



# TRI-COUNTY REGIONAL PLANNING COMMISSION

EST. 1958

## **EXECUTIVE BOARD MEETING**

**456 Fulton St. Suite 401**

**Peoria, IL 61602**

**Don White, CHAIRMAN**

**(Chuck Nagel, Rita Ali, Russ Crawford, Greg Menold, Autum Jones, Andrew Rand, John Kahl**

***Monday, May 15, 2023***

***9:00 a.m.***

**<https://global.gotomeeting.com/join/291023189>**

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**United States: +1 (408) 650-3123**

**Access Code: 291-023-189**

## **AGENDA**

1. Call to Order
2. Roll Call
3. Public Input
4. Motion to approve April 17, 2023 minutes
5. Executive Director report
6. Motion to recommend to Commission the FY24 Final Budget
7. Discussion of changes to Employee Handbook including joining Illinois Municipal Retirement Fund
8. Motion to approve Executive Director to renew subscription of Office 365 in the amount of \$1,296.00 from 6/1/2023 to 6/1/2024
9. Discussion and recommendation to Commission the amendment of the Procurement Policy and Bylaws of Sec. 11 B.11- All non-budgeted expenses more than \$1,000
10. Discussion and recommendation to Commission the Administrative Fiscal Policies per 2 CFR 200
11. Other
12. Adjournment



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**Don White, CHAIRMAN**

**(Chuck Nagel, Rita Ali, Russ Crawford, Greg Menold, Autum Jones, Andrew Rand, John Kahl)**

***Monday, April 17, 2023***

***9:00 a.m.***

### Minutes

1. Call to Order

Chairman White called the meeting to order at 9:01 am

2. Roll Call

Present: Don White, Russ Crawford, Greg Menold, Autum Jones, and John Kahl. Absent: Chuck Nagel, Rita Ali, and Andrew Rand. Virtual- Eric Miller. Also present: Debbie Ulrich, Camille Coates, Danny Phelan, Rebecca Eisele, and Michael Bruner.

3. Public Input-none

4. Motion to approve February 13, 2023, minutes.

John Kahl moved to approve February 13, 2023, minutes and Greg Menold seconded. Motion carried.

5. Executive Director report

Eric Miller reported on the following:

- Working with Regional stakeholder group led by the City of Peoria regarding EV charging stations.
- Working on several Comprehensive Plans
- Working on UPWP budget
- Strategic Planning timeline cycle

6. Discussion of amending the Commission Employee Handbook- Memo attached.

Commission Retirement Plans- Illinois Municipal Retirement Fund

<https://www.imrf.org/cmsmedia/files/multi-site-files/employer/units-of-government-considering-participation-in-imrf.pdf?la=en>

Eric Miller reported on the following:

- IMRF would be an attraction and retention benefit for our staff.
- Had HR Fit do a compensation study on benefits and retirement.

Rebecca Eisele explained the handout.

- 457B our current retirement contributes 5% to 7% savings. With IMRF the Commission rate will be 12.93%

- Once a unit of government IMRF, it cannot withdraw. The Commission would not have the right to terminate participation in IMRF, ever.
- If TCRPC ever dissolved, the member counties would be required to take on the IMRF obligation.
- Funds previously contributed to IMRF by TCROC would be reallocated to the IMRF fund(s) of the unit(s) of government that absorbed the IMRF liability.  
She then explained the Retirement Pension Tier 2 Regular Plan
- Russ Crawford asked if we could use IDOT rate and if this is all or nothing and she said it would be all.
- Eric Miller it is not a consensus at this time. This is a tool to help staff plan for there future and is a retention and attraction tool for employees. We are at fact findings at this time.
- Autum Jones mentioned this needs to be addressed at the 3 county board levels.
- Eric Miller added that July 2024 is our rate lock. We are generating a list of questions.
- Russ Crawford added we do not want to be a training ground. We need to keep good employees.
- Eric Miller added in order to adopt we need 2/3 majority vote from Commissioners.  
Almost unanimous consensus.

7. Discussion and action to have Terracon Consultants, Inc. prepare a FY2024 EPA Brownfield Grant Application at no cost to the Commission- Memo attached.

Russ Crawford moved to have Terracon Consultants; Inc. prepare a FY2024 EPA Brownfield Grant Application at no cost to the Commission and John Kahl seconded. Motion carried.

Eric Miller updated on the following:

- This was prompted by conversations with brownfield site investigation consultant, Terracon, the Greater Peoria Economic Development Council (GPEDC) approached TCRPC about the referenced grant application development work determining that, as a public body, Tri-County would be a more appropriate organization to lead the referenced investigation and planning effort. TRCPC staff wishes to inform you that it intends to approve a Work Authorization with St. Louis-based Terracon Consultants, Inc. (Terracon) to carry out Professional Brownfields Services, including: Environmental Protection Agency (EPA) Grant Writing at no cost to the Commission TCRPC staff will keep the Executive Committee and Commission informed of progress in this regard.

8. Discussion of Transportation Alternatives Program Call for projects

Michael Bruner updated on the following:

FY 2021 allotment is \$293,959; FY 2022 allotment is \$576,352; and FY 2023 allotment is \$ 588, 254. The total available funds are \$1,458,565. TCRPC announced the availability of TA set-aside funding on February 15, 2023. Applications were due March 31, 2023. The Commission received 2 applications; however, we extended the due date to May 4 due to bad weather.

Village of Germantown Hills submitted project:

- Germantown Hills to Metamora Trail

- Phase I & II Engineering for design of an off-road multi-use trail along IL Route 116. Improvements will be a 10 ft wide hot-mix asphalt path separated from roadway by vegetated buffer.
- Limits: Woodland Knolls Rd (Germantown Hills) to Douglas (Metamora)
- Length: 5.4 miles
- Project Funding-Phase 1/Phase 2- Engineering--TA Funds is \$240,000, Local Funds- \$60,000 Total funds- \$300,000.
- 20% local match to be funded by the Village of Germantown Hills, and Village of Metamora.

#### Peoria County

- Maxwell Road & Middle Road
  - Presented existing and proposed cross section.
  - Proposed sidewalk and multi-use path. Will complete connection to over 400 homes.
  - 4 miles of connected sidewalk & path upon completion
  - Project Funding- TA funds \$486,188, Local funds- \$192,761- Total project- \$678,949

TCRPC received a total TA set-aside funding request of \$726,188 (49.8%) of the \$1,458,565 available in funding. This would leave \$732,377 in leftover TA funding.

Staff recommends funding Germantown Hills at their requested 80% funding level and funding Peoria County at 80% of their total project cost, leaving \$675,406 in leftover TA funding.

Consensus was to go out for another Call for Projects for the remaining \$675, 406 in leftover TA funding.

#### 9. Other

Don White mentioned that he is going to write a letter to Mayor Hughes to continue being the representative of Tri County Regional Planning Commission.

#### 10. Adjournment

Autum Jones moved to adjourn at 10:13 am and John Kahl seconded. Motion carried.

Submitted by:

Eric Miller, Executive Director

Transcribed by:

Debbie Ulrich, Office Administrator

To: Members of the Commission  
From Eric W. Miller, Executive Director  
Date: May 9, 2023  
Subject: Executive Director Report for May 2023

| Project                                                  | Activity                                                                                           | Status   |
|----------------------------------------------------------|----------------------------------------------------------------------------------------------------|----------|
| <b>Administrative</b>                                    |                                                                                                    |          |
| Headlines                                                |                                                                                                    | Ongoing  |
|                                                          | Working with Regional Stakeholder group Led by the City of Peoria regarding EV charging stations   | Ongoing  |
|                                                          | Working on Regional Priority Process                                                               | Complete |
|                                                          | Monitored Federal Grants NOFO's                                                                    | Ongoing  |
|                                                          | Reviewed results of IMRF cost study with staff                                                     | Ongoing  |
|                                                          | Working with Communities, drafting letters of support for State and Federal grant funding programs | Ongoing  |
|                                                          | Developing transportation dashboard                                                                | Ongoing  |
|                                                          | Worked with stakeholders and consulting team re: Passenger Rail Federal Grant Applications         | Ongoing  |
| Personnel                                                | Semi-annual staff reviews ongoing                                                                  | Ongoing  |
|                                                          | IMRF Cost Study underway                                                                           | Ongoing  |
| Website                                                  | Content review of website.                                                                         | Ongoing  |
| <b>Planning Issues</b>                                   |                                                                                                    |          |
| Illinois River Issues                                    | Continued coordination of Beneficial Use of Dredged Material Pilot project                         | Ongoing  |
|                                                          | Continued coordination and outreach regarding Asian Carp                                           | Ongoing  |
|                                                          | Continued coordination with USACE for funding opportunities related to IL river/Peoria lakes       | Ongoing  |
| HUD Healthy Homes                                        | Work Ongoing                                                                                       | Ongoing  |
|                                                          |                                                                                                    |          |
| Village of Germantown Hills Comp Plan                    | Continued discussion with Village board regarding scope of work                                    | Ongoing  |
| Village of Creve Coeur                                   | Continued discussion with Village board regarding scope of work                                    | Ongoing  |
| Village of Bartonville                                   | Work underway                                                                                      | Ongoing  |
| City of Chillicothe                                      | Continued discussion with Village board regarding scope of work                                    | Ongoing  |
| Village of Brimfield                                     | Continued discussion with Village board regarding scope of work                                    | Ongoing  |
| City of East Peoria                                      | Consultant Selection underway                                                                      |          |
| Watershed Planning                                       | Contract Development with IEPA regarding Kickapoo Creek Watershed                                  | Ongoing  |
| Hazard Mitigation Plan                                   | Work has Commenced Meeting with Stakeholders                                                       | Ongoing  |
|                                                          |                                                                                                    |          |
| <b>GIS Projects/ Asset Management</b>                    |                                                                                                    |          |
| Village of Elmwood                                       | Dunlap                                                                                             | Ongoing  |
| Washburn                                                 | Peoria Heights                                                                                     | Ongoing  |
| Minonk                                                   | Village of North Pekin                                                                             | Ongoing  |
| Delavan                                                  | Village of Washburn                                                                                | Ongoing  |
| North Pekin                                              | Peoria Park District                                                                               | Ongoing  |
| El Paso                                                  | Tremont                                                                                            | Ongoing  |
| Hollis Park District                                     | Hanna City                                                                                         | Ongoing  |
| Chillicothe                                              | Creve Coeur                                                                                        | Ongoing  |
| Bartonville                                              | Sidewalk Inventory                                                                                 | Complete |
| Logan County GIS technical assistance                    | Technical Assistance as needed                                                                     | Ongoing  |
| Greater Peoria Sanitary District                         | Technical Assistance as needed                                                                     | Ongoing  |
| Germantown Hills Map development                         |                                                                                                    |          |
| <b>MPO/Transportation</b>                                |                                                                                                    |          |
| Technical Committee                                      | Prepare agenda for and coordination for Technical Meetings                                         | ongoing  |
|                                                          |                                                                                                    |          |
| Transportation Improvement Program                       | Development of FY 24 Transportation Improvement Program                                            | Complete |
|                                                          | Creation of web based TIP document application                                                     | Ongoing  |
|                                                          | Processed FY 23 TIP Amendments                                                                     | Ongoing  |
|                                                          |                                                                                                    |          |
| Intelligent Transportation Systems                       | Continued work on update to regional ITS architecture                                              | on hold  |
|                                                          |                                                                                                    |          |
| Highway Safety Improvement Program Guardrails            | Consultant Selection                                                                               | Ongoing  |
| Active Transportation Planning                           | Work with various Stakeholders, coordination of planning efforts                                   | ongoing  |
|                                                          |                                                                                                    |          |
| Special Transportation Studies                           |                                                                                                    |          |
| FY23                                                     |                                                                                                    |          |
| Chillicothe Active Transportation Plan                   | Project is underway, coordinating with consultant                                                  | Ongoing  |
| City of Peoria Intersection Study                        | Project is underway, coordinating with consultant                                                  | Ongoing  |
| City of Pekin Bike/Ped plan                              | Project is underway, coordinating with consultant                                                  | Ongoing  |
| MPO TDM work                                             | Work Completed                                                                                     | Complete |
|                                                          |                                                                                                    |          |
| FY 21 State Planning and Research Funding                |                                                                                                    |          |
| Asset Management software                                | Project is underway, coordinating with consultant                                                  | Ongoing  |
| Activity Based Travel Demand Model                       | Project is underway, coordinating with consultant                                                  | Ongoing  |
| Congestion Management Plan                               | Work is complete                                                                                   | Complete |
|                                                          |                                                                                                    |          |
| FY 23 State Planning and Research Funding                |                                                                                                    |          |
| Heart of Illinois Regional Port District Master Planning | Consultant selection / project mobilization underway                                               | Ongoing  |
| Regional Community Planning                              | Consultant selection / project mobilization underway                                               | Ongoing  |
|                                                          |                                                                                                    |          |
| <b>HSTP/Transportation</b>                               |                                                                                                    |          |
| 5310 program Grant                                       | Programmed 5310 Funds                                                                              | Ongoing  |
| HSTP Plan                                                | Commission Adopted Plan                                                                            | Ongoing  |
| HSTP meetings                                            |                                                                                                    | Ongoing  |

**TRI-COUNTY REGIONAL PLANNING COMMISSION**

**BUDGET FY24**

**JULY 2023 - JUNE 2024**

| <b>Revenue By Project</b>                          | <b>FY24 Budget Estimate</b> | <b>FY24 Federal</b> | <b>FY24 State</b> | <b>FY24 Local</b> |
|----------------------------------------------------|-----------------------------|---------------------|-------------------|-------------------|
| FY24 IDOT - UPWP                                   | <b>1,169,078.65</b>         | 935,262.92          | 233,815.73        | -                 |
| FY24 MPO Joint Funding - Local Projects            | <b>188,816.00</b>           | -                   | -                 | 188,816.00        |
| County Dues from MPO Joint Funding                 | <b>45,000.00</b>            | -                   | -                 | 45,000.00         |
| FY23 IDOT - UPWP (Remaining Funds)                 | <b>130,043.88</b>           | 104,035.10          | 26,008.78         | -                 |
| IDOT - Asset Management Software                   | <b>31,895.14</b>            | 25,516.11           | 6,379.03          | -                 |
| IDOT - Activity Based TDM                          | <b>141,885.59</b>           | 113,508.47          | 28,377.12         | -                 |
| IDOT - Port District Master Plan                   | <b>153,954.60</b>           | 123,163.68          | 30,790.92         | -                 |
| IDOT - Multi-Jurisdictional Comprehensive Plans    | <b>150,000.00</b>           | -                   | 120,000.00        | 30,000.00         |
| IDNR - Water Supply Planning                       | <b>30,000.00</b>            | -                   | 30,000.00         | -                 |
| IEMA - Hazard Mitigation                           | <b>69,993.61</b>            | 69,993.61           | -                 | -                 |
| FHWA - Safe Streets 4 All                          | <b>240,000.00</b>           | 240,000.00          | -                 | -                 |
| Kickapoo Creek Watershed Study                     | <b>48,000.00</b>            | 36,000.00           | -                 | 12,000.00         |
| HSTP - Human Services Transportation Plan          | <b>55,000.00</b>            | 55,000.00           | -                 | -                 |
| 5310 FTA                                           | <b>115,000.00</b>           | 115,000.00          | -                 | -                 |
| GIS - GPSD                                         | <b>4,000.00</b>             | -                   | -                 | 4,000.00          |
| GIS - Logan County                                 | <b>2,500.00</b>             | -                   | -                 | 2,500.00          |
| GIS - Woodford County                              | <b>30,000.00</b>            | -                   | -                 | 30,000.00         |
| Tazewell County - Planning Contract                | <b>9,045.00</b>             | -                   | -                 | 9,045.00          |
| City of Pekin - Bike Ped Master Plan - Local Match | <b>10,000.00</b>            | -                   | -                 | 10,000.00         |
| City of Peoria - Local Match                       | <b>7,000.00</b>             | -                   | -                 | 7,000.00          |
| Heart of IL Regional Port District                 | <b>33,637.50</b>            | -                   | -                 | 33,637.50         |
| METEC - HUD Healthy Homes                          | <b>20,000.00</b>            | -                   | -                 | 20,000.00         |
| Interest                                           | <b>750.00</b>               | -                   | -                 | 750.00            |
| <b>Total FY24 Budgeted Revenue</b>                 | <b>2,685,599.97</b>         | <b>1,817,479.89</b> | <b>475,371.58</b> | <b>392,748.50</b> |

| <b>Expenses</b>                    | <b>FY23 End of Year Estimate</b> | <b>FY24 Budget Estimate</b> |
|------------------------------------|----------------------------------|-----------------------------|
| <b>Amortization Expenses:</b>      |                                  |                             |
| Amortization Expense - Office      |                                  | 33,510.48                   |
| Amortization Expense - Copier      |                                  | 4,694.52                    |
| <b>Total Amortization Expenses</b> | <b>38,205.00</b>                 | <b>38,205.00</b>            |
| <b>Computer Expenses:</b>          |                                  |                             |
| Computer Hardware & Supplies       |                                  | 22,000.00                   |
| Computer Software & Services       |                                  | 7,344.00                    |
| <b>Total Computer Expenses</b>     | <b>57,190.47</b>                 | <b>29,344.00</b>            |
| <b>Outside Services:</b>           |                                  |                             |
| Computer Support Contracts         |                                  | 44,220.00                   |
| Contractual Services               |                                  | 117,000.00                  |
| Consultants                        |                                  | 1,128,656.10                |
| <b>Total Outside Services</b>      | <b>521,356.45</b>                | <b>1,289,876.10</b>         |
| <b>Depreciation:</b>               | <b>17,768.52</b>                 | <b>17,768.52</b>            |
| <b>Employee Benefits:</b>          |                                  |                             |
| Health Insurance                   |                                  | 97,054.81                   |
| Parking                            |                                  | 10,455.00                   |
| Payroll Taxes                      |                                  | 59,510.82                   |
| Retirement                         |                                  | 88,342.03                   |
| Workers Compensation Insurance     |                                  | 1,338.00                    |

**TRI-COUNTY REGIONAL PLANNING COMMISSION**

**BUDGET FY24**

**JULY 2023 - JUNE 2024**

| <b>Expenses</b>                          | <b>FY23 End of Year<br/>Estimate</b> | <b>FY24 Budget<br/>Estimate</b> |
|------------------------------------------|--------------------------------------|---------------------------------|
| <b>Total Employee Benefits</b>           | <b>164,543.98</b>                    | <b>256,700.66</b>               |
| Interest Expenses:                       |                                      |                                 |
| Interest Expense - Office                |                                      | 763.11                          |
| Interest Expense - Copier                |                                      | 252.23                          |
| <b>Total Interest Expenses</b>           | <b>2,297.65</b>                      | <b>1,015.34</b>                 |
| <b>Office Administration:</b>            |                                      |                                 |
| Bank Service Charges                     |                                      | 200.00                          |
| Copier Expense                           |                                      | 700.00                          |
| Fuel (Commission Vehicle)                |                                      | 500.00                          |
| Internet & Phones                        |                                      | 5,338.80                        |
| Professional Liab & Auto Ins             |                                      | 6,920.04                        |
| Office Supplies                          |                                      | 3,500.00                        |
| Parking (TCRPC Vehicle / Validations)    |                                      | 2,000.00                        |
| Postage                                  |                                      | 175.00                          |
| Repairs & Maintenance                    |                                      | 4,000.00                        |
| Subscriptions                            |                                      | 59.00                           |
| Office Water                             |                                      | 800.00                          |
| <b>Total Office Administration</b>       | <b>17,134.34</b>                     | <b>24,192.84</b>                |
| <b>Miscellaneous Projects Costs:</b>     |                                      |                                 |
| Advertising                              |                                      | 750.00                          |
| Membership Dues                          |                                      | 4,750.00                        |
| Legal Notices                            |                                      | 1,725.42                        |
| Other Miscellaneous Expenses             |                                      | 100.00                          |
| <b>Total Miscellaneous Project Costs</b> | <b>6,531.20</b>                      | <b>7,325.42</b>                 |
| <b>Professional Fees:</b>                |                                      |                                 |
| Accounting/Audit                         |                                      | 26,500.00                       |
| Legal Fees                               |                                      | 5,000.00                        |
| <b>Total Professional Fees</b>           | <b>33,692.55</b>                     | <b>31,500.00</b>                |
| <b>Facility Costs:</b>                   |                                      |                                 |
| Office Cleaning                          |                                      | 2,394.00                        |
| Property & Casualty Insurance            |                                      | 1,644.00                        |
| Utilities                                |                                      | 8,400.00                        |
| <b>Total Facility Costs</b>              | <b>14,669.11</b>                     | <b>12,438.00</b>                |
| <b>Salaries &amp; Wages:</b>             | <b>616,208.14</b>                    | <b>724,616.09</b>               |
| <b>Training &amp; Education:</b>         |                                      |                                 |
| In-State Conferences                     |                                      | 11,000.00                       |
| Out-of State Conferences                 |                                      | 1,700.00                        |
| Staff Training                           |                                      | 2,900.00                        |
| <b>Total Training &amp; Education</b>    | <b>12,043.76</b>                     | <b>15,600.00</b>                |
| <b>Travel:</b>                           |                                      |                                 |
| Lodging                                  |                                      | 250.00                          |
| Meals                                    |                                      | 250.00                          |
| Meeting Expenses                         |                                      | 250.00                          |
| Mileage Reimbursements                   |                                      | 767.33                          |
| Training - Travel                        |                                      | 12,500.00                       |
| Other Travel & Meals                     |                                      | 500.00                          |
| <b>Total Travel</b>                      | <b>12,366.48</b>                     | <b>14,517.33</b>                |
| <b>TOTAL BUDGETED EXPENSES</b>           | <b>1,514,007.65</b>                  | <b>2,463,099.30</b>             |
| <b>SURPLUS/(DEFICIT)</b>                 |                                      | <b>222,500.67</b>               |
| <b>Joint Funding Income</b>              |                                      | <b>173,816.00</b>               |
| <b>Regular Income</b>                    |                                      | <b>48,684.67</b>                |



# MEMORANDUM

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**TO:** Executive Board

**FROM:** Staff

**SUBJECT:** Administrative Fiscal Policies per 2 CFR 200

**DATE:** May 15, 2023

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**Action needed:**

Discussion of Administrative Fiscal Policies per 2 CFR 200.

**Background:**

In Spring 2022, the Commission underwent a Fiscal Administrative Review (FAR) with the Illinois Department of Human Services (IDHS). This process was a result of Tri-County's 2020 Census grant with IDHS. IDHS completed FAR reviews with grant recipients the year after the grant award to determine the level of review needed for future IDHS grant agreements. The IDHS reviewers recommended that the Commission formalize their existing procedures per 2 CFR 200 – "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards," commonly referred to as Uniform Guidance.

The 2 CFR 200 Requirements streamlined the Administrative Requirements, Cost Principles, and Audit Requirement guidelines for federal awards received by all types of non-federal entities. The federal government eliminated overlapping requirements and reformed overly burdensome or conflicting requirements. These changes allowed federal award and pass-through recipients to focus their efforts on programmatic objectives instead of compliance with complex fiscal and administrative requirements. The federal implementation of 2 CFR 200 resulted in the State of Illinois passing the Grants Accountability and Transparency Act.

The Commission's existing procedures follow the federal regulations in 2 CFR 200; however, some of those procedures are not formalized with written policies. These are the Property Control Policy, Physical Inventory Policy, Disposition Policy, Retention Policy, and Maintenance of Accounting Records/Software Backup Policy. Staff worked to develop these policies to showcase existing practices. Furthermore, staff has also implemented further steps to better show the segregation of fiscal responsibilities with the Executive Director signing off on the monthly financial reports, including the completed bank reconciliations, after his review to signify approval and better show that a second person reviewed and approved them. Additionally, staff presents the bank reconciliations and bank statements monthly to the Ways and Means Committee.



While developing and updating these policies, staff have also started to review and update Tri-County's existing internal procedures to administer federal and state awards.

## **2 CFR Part 200 Key Topics and Requirements**

- Subpart A – Acronyms and Definitions
- Subpart B – General Provisions
  - § 200.112 Conflict of interest
  - § 200.113 Mandatory disclosures
- Subpart C – Pre-Federal Award Requirements and Contents of Federal Awards
  - § 200.214 Suspension and Debarment
- Subpart D – Post Federal Award Requirements
  - § 200.301 – Performance measurement
  - § 200.302 – Financial management
  - § 200.303 – Internal controls
  - § 200.305 – Federal payment
  - § 200.306 – Cost sharing or matching
  - § 200.308 – Revision of budget and program plans
  - § 200.309 – Modifications to Period of Performance
  - § 200.310 – 200.316 – Property Standards
  - § 200.317 – 200.327 – Procurement Standards
  - § 200.328 – 200.330 – Performance and Financial Monitoring and Reporting
  - § 200.331 – 200.333 – Subrecipient Monitoring and Management
  - § 200.334 – 200.338 – Record Retention and Access
  - § 200.339 – 200.343 – Remedies for Noncompliance
  - § 200.344 – 200.346 – Closeout and Adjustments
- Subpart E – Cost Principles
- Subpart D – Audit Requirements

## **Approval Process**

This body's recommendation will be brought to the Ways and Means Committee at their June 7 meeting for review and recommendation to the Full Commission for final approval on June 7.

## **Property Control and Management Policies and Procedures**

### Purpose

The purpose of this policy is to ensure that all property of the Tri-County Regional Planning Commission ("Commission") is inventoried, insured, used, managed, and disposed of per 2 CFR Part 200.

### Scope

This policy applies to the Executive Director, Program Managers, Staff Accountant, and any other employees authorized to initiate and/or approve purchases, use, or dispose of equipment paid with federal, state, and local funds.

### Responsibility

The Commission has delegated the responsibility and authority for implementing the Property Control and Management Policies and Procedures to the Executive Director or designee. The Executive Director or designee is responsible for ensuring that all property that is owned or leased by the Commission is properly managed and used in accordance with federal and state laws, and this policy.

### Policy Statement

It is the policy of the Commission:

- To ensure that all property is managed and used in accordance with 2 CFR Part 200 and 44 Ill. Admin. Code Part 5010.
- To provide equivalent insurance coverage for real property and equipment acquired or improved.
- To maintain an Equipment Inventory and update it upon the procurement of new equipment.
- To ensure that property is maintained in good condition.
- To ensure that adequate safeguards are in place to prevent loss, damage, or theft of property.
- To dispose of property no longer needed for the original authorized purpose according to the procedures outlined in this policy.

### Property Management

The Commission must provide the equivalent insurance coverage for real property and equipment acquired or improved through grant funding. The Commission follows 2 CFR §

## Property Control and Management Policies and Procedures

200.313 to manage and dispose of equipment acquired through federal, state, or local funding.

The federal definition of equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000 (2 CFR 200.1 "Equipment").

The State of Illinois' definition of equipment is all tangible personal property of a non-consumable nature (Ill. Admin. Code tit. 44 § 5010.200). The Illinois State Statute continues to state that all equipment with an acquisition value greater than the nominal value and equipment that is subject to theft with a value less than that nominal value must be reported to the Illinois Department of Central Management Services by the holding agency. Equipment with an acquisition value of less than the nominal value that is not subject to theft is not subject to reporting; however, agencies will be responsible for establishing and maintaining internal control over these items (Ill. Admin. Code tit. 44 § 5010.220).

### Equipment Inventory

The Commission's Equipment Inventory is maintained and updated when new equipment is purchased. Commission staff follows 44 Ill. Adm. Code 5010 and 2 CFR 200.313 when inventorying equipment purchased or leased by the Commission. Equipment is removed from the Equipment Inventory once it has gone through disposition. Equipment that has not gone through the disposition process but is no longer in active use by Commission is maintained on the Equipment Inventory under a separate tab titled Retired.

The equipment inventory is maintained at the principal offices of the Commission and includes all items that are reasonably expected. Items of nominal value such as cables, keyboards, mice, etc. are not included in the inventory. The inventory is updated upon the acquisition or disposition of an item.

The equipment inventory is maintained in an Excel Workbook and organized in three tabs: Active, Phone System, and Retired. The Active Tab outlines all equipment used by Commission Staff except phones and nominal value items listed above. This includes servers, computers, monitors, tablets, web cameras, adapters, etc. The phone system outlines the desk phones and headsets used by Commission Staff. Lastly, the Retired tab outlines all equipment that is currently unusable due to being outdated or having issues that hinder usability but has not yet gone through the disposition process. The attributes collected in the equipment inventory are the serial numbers, type of equipment, make and model, user (i.e., staff member or location of equipment), vendor used for purchase, acquisition date, cost, funding source, and if the equipment was purchased or leased. Labels are placed on all monitors, computers, and tablets to indicate Commission ownership; these labels list the item's serial number.

## Property Control and Management Policies and Procedures

### Maintenance

It is the practice of the Commission to have an up-to-date, fully functional Information Technology (IT) network and ancillary equipment and follow maintenance requirements detailed in 2 CFR § 200.313(d)4. The Commission ensures that its property is maintained in good condition, and routine repair and maintenance costs are expensed as they are incurred. To maintain the system, the Commission employs the following measures:

- A server/network consultant is on call. IT Unified, based in New Lenox, IL, has been providing service to the Commission since 2022. They perform regular inspections of the server/network equipment and provide recommendations for necessary updates and or maintenance to the server.
- The Commission has an up-to-date inventory of IT equipment and other peripherals. It is the practice of the Commission to replace equipment every 5-7 years. Replacement of workstations, including computers and monitors (as needed) is done on an incremental basis (i.e., one to two new machines are purchased each year).
- The Commission workstations are equipped with the latest Microsoft Office software suite through an Office 365 subscription, which includes Word, Excel, PowerPoint, and other mainstream Microsoft software. Additionally, the subscription offers cloud storage via OneDrive.
- For printing and scanning equipment, the Commission uses a Xerox AltaLink C8145 for its primary printing, scanning, and copying needs. This machine is on lease from RK Dixon.
- For email, the Commission subscribes to Google Suites for business email, calendaring, cloud storage, and other applications. This service allows employee access to email via the web and eliminates the need for email hosting and email backups.

### Safeguards

The Commission will ensure that adequate safeguards are in place to prevent loss, damage, or theft of property. Any loss, damage, or theft must be reported to the Program Manager and Executive Director as soon as it is discovered. If applicable, law enforcement is also made aware of the theft.

If the item is not found after 90 days of reporting the missing property, the Program Manager will notify the Staff Accountant so they may remove the asset from the Equipment Inventory. If stolen items are not recovered, the Commission will submit copies of the police report and any insurance claims for equipment of \$500 or greater to non-federal awarding agencies, and if the current per-unit fair market value of the item is \$5,000 or greater for federal awarding agencies. Additionally, the report of the lost or stolen property will be submitted to the Ways & Means Committee and Full Commission.

## Property Control and Management Policies and Procedures

The Commission is responsible for replacing or repairing any lost, damaged, destroyed, or stolen items funded with state or federal funds. Replaced equipment should be inventoried accordingly under the originally funded program.

Additionally, the Commission has a Business Continuity Plan to provide policies and procedures to limit interruptions to digital services in the event of an emergency.

### Disposition

When the Commission determines that items of equipment acquired under a state or federal award is no longer needed for the originally authorized purpose, the Program Manager must obtain disposition instructions from the state or federal awarding agency in accordance with 2 CFR § 200.313(e).

- Items of federally funded equipment with a current per-unit fair market value of \$5,000 or less may be retained, sold, or otherwise disposed of with no further responsibility to the Commission.
- Items of state-funded equipment with a current per-unit fair market value of \$500 or less may be retained, sold, or otherwise disposed of with no further responsibility to the Commission.
- Except as provided in 2 CFR § 200.312(b), or if the awarding agency fails to provide requested disposition instructions within 120 days, items of equipment with a current per-unit fair market value more than \$5,000 may be retained by the Commission or sold. The awarding agency is entitled to an amount calculated by multiplying the current market value or proceeds from sale by the awarding agency's percentage of participation in the cost of the original purchase. If the equipment is sold, the awarding agency may permit the Commission to deduct and retain from the awarding agency's share \$500 or 10% of the proceeds, whichever is less, for its selling and handling expenses.
- The Commission may transfer the title of the property to the awarding agency or to an eligible third party provided that, in such cases, the Commission must be entitled to compensation for its attributable percentage of the current fair market value of the property.
- In cases where the Commission fails to take appropriate disposition actions, the awarding agency may direct the Commission to take disposition actions.

Upon termination or completion of a grant-funded project or program, for any residual inventory of unused supplies exceeding \$5,000 in total aggregate value which are not needed for any other award, the Commission shall retain the supplies for use on other activities or sell them. Upon either method of disposal, the Commission shall compensate the awarding agency for its share of the current market value or sales proceeds.

When acquiring replacement equipment or supplies, the Commission may use the equipment or supplies to be replaced as a trade-in or sell the property and use the proceeds to offset the cost of the replacement property.

## Property Control and Management Policies and Procedures

The Commission must comply with relevant laws governing the surplus of public property in disposing of unnecessary equipment or supplies acquired with state or federal funds. Such methods may include the following:

- Public auction and/or online sale – generally conducted by a licensed auctioneer
- Salvage – scrap sold to local dealers
- Negotiated sale – normally used when disposing of items of substantial value
- Sealed bid – normally used for items of substantial value or unique qualities
- Pre-priced sale – large quantities of obsolete or surplus equipment or supplies may be sold by this method
- Donation to charitable organizations
- Disposition to trash for equipment or supplies with no value

The Executive Director or designee will be responsible for maintaining records of disposed obsolete and surplus property and will report to the federal awarding agency when required.



## **File Management, Access, and Retention Policies and Procedures**

### Purpose

The purpose of this policy is to ensure that the Tri-County Regional Planning Commission ("Commission") maintains adequate records per 2 CFR Part 200, Grant Accountability and Transparency Act, and Local Records Act.

### Scope

This policy applies to the Executive Director, Program Managers, Staff Accountant, and any other employees authorized to work on administrative, fiscal, and programmatic activities.

### Responsibility

The Commission has delegated the responsibility and authority for implementing the File Management, Access, and Retention Policies and Procedures to the Executive Director or designee. The Executive Director or designee is responsible for ensuring that all records, including but not limited to financial records, supporting documents, procurement documents, contracts and agreements, statistical records, and all other records pertinent to administrative, fiscal, and programmatic activities of the Commission and its projects are properly managed, retained, and available for inspection in accordance with federal and state laws, and this policy.

### Policy Statement

It is the policy of the Commission:

- To ensure that all records are managed, retained, and available for inspection in accordance with 2 CFR Part 200 and Local Records Act (50 ILCS 205).
- To maintain up-to-date personnel files of all staff.
- To maintain both hard and digital copies of all meeting materials, resolutions, and contracts/agreements.
- To maintain up-to-date financial records with supporting documentation for each fiscal year, organized by month.
- To maintain up-to-date financial and programmatic records with supporting documentation for each funding award, organized by fiscal year.
- To maintain up-to-date inventory of all equipment purchased or leased.
- To maintain up-to-date files with all Freedom of Information Act (FOIA) requests, and responses.
- To maintain a record and outcome of any ADA or Title VI complaint, if one is to occur.

### File Management

A master file shall be maintained on the Commission's server, and a copy of all grant proposals or applications, award letters, memoranda of understanding, contracts, and programmatic and financial reports shall be maintained in the file. The master file should maintain a file structure that includes, at minimum, the following sections, with clear delineation between fiscal years:

1. Application or Proposal, such as application guidance, a copy of the application and research including statistical information used in preparation of and support of the grant.
2. Award Documents, such as award letters, agenda items, grant agreements, grant amendments, modifications, extensions, cancellations and terminations, and anything else related to the award.
3. Contracts, such as procurement documents, RFP/RFQ advertisements, RFP/RFQ questions and answers, RFP/RFQ scoring, and consultant agreements.
4. Finance, such as account set up, purchase orders, invoices, reimbursement requests.
5. Programmatic Reports, such as reports to granting entity and evaluation components.

### File Retention

The Commission, in accordance with the Local Records Act (50 ILCS 205), maintains its programmatic records for at least three years from the date of submission of the final expenditure report, adequate books, all financial records and supporting documents, statistical records, and all other records pertinent to the award, adequate to comply with 2 CFR 200.333, unless a different retention period is specified in 2 CFR 200.334 or 44 Ill. Admin. Code §§ 7000.430(a) and (b).

Awarding agencies may require retention periods in excess of three years. The Commission must ensure they comply with retention requirements specified by each awarding agency. Additionally, the Commission is also obligated to protect records adequately against loss, theft, fire, or other damage in accordance with statutory provisions.

Retention requirements extend to books of original entry, source documents supporting accounting transactions, the general ledger, subsidiary ledgers, personnel and payroll records, cancelled checks, and related documents and records. Source documents include copies of all awards, applications, and required recipient financial and narrative reports. Personnel and payroll records shall include time and attendance reports, personal activity reports, or equivalent documentation for all individuals reimbursed under the award.

### Accessibility of Records

The Commission, in compliance with 2 CFR 200.337 and 44 Ill. Admin. Code 7000.430(e), shall make any documents, papers, or other records of the Commission which are pertinent to the award, available to the authorized awarding agency representatives, the Illinois Auditor General, Illinois Attorney General, any Executive Inspector General, the Award



Agency's Inspector General, federal authorities, any person identified in 2 CFR 200.337, and any other person who may be authorized by the Awarding Agency (including auditors), by the state of Illinois or by federal statute in order to make audits, examinations, excerpts, and transcripts. The right also includes timely and reasonable access to the Commission's personnel for the purpose of interview and discussion related to such documents. The Commission shall cooperate fully in any such audit or inquiry.

#### Destruction of Records

The Commission complies with the Local Records Act (50 ILCS 205), which regulates the destruction and preservation of public records within the State of Illinois. It mandates the Secretary of State, who is named the local records advisor, to assist local governments in the implementation of the Act. This Act defines record material, explains the rights to public access to information, and sets standards for record keeping and microfilming. Additionally, the Act provides for the existence of a six-member Local Records Commission which regulates the disposal of local records and specifically forbids local officials from disposing of any public record without first obtaining their written approval.

Records with any sensitive information, such as personnel records, must be destroyed by incineration or shredding. Disposal of records intact to a landfill or through a disposal service is not appropriate.

## **Maintenance of Accounting Records Policies and Procedures**

### Purpose

The purpose of this policy is to ensure Tri-County Regional Planning Commission ("Commission") adequately protects and maintains the necessary financial records and documents. Additionally, ensure that financial records that are no longer needed are discarded at the proper time.

### Scope

This policy applies to the Executive Director, Program Managers, Staff Accountant, and any other employees authorized to work on administrative, fiscal, and programmatic activities.

### Responsibility

The Commission has delegated the responsibility and authority for implementing the Maintenance of Accounting Records Policies and Procedures to the Executive Director or designee. The Executive Director or designee is responsible for ensuring that all accounting records of the Commission and its projects are properly managed, retained, and available for inspection in accordance with federal and state laws, and this policy. The Executive Director collaborates with the Staff Accountant to ensure compliance with federal and state laws, and this policy.

### Policy Statement

It is the policy of the Commission:

- To ensure the preservation of accounting records documenting the activities of the Commission adheres to federal and state laws, rules, and regulations for the collection, preservation and maintenance of records concerning financial operations.
- To establish accounting records retention policies and practices to provide consistent operational practices among the various grants and programs to ensure compliance with government regulations.
- To provide reasonable safeguards to ensure accounting records are secure and accessible.
- Policies, procedures, and practices must adhere to government regulatory costing and administrative principles, such as those contained in 2 CFR Part 200 and Local Records Act (50 ILCS 205).

### Financial Management

The Commission maintains a proper fiscal management system as prescribed in 2 CFR Part 200, to receive both federal and state funding. Certain fiscal controls and procedures must be in place to ensure meeting all fiscal management system requirements. Failure to meet a requirement may result in return of funds or termination of the award.

Part of these requirements is the collection, preservation and maintenance of accounting records concerning the Commission's financial operations. Please note, the Commission record retention requirements in areas other than accounting records are not addressed in this policy (i.e., personnel files, meeting materials, FOIA requests, Title VI and ADA Complaints). Refer to the File Management, Access, and Retention Policies and Procedures for guidance on these types of records.

In the context of records management, retention is the length of time required for keeping documents, records, and information resources to assure that they support business functions for as long as needed. Some records are required to be retained past their active support of business functions to support good financial recordkeeping practices or to meet legal or regulatory retention requirements. On top of these considerations for retention, some records have long-term or enduring value and are expected to be retained indefinitely.

Accounting records include but are not limited to: annual reports, budgets, financial statements, contracts or agreements produced or received, contributions and cost share agreements, bank deposits, bank statements, canceled checks, wire transfers, payment requisitions, credit card settlement reports, journal entries, spreadsheets, memoranda, correspondence, planning documents and receipts, email messages to the extent they authorize or provide substantiating information, or other documentation of individual entries made in the transaction of its business.

For the successful completion of a grant award, the Commission must manage the expenditure and use of funds to ensure that grant award goals, terms, and conditions are being met, projected milestones are being accomplished, quality materials and services are being received, and other performance goals are being achieved in accordance with the approved grant award.

### Accounting Software Backup

The financial records of the Commission are maintained on QuickBooks with Qbox using the Accrual basis of accounting. With Qbox, QuickBooks is backed up and saved to the cloud every time the software is closed. Furthermore, Qbox stores the most 20 recent versions of your backup files on the cloud. This aids the Commission in providing reasonable safeguards against unwanted alteration and data corruption.

It is also essential to regularly make a hard local backup of the financial files in QuickBooks. The Commission Staff Accountant process payroll bimonthly. After processing payroll, the Staff Accountant backs up the accounting system and saves it locally on the server. The backup schedule is as follows: mid-month, month-end, and finally year-end. Lastly, backups are periodically assessed to ensure proper functionality.

#### Business and Financial Records Retention Schedule

Please note, the required retention period for various financial documents associated with a specific activity is dependent upon the source of funds used to support that activity. The information contained on this schedule is the minimum retention period for each specific category. This does NOT authorize disposal action per the Local Records Act (50 ILCS 205). State approval is expressly required prior to each disposal of records, regardless of format or volume, unless the documents are specifically categorized as non-records.

The calculation of retention periods is from the end of the Commission's fiscal year in which an entry is made charging or allocating a cost to a contract or subcontract. If a specific record contains a series of entries, the calculation of retention periods is from the end of the Commission's fiscal year in which the final entry is made. When requirements for long-term retention of records overlap, the Commission should retain records for the maximum period needed to meet both legal and audit requirements.

#### Retention Schedule

It shall be the responsibility of the Executive Director, Staff Accountant, and Program Managers to maintain the retention schedule per the Local Records Act (50 ILCS 205) and the Commission's Application for Authority to Dispose of Local Records. In general, the record retention period is seven years except for permanent records.

#### Destruction of Records

The Commission complies with the Local Records Act (50 ILCS 205), which regulates the destruction and preservation of public records within the State of Illinois. It mandates naming the Secretary of State the Local Records Advisor, to assist local governments in the implementation of the Act. This Act defines record material, explains the rights to public access to information, and sets standards for record keeping and microfilming. Additionally, the Act provides for the existence of a six-member Local Records Commission which regulates the disposal of local records and specifically forbids local officials from disposing of any public record without first obtaining their written approval.

The destruction of records must be by incineration or shredding. Disposal of records intact to a landfill or through a disposal service is not appropriate.

## **Segregation of Duties Policies and Procedures**

### Purpose

The purpose of this policy is to ensure that the Tri-County Regional Planning Commission ("Commission") employees perform their duties in accordance with proper Internal Controls as established by management. Segregation of duties is one of the key elements of Internal Control.

### Scope

This policy applies to the Executive Director, Program Managers, Staff Accountant, and any other employees authorized to work on administrative, fiscal, and programmatic activities.

### Responsibility

The Commission has delegated the responsibility and authority for implementing the Segregation of Duties Policies and Procedures to the Executive Director or designee. The Executive Director or designee is responsible for ensuring there is adequate segregation of duties within their areas of responsibility. No one employee should initiate, approve, and review the same action.

### Policy Statement

It is the policy of the Commission:

- To limit circumstances where an employee has the responsibility to complete two or more of these major functions: Authorization, Recording, Verification, Custody of Assets, and Managerial Review.
- To maintain accurate documentation of authorizations and retain documentation of the delegation of authority.
- To provide reasonable safeguards to ensure segregation of duties or place mitigating controls to reduce errors and irregularities.
- Policies, procedures, and practices must adhere to government regulatory costing and administrative principles, such as those contained in 2 CFR Part 200.

### Authorization

Authorization is the process of reviewing and approving transactions or operations. Some examples are:

- Verifying cash collections and daily balancing reports.
- Approving purchase requisitions or purchase orders.
- Approving time sheets, payroll certifications, leave and cumulative leave requests.

- Approving change orders, and invoices.

The Commission requires the authorization of all transactions. The Commission grants the Executive Director authority to spend up to a certain threshold, which is defined in the Commission's Procurement Policies and Procedures. All other transactions require board approval. The employee initiating the transaction must have the authority from the Executive Director or designee. Authorization confirms adherence to the following requirements:

- Employees cannot authorize transactions for their own reimbursement.
- Documentation of the authorization.
- All transactions must adhere to Commission policies, existing laws, regulations, compliance requirements, as well as any terms and conditions of the sponsor.
- All staff responsible for assignment and supervision of employees that carry out fiscal activities, or their designees, should appoint and document authorized signers of all financial transactions.
- The Program Manager is responsible for all sponsored activity to ensure the activity is Allowable, Allocable, and within the period of availability. For operational convenience, the Program Manager may delegate another employee to authorize transactions on their behalf. The Commission must manage and maintain documentation of delegated authority.

### Recording

Recording or record keeping is the process of creating and maintaining records of revenues, expenditures, inventories, and personnel transactions. These may be manual records or records maintained in the financial systems. Some examples are:

- Preparing cash receipt back-ups or billings, purchase requisitions, payroll certifications, and leave records.
- Entering charges or posting payments to an accounts receivable system.
- Maintaining inventory records.

### Verification

Verification or reconciliation is the processes of verifying the processing or recording of transactions to ensure that all transactions are valid, properly authorized, and properly recorded on a timely basis. This includes following up on any differences or discrepancies identified. Reconciliations are signed (electronic or manual) to signify approval. Examples are:

- Comparing billing documents to billing summaries.
- Comparing funds collected to accounts receivable postings.
- Comparing collections to deposits.
- Performing surprise counts of funds.

- Comparing payroll certifications to payroll summaries.
- Performing physical inventory counts.
- Comparing inventory changes to amounts purchased and sold.
- Reconciling departmental records of revenue, expenditure, and payroll transactions to the accounts reports.

A Project Lead, when size limitations apply may be permitted to verify all transactions for their respective sponsored activity; however, Internal Controls are significantly enhanced when someone other than the Project Lead performs this function.

### Custody of Assets

Custody of assets is the access to or control over any physical assets such as cash, checks, equipment, supplies, or materials. Some examples are:

- Access to any funds through the collection of funds, or processing of payments.
- Access to safes, lock boxes, file cabinets or other places where money, checks or other assets are stored.
- Receiving any goods or services.
- Maintaining inventories.
- Handling or distributing paychecks/advice, limited purchase checks or other checks.

### Managerial Review

In all cases, there is a level of review of the activity by managerial level personnel. This Managerial Review function provides assurance that segregation exists and that the transactions are appropriate. The frequency and extent required of the Managerial Review depends upon the degree to which duties are or are not segregated and other factors such as the dollar volume of transactions, the amount of cash involved, or the nature of the operation.

### Minimal Acceptable Degrees of Segregation

During times where the optimum degree of segregation cannot be achieved, a minimum degree of segregation must be maintained. At a minimum, no person should be able to perform more than two of the four major functions. The matrix below illustrates various degrees of segregation. The X, and O represent different staff members, and the M represents a third staff member—the manager.

|   | Authorization | Recording | Verification | Managerial Review |
|---|---------------|-----------|--------------|-------------------|
| 1 | O             | X         | O            | M                 |
| 2 | X             | X         | O            | M                 |
| 3 | X             | O         | O            | M                 |
| 4 | X             | X         | X            | M                 |



To maximize the opportunity to identify errors in the ordinary course of business, it is recommended that the process of recording and Verification be performed by two different individuals such as in examples 1 and 2. In examples 3 and 4, there must be a significant reliance on the Managerial Review to operate on a much more detailed and frequent basis to identify errors and irregularities Timely.

In instances where duties cannot be fully segregated, based on the matrix presented above, Mitigating or Compensating Controls must be established. For instance, if the record keeper also performs a Verification process, a frequent detailed review could be performed and documented by a supervisor to provide additional control over the assignment of incompatible functions.

### Mitigating Controls

There are several other control mechanisms that may mitigate a lack of segregation of duties:

- Audit trails enable re-creation of the actual transaction flow from the point of origination to its existence on an updated file. Adequate audit trails should provide the initiator of the transaction, date and time of entry, type of entry, data fields, and files updated.
- Reconciliation of applications increases the level of confidence that processes ran and/or interfaced successfully.
- Exception reports monitored at a supervisory level, supported by evidence that exceptions are reviewed, and if necessary, corrected in a timely manner. The review must be evidenced by signature of the supervisor and dated.
- Managerial Reviews should periodically be performed through observation and inquiry to help detect errors and irregularities.

### Accountabilities

All employees are responsible:

- To understand and follow appropriate policies and procedures for their job.
- For executing Internal Control activities.
- For identifying opportunities to increase the reliability and integrity of the Commission's accounting systems.
- For notifying supervisors of weaknesses in, and opportunities to enhance Internal Controls.

The Executive Director and Program Managers are responsible:

- For establishing appropriate controls in their sphere of influence.
- Monitor the operation and effectiveness of controls.
- Ensure appropriate segregation exists between functions.



- Ensure that effective Mitigating Controls are in place when adequate segregation of duties cannot be achieved.

The Project Lead is responsible:

- For all grant activity to ensure the activity is allowable, chargeable, and within the period of availability.
- Perform and document the Managerial Review periodically but must perform the review no less than quarterly for adherence to compliance requirements.
  - Perform timely managerial reviews of the financial system reports including a budget to actual comparison for the project.
  - Perform multiple functions of segregation of duties, but they are not allowed to record and authorize the same transaction.

#### Fiscal Responsibilities

The small number of staff at the Commission limits its ability to segregate certain fiscal responsibilities among qualified staff. To assist with this, Staff utilizes these procedures for issuing payments:

1. The Executive Director approves all purchases and contracts within their spending authority. All other purchases and contracts are approved by the Commission.
2. Before payment is made, the Program Manager or Executive Director approves all invoices.
3. The Staff Accountant prints all checks for signatures and delivers them with their corresponding invoices to the Office Manager.
4. The Office Manager and Executive Director review the checks and invoices to verify the amounts and payee for accuracy.
5. Two authorized individuals sign all checks, typically the Executive Director and Planning Program Manager, and then mailed by the Office Manager.

Staff utilizes these procedures for approving reconciliations:

- The Executive Director will review the completed bank reconciliations for accuracy and sign to signify approval of the reconciliations.
- The Staff Accountant presents the bank reconciliations and bank statements to the Ways and Means Committee for further review.

On the following page, Table 1 shows the fiscal responsibilities by position and board.

Table 1: Fiscal Responsibilities by Position

|                    | Approves purchases and contracts | Release Procurement Opportunities | Opens Mail | Prepare Bank Deposits | Records Cash Receipts Journal | Records Cash Disbursements Journal | Records General Journal | Approves Invoices | Prepares Checks for Signature | Reconciles checks with invoices | Signs Checks | Reconciles Bank Statements | Prepares monthly report on all manual journal entries | Prepare Monthly Financial Statements and Billings | Approves completed bank reconciliation | Approves General Journal Entries | Approves Monthly Financial Statements and Billings | Prepares monthly or quarterly reports for grants | Prepares Payroll Tax Returns | Approves Timesheets & Expenses | Prepares Payroll | Approves Payroll | Reviews monthly bank reconciliations | Recommends the approval of monthly Financials and Billings | Accepts and files monthly Financials and Billings |
|--------------------|----------------------------------|-----------------------------------|------------|-----------------------|-------------------------------|------------------------------------|-------------------------|-------------------|-------------------------------|---------------------------------|--------------|----------------------------|-------------------------------------------------------|---------------------------------------------------|----------------------------------------|----------------------------------|----------------------------------------------------|--------------------------------------------------|------------------------------|--------------------------------|------------------|------------------|--------------------------------------|------------------------------------------------------------|---------------------------------------------------|
| Commission         | X                                |                                   |            |                       |                               |                                    |                         |                   |                               |                                 |              |                            |                                                       |                                                   |                                        |                                  |                                                    |                                                  |                              |                                |                  |                  |                                      |                                                            | X                                                 |
| Ways & Means       |                                  |                                   |            |                       |                               |                                    |                         |                   |                               |                                 |              |                            |                                                       |                                                   |                                        |                                  |                                                    |                                                  |                              | X                              |                  |                  | X                                    | X                                                          |                                                   |
| Executive Director | X                                |                                   |            |                       |                               |                                    |                         | X                 |                               | X                               | X            |                            |                                                       |                                                   | X                                      | X                                | X                                                  |                                                  |                              | X                              |                  | X                |                                      |                                                            |                                                   |
| Program Manager    |                                  | X                                 |            |                       |                               |                                    |                         | X                 |                               |                                 | X            |                            |                                                       |                                                   |                                        |                                  |                                                    |                                                  |                              | X                              |                  |                  |                                      |                                                            |                                                   |
| Office Manager     |                                  |                                   | X          | X                     |                               |                                    |                         |                   |                               | X                               |              |                            |                                                       |                                                   |                                        |                                  |                                                    |                                                  |                              |                                |                  |                  |                                      |                                                            |                                                   |
| Accountant         |                                  |                                   |            |                       | X                             | X                                  | X                       |                   | X                             |                                 |              | X                          | X                                                     | X                                                 |                                        |                                  |                                                    |                                                  | X                            |                                | X                |                  |                                      |                                                            |                                                   |
| Project Lead       |                                  | X                                 |            |                       |                               |                                    |                         | X                 |                               |                                 |              |                            |                                                       |                                                   |                                        |                                  |                                                    | X                                                |                              |                                |                  |                  |                                      |                                                            |                                                   |