained from the Treasurer.

Travel Reimbursement Voucher

PURPOSE: _____ **STATEMENT:** 1 **PERIOD:** From _____ To _____

TRAVELER INFORMATION: *Receipts Attached* ☐ Check Box
Name _____
Address _____

Date	Account	Description	Hotel	Miles	Mileage @ \$0.67	Meals			Misc.	Total
					\$ -					\$ -
					\$ -					\$ -
					\$ -					\$ -
					\$ -					\$ -
					\$ -					\$ -
					\$ -					\$ -
					\$ -					\$ -
					\$ -					\$ -
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					\$ -					\$ -
					\$ -					\$ -
					\$ -					\$ -
					\$ -					\$ -
			\$ -	0	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
For per diem rates: http://www.qsa.gov/portal/content/104877										Subtotal \$ -
APPROVED: _____ Accomplished: _____										Advances
_____										Total \$ -
Pay Date: _____										

Appendix 1. Internal Revenue Service Tax Exempt Status Determination Letter

INTERNAL REVENUE SERVICE P. O. BOX 2508 CINCINNATI, OH 45201	DEPARTMENT OF THE TREASURY
Date: MAR 15 2004	Employer Identification Number: 02-0703755
ASSOCIATION OF RETIRED FISH & WILD LIFE SERVICE EMPLOYEES 698 CONSERVATION WAY SHEPHERDSTOWN, WV 25443	DLN: 17053289033043 Contact Person: SANDRA MAK ID# 95023 Contact Telephone Number: (877) 829-5500 Accounting Period Ending: December 31 Foundation Status Classification: 509(a)(2) Advance Ruling Period Begins: September 2, 2003 Advance Ruling Period Ends: December 31, 2007 Addendum Applies: No

Dear Applicant:

Based on information you supplied, and assuming your operations will be as stated in your application for recognition of exemption, we have determined you are exempt from federal income tax under section 501(a) of the Internal Revenue Code as an organization described in section 501(c)(3).

Because you are a newly created organization, we are not now making a final determination of your foundation status under section 509(a) of the Code. However, we have determined that you can reasonably expect to be a publicly supported organization described in section 509(a)(2).

Accordingly, during an advance ruling period you will be treated as a publicly supported organization, and not as a private foundation. This advance ruling period begins and ends on the dates shown above.

Within 90 days after the end of your advance ruling period, you must send us the information needed to determine whether you have met the requirements of the applicable support test during the advance ruling period. If you establish that you have been a publicly supported organization, we will classify you as a section 509(a)(1) or 509(a)(2) organization as long as you continue to meet the requirements of the applicable support test. If you do not meet the public support requirements during the advance ruling period, we will classify you as a private foundation for future periods. Also, if we classify you as a private foundation, we will treat you as a private foundation from your beginning date for purposes of section 507(d) and 4940.

Grantors and contributors may rely on our determination that you are not a private foundation until 90 days after the end of your advance ruling period. If you send us the required information within the 90 days, grantors and contributors may continue to rely on the advance determination until we make

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ASSOCIATION OF RETIRED FISH & WILD

a final determination of your foundation status.

If we publish a notice in the Internal Revenue Bulletin stating that we will no longer treat you as a publicly supported organization, grantors and contributors may not rely on this determination after the date we publish the notice. In addition, if you lose your status as a publicly supported organization, and a grantor or contributor was responsible for, or was aware of, the act or failure to act, that resulted in your loss of such status, that person may not rely on this determination from the date of the act or failure to act. Also, if a grantor or contributor learned that we had given notice that you would be removed from classification as a publicly supported organization, then that person may not rely on this determination as of the date he or she acquired such knowledge.

If you change your sources of support, your purposes, character, or method of operation, please let us know so we can consider the effect of the change on your exempt status and foundation status. If you amend your organizational document or bylaws, please send us a copy of the amended document or bylaws. Also, let us know all changes in your name or address.

As of January 1, 1984, you are liable for social security taxes under the Federal Insurance Contributions Act on amounts of \$100 or more you pay to each of your employees during a calendar year. You are not liable for the tax imposed under the Federal Unemployment Tax Act (FUTA).

Organizations that are not private foundations are not subject to the private foundation excise taxes under Chapter 42 of the Internal Revenue Code. However, you are not automatically exempt from other federal excise taxes. If you have any questions about excise, employment, or other federal taxes, please let us know.

Donors may deduct contributions to you as provided in section 170 of the Internal Revenue Code. Bequests, legacies, devises, transfers, or gifts to you or for your use are deductible for Federal estate and gift tax purposes if they meet the applicable provisions of sections 2055, 2106, and 2522 of the Code.

Donors may deduct contributions to you only to the extent that their contributions are gifts, with no consideration received. Ticket purchases and similar payments in conjunction with fundraising events may not necessarily qualify as deductible contributions, depending on the circumstances. Revenue Ruling 67-246, published in Cumulative Bulletin 1967-2, on page 104, gives guidelines regarding when taxpayers may deduct payments for admission to, or other participation in, fundraising activities for charity.

Contributions to you are deductible by donors beginning Sept 2, 2003.

You are not required to file Form 990, Return of Organization Exempt From Income Tax, if your gross receipts each year are normally \$25,000 or less. If you receive a Form 990 package in the mail, simply attach the label provided, check the box in the heading to indicate that your annual gross receipts are normally \$25,000 or less, and sign the return. Because you will be treated as

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a public charity for return filing purposes during your entire advance ruling period, you should file Form 990 for each year in your advance ruling period that you exceed the \$25,000 filing threshold even if your sources of support do not satisfy the public support test specified in the heading of this letter.

If a return is required, it must be filed by the 15th day of the fifth month after the end of your annual accounting period. A penalty of \$20 a day is charged when a return is filed late, unless there is reasonable cause for the delay. However, the maximum penalty charged cannot exceed \$10,000 or 5 percent of your gross receipts for the year, whichever is less. For organizations with gross receipts exceeding \$1,000,000 in any year, the penalty is \$100 per day per return, unless there is reasonable cause for the delay. The maximum penalty for an organization with gross receipts exceeding \$1,000,000 shall not exceed \$50,000. This penalty may also be charged if a return is not complete. So, please be sure your return is complete before you file it.

You are not required to file federal income tax returns unless you are subject to the tax on unrelated business income under section 511 of the Code. If you are subject to this tax, you must file an income tax return on Form 990-T, Exempt Organization Business Income Tax Return. In this letter we are not determining whether any of your present or proposed activities are unrelated trade or business as defined in section 513 of the Code.

You are required to make your annual information return, Form 990 or Form 990-EZ, available for public inspection for three years after the later of the due date of the return or the date the return is filed. You are also required to make available for public inspection your exemption application, any supporting documents, and your exemption letter. Copies of these documents are also required to be provided to any individual upon written or in person request without charge other than reasonable fees for copying and postage. You may fulfill this requirement by placing these documents on the Internet. Penalties may be imposed for failure to comply with these requirements. Additional information is available in Publication 557, Tax-Exempt Status for Your Organization, or you may call our toll free number shown above.

You need an employer identification number even if you have no employees. If an employer identification number was not entered on your application, we will assign a number to you and advise you of it. Please use that number on all returns you file and in all correspondence with the Internal Revenue Service.

This determination is based on evidence that your funds are dedicated to the purposes listed in section 501(c)(3) of the Code. To assure your continued exemption, you should keep records to show that funds are spent only for those purposes. If you distribute funds to other organizations, your records should show whether they are exempt under section 501(c)(3). In cases where the recipient organization is not exempt under section 501(c)(3), you must have evidence that the funds will remain dedicated to the required purposes and that the recipient will use the funds for those purposes.

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-4-

ASSOCIATION OF RETIRED FISH & WILD

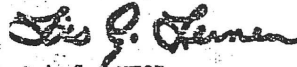
If you distribute funds to individuals, you should keep case histories showing the recipients' names, addresses, purposes of awards, manner of selection, and relationship (if any) to members, officers, trustees or donors of funds to you, so that you can substantiate upon request by the Internal Revenue Service any and all distributions you made to individuals. (Revenue Ruling 56-304, C.B. 1956-2, page 306.)

If we said in the heading of this letter that an addendum applies, the addendum enclosed is an integral part of this letter.

Because this letter could help us resolve any questions about your exempt status and foundation status, you should keep it in your permanent records.

If you have any questions, please contact the person whose name and telephone number are shown in the heading of this letter.

Sincerely yours,



Lois G. Lerner
Director, Exempt Organizations
Rulings and Agreements

Enclosure(s):
Form 872-C

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0049 0003

Appendix 2.

Procedures for Travel Approval and Reimbursement for Retirees Association Board Members and Support Staff

December 2024

Board members and support staff of the FWS Retirees Association (FWSRA) must follow these procedures for travel approval and reimbursement.

Some or all travel expenses may be reimbursed by the FWSRA, subject to availability of funds, including:

- Meals and incidental expenses, reimbursable according to current GSA per diem rates.
 - Lodging expenses minimized when possible, such as with AAA, AARP, or group rates when a block of rooms has been reserved.
 - Transportation expenses, such as rental car and gas, tolls, parking, and mileage (based on current GSA rate).
1. The traveler must contact FWSRA Chair (or Vice-Chair if the Chair can't be reached in time prior to travel) prior to incurring expenses (when possible, at least two weeks prior to travel). The traveler must identify the purpose and duration of the trip, planned transportation methods and estimated travel cost. The form on the last page of this procedure document may be used as a guide to estimate travel expenses.
 2. The Chair will contact the Retirees Association Treasurer to confirm that funding is available.
 3. In advance of travel, the Chair will inform the traveler which expenses will be reimbursed.
 4. Following travel, the traveler will complete the Travel Reimbursement Voucher (Table 5 of the FWSRA Fiscal Policies and Procedures Document) or some other acceptable format. The completed form and receipts should be scanned and emailed to the Treasurer, ideally within two weeks of completing travel.
 5. The Treasurer will forward the voucher and receipts to the Chair for approval.
 6. Following approval, the Treasurer will reimburse the traveler by check within 30 days.

REIMBURSEMENT ESTIMATION FOR TRAVEL EXPENSES BY FWS RETIREES ASSOCIATION BOARD MEMBERS AND SUPPORT STAFF

Travelers should complete and send this form by email to the Chair for approval prior to traveling. An electronic copy is available from the Treasurer.

Traveler's name:

Traveler's mailing address:

Traveler's email:

Traveler's phone number (cell preferred):

Purpose of travel:

Dates of travel (mm/dd/yyyy - mm/dd/yyyy):

Destination (city/state):

POV mileage (reimbursed at current GSA rate, <https://www.gsa.gov/travel/plan-book/transportation-airfare-pov-etc/private-owned-vehicle-pov-mileage-reimbursement-rates>):

Rental car cost:

Gas for rental car:

Tolls:

Parking (airport and/or hotel or other):

Lodging:

Meals and Incidental Expenses (M&IE) reimbursed at current GSA rate, <http://www.gsa.gov/portal/content/104877>):

Airfare:

Miscellaneous (describe):

Note that receipts will be required for all expenses except tolls and M&IE.