



**Fiscal Guidelines  
For  
CSC Funded Programs**

**FY 2016/2017**

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*Administrative Guidelines for CSC Programs – Fiscal*

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## Introduction

The Children's Services Council of Palm Beach County (CSC) is pleased to provide the revised Fiscal Year 2016-2017 General Administrative Fiscal Guidelines (the "Fiscal Guidelines"). The effective date of these Fiscal Guidelines is October 1, 2016.

These Guidelines are offered to CSC Funded Providers (Providers) as a tool to be referenced in the execution of contracts with the CSC. The Fiscal Guidelines, by reference, are incorporated in the CSC standard contract language as an integral part of its General Conditions; thereby requiring all CSC Funded Providers become familiar with the stated Guidelines.

CSC expects all Providers, including those that subcontract service delivery, to follow the tenets of these Fiscal Guidelines.

CSC expects Providers who subcontract service delivery to incorporate these Fiscal Guidelines into their subcontractor agreements. See the CSC Lead Agency Administrative Guide ([www.cscpbcc.org/LeadAgencyGuide1617](http://www.cscpbcc.org/LeadAgencyGuide1617)) for further instructions.

To facilitate its use, these Fiscal Guidelines will be located on the CSC Website at [www.cscpbcc.org/FiscalGuide1617](http://www.cscpbcc.org/FiscalGuide1617) and on SAMIS under the tab Fiscal Documents. Copies of the Fiscal Guidelines may also be obtained by contacting your Children's Services Council Budget Specialist at (561) 740-7000.

## Goals of the Fiscal Guidelines

- To establish mutually understood guidelines for the fiscal management of CSC funds. CSC funds are defined as funding received by a program through its contract with CSC regardless of whether or not the funding originates with CSC or with another funder whose funds flow through CSC and then to the Provider.
- To help Providers develop their budgets, the fiscal plan for a program, and operate their programs according to sound fiscal management principles.
- To minimize disallowances of Provider expenditures.

Please be advised that the guidelines are written primarily for cost reimbursement contracts. Judgment must be applied in the interpretation and application of these Fiscal Guidelines as it is not the intent that the Fiscal Guidelines will address every fiscal scenario.

The Council may take an action in a given contract period which may take precedence over these guidelines for that year.

## General Guidelines

### Seeking CSC Budget Specialist Advice – Technical Assistance

CSC Budget Specialist’s advice should be solicited throughout the year regarding allowable CSC budget items and expenditures. When a Request for Proposal (RFP) process is underway, restrictions may apply. For example, answers to Provider questions regarding the RFP generally are posted on CSC’s website so that all applicants have access to the questions and answers.

### Use of SAMIS for Fiscal Data Submission

SAMIS (Services Activities Management Information System) is the web-based reporting system developed to increase the efficiency of program related and financial data between CSC and its funded Providers. All funded Providers are to use the SAMIS system unless authorized to use an alternative method of reporting.

Program budgets and any subsequent amendments are to be submitted to CSC in SAMIS, unless specifically authorized to use an alternative method of reporting, and are to be balanced. Therefore, total CSC budgeted program expenses are equal to the total CSC program allocations. All expenses are to be billed to CSC using the SAMIS system, unless specifically authorized to use an alternative method of reporting, in the budget period in which the expense and/or event occurs. Whenever there is a request for reimbursement of an unusual or infrequent nature, add an explanatory note in the SAMIS reimbursement narrative for further clarification.

Advance requests are to be submitted to CSC in SAMIS, unless specifically authorized to use an alternative method. The Provider can reference the SAMIS Manual at <https://www.samiscsc.org>. **SAMIS Help Desk:** CSC has a full-time staff member available. Call (561) 740-7000.

### Budgets

A budget represents the fiscal plan for a program. CSC expects the budget submitted to CSC to support the policies and procedures of the agency submitting the proposed budget. It is expected that the agency’s written policies be approved by their governing board prior to contracting with CSC.

CSC expects initial budgets to be detailed and to itemize all anticipated expenditures (including anticipated salary increases by approved position).

All budgets submitted to the CSC must include the most recent quarterly income statement, balance sheet, and statement of cash flows for the requesting agency, as was submitted to the agency’s Board of Directors (BOD).

## **Budget Line Item/Cost Category Overages**

Programs have the authority to overspend a cost category by a specific percentage depending on the category as described in the Specific Guidelines below without prior authorization from CSC as long as the budget total remains the same and the items causing the over expenditure have been identified in the contracted budget. These over expenditures must be documented in the narrative section of the appropriate month(s) reimbursement request to create an audit trail.

## **Approved Budget Revisions**

Any budget changes must be submitted and approved through SAMIS or an authorized alternative method.

## **Provider Expenditures (Reimbursements, Disallowances, Unit Costs)**

### **Reimbursements**

CSC reimburses on two methodologies: cost reimbursement and unit cost.

### **Cost Reimbursement Contracts**

CSC will reimburse the Provider up to the contracted budget amount based upon the approved budget. CSC reimburses based on actual expenditures. Expenditures in excess of the contracted budget will not be reimbursed by CSC.

Expenditures must be billed for reimbursement in the budget period in which the expense is incurred except for those prepaid expenses identified in the Specific Guidelines section. For those expenses budget periods must be prorated.

SAMIS (Services Activities Management Information System) is the web-based reporting system developed to increase the efficiency of program related and financial data between CSC and its funded Providers. All funded Providers are to use the SAMIS system unless specifically authorized to use an alternative method of reporting.

### **Payment Frequency**

The payment of CSC funds on a cost reimbursement contract will occur on a monthly basis for expenditures incurred pursuant to the terms of the contract.

### **Due Date**

The Provider requests reimbursement through submission of a monthly invoice by the tenth of the month, unless another date is set forth in the program's contract following that for which expenditures are claimed. In general, except for specific line items, monthly reimbursement requests should be

approximately 1/12 of the annual contract amount for the CSC program. Whenever there is a request for reimbursement of a greater than usual monthly expense, an explanatory note in the SAMIS reimbursement narrative is required.

### *Disallowable Expenditures*

CSC reserves the right to disallow any expenditure that is considered inappropriate for the program it funds even if it falls within the expenditure limitations placed on the cost categories. CSC generally will not fund or reimburse the following:

- The purchase of real property and/or renovations (permanent improvements to the property or site preparations).
- Medical equipment, services or treatment.
- Mortgage payments, interest payments, financing agreements or long-term vehicle leases.
- Staff entertainment expenses.
- Alcoholic beverages.
- Late fees or financing fees (for example: credit card late fees, late fees from lease agreements or on a standard bill).
- Florida state sales tax on purchases made.
- Expenses that are incurred outside of the budget period being billed for reimbursement (including costs relative to implementation of new programming).
- Bonuses to staff employed in its funded programs.
- Accrued vacation and sick time payouts except upon separation from employment as provided for in the personnel policies and procedures of the program.

CSC reserves the right to disallow costs for which the agency cannot provide appropriate supporting documentation. (See *Supporting Documentation* on page 17).

### **Unit Cost Contracts**

CSC will pay the Provider based on the actual number of units provided up to the capacity limits for the program, as defined in the contract. Providers will be required to adhere to the specific Unit Cost terms or requirements as defined by their approved budgets, and contained within their CSC contract. Providers must maintain documentation that supports the provision of unit(s).

## **Late Submissions Policy for Request for Reimbursement**

The following policy will apply concerning requests for reimbursement:

Reimbursement submissions are due the 10th of each month unless another date is set forth in the program's contract. A third late request for reimbursement within a rolling 12-month period will be assessed a \$500 late charge. This late charge shall be deducted by the CSC Budget Specialist from the reimbursement submission. The CSC Program Officer will notify the program's Executive Director/CEO

and Board Chair in writing that the late charge is being deducted from the reimbursement. CSC's Council will be advised of such late charges applied in the form of an "FYI" item.

In the event of a fourth late invoice submission in a rolling 12-month period, staff will, with the Provider, develop a "Performance Improvement" or "Corrective Action Plan" [with varying levels] which will also be presented to Council as an "FYI" item. In the event that the plan for the action steps is not satisfactorily completed, the program will come before the Council for action under a "Corrective Action Plan".

## **Advanced Funding**

Providers may submit an advance request in SAMIS for up to 45 days of personnel costs only after execution of a signed agreement and full repayment of previously issued advances. An amount greater than 45 days may be approved by the authority of the Chief Financial Officer or Program Budget Manager. If the contracted agency is considered a lead agency for a program with subcontractors or if the budget methodology is based on unit cost or slots, the Provider may request up to 10% of the total budget only after execution of a signed agreement and full repayment of previously issued advances. All advances may be repaid at any point during the contract period, but must be repaid within the last three months of the contract period. Providers whose program(s) is not in SAMIS may request an electronic version of the Advance Funds Request Form from your Budget Specialist.

A request for advance funding at a time other than at the beginning of the contract may be considered if extenuating circumstances exist, and must be submitted with a written hardship request to the Budget Specialist. The request must be made prior to the final three months of the contract period. Any request for advance funding must be accompanied by the most recent quarterly income statement, balance sheet, and statement of cash flows for the requesting agency, as was submitted to its Board of Directors (BOD).

## **Accelerated Draw Down of Funds**

The Accelerated drawdown of CSC funds to accommodate the timing of an agency's contribution to the program may be approved. However, if under expenditures occur related to the purpose of the accelerated drawdown, an adjustment to future reimbursements must be made within the same budget period. CSC does not allow accelerated drawdown of funds to accommodate:

- Unplanned salary increases.
- Loss of other or supplemental program funding.

## **Funds Raised as a Result of CSC Funds**

Funds raised as a result of CSC-funded programs' fund-raising or development positions are expected to flow proportionately back into the CSC funded program and reflected in the budget. If unanticipated funds that are applicable to the CSC program are raised during the budget period, a budget amendment is required.

## **Final Reimbursement Request**

### **Renewed Contracts**

Programs are expected to submit in SAMIS, no later than within 30 calendar days after the contract ends, a final expenditure report, including all billable items related to the contract. Expenses not reported in the final reimbursement request will not be reimbursed by CSC.

### **Terminated Contracts**

If a contract is terminated, regardless of the reason, a contract close-out audit must be conducted prior to the final reimbursement request being paid. Any disallowance assessed as a result of the close-out audit will be deducted from the final reimbursement. In cases where the agency operates other CSC funded programs (contracts), the close out audit may be postponed and the final reimbursement payment released. In these specific instances, a program (contract) close-out audit will be included in the agency audit at the scheduled time of the other CSC funded program(s). Any disallowed expense in the closed program that is identified at the time of the full agency audit, will be collected by agency check or deducted from one of the existing program's subsequent reimbursement.

## Specific Guidelines

The information contained in this section provides guidance for line items and cost categories that are commonly subject to questions and/or to disallowances as it relates to personnel, operating expenses, credit card use, and stale dated checks.

### Personnel

#### Salaries

Salaries represent a critical and substantial portion of the program budgets funded by CSC. CSC expects the program to be able to demonstrate that the percentage of a salary that CSC supports corresponds to the amount of time dedicated by the employee to the CSC program or the portion of the CSC program funded over the course of a budget period. For that reason, salary changes require consultation with CSC staff prior to submitting a budget revision for approval. Failure to do so may result in a disallowance even if there are dollars remaining in the budget.

#### *Salary Pay Period*

Salary pay periods may be weekly, bi-weekly, semi-monthly, or monthly. Supporting documentation must be maintained which includes but is not limited to a payroll register, an employee listing by position, an employee listing by start date and the number of eligible pay periods for each position being funded by CSC.

#### *Salary Accruals*

Salary cannot cross CSC's contract periods, and WILL require the agency to accrue the final payroll (or portion of days crossing the contract period) during the last month of the contract period, where applicable.

#### *Billable Staff Positions*

All billable positions and the name associated with the position must be entered into the SAMIS Position Management Module (PMM). The PMM must be updated throughout the budget period in a timely manner. Positions not identified in the CSC contracted budget are not to be charged to CSC. Providers may be required to provide the salary ranges for their various classes of employees and documentation that the payment was made in accordance with this policy.

#### *Merit Increases*

Pre-planned merit increases for CSC-funded positions must be reflected in the salary for each position that is included in the approved CSC line item budget. Merit increases must not cause the actual salary for the position to exceed the approved budget for the position by more than 5% of the approved budget for the position.

#### *Overtime*

Overtime pay to non-exempt employees is an allowable expense in accordance with the Fair Labor Standards Act (FLSA) and any other applicable federal, state or local guidelines. Such expenses are to be

incorporated into the contracted budget and any changes are to be submitted in the budget revision. It is the program's responsibility to ensure compliance with FLSA and any other applicable federal, state or local laws and regulations.

### *Bonuses*

CSC will not reimburse for the payment of bonuses to staff employed in its funded programs.

### *Temporary Employees*

Costs associated with temporary employees are an allowable expense and are to be identified in the contracted budget and/or budget revision. Programs requiring continuous coverage for vacation and/or absences are expected to budget for such contingencies. An audit trail must be maintained for temporary employees, such as ensuring the name of the person substituting is identified in the reimbursement, in order to avoid disallowances for these expenses.

### *Contingent Salaries*

In circumstances where there is a contingent salary amount associated with a position based upon an employee's ability to generate additional funds for the agency/program, CSC will reimburse the approved percentage of the actual salary paid up to the amount approved in the CSC budget. Any funds raised in excess of the amount required to meet the position's budgeted salary should flow back into the CSC program.

### *Separation Costs*

Separation costs may include payments to employees for severance, accrued vacation payout and accrued sick payout.

CSC will not reimburse for accrued vacation and sick time payouts except upon separation from employment as provided for in the personnel policies and procedures of the program. For instance, if the staff is leaving the CSC funded program but continues employment with the agency, no accrued leave time would be paid.

Consult with your CSC Budget Specialist for a severance payout and/or vacation/sick payout calculation example and template.

### *Severance Pay*

CSC will only reimburse severance pay due to an individual employed in a CSC funded program at separation of employment from an agency if the separation occurs immediately following the termination of a CSC contract or reduction in force. CSC will not reimburse severance when a reduction in force will affect the viability of the program. Please refer to General Conditions, Section 1.e.i. for requirements to notify CSC of such actions.

CSC will only reimburse severance to Providers which have an existing board approved severance policy prior to notification that the CSC program will be terminating. If the cost of severance pay is not available through under expenditures elsewhere in the program's budget, additional funds cannot be requested from CSC.

If the severance payment requires a budget revision, the revision must be submitted through SAMIS prior to the end of the budget period. Prior approval of severance payments must be obtained in writing from the CSC Program Officer and Budget Specialist. The agency must report severance pay to the Florida Department of Economic Opportunity, and may impact the date of eligibility for unemployment benefits.

The amount of CSC's reimbursement for severance to an employee will be determined by calculating a percentage that is determined by dividing the number of months the employee has been employed in the CSC program by the total number of months employed by the agency. This percentage will be applied against the severance payment to determine how much is allocable to the CSC funded program. The CSC percentage of the employee's costs allocated to the program would then be applied to the amount resulting from the previous calculation. Severance pay will be paid in according to the formula provided in Table 1 (see page 13).

### *Accrued Vacation and Sick Pay*

Accrued vacation and sick time payouts will be paid only upon separation from employment using the formula provided in Table 1. For instance if the staff is leaving the CSC funded program but continues employment with the agency, no accrued leave time would be paid.

The following applies to both severance and accrued vacation and sick pay:

- CSC may reimburse for costs due an employee at separation of employment from the agency based on the length of time the employee has been continuously funded by CSC and working for the same agency.
- Request for authorization for such expense must be submitted to the CSC Budget Specialist for approval. Approved requests may require a SAMIS budget revision.
- The reimbursement will be determined by calculating a percentage that is determined by dividing the number of months the employee has been continuously employed in CSC program(s) by the total number of months employed by the agency. This percentage will be applied against the costs related to the separation to determine how much is allocable to the CSC funded program(s). The CSC percentage of the employee's costs allocated to the program(s) would then be applied to the amount resulting from the previous calculation. CSC will only reimburse separation costs to Providers that have an existing board approved policy governing employee separation, and developed prior to notification that the CSC program will be terminating.
- Consult with your CSC Budget Specialist for a vacation/sick payout calculation example and template.

**CSC will cap separation costs to individual employees at the following levels:**

(One (1) year of service equals one (1) year of continuous service)

<b>Years of Service *</b>	<b>Rate</b>
Less than one year	2 weeks
One Year but less than 3 years	4 weeks
Three years but less than 5 years	6 weeks
Five years but less than 7 years	8 weeks
Over 7 years	10 weeks

Table 1

### Fringe Benefits

The Agency must maintain individual employee’s records of benefits paid per employee per pay period. Fringe Benefit dollars are reimbursed for actual fringe benefits purchased. The use of CSC funds for cash payments in lieu of fringe benefits is not an allowable expense. Fringe benefit dollars must be billed in the appropriate line item. For example, health insurance cannot be billed to the worker’s compensation line item. CSC requires Providers to maintain (as part of their financial records) a breakdown of each fringe benefit and the percentage or amount applied for each employee, as well as verification of payment for each benefit (by category), for each pay period or as applicable. The percentage of fringe benefits that CSC reimburses should not exceed the budgeted percentage of salary reimbursed for each position.

### Personnel Cost Category

Overspending the Personnel Cost Category (Salaries and Fringe benefits): Programs may overspend the personnel cost category by up to 10% without prior approval by CSC provided that:

- The increase in salary for any position within the salaries line item may not exceed 5% of the original salary approved in the budget. The total budgeted salary line item amount must not be exceeded.
- Adequate provision is made within the personnel cost category to accommodate any increased fringe benefits (proportionately) associated with the increased salary.
- There are funds available in the overall budget to meet the over expenditure in the personnel cost category and the over expenditure in other cost categories will not adversely affect the performance of the services agreed upon in the contract.
- An over expenditure in any position in the salary line item does not bind CSC to fund the position(s) at the same rate of pay or increased rate for any future contract period.
- If the line item for a position is increased using other revenue and not CSC dollars, permission from CSC is not required; however, CSC needs to be informed through the budget revision indicating the change in percentage CSC is paying for.

All budgetary changes should be communicated to the CSC Budget Specialist prior to the effective date of the change.

## Leased Employee

Funded Providers using a leased employee arrangement (for any employee whose compensation, in whole or in part, is funded by CSC) shall report the arrangement to CSC. Funded Providers shall be responsible for:

1. Making timely payments to the employee leasing company.
2. Ensuring that all government withholdings are made by the employee leasing entity and paid as required by law.
3. Ensuring that all deductions from employees' gross earnings are paid by the employee leasing company to the entity for the purpose for which the deduction was made.
4. Maintaining supporting documentation. (i.e. an annual attestation letter from the employee leasing company).
5. Ensuring that the requirements set forth in these "Fiscal Guidelines" regarding personnel are followed.

## Operating Expenses

### Pre-paid Expenses

Prepaid expenses are payments by the Providers in advance of goods or services being delivered. Common examples of prepaid expenses include conferences, rent and insurance. CSC will not reimburse the cost of purchasing items such as gift cards for use in the next budget period.

### *Conference/Registration/Travel*

In-state and out-of-state conference expenses must be related to the current budget period. Meetings relevant to an agency's activities, staff and volunteer trainings, and related travel expenses, registration fees, etc. will be reimbursed after the bill has been paid and the event has taken place. If the expenses are incurred in one budget period and the event occurs in the next, the travel-related expenses (registrations, airfare, hotel accommodations, etc.) cannot be billed to CSC until the event occurs. If an agency prepays such expenses they should budget for them in the correct budget period.

### *Insurance and independent audit (annual costs)*

CSC will reimburse these annual costs in the budget period the expense is incurred and paid and the costs do not need to be considered prepaid or pro-rated between budget periods. Payment of the annual cost of these types of expenses will be paid for once in a twelve month period.

## Travel

Travel expenses are the costs associated with CSC-funded employees traveling for agency related business. Per Diem is an allowance paid to employees for lodging, meals, and incidental expenses incurred when travelling. This allowance is in lieu of paying actual travel expenses. Travel should be documented by individual position and should specify if the travel budget includes personnel whose wages are not reimbursed by CSC. The rates are based on agency's rate up to the funder's allowable rate not to exceed the current CSC reimbursable rate effective October 1st of each year. See IRS Topic 511 – Business Travel Expenses for further information.

### *Lodging*

There is no specific per diem rate for lodging. There is a per diem rate for combined lodging and meal costs, and a per diem rate for meal costs alone. A Provider may use either per diem method for reimbursing employee travel expenses (if using per diem for meals, lodging costs are governed by the preceding paragraph). Combined lodging and meal per diem rates vary depending on location, and provider should use the rate for the area where the employee spends the night. The rates for different cities and additional guidance are available at the GSA site -

<http://www.gsa.gov/portal/content/104877>.

### *Meals*

The per diem rate for meals will be the IRS standard "M&IE" rate for all locations within the continental United States, without taking into account specific higher-cost locations (as set forth in the most current IRS M&IE per diem publication).

### *Documentation*

If a provider uses the approved IRS per diem rate, receipts and/or other documentation for meals and lodging will not be required to support reimbursement. Otherwise, receipts and backup documentation are required for all travel related expenses to be accepted as an approved expense. For additional guidance on maintaining proper documentation to support per diem expenses, please refer to:

[https://www.irs.gov/publications/p463/ch05.html#en\\_US\\_2015\\_publink100034069](https://www.irs.gov/publications/p463/ch05.html#en_US_2015_publink100034069).

### *Mileage*

The IRS mileage rate in effect at the time the CSC program budget is prepared will be used, and will **not** be increased in January when it is typical for the IRS to increase rates, subject to the following provisions:

- in the event that the IRS establishes lower rates during the fiscal period, the rates established will automatically be lowered to those established by the IRS, and;
- in unusual circumstances, the CSC Chief Executive Officer may increase mileage rates, but not to exceed the then-current IRS rate.

If a CSC funded agency's mileage reimbursement rate is lower than that of the maximum CSC allowed rate, then reimbursement will be capped at the agency's rate established by its policy.

## Food Service

This item represents the reasonable and necessary costs of food where there is a business purpose for a documented activity the clients are involved in and it is a necessary part of the program.

## Indirect Cost Allocation

The costs that cannot be identified with a program but are necessary for the general operation of the organization. When any indirect cost activities can be reasonably identified as a direct part of a specific program, the expenses should be charged to the program and not be part of the indirect cost calculation. An agency's indirect cost rate can be used to allocate a percentage of services and can include, but not limited to:

- Legal services
- Accounting
- Auditing
- Office management
- Executive direction
- Administrative support

The indirect cost rate is established through initial negotiations of the budget and completion of the indirect cost worksheet (See <https://www.samiscsc.org>). The indirect cost rate that is agreed upon is not subject to revision during the course of the budget period. CSC will reimburse up to a maximum of 15% for indirect costs. If Providers have their own state/federal indirect cost rate, CSC will pay the lesser of the state/federal rate and the CSC maximum rate and funded Providers are required to maintain up to date information showing how the amount being requested for indirect costs are calculated.

## Capital

Capital equipment includes items which have a useful life of one year or more and costs in excess of \$500 (generally furniture and equipment), and does not include infrastructure or the purchase of real property and/or renovations (permanent improvements to the property or site preparations). Funds budgeted for such one-time purchases (e.g. equipment) in a given budget period are not included in the CSC forecast of an annual budget for consideration in subsequent budget periods.

Capital equipment requests are only permitted for 1) start-up/installation programs; 2) as a result of an expansion of the program; or 3) through the Computer Replacement Initiative (for positions that are funded at least 50% with CSC funds). Requests for IT equipment and peripherals may also be submitted through the Continuous Improvement Initiative. The application is available on the CSC website at [www.cscpcb.org](http://www.cscpcb.org).

CSC supports the use of its funds for new vehicle purchases only (CSC may at its discretion fund the purchase of new vehicles for the execution of its program activities). All vehicles purchased with CSC funds should be in the Provider name with Children's Services Council listed as the 1st lien holder. Children's Services Council will retain a copy of the title for 48 months. The CSC logo must be displayed on the outside of the vehicle.

Capital equipment purchased in a program no longer being funded by CSC must be returned if requested.

## **Credit Card Use**

### **Purchases**

Credit card use for personal purchases, even in those cases where the CSC funded program employee reimburses the agency for the item(s) purchased, is prohibited.

### **Receipts**

All credit card purchases made by agency personnel for operation of CSC funded programs and reimbursed by CSC must have adequate supporting documentation attached to the receipt. Supporting documentation must include itemized purchases corresponding with total purchase price. The expense is considered “paid” at the point of purchase.

## **Stale-dated checks**

The Provider is advised to review and follow the State of Florida Unclaimed Property Reporting and Remitting requirements in Chapter 717, Florida Statutes and Chapter 69I-20, Florida Administrative Code. An example would be if the Provider writes a check for goods or services they have received and the check is never cashed, the Provider has an obligation after five years to forward the funds to the State as “unclaimed property.” The CSC expects Providers to make a determination from the payee regarding checks that are outstanding for 180 days or more (or the timeframe specified in the Provider’s policy, whichever is less). The Provider should determine if a stop payment should be placed on the outstanding check and the check should be re-issued.

## **Supporting Documentation**

Adequate supporting documentation showing proof of payment should include but not be limited to:

- Credit Card Purchases - Itemized receipt along with signature approved copy of purchase authorization.
- Client/Participant “assistance”, including stipends - Hard copy record with Gift/Cash card # and dollar amount, participant name or other verifiable ID #, signature of issuing agency staff and client/participant, and date issued.
- Worker's Compensation & Unemployment Insurance - rate agreement, employees covered, invoice with time period covered or proof of self-insurance if applicable.
- General Ledger – documentation showing transaction detail within the accounting system.

- Operating Expenses - documentation reflecting cost allocation methodology for expenses that are allocated to different programs/locations and contracts.
- Training - Include the date(s) of service/training on all applicable expenses. In the instance where an employee of a CSC funded program is being compensated by CSC for providing training, a documented leave of absence must exist.
- Mileage - report/form to include the amount of miles, reimbursement rate and approval.
- Telephone expenses – telephone bill(s) and a list of which CSC funded employees are included in the expense (includes employees who are not funded through the budget but do work for that contract).
- Equipment Rental – invoices and/or contract and a list of which administrative and/or program site(s) the expense is applied to.
- Professional Fees - provide the contract/agreement and related invoices with service Providers.
- Capital – invoices and listing (by date of purchase) of all equipment purchased with funds provided by CSC.
- Check Request Form - signed by preparer and approver

## **Changes to the Contracted Budget**

Budgeted expenses are intended to be directly related to the program’s ability to achieve the results in which the Council has invested. Any budget revisions, should, therefore, not change the nature of the program. If capacity is increased as a result of a budget revision, increased performance will be expected. In order to minimize the risk of an expenditure being disallowed, Providers are required to submit a CSC budget revision through SAMIS, if applicable, incorporating the authorized change.

CSC expects the CSC Budget Specialist to be consulted regarding any potential budget change to a cost category over the 10% rule (operating and personnel expenses with the exception of the 5% rule governing salaries and FICA). Budget changes for the current budget period that may increase the following budget period’s allocation request may be authorized. If authorized, CSC is not committed to funding that increase in the following budget period.

If during the budget revision process, it is determined that the program does not have a valid reason for the movement of unexpended funds, the amount of those funds will result in a budget amendment reducing the contract by the total of those funds.

**The budget revision is required under the following circumstances:**

- Providers who received approval for a change to the program budget must complete the budget revision via SAMIS and incorporate those prior approved changes in the formal budget revision.
- A budget revision should also be completed by Providers anticipating expenditures in excess of 10% above amounts in any cost category.
- Any adjustments to a contracted line item that is necessary to reflect actual expenditure patterns.

CSC is not obligated to approve items requested in a budget revision and may require justification for each change. Approval will not be entertained for a revision which involves an increase in dollars over the original contract amount.

**The approved budget staffing structure for salaries may not be revised during the budget period unless one of the following conditions applies:**

- A change in the “Exhibit B” requires the addition of a position(s).
- A change in the “Exhibit B” requires the deletion of a position(s).
- The performance of a function is converted from being performed by a Provider staff person to being performed by an independent contractor.

If a program requests a change in a salary, CSC will examine the impact upon the following budget period’s budget. If the change requires an increase in the program budget, CSC is not committed to funding the change in the following budget period.

Changes to the budget after the revision has been approved should be kept to a minimum to address extenuating circumstances and are to be submitted via SAMIS by the 15th of the month prior to the last month of the budget period.

**Extenuating circumstances prompting such a request include:**

- A salary for a position is being increased.
- Expenditures in a cost category are going to exceed 10% of the approved amount.
- It becomes necessary to use funds for expenses other than those described in the CSC budget narrative.

All approved changes to the budget supersede the last approved budget within the CSC contract. The formal approved budget and any approved requests for revisions will be reviewed as part of the audit.

CSC will reimburse only up to the maximum amount specified in the contract. No revisions to a program budget submitted after the end of the contract will be approved.

**Questions CSC staff will ask prior to responding to the request include but are not limited to:**

- ✓ How will the change help the program achieve the results in which the Council has invested?
- ✓ Is the change tied directly and integrally to the program's ability to achieve its contracted results?
- ✓ Will the change allow the program to end the year with a balanced budget?
- ✓ When the budget is annualized for the subsequent year, are additional funds required to support the change?
- ✓ Are there other resources or ways the programmatic need can be met without increasing the program's annualized budget?
- ✓ What can CSC staff do to help the Provider locate additional resources to accommodate the change if it cannot be supported in the subsequent year?

## **Late Submissions of Documentation**

The CSC contract contains provisions for reporting fiscal and program information and for submitting current copies of certain documents to be retained on file with CSC and/or any other entities identified in the CSC contract (as applicable). There are specific time frames within which this information is to be received by CSC, and/or the entity identified in the CSC contract. These time frames have either been communicated through the contract document itself or this set of Fiscal Guidelines. If due dates are not adhered to, a late charge may result. CSC's Late Submission of Documentation provisions documented in the contract includes the following:

- Monthly Reimbursement requests are due to CSC through SAMIS, unless specifically authorized to use an alternative method of reporting. Reimbursement requests are due by the 10th of each month, unless otherwise specifically authorized by CSC. A program with three late invoice submissions within a rolling 12-month period will incur a \$500 late charge (applied to the latest invoice submission). The late charge will then be brought to the Council at that month's meeting for informational purposes only.
- A **bound original copy** of the annual independent audit complete with Management Letter - which must comply with GAGAS (Yellow Book or OMB A-133 Single Audit standards as defined by levels of agency funding and as specified by the Federal OMB threshold). The CSC will also accept (*in lieu of the bound original copy*), an electronic copy (preferably PDF) of the completed Audited Financial Statements for any of its funded Providers, with the single provision being that electronic copy is sent **directly** from the Auditor (CPA) or Audit Firm completing the audit engagement for the Provider. If the annual audit is received without the Management Letter, the audit will be considered late. If a Management Letter was not issued, notification from the

audit firm is required. All audited financial statements (based on the above stipulations) must be submitted within the timeframe specified and to the entity identified in the CSC contract.

- The Board approved unaudited quarterly financial statements inclusive of the income statement, balance sheet, and statement of cash flows for the requesting Provider must be submitted to the CSC within ten calendar days of the Board meeting. Government entities and private entities are excluded from this requirement.
- General Liability insurance
- Auto insurance if vehicle was purchased with CSC funds, or if transporting children as part of CSC program services.
- Worker’s Compensation Insurance
- Fire Inspection (if applicable)

## Request for Extensions

### *Independent Audits*

Providers must let the CSC Budget Specialist assigned to their program know if an audit will be late. The request for extension must be submitted by the agency’s Auditor (CPA) or Auditing Firm. If an extension is approved by CSC, the Provider will receive a written form of notification establishing an extended due date by which the outstanding information is to be received by CSC. If the extended due date is not complied with, the late charge will be assessed.

### *Other Certification Documents*

Providers must let the CSC Program Officer assigned to their program know if other certification file documents, or requested data submission will be late. If an extension is requested and approved by CSC, the Provider will receive a written form of notification establishing an extended due date by which the outstanding information is to be received by CSC. If the extended due date is not complied with, the late charge will be assessed.

## Late charges

If the documents (i.e. independent audit report, insurance documents, fire inspection and licenses) are not submitted by the applicable due date, the CSC Budget Specialist shall deduct a \$500 late charge from the latest reimbursement request for each month or portion of a month that the required documentation is late. The CSC Program Officer will notify the program’s Executive Director or CEO and Board Chair in writing that the late charge is being deducted from the reimbursement. CSC’s Council will be advised of such late charges applied in the form of an “FYI” item.

## **Disposing of Capital Items Purchased with CSC Funds**

For the purpose of this guideline, “purchased with CSC funds” is defined as capital expenses paid in full using CSC funds. Capital items are those items valued at \$500.00 or more, which have been: 1) purchased with CSC funds, reported and reimbursed as capital expenses under contract with CSC; 2) provided through the Computer Replacement Initiative; or 3) awarded through CSC’s Continuous Improvement Initiative. It includes items purchased from the date the program was first funded by CSC through the date that CSC no longer provides funding for the program.

### **Disposal of Vehicles**

Vehicles that were purchased new with CSC funds and have been in operation for 36 months or less at the time CSC ceases to fund the program, the Provider will be given the option to either return the vehicle to CSC or pay to CSC the cash equivalent of the value of the vehicle. The cash value of the vehicle will be determined using a 48 month useful life and a straight line depreciation method.

***Formula:** Cash Value = CSC purchase price less CSC purchase price divided by 48 months times the number of months since the vehicle was purchased.*

If the vehicle has been in operation between 37 and 48 months, CSC will request that the cash value of the vehicle, as calculated using the formula above, be returned to CSC and the vehicle be retained by the Provider. If the vehicle is over 48 months old, the Provider will retain the vehicle without cash settlement.

For CSC purchased equipment, the equipment purchased in a program no longer being funded by CSC must be returned if requested.

## **Conditions to be Observed throughout the Contract**

### **Cash Shortage Notification**

The Provider agrees to notify CSC of any anticipated cash shortages within 10 days of the receipt of that information.

### **Notification of Excess Revenue**

If any fees are generated by the Council’s funded program in excess of the amount budgeted, the Provider will notify the Council staff of the excess revenues and plans to expend such fees. All fees generated by the Council funded program will be recorded in a separate revenue account.

The Provider agrees to prioritize the use of excess fees in the following order:

1. Increase the number of clients attending the program within licensed capacity.
2. Purchase those items which would be considered “enhancements” to the service being provided in order to improve the quality of the program.
3. Reduce the Council’s funding by the amount of the excess fees received.

## **Minimum Fiscal Requirements for Funded Programs**

The Provider is required to maintain books, records and documents in accordance with generally accepted accounting procedures and practices. The requirements apply whether the Provider employs its own accounting staff or sub-contracts with a third party vendor. The minimal fiscal requirements are:

- a. Maintain General Ledger
- b. Maintain Payroll Ledger
- c. Retain monthly bank statements and ensure timely approved reconciliations in accordance with the Provider's policies.
- d. Prepare Monthly Financial Statements inclusive of Revenues and Expenses and Balance Sheet and Statement of Cash Flows
- e. Maintain Chart of Accounts
- f. Maintain revenue and expenses cost allocation worksheets
- g. Track physical inventory if CSC funded
- h. Prepare IRS 941 report quarterly (be able to show 941 forms and bank statement to verify payments have been made. If a sub-contractor does this on behalf of the Provider, the Provider needs to obtain a letter verifying that the payments have been made through the most recent payroll date.)
- i. Ensure that an independent audit, along with IRS Form 990, is completed on an annual basis.
- j. The CSC requires all independent audited financial statements must be submitted to CSC within the timeframe as specified in the CSC contract. The document can be hand delivered or submitted via any acceptable US mail system. The CSC will also accept (*in lieu of the bound original copy*), an electronic copy (preferably PDF) of the completed Audited Financial Statements for any of its funded Providers, with the single provision being that electronic copy is sent **directly** from the Auditor (CPA) or Audit Firm completing the audit engagement for the Provider. The independent audit should be submitted to [compliance@cscpsc.org](mailto:compliance@cscpsc.org). The e-copy would require some prior approval/agreement between the Provider and the audit firm to release that information to its funders.
- k. Prepare W-2 forms for each employee annually by January 31 of subsequent year.
- l. Prepare and distribute IRS Form 1099 in accordance with IRS guidelines.
- m. Prepare employer's quarterly tax report in accordance with IRS guidelines.
- n. Prepare monthly reimbursement requests. Enter these requests in the SAMIS system, unless specifically authorized to use an alternative method of reporting, and maintain supporting documentation.

*Administrative Guidelines for CSC Programs – Fiscal*

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- o. Present financial statements and other fiscal matters at the Agency Board Meetings.
- p. Notify CSC of anticipated agency cash shortages.
- q. The Board approved unaudited quarterly financial statements inclusive of the income statement, balance sheet, and statement of cash flows for the requesting Provider must be submitted to the CSC within ten days of the Board meeting. If the board meeting has not taken place by the last day of the month following the end of the quarter, please submit your quarterly financial statements by the last day of the month, and then submit the Board approved financials the day following your board meeting. Government entities and private entities are excluded from this requirement.

**NOTE:** Only one set of financial statements needs to be submitted per Provider.