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## MONEY AND PROPERTY MANAGEMENT POLICY

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### Policy Purpose

To establish the policies that individuals with interest in Peace Through Action® USA (the "Corporation") shall apply when planning the use of, receiving, holding, spending, using, monitoring, and reporting on the use of money and property of the Corporation.

### Definitions

1. Interested Person—Any director, officer, employee, intern, contractor, or volunteer of the Corporation.
2. Award—Financial assistance in the form of money to the Corporation by a grant, contract, cooperative agreement, or other instrument.
3. Capital Asset—Asset with a useful life longer than a year that is not intended for sale in the regular course of the Corporation's operation.
4. Class—Mechanism to separate financial transactions by function area, program, award, or other distinction.
5. Cost—the monetary value of expenditures made to acquire, produce, or maintain something.
6. Cost Allocation—the practice of grouping all indirect costs together in a manner that assists in determining the actual operating costs of its program services.
7. Direct Cost— A cost that can be identified specifically with a specific program service or an award, or that can be directly assigned to a program service or award relatively easily with a high degree of accuracy.
8. Fixed Asset—Asset for long-term use and not likely to be converted quickly into cash.
9. Governing Authorities—constitutions, statutes, regulations, award terms and conditions, and unit policies.
10. Funds—Monies directly received from a grantor, contractor, donor, or other party.
11. Indirect Cost/Shared Cost— a cost incurred for a common or joint purpose benefiting more than one program service and cannot be readily assignable to a specific program service without effort disproportionate to the results achieved.
12. Internal Control—An operating, reporting, or compliance procedure that provides reasonable assurance that the objectives of an entity will be achieved.
13. Marketable Security—Non-cash monetary instrument that is easily convertible into cash at a reasonable market value.

14. Money—Anything generally accepted as a medium of exchange, a measure of value, or a means of payment.
15. Property—Anything owned by the Corporation.
16. Uniform Guidance—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards [2 CFR 200].)
17. Unit—A department or agency of the government.

## Policy

### General

1. Peace Through Action® USA (the “Corporation”) shall achieve and maintain an organization culture and practice of accountability, including operating according to governing authorities (including the Uniform Guidance), our formation documents, and our policies.
2. The Corporation shall wisely steward our money and property.
3. The Corporation instructs interested persons of the Corporation’s money and property management policy by an orientation to the policy, notices in the organization’s print and online materials, the distribution of policy and procedures, and training.

### Board of Directors Responsibilities

4. The Board of Directors holds ultimate responsibility for the management of money and property of the Corporation.
5. The Board of Directors oversees the Corporation’s internal controls.
6. The Board of Directors assigns the treasurer and chief executive officer custody of the Corporation’s money and property records.
7. The Board of Directors shall approve for each fiscal year a comprehensive revenues and expenses budget.
8. The Board of Directors shall review at least quarterly the financial statements of the Corporation.
9. The Board of Directors shall commission periodically an independent audit or review of the Corporation’s financial statements.
10. The Board of Directors shall ensure actions are taken to correct any findings or material weaknesses identified through an independent audit or review.
11. The Board of Directors authorizes the treasurer of the Corporation to act on behalf of the Board of Directors when board of directors action is warranted but the board of directors or a committee of the board of directors cannot be convened within the period in which a decision must be made.
12. The Board of Directors authorizes the treasurer of the Corporation to perform the money and property management duties of the chief executive officer in circumstances of leave, vacancy, disability, or death of the chief executive officer.
13. The Board of Directors shall approve the entering into contracts, signing checks, or authorizing electronic funds transfers at amounts greater than 25 percent of the organization’s expenses budget for the fiscal year in which the contract, check, or electronic funds transfer is to be executed.

14. The Board of Directors shall approve the entering into contracts or agreements for any bank loans, credit cards, vendor credit accounts, and real estate leases or purchases.
15. The Board of Directors shall approve any borrowing of money or property from any interested person.

### Chief Executive Officer Responsibilities

16. The Board of Directors assigns to the chief executive officer of the Corporation the following money and property management responsibilities and duties:
  - a. establish and maintain internal controls of the Corporation's money and property.
  - b. establish and maintain accounting procedures including a chart of accounts and a chart of classes, cost allocation plan, transaction entries and reconciliations, budget-to-actual reviews, subaward management and monitoring, procurement, financial reporting, requests and drawdowns of awarded funds, purchases approvals, business-related advances and reimbursements issuances, timekeeping, and pay administration.
  - c. submit annually a proposed comprehensive revenues and expenses budget to the board of directors for its approval.
  - d. manage expenses of the Corporation within the overall parameters established by the board of directors in a comprehensive budget, including verifying allowability of costs prior to expending funds, hiring personnel, entering into contracts for property and services, paying obligations for property and services obtained by the Corporation, and signing checks or authorizing electronic funds transfers.
  - e. establish and maintain procedures and information software to record, account for, and provide accurate, complete, and timely accounting data able to be segregated by account, class, period, and source of funds to the board of directors, units and other providers of awards, donors, and the public.
  - f. account for unit-restricted, donor-restricted, and board-designated funds separately from general operating funds, and clearly define the restrictions applicable to these funds.
  - g. establish and maintain a cost allocation plan for direct and indirect costs.
  - h. establish indirect cost rate agreements with units and other providers of awards.
  - i. establish and maintain means to receive money and property for the Corporation.
  - j. establish and maintain bank accounts.
  - k. establish and maintain means to solicit gifts of money, services, and property to the Corporation.
  - l. decline any gift of money, services, or property and return gifts of money, services, or property to their donor for any reason.

- m. manage property of the Corporation, including planning and carrying out suitable protection and maintenance of supplies, furnishings, equipment, and buildings.
- n. protect real property, personal property, intellectual property, information, and files of the Corporation from unauthorized access, tampering, loss, or significant damage.
- o. manage activities and operations of the Corporation and interested persons in a manner to avoid actions that would expose the Corporation and interested persons to claims of liability.
- p. insure against theft and casualty losses to the Corporation and against liability losses to the Corporation and interested persons of the Corporation to levels indicated in consultation with suitable professional resources.

### Capital Assets

- 17. The Corporation classifies fixed assets with purchase prices greater than \$5,000 per unit as capital assets in accounting records.
- 18. Depreciation of capital assets shall not exceed five years for furniture and equipment or three years for information technology hardware.

### Personal Property

- 19. The Corporation shall maintain an inventory of its tangible personal property. The inventory shall record the following information about each property item: 1) description of the property, 2) source of funding, 3) award number of source of funding (if applicable), 4) title holder of the property, 5) acquisition date, 6) acquisition cost, 7) shares of acquisition cost by each source, 8) location of property, 9) condition of property, and 10) ultimate disposition of the property.

### Gifts

- 20. The Corporation generally accepts gifts of money or property from individuals, donor-advised funds, foundations, corporations, units, and other entities.
- 21. The Corporation generally accepts gifts of cash in any form or amount.
- 22. The Corporation generally accepts gifts in digital currency in any form or amount. The chief executive officer shall ensure any digital currency given to the Corporation is converted to fiat currency immediately upon receipt.
- 23. The Corporation generally accepts gifts of marketable securities. The chief executive officer shall ensure that transfer and recording the value of the security is completed in a consistent manner and in compliance with accounting standards. The chief executive officer shall ensure any security given to the Corporation is sold immediately upon receipt.
- 24. The Corporation generally accepts bequests from donors under their wills.
- 25. The Corporation generally accepts designation as a beneficiary under revocable trusts and commercial annuities and retirement plans, a beneficiary and irrevocable owner of life insurance, a remainder beneficiary under charitable remainder trusts, and an income beneficiary under charitable lead trusts.

26. The Corporation generally accepts gifts of services that are helpful to advancing the Corporation's mission.
27. The Corporation generally accepts gifts of property that are helpful to advancing the Corporation's mission, or that are sellable and that the donor agrees the Corporation can sell.
28. The Corporation reserves the right to review gifts of money, services, and property of any type prior to acceptance.
29. The Corporation reserves the right to decline any gift of money, services, or property and to return gifts of money or property to their donor for any reason, including incompatibility with the Corporation's mission, vision, and values, the Corporation's inability to use the gift, expenses or difficulties the Corporation would incur upon accepting the gift, or potential damage to the Corporation's reputation.
30. The Corporation treats all awards and gifts of money and property as unrestricted unless the donor places an explicit restriction on the intent and use of the award or gift and the Corporation accepts the award or gift with the attached restriction.
31. The Corporation shall issue written acknowledgement of gifts to all donors.
32. The Corporation shall not provide legal, accounting, or other advice to prospective donors about the consequences of their gift on the donor.

### Cash Drawdowns

33. The Corporation shall maintain active organization and user accounts and profiles in payment management services operated by units and other providers of awards.
34. The Board of Directors authorizes the treasurer, chief executive officer, and subordinate interested persons designated by the chief executive officer to request payments of money for costs incurred pursuant to its administration of awards issued by a unit or other provider.
35. The Corporation shall request payments of money to reimburse the Corporation for costs incurred pursuant to its administration of an award issued by a unit or other provider.
36. The Corporation may request payments of money in advance of incurring costs if it will disburse the money within three working days of making the request.
37. The Corporation will exercise its right, when granted, to request advanced, reimbursable, and combination payments of money as often as needed.
38. The Corporation shall request payments of money only for costs that are within the amount and purposes of award budgets, supported by accounting records, and are allowable, reasonable, necessary, and allocable.

### Match

39. The Corporation shall provide cash and/or in-kind match when it is required to fulfill cost share or match requirements attached to awards to the Corporation.
40. The Corporation shall not use expenses used to meet cost share or matching requirements to satisfy more than one such requirement unless a governing authority expressly permits otherwise.

41. The Corporation shall establish and document valuation of in-kind match. Valuation shall be determined by the match provider.
42. The Corporation shall account for expenses used for cost share or match within its accounting system as the expenses are expended.

### Subawards

43. The Corporation may sub-award financial assistance of a unit or other provider of an award when the unit or other provider permits subawarding.
44. The Corporation shall pass through to entities it selects to receive a subaward the unit's or other provider's award requirements.
45. The Corporation instructs entities receiving subawards of the unit's or other provider's requirements by an agreement, orientation to the requirements, and training.
46. The Corporation shall monitor entities receiving subawards to ensure the entity is complying with the terms and conditions of the subaward agreement.
47. The Corporation shall exclude from the selection, sub-award, or administration of a subaward entities that have been suspended or debarred by the unit or other provider of the award which serves as the source of the subaward.

### Procurement

48. The Corporation may use informal, formal, or noncompetitive methods for procuring property or services. The method to be used is dependent on the value of the property or service to be procured, the availability of potential providers, and whether an exigency or emergency is the cause of the procurement need.
49. The Corporation may use informal methods for procuring property or services when the dollar amount of the purchase falls below the micro-purchase threshold or small purchase threshold for procurement activities set by the Federal Acquisition Regulation at 48 CFR part 2, subpart 2.1.
50. The Corporation shall use formal competitive procurement for property or services when the dollar amount of the purchase falls above the simplified acquisition threshold for procurement activities set by the Federal Acquisition Regulation at 48 CFR part 2, subpart 2.1.
51. The Corporation shall perform a cost or price analysis when a procurement will be over the simplified acquisition threshold set by the Federal Acquisition Regulation at 48 CFR part 2, subpart 2.1.
52. The Corporation may use noncompetitive procurement if a) the dollar amount of the property or services does not exceed the micro-purchase threshold set by the Federal Acquisition Regulation at 48 CFR part 2, subpart 2.1, b) the item is available only from a single source, c) the public exigency or emergency for the requirement will not permit a delay resulting from publicizing a competitive solicitation, d) the unit or other provider of an award expressly authorizes noncompetitive procurement, or e) after solicitation of a number of sources, competition is determined inadequate.



53. The Corporation shall select the provider of the property or service based on cost, experience, and other factors.
54. The Corporation may award a contract to or purchase from any provider and is not required to accept the lowest cost proposal.
55. The Corporation shall exclude from the selection, award, or administration of a procurement interested persons and their immediate family members who have a substantial financial or other interest in or a tangible personal benefit from the procurement.
56. The Corporation shall exclude from the selection, award, or administration of a procurement contractors that have been suspended or debarred by the unit or other provider of the award which serves as the source of the financial assistance for the procurement.
57. The Corporation shall award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources.
58. The Corporation shall avoid procurement of unnecessary or duplicative items.
59. The Corporation shall consider lease vs. purchase, where appropriate, or shared service or goods agreements, or surplus federal property.
60. The Corporation shall endeavor to procure property and services from entities designated minority-, women-, and veteran-owned businesses, LGBTQIA person- and disabled person-owned businesses, small businesses, and labor surplus area businesses.
61. The Corporation shall endeavor to procure property and services that are produced in the United States.
62. The Corporation shall maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.
63. The Corporation shall maintain records sufficient to detail the history of procurement. These records shall include, but are not necessarily limited to, the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.

#### Time and Attendance

64. The Corporation maintains procedures and information system software for interested persons receiving wages, salaries, living allowances, and stipends from the Corporation to measure and document their time and effort.
65. The Corporation ensures that interested persons receiving wages, salaries, living allowances, and stipends record actual hours of work or service and distribute hours among classes.
66. The Corporation ensures that a supervisor of each interested person receiving a wage, salary, living allowance, or stipend verifies the accuracy, allowability,

reasonableness, and proper allocability of the time and effort the interested person is distributing to classes.

67. The Corporation ensures that charges to classes for wages, salaries, living allowances, and stipends claimed as cost share or match are supported by documentation that accurately reflects the work or service performed and reflects the total activity for which the interested person is paid.
68. The Corporation ensures interested persons receiving wages, salaries, living allowances, and stipends are paid on a regular recurring schedule.

### Cost Allocation

69. The Corporation shall establish a cost allocation plan for indirect costs.
70. The Corporation shall ensure its cost allocation plan is in writing, and reviewed, approved, and certified by the chief executive officer.
71. The Corporation shall ensure the cost allocation plan complies with governing authorities and the specific cost allocation requirements of units and other providers of awards to the Corporation.
72. The Corporation may use multiple cost allocation methodologies.
73. The Corporation shall ensure that allocated costs charged to its program services reasonably reflect the costs expended.
74. The Corporation shall consistently implement its plan for all program services to ensure fair and consistent treatment of costs.
75. The Corporation shall exclude from allocation those costs deemed unallowable or prohibited by a unit or other provider of an award to the Corporation.
76. The Corporation shall regularly review the cost allocation plan for accuracy and updating to ensure financial statements and program service costs are accurately reported, and shared costs allocated reflect the overall organizational costs.
77. The Corporation shall retain information and documentation used to support its cost allocation plan.
78. The Corporation shall implement its cost allocation plan when required by a unit or other provider of an award to the Corporation.