

Rocky Mountain Conservancy

Financial Policies



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The Rocky Mountain Conservancy promotes stewardship of Rocky Mountain National Park and similar lands through education and philanthropy.

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I. Introduction

The purpose of this manual is to describe all accounting policies and procedures currently in use at Rocky Mountain Conservancy (hereafter referred to as the "*Organization*") and to ensure that the financial statements conform to generally accepted accounting principles; assets are safeguarded; guidelines of grantors and donors are complied with; and finances are managed with accuracy, efficiency, and transparency.

All the Organization's staff with a role in the management of fiscal and accounting operations are expected to comply with the policies and procedures in this manual.

These policies will be reviewed annually and revised as needed by the staff and approved by the Executive Director and the Board of Directors Operations & Finance Committee.

II. Division of Responsibilities

The following is a list of board members and staff and their accounting or fiscally related responsibilities.

Board of Directors or Committees

1. The board is responsible for corporate governance, strategic direction and organizational accountability.
2. The Operations & Finance Committee reviews and recommends the annual operating budget and annual park project spending proposals to the full board for approval and reviews periodic and year-end financial statements.
3. The full board reviews periodic and year-end financial statements.
4. The full board reviews and approves the annual IRS-990 tax filing.
5. The Executive Committee is responsible for hiring, supervision, and annual performance evaluation of the Executive Director and determining the Executive Director's salary.
6. The board appoints at least two board members as authorized signers on the bank accounts.
7. Based on recommendations by the Executive Committee and Operations and Finance Committee, the board reviews and approves all non-budgeted expenditures totaling over \$50,000.
8. In conjunction with the Organization's external audit firm, the Audit Committee reviews and advises staff on internal controls and accounting policies.
9. The Investment Committee is responsible for overseeing the management of the Conservancy's invested assets.

Board President

1. Member of the Executive Committee.
2. Serves as direct supervisor of the Executive Director.
3. Reviews and approves all expenditures and reimbursements of the Executive Director.
4. Authorized to enter, or designate another to execute, contracts on behalf of the Organization.

Executive Director

1. Responsible for the creation, implementation, and financial results of the annual operating plan.
2. Non-voting member on permanent and ad-hoc board committees.
3. Serves on the Organization's 401K plan committee.
4. Reviews and approves financial reports prior to any board presentation.
5. Collaborates with staff on annual operational and park project budget development.
6. Authorized signatory on checks. Reviews all issued checks and bank drafts, including payroll.
7. Regularly reviews inter-account bank transfers on bank reconciliations.
8. Reviews all bank statements for any irregularities, and reviews completed monthly bank reconciliations and credit card statements.
9. Oversees staff adherence to fiscal internal controls.

Director of Administration

1. Oversees and leads Administration Department staff.
2. Participates in the following committee meetings: Audit, Operations & Finance, Investment, and Facilities.
3. Serves as on the Organization's 401K plan committee.
4. Responsible for organization-wide Information Technology infrastructure, vehicle fleet and building assets.
5. Collaborates with the board and legal counsel to create compliant governance documents, contracts, and agreements.

6. Monitors and manages spending of Administration departmental budget.
7. Active participation in certain financial transactions such as interbank transfers, posting monthly OPS revenue, and weekly check disbursements to provide additional oversight and ensure segregation of team duties.
8. Collaborates with Finance Manager to complete annual audit.
9. Works closely with the Executive Director and RMNP to create the annual park project budget. Serves as the primary liaison to the park for all annual project and aid expenditures, ensuring budgetary compliance.
10. Attends meetings and participates in committees with RMNP on signature RMC projects to provide additional contract oversight and support.
11. Primary liaison with our agency partners to administer partnership agreements with the USDAFS, NPS, BLM and other partners.
12. Responsible for the contractual and fiscal administration of federal Task Agreements, Cooperating and Cooperative Agreements, Requests for Proposal (RFP), and Memorandums of Understanding (MOU).

Finance Manager

1. Supervises the Finance Associate.
2. Participates in the following committee meetings: Audit, Operations & Finance, 401K, and Investment.
3. Collaborates with the Executive Director and department heads to develop departmental and program budgets. Regularly monitors budgets and reports on their performance.
4. Develops and maintains timely and accurate financial statements and reports that are in accordance with generally accepted accounting principles.
5. Reconciles all bank accounts.
6. Monitors and manages cash flow; initiates bank transfers.
7. Responsible for RENXT database and maintaining the general ledger.
8. Works closely with the HR Coordinator to ensure proper payroll and benefits processes.
9. Leads the annual external audit process. Collaborates with staff finance team, external auditor, and the board to finalize financial statements and file IRS Form 990.
10. Ensures appropriate insurance coverages for the Organization and its Directors and Officers.
11. Meets the statutory filing requirements of the Organization including charitable status, payroll taxes, and sales taxes.
12. Reviews grant application budgets, assists with grant financial reporting, and ensures appropriate annual release of temporarily and permanently restricted funds.
13. Oversees fixed asset inventory and depreciation schedules.
14. Reviews all deposits and supporting documentation.

Finance Associate

1. Manages accounts payable processes including entering invoice, issuing checks, and sending to vendors
2. Monitors and reconciles corporate charge account transactions.
3. Performs weekly check run and EFT bank transfers.
4. Processes and posts donation remits and makes bank deposits.
5. Prepares OPS revenue remits.
6. Manages the petty cash and change funds.
7. Manages Accounts Receivable.
8. Collaborates with Finance Manager to complete annual external audit.
9. Performs routine general journal entries.
10. Assists Finance Manager with ensuring and certifying merchant PCI compliance.
11. Takes deposits to the bank.

Administrative Assistants

1. Obtains mail/packages at the post office. Opens and dates all mail before dispersing.
2. Performs initial store and outlet remit reconciliations, including cash counting.
3. Photocopies incoming donation checks to provide to Finance Associate.
4. Collects and deposits donation coin bags.
5. Performs second cash count on bank deposits.
6. Assists with check run.
7. Makes change for the stores and outlets.

Human Resources Coordinator

1. Processes bi-weekly payroll and stipend payments.
2. Ensures that employee reimbursements have proper documentation and approvals.
3. Responsible for Paylocity database and properly maintaining electronic and hardcopy personnel files.

Member and Donor Services Manager

1. Supervises the Member and Donor Services Associate.
2. Reviews donation and member remits and submits to the Finance Associate.
3. Maintains the donor and member software.

Member and Donor Services Associate

1. Processes and verifies donation and membership checks.
2. Prepares remits for finance.
3. Prepares donor acknowledgement letters for signature by Executive Director.
4. Assists with obtaining mail/packages at the post office. Opens and dates all mail before dispersing.

III. Internal Controls

The Organization has established internal controls over each process discussed below. Internal controls are designed to provide reasonable assurance that the Organization is achieving its objectives. This includes ensuring that the financial reports are accurate, assets are safeguarded, and the Organization complies with laws and regulations.

The Organization designs internal controls considering the:

1. Control Environment
2. Risk Assessment
3. Control Activities
4. Information and Communication
5. Monitoring

Key factors in designing and implementing internal controls are:

1. Segregation of Duties - separating the work to reduce the risk of error
2. Physical Controls – securing equipment, inventory, cash, other assets, and confidential documentation.
3. Review Levels – ensuring appropriate levels of review to check for accuracy.

Internal controls over each process are detailed below in each section.

The Organizations internal controls are reviewed periodically for changes in process and personnel. Annually the Organization prepares an Internal Control memo detailing internal controls throughout the organization and submits to our external auditors. The auditors review and test the internal controls annually during the financial statement audit.

Background Checks

Background checks are performed on all members of the Operation/Finance team and Education team (including Rocky Mountain Conservation Corp and High School Leadership Corp) prior to employment. Background checks are performed on all signers on the Organization's bank accounts.

Background checks are performed through TrueScreen.

IV. Chart of Accounts and General Ledger

The Organization has designated a Chart of Accounts specific to its operational needs and the needs of its financial statements. The Chart of Accounts is structured so that financial statements can be shown by natural classification (expense type) and functional classification (program vs. fundraising vs. administration). The Finance Manager is responsible for maintaining the Chart of Accounts and revising it, as necessary. The external auditor annually reviews the Chart of Accounts.

The general ledger is automated and maintained using our Blackbaud Financial Edge NXT accounting software. All input and balancing are the responsibility of the Finance Associate with final approval by the Finance Manager.

The Finance Manager reviews the general ledger periodically for unusual transactions.

V. Cash Receipts

Cash receipts arise from:

1. Direct donor contributions
2. Earned revenue including nature store sales and field institute classes
3. Contracts and grants
4. Events and fundraising activities
5. Housing rental payments

The principal steps in the cash receipts process are:

The Administrative Assistant and/or Donor Services Associate receive incoming mail, opens, date stamps, and distributes the mail. These Assistants stamps all checks “for deposit only,” and makes a copy of each check. The checks are kept in the safe until handed to the Finance Associate for processing and depositing.

No less than weekly, but more frequently if needed, the Finance Associate processes the deposits and takes them to the bank. A copy of the deposit slip is reviewed, initialed, and attached to each deposit and filed by the Finance Manager.

All cash received through earned revenue will be counted and verified against each remit prior to giving to the Finance Associate. Upon creating an operational remit, the cash will immediately be posted using the appropriate allocations. The cash will be kept in a locked, secure location until it is deposited.

Two of our Nature Stores have bank accounts at bank branches near their locations. Cash receipts are deposited twice a month and deposit slips are sent to the Finance Associate. The Finance Manager reconciles the deposit slips with the bank statements and the Finance Associate records these in FENXT.

All cash received through donation boxes will be uncrumpled and counted by an Administrative Assistant in a supervised (1 or more other people present) location. All cash counts are verified by the Finance Associate. Upon creating a donation box remit, the cash will immediately be posted using the appropriate allocations. The cash is kept in a locked, secure location until deposited.

Payments are also received by credit card. The Finance Manager reconciles these receipts monthly with the bank statement, credit cards merchant statement, and revenue reports provided by the department head.

Payments received by EFT (grants and donations) are verified to the grant award letters and documentation provided by the Member and Donor Services Manager.

VI. Bank Transfers and ACH transfers

Bank Transfers

1. The Finance Manager monitors the balances in the bank accounts to determine when there is a shortage or excess in the accounts. They complete all inter-account bank transfers and initiate check transfers for all intra-account bank accounts. All bank transfers are reviewed by the Executive Director through monthly account reconciliations.

ACH Transactions

1. The Finance Manager monitors the balances in the bank accounts to determine when there is a shortage or excess in the accounts. They initiate all ACH bank transfers, and the Director of Administration approves these transfers prior to execution. All bank transfers are reviewed by the Executive Director through monthly account reconciliations.

VII. Cash Disbursements & Expense Allocations

Cash disbursements are made for:

1. Payments to vendors for goods and services
2. Taxes/license fees
3. Staff training and development
4. Memberships and subscriptions
5. Operational expenses
6. Aid and annual Rocky Mountain National Park approved project expenditures

Operational invoices are submitted to the Finance Associate for input into the Financial Edge accounting system. Invoices utilizing fundraised funds or aid funds are input by the Director of Administration. Aid funds are a portion of proceeds earned at each retail nature store located within Rocky Mountain National Park or in our other outlet store locations. Earned aid is recorded annually as a liability and banked for future use by that location for solely educational, interpretation, and research purposes. The Director of Administration reviews expenditure requests and approves them based on adherence to the board approved annual project budget, exercising active fiscal responsibility, and honoring donor intention. Weekly, the Director of Administration runs a preliminary check run to review the invoices that have come due and obtain check numbers for approved disbursement. This approved run is provided to the Finance Associate who then prints the checks. Checks can be prepared manually more frequently, with as little as one day's notice if necessary.

Requests for cash disbursements are submitted to finance in three ways:

1. Original invoice
2. Purchase request (submitted on approved form)
 - a. Retail purchase orders greater than \$15,000 require Executive Director approval prior to order submission.
3. Requisition

A Program Manager approves invoices before submitting them to finance.

The Finance Manager reviews all operational requests for payment and:

1. Verifies expenditure and amount
2. Provides or verifies appropriate allocation information
3. Submits to the Finance Associate for processing

The Finance Associate processes all invoices as follows:

1. Immediately enters invoices into the Financial Edge Accounts Payable module.
2. Prints checks according to allocation and payment date provided by the Finance Manager.
3. Submits checks, with attached backup documentation, submits to Executive Director for approval and signature. All checks in excess of \$1,000 require a second signature from an authorized board or staff member.
4. Stamps invoices "posted" and dates.

The Administrative Assistant:

1. Mails checks including check remittance stubs
2. Files all backup documentation in the appropriate file

EFT Payments

EFT payments are made for routine expenses. These expenses include sales tax payments, employee benefit payments, and monthly utility bills. EFT payments are only made by the Director of Administration, Finance Manager, and Finance Associate with the approval of the Executive Director.

Each EFT payment requires the same documentation and is entered into the accounting software using the same process as discussed above for check payments.

Personal expense reimbursements

For the Executive Director's expenses, the Board President approves them after the supporting documentation has been reviewed. The Board President initials and dates the documents. For all other staff, their supervisor approves them after review of the reimbursement form and supporting documentation. Upon approval, the funds are reimbursed through Paylocity as part of the payroll process. The Executive Director also reviews these reimbursements and documentation as part of the payroll review process.

Expense Allocations

Most non-salary expenses that benefit more than one cost center (administration, fundraising, and program) are allocated across centers using a shared cost method. Under this method, the number of full-time equivalents (FTEs) within a department are divided by the total number of FTEs at the Organization to determine the percentage of shared costs they should bear. This is done quarterly by the Finance Manager.

VIII. Credit Card Policy and Charges

All staff members authorized to carry an organization credit card will be held personally responsible for any charge deemed personal or unauthorized. Cash advances are not permitted by any user. Prior to issuance of a credit card, employees must agree to prudent use and acknowledge responsibility for card activity.

Credit cards

The Director of Administration adds all new users and sets spending limits according to job duty and spending needs. Unauthorized use of the credit card includes personal expenditures of any kind; expenditures which have not been properly authorized; meals, entertainment, gifts, or other expenditures which are prohibited by budgets, laws, and regulations, and the entities from which the Organization receives funds.

The receipts for all credit card charges are given to the Finance Associate within two weeks of the purchase along with proper documentation. The Finance Associate will verify all credit card charges with the monthly statements and allocate them to the appropriate accounts. A copy of all charges is attached to the monthly credit card statement and submitted to the Executive Director for approval and signing. The Finance Associate or Finance Manager schedules payments with credit card company online.

The Executive Director's credit card receipts are provided to the Board President for approval.

Fuel cards

Crew leaders in the Conservation Corps program are given fuel cards that are only authorized for fuel or vehicle maintenance supply purchases at select locations. No food or drink purchases are authorized. A monthly statement is sent to the Director of Administration. They forward this to the manager of the Conservation Corps for final approval. The Finance Manager books the EFT payment.

IX. Accruals

To ensure a timely close of the General Ledger, the Organization books accrual entries. Some accruals are made as recurring entries.

Accruals to consider:

1. Monthly interest earned on money market accounts, certificates of deposits, etc.
2. Unrealized/Realized Gain (Loss) on Endowment investments.
3. Recurring expenses:
 - a. Employee vacation accruals
 - b. Payroll wage and tax accruals
 - c. Prepaid corporate insurance
 - d. Depreciation
 - e. Credit card fees

X. Bank Account Reconciliations

1. The Finance Manager downloads the bank statements from the bank website.
2. The Finance Manager reconciles as follows: a comparison of dates and amounts of deposits as shown in the accounting system and on the statement, a comparison of inter-account transfers, an investigation of any rejected items, a comparison of cleared checks with the accounting record including amount, payee, and sequential check numbers.
3. The Finance Manager verifies that voided checks, if returned, are appropriately defaced and filed.
4. The Director of Administration and/or Finance Manager investigates any checks that are outstanding over six months.
5. The Finance Manager attaches the completed bank reconciliation to the applicable bank statement, along with all documentation.
6. The reconciliation report and attached financial statement is reviewed, approved, dated, and initialed, by the Executive Director.

XI. Petty Cash, Cash Drawers, Reserve Change Funds, and Safes

Petty Cash

Petty cash tills are utilized at several offsite outlet store locations. Petty cash funds are to be used for miscellaneous operational purchases such as money order fees, postage, or small emergency store needs. Reimbursement requests for petty cash must be accompanied by all applicable receipts.

1. The petty cash fund will not exceed \$50.00 per location and is to be kept in a safe or locking cabinet.
2. Access to a petty cash till is granted only to our retail clerk or partner outlet contact depending on the location.
3. Reimbursements are only disbursed after a request, including receipts, is approved.
4. No checks can be cashed using petty cash funds.
5. The Finance Associate oversees the annual reconciliation of petty cash funds.

Cash Drawers

Retail cash register drawers are utilized in all Rocky Mountain National Park and outlet retail store locations. The amount kept at each location depends on the volume of sales expected but is kept static throughout the season. Retail clerks count their drawers each morning to verify their daily starting balance. Depending on the sales volume of the store's location, a retail clerk or partner agency employee will prepare a closing remit, as often as daily, but minimally each month. In the remit, in addition to reporting sales activity, they reconcile the drawer count, and include any cash over or short, if applicable.

1. Cash drawers' range in value from \$100.00 - \$400.00 per location. The drawers are kept in a safe or locking cabinet at night.
2. It is the retail clerk's responsibility to make change for the drawer from their reserve change funds.
3. Best practices are followed to minimize the acceptance of counterfeit currency.
4. No checks can be cashed using cash drawer funds.
5. The Finance Associate monitors cash drawer balances throughout the year and oversees their annual reconciliation.

Reserve Change Funds

Reserve change funds are utilized in all Rocky Mountain National Park and outlet retail store locations. The amount kept at each location depends on the volume of sales expected. This amount, especially in the RMNP stores, can be increased or decreased seasonally.

1. The amount of reserve change funds by location varies widely, but none are to exceed \$5,000.00.
2. It is the retail clerk's responsibility to utilize the reserve change funds to make accurate change for their cash register drawer.
3. Though the Administrative Assistant or Finance Associate regularly checks the reserve change funds at Rocky Mountain National Park store locations, it is the retail clerk's responsibility to inform administrative staff when the reserve change funds need to be replenished with smaller denominations.
4. No checks can be cashed using reserve change funds.
5. The Finance Associate oversees the annual reconciliation of reserve change funds.

Safes

Safes are located in the most secure location within Q48, the retail office, and at each Rocky Mountain National park visitor center. These safes hold daily store remits, extra change, and the cash register drawer overnight. Access to safes is limited to OPS/Finance employees and store clerks. As detailed above, all funds stored in a safe are regularly counted and balances recorded and reported on for audit purposes. If a safe has the capacity to change the combination, this is done after an employee has been terminated.

XII. Property and Equipment

Property and equipment include items such as:

1. Land
2. Buildings (Residential)
3. Building Improvements
4. Furniture and Fixtures
5. Equipment
6. Computer Equipment
7. Vehicles
8. Leasehold Improvements
9. Computer Software

It is the Organization's policy to capitalize all items which have a unit cost greater than two thousand dollars (\$2,000). Items purchased with a value or cost less than two thousand dollars (\$2,000) are expensed in the period purchased.

The depreciation period for capitalized assets is as follows:

Land	No Depreciation
Buildings (Residential)	27.5 years
Building Improvements	Estimated life or 15 years
Furniture and Fixtures	7 years
Equipment	Estimated life or 10 years
Computer Equipment	5 years
Vehicles	5 years
Leasehold Improvements	Estimated life
Computer Software	36 months

The following processes are followed with respect to the property and equipment:

1. A Fixed Asset Log is maintained by the Finance Manager including date of purchase, asset description, purchase/donation information, cost/fair market value, identification number, and life of asset.
2. Annually, a physical inspection and inventory will be taken of all fixed assets and reconciled to the general ledger balances.
3. The Finance Manager shall be informed in writing of any change in the status or condition of any property or equipment.
4. Depreciation is recorded monthly. Depreciation is computed using the straight-line method over the estimated useful lives of the related assets. Any impaired assets discovered during the inventory will be written down to their actual value.

XIV. Records and Document Retention

Personnel Records

Items stored in employee personnel record within Paylocity on-line platform:

- Personal Contact Information
- Copy of Driver's License
- Direct Deposit Information
- Compensation History
- Pay Stubs
- IRS W-4 Form
- USCIS Form I-9 with supporting forms of identification
- Employee Handbook & Acknowledgement
- Emergency Contact Information
- Safety Handbook & Acknowledgement
- Employment Offer Letter (not applicable for employees hired prior to Paylocity)

Items stored in each employee's physical personnel file:

- RMC employee property checklist
- Employee Handbook acknowledgement
- Employment offer letters
- Benefit information (enrollment summary, plan changes, etc.)
- Performance reviews
- Compensation changes
- IRS W-9 (if applicable)
- Personnel Action Forms (warnings, write-ups)
- Exit interviews

Items stored in a **legally required separate** physical file in access restricted storage:

- Medical paperwork (physician notes, test results, work releases, Family & Medical Leave Act (FMLA) paperwork, etc.)
- Workers Compensation file including all supporting documentation, photos, claim/injury documents
- USCIS Form I-9 with copies of supporting identification

Items stored on the HR: Drive:

- AmeriCorps participant files & High School Learning Corps participant files
 - Interview notes

- Offer letters
- Reference checks
- IRS W9 forms
- 2-3 forms of identification
- Conditional offer letter
- Performance reviews
- Performance improvements: Warnings & write ups
- CPR/First Aid/Wilderness First Aid (WFA) certification
- Direct Deposit information
- Criminal History Consent Form
- Background Check Adjudication results (Fieldprint & Truescreen)
- Participant Health Form
- GSA Form 301A – Volunteer Service Agreement
- Immunization records
- Master Service Agreement (MSA)
- Workers Compensation First Report of Injury Forms (FROI) and documentation
- Exit interviews
- Employees files
 - Interview notes
 - Employment offer letters
 - Reference checks
 - RMC employee property checklists
 - Housing packets and signed documentation
 - Performance reviews
 - Performance improvements: Employee warnings and write ups
 - Workers Compensation First Report of Injury Forms (FROI) and documentation
 - Exit interviews

Finance and Business Documents

Business Documents Kept For At least Three Years:

- Employee Records
 - Colorado employers must keep employee records for at least three years after the employee's compensation is due, and for the duration of any pending wage claims. This includes the employee's name, address, occupation, date of hire, date of birth, daily hours worked, credits claimed, tips, and pay information. Employers can keep these records in a spreadsheet, physical or electronic folder, or HRIS software, as long as they are kept in a designated location and maintained accurately. These records are stored in Paylocity.
- Employment Applications
- Expired Insurance Policies
- Itemized Pay Statements

- o Colorado employers must keep records of an employee's itemized pay statements for at least three years after the compensation was due. These records must be available for inspection by the division, and employers must provide copies upon request. These records are stored in Paylocity.
- Timecards For Hourly Employees
 - o These records are stored in Paylocity

Business Documents Kept For At least Five Years:

- Employee Personnel Records (after termination)
 - o Colorado employers must keep personnel records for five years, including requests for accommodation, complaints of discrimination or harassment, applications for employment, and records related to hiring, promotion, demotion, transfer, layoff, OSHA accident forms, termination, and more. RMC has historically kept these documents for 8 years as the Organization receives many proof of employment requests after the five-year period.

Business Documents Kept At least Seven Years:

- Auto Accident Reports, Claims
- Accounts Payable Ledgers and Schedules
- Accounts Receivable Ledgers and Schedules
- Bank Statements and Reconciliations
- Cancelled Checks
- Employment Tax Records
- Expense Distribution Schedules
- Expired Contracts, Leases
- Inventory: Merchandise
- Invoices to Customers
- Notes Receivable Ledgers, Schedules
- Payroll Records
- Purchase Orders
- Records related to net operating losses (NOL's)
- Receiving Vouchers
- Requisitions for donated fund expenditures
- Sales Records
- Departmental Ledgers
- Travel and Entertainment Records

Business Records Kept Indefinitely:

While federal guidelines do not require us to keep most records “forever,” in many cases there are other reasons that deem it RMC’s best interest to retain these documents indefinitely. These items are stored in hardcopy or digital copy depending on the technology available.

- Audit Reports from CPAs/Auditor
- Board and Committee Meeting Minutes
- Charts of Accounts
- Current Contracts still in effect
- Corporate Documents (Articles of Incorporation, Board Policies, Bylaws, etc.)
- Documents substantiating fixed asset additions
- Deeds
- Depreciation Schedules

- Financial Statements (Year-End)
- General Ledger & Year-End Trial Balances
- Insurance Records: current accident reports, claims, policies
- IRS 990s and worksheets
- Non-routine journal entries
- Legal records, correspondence
- Retirement: 401(k) audit and tax returns

Document Storage & Destruction:

- To fulfill legal requirements, completed USCIS I-9 forms are kept in a secure location separate from all other personnel files.
- Current year personnel files are kept in a locking cabinet in a locked accounting office at Q48. All historic personnel files are to be kept in a secure, locked file cabinet and can be accessed only by authorized staff and kept in the locked server room in the Q48 basement.
- Background checks are conducted via an online platform. Only an adjudication is saved to prove qualifying date for AmeriCorps purposes. No hard copies are stored of any background check report.
- Each year, all the paper documents referred to above are stored in banker boxes, labeled by year of activity, and stored in the basement at Q48. All documents that are either confidential or of higher importance are kept in locking storage cabinets in the locked server room in the basement of Q48. Each year, an in-house audit is done to take the boxes of documents that have reached the expiration of their document retention period and are taken to a shredding facility or to NPS to join their annual secure shredding event.

XV. Information Technology – Operations and Finance Department

Hardware:

1. The main server at Q48 is housed in a room in the basement inside of a lockable server cage. This room is kept locked, and the key is stored in the administrative office, a one room space equipped with a door locked when not occupied. The two servers at the retail department are kept in a locking server cage.
2. The RMC finance and human resources staff are located at Q48. Each staff member has a laptop computer which connects to the server through the local network utilizing ethernet or Wi-Fi. These staff members can also work remotely accessing the RMC server via Virtual Private Network (VPN).
3. All physical locations have Dell SonicWall firewalls with up-to-date licensing and firmware which is updated upon release of any patches.
4. All laptops and servers are kept under Dell warranty, so all systems are utilizing the newest technology and running the latest security programs and patches.

Data:

1. RMC currently has three servers at two separate physical locations within Estes Park. The master server is at Q48 with two smaller servers at the nearby retail offices. The data housed on the two retail servers is also backed up onto the master server at Q48. The Q48 server data backed up to the cloud using TotalRescue, a third-party managed disaster recovery service.
2. Retail RPRO systems are located throughout the park, all data, excluding payment card information (PCI), is backed up to the cloud using a third-party, CrashPlan.
3. Blackbaud's Raiser's Edge NXT, used by the member and donor services team, and Financial Edge NXT, used by the OPS/Finance team, are both cloud-based services. All data is stored off-site, and the vendor provides data storage redundancy and enhanced security.
4. Microsoft Office 365 user account data is also backed up off-site.

Access:

1. All new users are added by submitting a New User Setup Form to Greystone Technology. This form specifies exactly what access an individual should have. These accesses cannot be changed by the user; the Director of Administration must approve them. For added oversight, the Human Resources Coordinator is copied on all requests.
2. All RMC computers require a user login ID and password for access. Computers time-out after a few minutes of inactivity.
3. All computer users have a Microsoft 365 account which includes the typical suite of Office products such as OneDrive, Outlook, Word, Excel, SharePoint, and Teams.
4. Significant software applications require individual user IDs and passwords. User access to data or modules within these programs is customized based on the user's duties and the sensitivity of the data involved.
 - o Blackbaud Financial Edge and Raiser's Edge are online platforms that not only require each user to have their own login, password, but also require MFA. The Director of Administration is the security admin for the Blackbaud suite.
 - o Retail Pro (RPRO) requires individual user logins and passwords.
5. Drives on the server have different levels of security. RMC has a P:Collaborative drive which houses shared data, photos, or project knowledge that is accessible by all employees. There are a few privileged server drives, such as F:Finance, O:OPS, H:HR that have restricted access to only certain staff members to fulfill their duties as appropriate. The Organization does not need to restrict access at the file folder level with the exception that each employee has their own personal work folder housed on the Z:Users drive that is only accessible by them, the Director of Administration, and the third-party IT provider.
6. Employee access can only be requested by submitting an emailed ticket to the third-party IT provider. The Director of Administration and the HR Coordinator are copied on all request ticket

emails and must provide email approval for requests that involve access to the privileged user drives.

Security:

1. The Organization requires forced mandatory password resets for basic computer access and Microsoft 365 accounts every 90 days (about 3 months).
2. Microsoft 365 accounts require multi-factor authentication (MFA) to be enabled. Human Resources Coordinator verifies access and MFA setup during employee on-boarding.
3. RMC does not have a formal password policy for smaller online accounts. Passwords are not shared. All administrative employees keep their individual passwords stored in a password protected Excel file within their private folder. Periodically, a copy of these passwords is printed and stored in the safe at Q48.
4. Greystone Technology utilizes a third-party vendor, SentinelOne, to provide premium endpoint security service to protect our network and users from both internal and external threats.

Strategic Planning & Risk Management:

1. The Director of Administration and Human Resources Coordinator are copied on all emailed service tickets to Greystone Technology.
2. The Director of Administration and a representative from the retail department attend quarterly “Blueprint” meetings hosted by Greystone Technology. In these meetings, participants from both organizations review the performance from the past quarter, including any issues needing follow up. They also discuss upcoming projects and concerns such as server management, licensing/warranties, equipment needs, security reports, and employee training. Maintaining best practices for cybersecurity of RMC infrastructure is an overarching priority.

XV. Payroll Processing

1. Timesheets are maintained in the payroll software Paylocity. Staff clock-in and out through a payroll app and submit vacation and sick time requests. Managers approve bi-weekly on the Monday following the end of the pay period. If Monday is a holiday approvals are submitted on Tuesday. Exceptions to the submittal date may occur and will be communicated accordingly.
2. Timesheets are prepared and maintained electronically.
3. Any corrections to timesheets are to be made through the software and approved by the manager and HR Coordinator.
4. Changes in the base pay rate must be approved by the manager and Executive Director. The HR Coordinator inputs the change and effective date in the payroll software and is approved electronically by the Director of Administration and Finance Manager.
5. The HR Coordinator processes payroll by 3 pm on Wednesday following the end of the pay period. If the Friday following the end of the pay period is a holiday, payroll is processed by 3 pm on Tuesday.
6. Paychecks are processed through direct deposit by the Friday following the end of the pay period. Termination checks are processed manually by the finance department and approved by the HR Coordinator and Executive director.
7. The Finance Manager will review payroll expenditures and allocations by Wednesday following the end of the pay period.
8. The Executive Director reviews all payroll items.
9. All quarterly federal and state payroll reports are prepared and filed by the payroll software. The Finance Manger reviews all filing prior to submission.
10. All W-2 statements are issued to employees before January 31st of the following year.

XVI. End of Month and Fiscal Year-End Close

1. The Finance Manager reviews and signs off on all month- and year-end journal entries. These are printed and filed for audit trail purposes.
2. At the end of each month and fiscal year end, the Finance Manager reviews all balance sheet accounts including verification of the following balances: cash accounts match the bank reconciliations, fixed assets accounts reflect all purchases, write-downs and retirements, accounts receivable and payable accounts match outstanding amounts due and owed.
3. The income and expense accounts review include reconciliation of amounts received and expended and verification that payroll expenses match the payroll reports including federal and state payroll tax filings.
4. Once the final monthly and fiscal year-end financial statements are run, reviewed, and approved by the Finance Manager and Executive Director, no more entries or adjustments will be made into that month or year's ledgers.
5. At the end of the fiscal year, the Finance Manager or outside CPA prepares the annual Return for Organization Exempt from Income Tax (IRS Form 990). The return is presented to the Director of Administration, Executive Director, and the full Board for their review and approval. The return is then filed electronically with the Internal Revenue Service by the annual deadline.
6. All other appropriate government filings including those required by the state tax board and attorney general's office will be completed and filed with the appropriate agency.

XVII. Financial Reports

The Finance Manager prepares monthly and annual financial reports for distribution to the Executive Director and Director of Administration. The reports include a statement of activities (operation and programs) with a budget versus actual comparison, statement of functional expenses, statement of financial position, operating and fund cash analysis, aid payable analysis, cash flow projection, and any other requested reports.

Periodic and annual financial reports are submitted to the Finance Committee and Board of Directors for review and approval.

XVIII. Fiscal Policy Statements

1. All cash accounts (except petty cash) owned by the Organization will be held in financial institutions which are insured by the FDIC.
2. All capital expenditures which exceed two thousand dollars (\$2,000) will be capitalized.
3. Employee or public personal checks will not be cashed through the petty cash fund.
4. Travel cash advances may be made under special conditions and pre-approved by the Executive Director.
5. Reimbursements will be paid upon complete expense reporting and approval using the official Organization form. Reimbursements to the Executive Director will be authorized by the Board President.
6. Any donated item with a value exceeding (\$50) will be recorded, and a letter acknowledging it will be sent to the donor within two weeks of receipt.
7. The Executive Director, select staff, and two designated Board members are the signatories to the Organization's bank accounts. Disbursements exceeding \$1,000 require a second signature by an authorized board or staff member.
8. Bank statements will be reconciled monthly by the Finance Manager and approved by the Executive Director.
9. Accounting and personnel records will be kept in locked file cabinets in the finance office and only parties with financial and/or HR responsibility will have access to the keys.