

FISCAL POLICY & PROCEDURE MANUAL

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SUBCHAPTER 6.1 - GENERAL PROVISIONS

§ 6.101 Title.

This fiscal policies and procedures manual shall be known as the Fiscal Policies and Procedures Manual (“Manual”) of the Lac Courte Oreilles Ojibwe University.

§ 6.102 Authority.

This Manual is enacted pursuant to the authority of the Board of Regents for the Lac Courte Oreilles Ojibwe University Board of Regents as enumerated under the Restated Articles of Incorporation of the Lac Courte Oreilles Ojibwe University (“University”, “University Charter”, or “Charter”). Under Article XI, section 6.21 titled “Powers” the Regents have the authority to “establish broad general policies for the governance of the University and hold the President accountable for administering them.”

§ 6.103 Purpose.

It is the purpose of this Manual to provide the general policies, rules and practices in effect at the University such as the following:

(1) Ensure accurate and timely accounting of all financial transactions involving the University or funds or Assets of the University.

(2) Ensure that all funds and Assets of the University are properly accounted for to safeguard

the same against loss from unauthorized use or disposition.

(3) Ensure the University's compliance with requirements of every applicable governing authority, including requirements related to grants or other sources of funding.

(4) Ensure compliance with Generally Accepted Accounting Principles.

(5) Ensure the accuracy and reliability of the University's financial statements.

§ 6.104 Effective Date.

Except as otherwise provided in specific sections, the provisions of this Manual shall be effective on the date adopted by the Board of Regents.

§ 6.105 Interpretation.

The provisions of this Manual:

(1) Shall be interpreted and applied as minimum requirements applicable to the fiscal and accounting related activities of the University;

(2) Shall be liberally construed in favor of the University;

(3) Shall not be deemed a limitation or repeal of any other tribal power or authority.

§ 6.106 Severability and Non-Liability.

If any section, provision or portion of this Manual is adjudged unconstitutional or invalid by a court of competent jurisdiction, the remainder of this fiscal policy and procedural manual shall not be affected thereby. The University further asserts immunity on its part and that of its agencies, employees, and/or agents from any action or damages that may occur as a result of reliance upon and conformance with this fiscal policy and procedural manual.

§ 6.107 Repeal of Inconsistent Governmental Manual(s).

All previous Fiscal Policy and Procedural Manual(s) of the University inconsistent with this manual are hereby repealed and the provisions of this manual shall govern the fiscal and accounting related activities of the University.

SUBCHAPTER 6.2 – DEFINITIONS

§ 6.201 General Definitions.

Any term not defined in this Section shall be given its ordinary meaning. The following terms, wherever used in this ordinance, shall be construed to apply as follows, except where the context indicates otherwise:

- (1) **“Account Number”** means a group of numbers used to identify the fund, department, and description of an account. For example, 30-00000-19000 is broken down as follows: 30= fund, 00000= department and 19000 = object (See Subchapter 6.4).
- (2) **“Allowable Cost”** (as set forth in Uniform Guidance - 2 CFR Part 200) means those which meet the following general criteria:
 - (a) Be reasonable for the performance of the award and be allocable thereto under these principles;
 - (b) Conform to any limitations or exclusions set forth in these principles or in the award as to types or amount of cost items;
 - (c) Be consistent with policies and procedures that apply uniformly to both federally financed and other activities of the organization;
 - (d) Be accorded consistent treatment;
 - (e) Be determined in accordance with GAAP (Generally Accepted Accounting Principles);
 - (f) Be adequately documented.
- (3) **“Asset”** means any valuable item that is owned or a future economic benefit obtained or controlled by a particular entity as a result of past transactions or events. Examples include cash and accounts receivable.
- (4) **“Appropriation”** means funds set aside for a specific purpose.
- (5) **“Balance Sheet”** means a statement of the Assets, liabilities, and Fund Balance as of a specified date. Total Assets equal total liabilities plus Fund Balance.
- (6) **“Board of Regents”** means the Board of Regents for the Lac Courte Oreilles Ojibwe University as created under the University’s Charter possessing the authority granted to it under the University By-Laws.
- (7) **“Budget”** means an itemized summary of probable income and approved expenditures for a given program and period which is prepared annually and approved by the Executive Council and Board of Regents
- (8) **“Budget Department Manager”** means an individual who holds a position at the University with an oversight role for financial activity.

- (9) **“Business Office”** means the accounting office for the University.
- (10) **“Chart of Accounts”** means a list of all account numbers used by an organization to record activity into the general ledger.
- (11) **“Chief Financial Officer or CFO”** means the director of finances for the University as appointed by the University President.
- (12) **“Chief Operations Officer or COO”** means the director of operations of the University as appointed by the University President.
- (13) **“Credit”** means the right side of an account.
- (14) **“Debit”** means the left side of an account.
- (15) **“Deferred Revenue”** means revenue that is not yet recognized.
- (16) **“Direct Cost”** means any cost which can be specifically identified with a particular cost objective.
- (17) **“Disbursement”** means funds paid out.
- (18) **“Discretionary Funds”** means funds that may be spent as the University’s wishes, subject to any applicable legal constraints.
- (19) **“Encumbrance”** means commitments related to unperformed contracts for goods or services. As used in budgeting, encumbrances are not GAAP expenditures or liabilities, but represent the estimated amount of assets reserved for outstanding purchase orders.
- (20) **“Equipment Purchase”** means the expense line item used to record Equipment Purchased. This expense line should only include items costing \$5,000 or more individually. Equipment items of lesser value should be charged to a supply expense line.
- (21) **“Executive Council”** means the executive body of the University’s governance system, an advisory body to the University President.
- (22) **“Expense”** means a decrease in financial resources.
- (23) **“Finance Department”** means the unit of a business responsible for obtaining and handling any funds on behalf of the University. Also controls the income and expenditure in addition to ensuring effective business practices.
- (24) **“Fiscal Year”** means the fiscal year starting July 1st and ending June 30th.
- (25) **“Fixed Asset”** means a single tangible item valued at \$5,000 or more with a useful life longer than one year, including buildings, equipment and vehicles and items of a lesser value which are subject to pilferage such as computers.
- (26) **“Fringe Benefit”** means any property, service, cash or cash equivalent provided to an employee by an employer in connection with the performance of services.

- (27) **“Fund”** means a fiscal and accounting entity with a self-balancing set of accounts which is segregated for the purpose of tracking specific activities in accordance with special regulations or restrictions.
- (28) **“Fund Balance”** means the difference between the Assets and Liabilities of a governmental fund.
- (29) **“Generally Accepted Accounting Principles or GAAP”** means the rules of accounting established by experienced professional accountants and bodies such as the financial accounting standards board.
- (30) **“General Fixed Assets”** means capital assets which are not assets of any fund, but rather are assets of the unit as a whole. Most often these assets arise from the expenditures of the financial resources of governmental funds.
- (31) **“General Fund”** means accounts for all financial resources except those required to be accounted for in another fund.
- (32) **“General Ledger”** means a record of monetary transactions of an organization posted in the form of Debits and Credits.
- (33) **“Governmental Funds”** means the funds used to finance most governmental function.
- (34) **“Grants Manager”** means the person who coordinates and monitors grant applications, grant management and overall grant compliance.
- (35) **“Human Resources Department”** means the human resources department for the University.
- (36) **“Incoming Check Log”** means the tracking sheet completed daily of all checks or funds that have been received by the University.
- (37) **“Indirect Cost”** means the expenses of doing business that are not readily identified with a particular grant, contract, project function or activity, but are necessary for the general operation of the organization and the conduct of activities it performs.
- (38) **“Journal Entry”** means a two-sided entry consisting of a Debit and a Credit used to record information into the general ledger.
- (39) **“Journal Voucher Edit List”** means the list showing the journal entry information including general ledger account codes, amounts, and backup documentation to be reviewed prior to posting.
- (40) **“Liability”** means the obligations of an entity, such as accounts payable.
- (41) **“Management Reports”** means reports requested by management or the Board of Regents.
- (42) **“Payee”** means the one to whom money is to be paid.
- (43) **“Petty Cash Vouchers”** means a voucher that is completed by a staff or faculty member with one of the finance department staff in order to receive cash.

- (44) **“Post”** means to record an item in the General Ledger.
- (45) **“Program Manager”** means the person in charge of the program, responsible for staying in compliance and monitoring any grants they are responsible for.
- (46) **“Proprietary Funds”** means funds used to account for governmental activities that are similar to for profit business operations in the private sector.
- (47) **“Purchasing Officer”** means the person who is authorized to make purchases pursuant to the procurement policy.
- (48) **“Purchase Requisition Form”** means a requisition or purchase request that is processed through our self-service on Colleague ERP system.
- (49) **“Reasonable Costs”** (as set forth in Uniform Guidance - 2 CFR Part 200) means a cost which, in its nature or amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the costs. The question of the reasonableness of specific costs must be scrutinized with particular care in connection with organizations or separate divisions thereof which receive the preponderance of their support from awards made by Federal agencies. In determining the reasonableness of a given cost, consideration will be given to:
- (a) Whether the cost is of a type generally recognized as ordinary and necessary for the operation of the organization or the performance of the award;
 - (b) The restraints or requirements imposed by such factors as generally accepted sound business practices, arm’s length bargaining, federal and state laws and regulations, and terms and conditions of the award;
 - (c) Whether the individuals concerned acted with prudence in the circumstances, considering their responsibilities to the organization, its members, employees, and clients, the public at large, and the government; and
 - (d) Significant deviations from the established practices of the organization which may unjustifiably increase the award costs.
- (50) **“Restricted Fund Balance”** means those portions of Fund Balance not appropriable for expenditures or that are legally segregated for a specific future use.
- (51) **“Request for Leave Form”** means formal request by employee to request time off from the University.
- (52) **“Revenue”** means an increase in financial resources.
- (53) **“Revenue and Expenditure Report”** means the report generated based on the revenue and expenses for the purposes of budgetary control and budgetary comparisons.
- (54) **“Request for Contract Form”** means a form where department users to submit a request to a contract office when a contract is needed or amend an existing contract.
- (55) **“Special Revenue Funds”** means funds to account for specific revenue sources that are restricted legally to be expended for specific purposes.

- (56) **“Trial Balance”** means a list of the balances of the accounts in a ledger fund by double entry, with the Debit and Credit balances shown in separate columns. The totals of the Debits and Credits must be equal for the trial balance to balance.
- (57) **“Unallowable Costs”** (as set forth in Uniform Guidance - 2 CFR Part 200) include but are not limited to the following:
- (a) Alcoholic beverages;
 - (b) Bad debts;
 - (c) Contingencies (See exceptions, Number 12, Uniform Guidance - 2 CFR Part 200);
 - (d) Contributions and donations;
 - (e) Entertainment;
 - (f) Fines and penalties;
 - (g) Fund raising;
 - (h) Interest and other financing costs except where authorized under the circular;
 - (i) Legislative expenses;
 - (j) Lobbying expenses; and
 - (k) Under-recovery of costs of other grants or agreements
- (58) **“University President”** means the president of the University appointed by the Board of Regents who exercises authority as set forth in the University By-Laws.

SUBCHAPTER 6.3 – METHOD OF ACCOUNTING

§ 6.301 General.

As an academic entity, the University is required to follow GAAP as endorsed by the Governmental Accounting Standards Board (“GASB”), including the following five basic principles of governmental accounting, which the University will adhere pursuant to this subchapter.

§ 6.302 Accounting and Reporting Capabilities.

The accounting system must make it possible to present fairly and with full disclosure the financial position and results of operations of the funds and account groups of the governmental unit in conformity with GAAP and to demonstrate compliance with legal and contractual provisions.

§ 6.303 Fund Classifications.

The accounting system should be organized and operated on the fund basis. The three major categories of funds are Unrestricted Funds, Endowment Funds, and Restricted Funds. Within each of these categories there are the following fund types and account groups:

(1) Unrestricted Fund would be the funds can be used for any purpose the organization sees fit.

(2) Endowment Funds would be funds received with a donor-imposed restriction that states that the donation must be maintained permanently but may permit the organization to use up or expend part or all of the income derived from the Asset.

(3) Restricted Funds are funds that must be used for a specific, stated purpose.

§ 6.304 Basis for Accounting.

All Governmental Funds must be accounted for using the modified accrual basis of accounting, under which revenues are recognized when they become measurable and available, and expenditures are recognized when the related fund liability is incurred. All Proprietary Funds must be accounted for using the accrual basis of accounting, under which revenues are recognized when earned, and their expenses are recognized when incurred.

§ 6.305 Budgeting.

A budget must be prepared annually to coincide with the fiscal year. The accounting system provides the basis for appropriate budgetary control and budgetary comparisons will be included on the Revenue and Expenditure Report.

§ 6.306 Annual and Interim Financial Reporting.

Complete audited financial statements of the General Funds and the Special Revenue Funds must be issued annually. Interim financial reports such as Trial Balances, Revenue & Expenditure Reports and detailed General Ledgers must be issued monthly or at the request of the University President or Board of Regents. It is the responsibility of the Program Managers to monitor their program.

SUBCHAPTER 6.4 – CHART OF ACCOUNTS

§ 6.401 Purposes.

The University has established the Chart of Accounts that is reflected below, the purpose of which is to establish a system of numbering accounts in such a way manner that identifies certain information about the account.

§ 6.402 Chart of Accounts Grouping.

The Chart of Accounts is grouped into three groups of digits as follows: Fund –Department–Object, with the following corresponding number of digits: xx - xxxxx - xxxxx.

- (1) The first group of two digits represents the fund group and the fund. The first digit in this group represents the fund group (Unrestricted, Restricted), and the last digit in this group represents the fund (Operations, Grants, and Endowments).
- (2) The second group of four digits usually represents the department.
- (3) The third group of four digits represents the object.

SUBCHAPTER 6.5 – INTERNAL CONTROLS

§ 6.501 Objective.

The objective of internal controls is to provide management with reasonable assurance as to the safeguarding of Assets against losses from unauthorized use or disposition, and the reliability of financial records for preparing financial statements and maintaining accountability of Assets.

§ 6.502 Characteristics.

The characteristics of an adequate system of internal controls include:

- (1) The segregation of duties within the organization based on functional responsibilities;
- (2) A system of authorization and record retention;
- (3) A degree of personnel competence commensurate with responsibilities; and
- (4) A sound basis for practices to be followed to achieve the objectives of internal accounting controls.

§ 6.503 Best Management Practices.

The following internal controls are recognized as best management practices, and although conditioned upon the number of employees, will be adhered to whenever possible:

- (1) No person will have complete control over all phases of any significant transaction.
- (2) Whenever possible, the flow of work will be from one employee to another so that the work of the second, without duplicating that of the first, provides a check upon the work of the first employee.
- (3) Responsibilities in the Business Office will be clearly established and followed as closely as possible.
- (4) Record keeping will be separated from operations or the handling and custody of Assets, including:
 - (a) The function of receiving cash will be centralized in one person, who will not be concerned in any way with approving or certifying vouchers, acting as petty cash cashier, preparing deposits, making disbursements, or keeping accounting records; and
 - (b) In receiving cash through the mail, the person responsible for opening the envelopes will immediately fill out a cash receipt journal and sign off on all incoming checks and other negotiable instruments; these along with other cash received will be

logged and listed in duplicate before forwarding the receipts to accounting for deposits to the bank.

(5) The following will be adhered to when handling cash:

- (a) All cash receipts will be deposited intact and for the full amount received; and
- (b) All collections will be deposited as soon as possible, preferably the day received.

(6) Collections and all other funds held within an office pending regular deposit will be restrictively endorsed. Petty Cash funds and all other funds will be kept under complete control and under proper safeguards; preferably in a fire-resistant combination safe or safe cabinet.

(7) Uncollectible items and related documents will not be handled by the person making up deposits or by the person handling accounts receivable.

(8) If possible, persons preparing payrolls or time reporting records will not handle the related pay checks.

(9) Bank statements will be reconciled promptly to the formal accounting records and the reconciliation reviewed and approved by the CFO.

(10) The number of bank accounts and inter-bank transfers will be kept to a minimum.

(11) The following will be adhered to when issuing checks:

- (a) Checks will not be issued to “cash” or “bearer;”
- (b) Check signers will not sign blank checks; and
- (c) Records of void checks will be kept. When possible the actual void check will be stamped void and filed.

If required, a replacement check will be issued following the process set forth in the Subchapter 6.13 of this manual. When the actual check is not available and the check is for more than \$15, a stop payment will be issued.

SUBCHAPTER 6.6 – GRANTS MANAGMENT

§ 6.601 Separate Accounting.

Each grant must be accounted for separately and all terms and conditions of contracts and grants between the University and funding agencies or contractors will be complied with.

§ 6.602 Expenditures.

Expenditures will be charged to a particular grant/contract only in accordance with the terms and conditions thereof. Grant/contract compliance is the responsibility of the Program Manager, and compliance will be monitored by the CFO.

§ 6.603 Compliance Requirement.

The University, tribal entities, or a consortium receiving advance payments under the Indian Self-Determination and Education Assistance Act of 1975 (“ISDEAA”) or the Tribally Controlled Schools Act may invest advance payments (some recipients refer to these advanced payments as “Unearned Revenue”), before such funds are expended for the purpose of the grant, contract, or funding agreement, so long as such funds are:

(1) Invested only in obligations of the United States or in obligation or securities that are guaranteed or insured by the United States, or mutual (or other) funds registered with the Securities and Exchange Commission and which only invest in obligations of the United States or securities that are guaranteed or insured with the United States; or

(2) Deposited only in accounts that are insured by an agency or instrumentality of the United States or are fully collateralized to ensure protection of the advance funds, even in event of a bank failure (25 U.S.C 450e-3).

§ 6.604 Department Proposals.

Departmental proposals for contract/grant funded programs and projects shall be prepared with the knowledge of the supervisor. The grant proposal form needs to be completed at least three weeks prior to grant application deadline.

§ 6.605 Review of Proposals.

Prior to submission to the University President, all proposals shall be reviewed by the Executive Council. Proposals for review shall consist of a copy of the completed grant proposal form. This documents enable staff who are responsible for administrating and reporting on these projects to review, revise, approve or disapprove proposed projects based upon considerations of budget information, project costs and benefits, technical and administrative capacity to perform, attainable goals and deliverables, space/equipment and staffing requirements, realistic goals and matching requirements, and objectives related to the strategic plan.” If Executive Council recommends the grant application to be submitted, approval from University President is then required. University President’s signature authorizes the grant application for submission.

§ 6.606 Grants/Contracts Proposed as Pass Thru.

All grants/contracts that are proposed as pass through and/or subawards to other educational institutions or tribal entities shall be accompanied with a certification that the governing authority of any such entity has reviewed and approved the application. There shall be a subrecipient agreement completed by the University and pass thru agency.

§ 6.607 Grants/Contracts Reviews Completed.

All grant/contract proposals review shall be completed and submitted to University President at least seven (7) calendar days prior to request for approval. This is intended to give the President time to review the applications, and if necessary to request additional information from the department submitting the application.

§ 6.608 New Grants/Contracts Applications.

All new grant/contract applications (including those that are continuation of funding for existing programs) require approval of the University President.

§ 6.609 Departmental Programs and Projects.

Departmental programs and projects are subject to this Chapter and all fiscal, personnel, and property management policies of the University, as well as all applicable federal, tribal and state rules and regulations.

§ 6.610 Approved Proposals.

Copies of all approved proposals for contract/grant-funded programs and projects are filed with the CFO and documents uploaded to the grants management system prior to submission to funding agency. In all cases, the applicant entity is “Lac Courte Oreilles Ojibwe University, 13466 W. Trepania Road, Hayward, WI 54843.” The authorizing official is the University President. All grant/contract award notifications shall be directed to the University President.

§ 6.611 Notice of Award Selection.

When notice is received that the grant/contract grant has been selected for award, all pre award documents (contracts/agreements/certifications) shall be processed by the Project Manager. All signatures/requested information (grant/ programmatic or narrative information requested are the responsibility of the project director) and collected by the CFO.

§ 6.612 Advance or Reimbursement from a Funding Agency.

Any department seeking an advance or reimbursement from a funding agency will initiate the request by written submission to the CFO, who shall process the request.

§ 6.613 Incurring Costs Against an Award.

Prior to incurring any costs against an award all budgetary information shall be submitted to the CFO for approval and forwarded to the Business Office staff for entry into the Enterprise Resource Planning (“ERP”) system. No expenditures can be coded to any line item that has not been appropriated, without exception.

§ 6.614 Requests to Move Contract/Grant Funds.

Departmental requests to move contract/ grant funds from one budget line item to another must be made on the "Request for Budget Modification" form and require program manager’s signature.

§ 6.615 Internal Audit and Self-Monitoring.

The following apply regarding internal audit and self-monitoring:

(1) The CFO shall schedule a date annually to meet with the Program Manager of each department that provides services based upon eligibility determinations. The meeting shall be for the purpose of conducting an internal audit and to review Contract Compliance Procedures including grant/contract applications and administration, professional services contracts, match documentation requirements, and to distribute any updated forms.

(2) The COO shall instruct any Program Manager that has \$2,000 or more budgeted for a construction contract concerning the requirements of the Davis Bacon Act. Under the Davis Bacon Act all laborers and mechanics employed by contractors or subcontractors to work on construction contracts in excess of \$2,000 financed by federal assistance funds must be paid wages not less than those established for the locality of the project (prevailing wage rates) by the Department of Labor.

(3) A signed acknowledgement must be received by the Program Manager from any contractor receiving a construction contract in excess of \$2,000 stating that they have been informed of the requirements of the Davis Bacon Act and that they will provide the University with copies of their certified payrolls for the said contract.

(4) Before the COO approves any payment on construction contracts of \$2,000 or more, it must verify that the Davis Bacon Act is complied with and said contractor has provided the University with acknowledgement and copies of certified payrolls for the construction contract.

(5) All client/ participant files prepared or maintained during the twelve (12) months prior to review are audited. Determination if the program complied with all applicable policies, procedures and statutory requirements for eligibility and payment or distribution of benefits from that program.

(6) Program Managers are required to provide the CFO copies of program policies, procedures and requirements at least one (1) week prior to the scheduled meeting. A report shall be prepared within ten (10) working days after the completion of review. copies of the report shall

be forwarded to the Program Manager and their supervisor.

(7) If the Grants Manager finds a program to be non-compliant, a corrective action plan will be initiated. This corrective action plan will be prepared with the participation of the Program Manager, supervisor and CFO.

(8) The corrective action plan shall include a list of violations, strategies, and the timeline for correction of the non-compliant issue. The timeline for completion of tasks in the corrective action plan shall be no less than five (5) working days and no longer than two (2) months from the issuance date of the corrective action plan. The timeline for completion depends upon the severity of the issue(s) and the potential impact to that program's continuation.

(9) The Program Manager is responsible for correcting the deficiencies found in the review. The CFO shall review the status of the corrective action plan at the end of the timeline for completion. Program Managers that fail to correct noncompliance issues upon the deadline shall be subject to disciplinary action.

(10) The CFO will schedule a date annually to meet with the Program Manager of each department that does not include the determination of eligibility or the distribution of benefits. The meeting shall be for the purpose of reviewing grant/contract compliance procedures including applications and administration, professional services contracts, match documentation requirements, and to distribute any updated forms. In the event of a violation, the above provisions of this Section shall apply as applicable.

§ 6.616 Drawdowns.

The following apply regarding drawdowns:

(1) Each federal and state agency has established the method of grant/contract payments to the grantee/contractor. All drawdowns of these payments will be made according to grant guidelines provided by the funding agency. While some grants may be drawn down in advance, many may only be drawn down on a reimbursement basis.

(2) The Business Office will follow the procedures for drawdown of funds and reimbursement of costs as set forth by the funding agency.

(3) If a federal grant is drawn down in advance, the draw down will be done so that cash-on-hand is kept at the minimum amount needed for disbursements to be made immediately or within ten (10) days, unless a different amount is specifically allowed by the grant.

(4) If a program needs an unusually large disbursement of funds by a specific date, the Program Manager shall notify the CFO at least one (1) week before the payment is due.

(5) The CFO will periodically review the financial reports of all programs. Upon review of the availability of funds, cash on hand, accounts payable, expenditures to date and encumbrances, funds will be requested for draw down approval by the CFO by e-mailing the Project Manager for approval of

drawdown. The request for the drawdown of funds from the funding agency will be submitted to the funding agency by the CFO.

(6) The total amount of the grant/contract will be requested in full and drawn down, if allowed. The CFO will review the cash needs of each program and determine what funds are not immediately required. The CFO will invest the funds in the manner that would be most financially advantageous and in the best interest of the University, to the extent that is allowable by law. Any interest or revenue earned will be used for general tribal operations, to the extent that is allowable by law.

SUBCHAPTER 6.7 – BUDGETS

§ 6.701 Annual Budgets.

Prior to the beginning of each fiscal year annual budgets are prepared for the University which is approved by the Board of Regents.

§ 6.702 Budget Preparation.

The Budgets are prepared by the CFO with the help and input of Department Budget Managers.

§ 6.703 Budget Review.

All budgets are reviewed by the University President and Executive Council.

§ 6.704 Budget Approval.

All budgets require the approval of the Board of Regents.

§ 6.705 Budget Comparisons.

All approved budgets are entered into the accounting system by fiscal staff actual to budget comparisons are reflected on the Revenue and Expenditure Report.

§ 6.706 Department Budget Managers.

A Department Budget Manager is an individual who holds a position at the University with an oversight role for financial activity. A Department Budget Manager will ensure the following:

- (1) Ensure funds are received, spent and managed in accordance with the University's policies and mission.
- (2) Understand and ensure compliance with university, federal, or sponsoring agency regulations, policies, and procedures.
- (3) Transactions are posted appropriately to the ledger in a timely manner.

The Department Budget Manager is responsible for the annual creation of budgets that align with university operations and anticipated revenues and expenditures. The Department Budget Manager is responsible for maintaining defined operating and personnel budgets and appropriate Fund Balances for designated accounts. It is also the Department Budget Manager's responsibility to adjust budgets in accordance with university guidelines. The Department Budget Manager is responsible for regular monitoring of designated accounts to ensure expenditures are within defined budgets and appropriate Fund Balances are maintained. The Department Budget Manager is also responsible for ensuring all financial activities are accurate

and correcting identified discrepancies. When a secondary source of financial activity is involved, a reconciliation is required.

SUBCHAPTER 6.8 – AUDITS

§ 6.801 Audit Accordance.

An audit in accordance with GAAP, and the standards applicable to financial audits contained in “Auditing Standards” issued by the Comptroller General of the United States shall be conducted once a year. These standards require that the audit be planned and performed to obtain reasonable assurance about whether the financial statements are free of material misstatement.

§ 6.802 Single Audit Act.

The audit will be performed in accordance with the Single Audit Act and shall address compliance and internal control issues.

§ 6.803 Auditing Firms.

All changes in auditing firms hired to perform and audit requires the prior approval of the University President, in consultation with the Board of Regents.

SUBCHAPTER 6.9 – PETTY CASH

§ 6.901 Petty Cash.

Whenever possible and practical, disbursements should be made by check from the general bank account. When it does become necessary to make small miscellaneous cash expenditures they may be made from the “Petty Cash” fund.

§ 6.902 Petty Cash Fund Issuance.

The person to whom a Petty Cash Fund is issued is solely responsible for properly controlling and maintaining the same.

§ 6.903 Petty Cash Access Restricted.

All Petty Cash shall be kept in a locked box and in a locked drawer, with access restricted to the person to whom the Petty Cash Fund has been issued.

§ 6.904 Petty Cash Fund.

The amount of the Petty Cash Fund shall not exceed \$300. The total cash on hand plus the total of Petty Cash Vouchers must equal the total Petty Cash Fund at all times.

§ 6.905 Cash on Hand Replenishment.

When the total cash on hand requires replenishment, the following steps shall be followed:

- (1) Request replenishment of Petty Cash from the Business Office;
- (2) Provide a reconciliation of all Petty Cash spent to the Business Office;
- (3) Provide account numbers to be charged for expenditures; and
- (4) Include invoices or other documentation to support reconciliation.

SUBCHAPTER 6.10 – BANK RECONCILIATIONS

§ 6.1001 Separate Accounts.

The University shall maintain a checking account for payroll, federal funds, technology, money market, and General Fund. All cash receipts for all funds will flow through the General Fund account.

§ 6.1002 Reconciliation of Cash Balances.

At the end of each month, all General Ledger cash balances shall be reconciled to the corresponding bank statements.

§ 6.1003 Additional Bank Accounts.

Additional bank accounts such as certificates of deposit may also be used by the University. These bank accounts will also be reconciled to the General Ledger on a monthly basis.

§ 6.1004 Bank Reconciliations.

The following will apply to bank reconciliations:

(1) Bank statements must be picked up at the bank by an authorized employee, received via US mail, or printed off from the online banking website.

(2) Reconciled deposits recorded on the bank statement to the cash receipts must be recorded in the cash receipts journal. Any deposit-in-transit from the prior month's reconciliation to the bank statement must be traced and the date these deposits were credited to the bank must be indicated.

(3) Any deposits not clearing the bank statement will represent deposits-in-transit on the current month's reconciliation. Deposits which have not cleared the bank within a week of the date deposited should be brought to the attention of the CFO.

(4) The prior month's reconciliation must be matched to the cancelled checks against those listed as outstanding. Any checks still outstanding should be listed on the current month's outstanding check list.

(5) Each cancelled check must be compared with the entry in the cash disbursements journal and place a check mark by the entry. Those entries not checked off will make up the current month's outstanding check list. Checks outstanding for a period of more than sixty (60) days should be brought to the attention of the CFO.

(6) Any other transaction appearing on the bank statement which will be recorded on the books by Journal Entry must be noted, including:

- (a) Returned checks;
- (b) Bank service charge;
- (c) Wire transfer of funds; and
- (d) Stop payment checks.

(7) The monthly bank statement must be reconciled to the balance shown in the General Ledger account for cash on deposit. Since the balance in the General Ledger account for cash on deposit controls the accuracy of the books, it is essential that the figure be reconciled with the balances shown by the bank statement.

SUBCHAPTER 6.11 – CASH RECEIPTS

§ 6.1101 Cash Transactions.

There is a relatively high risk associated with transactions involving cash. Cash generally is received from the following sources:

- (1) Student Account Payments
- (2) Employee Reimbursing the University
- (3) Other Miscellaneous cash receipts.

§ 6.1102 Cash Internal Controls.

In addition to the provisions of this Manual, including the internal controls listed in Subchapter 6.5 of this manual, the following apply to all cash receipts:

- (1) Cash Receipts must be properly safeguarded and appropriately recorded;
- (2) Access to Cash Receipts must be limited to as few employees as possible;
- (3) Cash Receipts must be recorded immediately; and
- (4) Cash Receipts must be deposited intact and on a timely basis.

§ 6.1103 Business Office Deposit.

Specifically, when a deposit is received in the Business Office the staff accountant in attendance will sit down with the person that brought the deposit and verify the total amount of money received in cash and by check and enter that amount onto the EPR system along with a brief description of where it came from, what it was for, and who brought it over.

§ 6.1104 Incoming Check Log.

Once the amount has been verified by both the staff accountant and the person that brought the deposit, the payment will be placed securely in the file cabinet to be processed by the staff accountant.

§ 6.1105 Immediate Transfer of Cash.

The cash will immediately be transferred to the staff accountant. The staff accountant will count the cash, verify the amount, and initial the Incoming Check Log as verification that the entire amount of cash listed has been received. If the staff accountant is not immediately available the cash will be given to the Lead Accountant. Lead Accountant will verify the amount of cash received and sign off on the Incoming Check Log. If the amount of cash does not agree with the

amount on the Incoming Check Log, any discrepancy must be reported to the Chief Financial Officer immediately. All other deposits will be placed immediately in the file cabinet and locked.

§ 6.1106 Preparation of Receipt.

The staff accountant shall prepare a receipt for each item received, and reconcile that item to the Incoming Check Log, and initial the log as verification. The staff accountant will immediately notify the CFO via e-mail of any receipts that do not agree with the amounts entered on the Incoming Check Log. Each receipt shall have three (3) copies, with the original going to the person making the payment. One (1 copy is filed in the cash receipts journal and the other copy remains in the cash receipts book . After the staff accountant prepares the Journal Entry for the deposit, the lead accountant posts the Journal Entry and reviews the deposit. The CFO takes the deposit to the bank and brings back a deposit receipt which is verified by someone outside of the Business Office.

§ 6.1107 Employee Cash Handling.

Each employee handling cash is personally responsible for that amount until they have someone else sign off for it, or until it is verified as having been deposited into the proper bank account. Any shortages resulting from lost or missing cash is deducted from the next payroll check of the last person to sign off as having received it prior to it being discovered to be lost or missing.

§ 6.1108 Miscellaneous Cash Receipts.

Miscellaneous cash receipts will show the source, amount and nature of the cash received. Cash receipts are summarized in a cash receipts journal, which contains the following information:

- (1) Date of receipt of the cash;
- (2) Source from which the cash was received;
- (3) Total amount of cash received; and
- (4) Account number to be credited for the cash receipt.

§ 6.1109 Accounts Receivable Balance Review.

Accounts receivable balances will be reviewed periodically and adjusted for bad debts at least once per year. The Lead Accountant will conduct a quarterly balance review and AR aging report. If there are balances owed past 365 days, the Lead Accountant will process a journal entry for the adjustment of Allowance for Doubtful Accounts and Tuition Bad Debt Write-Offs and the CFO will approve. Annually we will bring balances that are over 5 years old to the board of regents for approval of write offs.

SUBCHAPTER 6.12 – PROCUREMENT

§ 6.1201 Purchases.

All purchases must be in compliance with Chapter 8 of the Lac Courte Oreilles Ojibwe University– Property and Procurement Policies and Procedures. The applicable budget shall serve as the guideline for annual expenditures for all operating expenses.

§ 6.1202 Purchases within the Approved Budget Line.

All purchases within the approved budget line items are classified as follows:

(1) Routine and Recurring Purchases. Purchases under this category include monthly payments for rent, telephone, utilities, insurance, etc. It is not necessary for the Business Office to obtain Program Manager signature each month for these routine purchases. A blanket purchase order will be created.

(2) Special Program Purchases. Program purchases include project expenditures such as supplies and training. Prior to making these types of purchases, a Purchase Requisition must be received from the Program Manager. The requisition must be completed in every detail and signed by the Program Manager. Upon receipt of the Purchase Requisition, the Purchasing Officer will review the purchasing request for propriety regarding vendor, price, budget and bids. The staff accountant will create a purchase order in the ERP system. Upon signed authorization by the Program Manager, the purchase order will then be submitted to the vendor for processing.

(3) Travel Claims. All purchases must be in compliance with Chapter 10 of the Lac Courte Oreilles Ojibwe University-Travel Policies and Procedures.

(4) Equipment. All purchase must be in compliance with Chapter 8 of the Lac Courte Oreilles Ojibwe University – Property and Procurement Policies and Procedures.

§ 6.1203 Purchases of Individual Items.

Purchases of individual items require the following approval levels:

(1) \$0 to \$50,000 requires approval of the University President; and

(2) Over \$50,000 requires three (3) documented bids, and Board of Regents approval.

§ 6.1204 Vendor and Professional Services Contracts.

All vendor and professional services contracts, excluding Education Department Tutoring contracts, require approval regardless of the dollar amount. The process for requesting such approval is as follows:

(1) The procurement documentation and Request for Contract Form must be completed in their entirety by

(2) The procurement documentation and Request for Contract Form must be submitted to the COO who will assign a contract number.

(3) The approved procurement documentation and Request for Contract Form must then be submitted to the Board of Regents for approval at least seven (7) calendar days prior to the date of consideration, which gives the Board time to review the documents and if necessary, request additional information.

(4) After approval and signature by the University President, copies shall be provided to the CFO.

§ 6.1205 Sole Source Provider.

The University strongly discourages the awarding of any contract to a sole source provider. Unless sufficient evidence is provided that a contractor is a true sole source provider, such contract shall be rejected.

§ 6.1206 Purchase Orders.

The following requirements apply to purchase orders (“PO”), in that all purchase orders must:

(1) Submit a requisition in the self-service portal on the University website and be approved by the Budget Manager which will assign a PO number;

(2) Requisitions are approved by a Budget Department Manager;

(3) Once requisition has been approved and turned into a PO, it will be entered into the financial software to reflect Encumbrances; and

(4) Be compared to invoices upon receipt, and related Encumbrances must be removed when invoice is paid.

SUBCHAPTER 6.13 – CASH DISBURSEMENTS

§ 6.1301 Unused Checks.

Unused checks are stored in the locked safe located in the finance department.

§ 6.1302 W-9 Form.

A W-9 form shall be completed for each new vendor used. No payments will be made to new vendors without W-9 information.

§ 6.1303 “Debarred” or “Suspended”.

The Business Office periodically reviews new vendors to confirm that they have not been “debarred” or “suspended” by the federal government.

§ 6.1304 Accounts Payable Vouchers.

The deadline for submission and approval of requisitions is 4:30pm Monday. In order for a check to be issued by 11:00 am Thursday, the properly completed PO must be received by the 4:30 Monday deadline. PO received after the submission deadline will not be processed until the following week.

§ 6.1305 Improperly Coded Vouchers.

PO not properly coded and authorized will be returned and will not be processed until properly completed. The properly completed PO will be processed in accordance with the processing schedule cited above based on the time when the properly completed voucher is received.

§ 6.1306 Supporting Documentation.

The Business Office reviews and approves original supporting documentation for expenditures prior to payment.

§ 6.1307 Payments for Purchases.

Payments for purchases, and obligations made from grant funds are made only by check; provided no check will be issued unless there is documentary proof that the service or merchandise has been received and is satisfactory.

§ 6.1308 Purpose for Payment.

When a check is written, the purpose for the payment shall be stated in the related paperwork.

§ 6.1309 Check Signers.

All checks shall be signed by the University President, and the Treasurer of the Board of Regents.

§ 6.1310 Recording of Cash Disbursement Journal.

All checks shall be recorded in the Cash Disbursement Journal and posted to the General Ledger when issued.

§ 6.1311 Cash Disbursement Journal.

The Cash Disbursement Journal contains the following information:

- (1) Check number;
- (2) Payee;
- (3) Date of check;
- (4) Amount of check; and
- (5) Distribution of the expense accounts affected.

§ 6.1312 Proof that the Service or Merchandise has been Received.

The bill, invoice, or proof that the service or merchandise has been received shall be clearly marked "Paid", and a second copy of the check stapled to it to prevent duplicate payment.

§ 6.1313 Paid Bills in a Vendor File.

All paid bills are filed in a vendor file in alphabetical order for future reference.

§ 6.1314 Check Distribution and Automatic Deposit

All checks are mailed, through campus mail.

Employee reimbursements and payroll are disbursed via automatic direct deposit. Authorizations/changes must be received by the Human Resources Department in relation to payroll and the business office in relation to reimbursements prior to any pay period effective for the subsequent payday.

§ 6.1315 Honorariums

Individuals who are not employees of the University may be reimbursed contractually for services rendered as outside consultants, professional entertainers, etc. These types of payments

are referred to as honoraria or two-party agreements.

A two-party agreement form must be completed and signed by the provider of services. It must be signed by both parties before the event, not after. The provider should be advised by the paying unit that the amount paid will be reported to the IRS on a 1099 form by January 31 of the following year. Please note that University employees cannot be paid through a two-party agreement for any extra services provided; they must be paid through existing Payroll and Office of Human Resources procedures.

§ 6.1316 Stop Payments

A stop payment is a request by the University to a financial institution (bank) to not process a check upon presentation. The most frequent reasons for stop payments are a lost, stolen, or damaged check. A request is made to reissue the original check. A stop payment is made to prevent two checks being presented for payment for the same thing.

SUBCHAPTER 6.14 – CREDIT CARDS

§ 6.1401 Credit Cards.

(1) Use of University issued credit cards shall be for official business only. All receipts for use of the credit cards must be retained and submitted to the Business Office. University credit cards do not leave the University and any trip expenses that require a credit card will be paid for in advance of the trip.

(2) Each holder of a University issued credit card shall sign a statement agreeing to the following:

(a) That the card shall not be used for personal items under any circumstances, and that misuse of the card is grounds for disciplinary action up to and including termination.

(b) Any undocumented/unapproved purchase will be deducted from the cardholder's payroll check; three (3) days' notice will be given of such a deduction; if receipts are submitted, this amount can be reimbursed.

SUBCHAPTER 6.15 – TRAVEL

§ 6.1501 Travel.

Refer to Title X, Chapter 10 of the Lac Courte Oreilles Ojibwe University Travel Personnel Policies and Procedures for details regarding the University's policies and procedures for details regarding the University's travel policies and procedures.

SUBCHAPTER 6.16 – PAYROLL

§ 6.1601 Recruitment Form.

The CFO must authorize all new hire, adjunct, limited-term employee, and intern pay and request for pay increase and bonus pay on the recruitment form or comparable document.

§ 6.1602 Pay Periods.

The normal pay periods for employees are bi-weekly. The deadline for submission and supervisor approval of timecards is 12pm on the Monday after the pay period ends. In order for pay to be issued by the Friday pay date, the properly completed timecard must be received by the 12pm Monday deadline. Completed timecards that are received after the submission deadline will not be processed until the next payroll.

§ 6.1603 Timecards.

All timecards must have the hours accurately totaled, must be finalized in the self-service website by the employee, and must be approved by the supervisor, or they will not be processed until properly completed. The properly completed timecards are processed in accordance with the processing schedule cited above based on the time when the properly completed timecard is received. In order to maintain our current level of operating efficiency it is imperative that these submission deadlines and processing schedules be strictly adhered to.

§ 6.1604 End of Pay Periods.

At the end of each pay period the following steps will be performed:

(1) Each nonexempt hourly employee enters the hours that they worked on the timecard during the week. After verifying that the hours are correct, the employee finalizes the timecard on the self-service website for the University.

(2) The employee submits the timecard to their supervisor for review. After verifying that the hours on the timecard are correct, and that it has been marked as finalized by the employee, the supervisor approves the timecard.

(3) Timecards must accurately reflect all annual leave, sick leave, or other absence from work during the pay period.

(4) All Request for Leave Forms must be turned in before the Monday of payroll.

(5) The Business Office maintains records showing current accrued vacation and sick leave.

(6) Any timecards on which hours are not accurately totaled, not finalized by the employee or the supervisor, or which do not otherwise meet the requirements of this manual, will not be

processed; but rather will be returned to the supervisor for proper completion.

(7) Ensure that prior to payment, all payroll calculations are reviewed by a financial department employee other than the person who prepared the original calculation.

§ 6.1605 Business Office Responsibilities Pertaining to Pay Periods.

The Business Office shall:

(1) Review computer files to reflect status changes, garnishments, and other items that affect payroll have been entered by the Human Resources Department;

(2) Review wages are being charged to the correct funding sources;

(3) Balance timecards with payroll reports;

(4) Ensure that proper authorization for deductions are on file;

(5) Ensure that all payroll direct deposits are submitted to the bank via ACH file by Thursday at noon.

(6) Ensure that payroll reports are printed and filed after processing a payroll.

(7) Ensure that payroll tax deposits and Fringe Benefit payroll deductions are paid to the appropriate agencies in a timely manner.

§ 6.1606 Termination, Resignation, or Layoff of an Employee.

Upon termination, resignation, or layoff of an employee, the Human Resources Director shall verify that the employee has completed all required reports, and returned to the University, all keys, computers, cell phones, and all other property belonging to the University assigned to the employee during the term of their employment. The Human Resources Director may place a hold on the employee's final paycheck pending receipt of those items. An "Authorization to Hold Check" memo shall be completed and submitted to the lead accountant. The lead accountant holds the employee's final check until a completed "Authorization to Release Check" memo or email is received from the Human Resources Director.

SUBCHAPTER 6.17 – JOURNAL ENTRIES

§ 6.1701 General.

Journal entries are made to accounts to record information not posted to the General Ledger through the payroll, accounts receivable, or accounts payable systems.

§ 6.1702 General Ledger Journal Entry.

The Business Office shall comply with the following when recording a Journal Entry to the General Ledger:

- (1) A Journal Entry will be processed within the ERP system.
- (2) All necessary documentation will be attached. Where no documents exist, appropriate reference will be sufficient.
- (3) After a Journal Entry is entered into the system a Journal Voucher Edit List will be printed and reviewed for accuracy.
- (4) The Journal Voucher Edit List will be reviewed to verify that it is correct, and upon verification the Journal Entry will be posted to the General Ledger.

SUBCHAPTER 6.18 – GENERAL LEDGER

§ 6.1801 Journal Entries to the General Ledger on a Weekly Basis.

The Business Office records and posts all information from payroll, cash receipts, cash disbursements, as well as journal entries to the General Ledger on a weekly basis.

§ 6.1802 Business Office Responsibilities Each Month.

The Finance Department, after each month, will:

(1) Lock down the General Ledger for that month, which prevents information from being changed, which is necessary to ensure that the General Ledger information coincides with the reports filed by the Business Office with the funding agencies; and

(2) Generate Management Reports, which will be distributed to managers by the 10th of each month.

SUBCHAPTER 6.19 – YEAR END ACCRUALS

§ 6.1901 Business Office Responsibilities Each Fiscal Year.

At the end of each fiscal year, the Business Office will:

- (1) Record expenses into the correct year;
- (2) Prorate payroll expenses so that they are charged to the year in which the employee actually worked;
- (3) Record invoices for items received or services rendered in the prior fiscal year but paid for in the current fiscal year at year end to ensure that the financial statements reflected the expense in the correct fiscal year; and
- (4) Record third party revenue to ensure that revenue is recognized in the year when the services were provided.

SUBCHAPTER 6.20 – FIXED ASSETS

§ 6.2001 Purchases.

Purchases of Fixed Assets are made from funds designated for such purpose in compliance with, Chapter 8 of the Lac Courte Oreilles Ojibwe University Property and Procurement Policies and Procedures. The Business Office maintains a record on the Property Inventory List by program and location for each Fixed Asset costing \$5,000 or more and for all vehicles, computer equipment, and other sensitive “walk-away” Assets.

§ 6.2002 Property Inventory List.

The Property Inventory List will include the following:

- (1) Description of the property, new or used;
- (2) Date of acquisition;
- (3) Location of the property;
- (4) Serial number, vehicle identification number, or other identifying number, if applicable;
- (5) Acquisition cost or assigned value; and
- (6) General condition of the property.

§ 6.2003 Equipment Accounts in the General Ledger.

The total amount shown on the record should be consistent with the amount shown in the Equipment Accounts in the General Ledger.

- (1) The Business Office will conduct a physical inventory at least one (1) time every two (2) years. The inventory will be reconciled with the subsidiary ledger.

§ 6.2004 Business Office Responsibilities.

The Business Office shall maintain the Property Inventory List; will record acquisitions, disposals, and transfers and will prepare Fixed Asset financial reports, such as:

- (1) Schedule of General Fixed Assets;
- (2) Schedule of changes in General Fixed Assets; and
- (3) Proprietary fund schedules of property and equipment.

§ 6.2005 Fixed Asset Disposal.

Refer to Title VIII, Chapter 8 of the Lac Courte Oreilles Ojibwe University – Property and Procurement Policies and Procedures.

SUBCHAPTER 6.21 – INDIRECT COST PROPOSAL

§ 6.2101 Indirect Cost Proposal Preparation.

The CFO shall prepare an Indirect Cost Proposal each year in compliance with federal guidelines including Uniform Guidance - 2 CFR Part 200. The CFO reviews the Indirect Cost Proposal and submit it to the Board of Regents.

§ 6.2102 Indirect Cost Proposal Approval.

The Indirect Cost Proposal requires the approval of the Board of Regents prior to mailing to the U.S. Department of Health and Human Services. The final negotiated rate also requires approval by the Board of Regents before it is signed for acceptance.

SUBCHAPTER 6.22 – MATCHING FUNDS

§ 6.2201 Matching Funds Required.

In cases where matching funds are required, the Program Manager ensures that adequate matching funds are secured and that the matching funds meet all guidelines called for in the award documents.

§ 6.2202 Matching Funds Compliance.

The CFO monitors compliance with all matching requirements.

SUBCHAPTER 6.23 – ELIGIBILITY

§ 6.2301 Eligibility Requirements.

Many programs and grants require that individuals who receive goods or services meet certain eligibility requirements. Program Managers must document eligibility before providing any goods or services.

§ 6.2302 Eligibility Determination.

The CFO monitors compliance, but it is not the responsibility of the financial department to determine eligibility.

SUBCHAPTER 6.24 – FINANCIAL SOFTWARE

§ 6.2401 Designated Financial Software.

It is important for the University to use financial software designed for use by a governmental organization. The University currently uses Enterprise Resource Planning (ERP system) software to manage day-to-day business activities such as accounting, procurement, project management, etc.

§ 6.2402 Financial Software Integrity.

The Business Office and information technology staff shall maintain and ensure the security of written and electronic fiscal records.

SUBCHAPTER 6.25 – LOANS AND DELIQUENT DEBTS

§ 6.2501 Loans.

The Lac Courte Oreilles Ojibwe University does not offer loans made to individuals.

SUBCHAPTER 6.26 – STUDENT ACCOUNTS

§ 6.2601 Accounts Receivable (Student)

The ERP system is currently used for the purpose of accumulating all charges into a centralized system so students have access to their billing statement via MyLCOOU. This benefits both the student and the University since payments and financial aid are directly applied to those charges. If this creates an excess balance this amount is refunded directly to the student. Collection efforts are also enhanced since multiple debts from the same student can be worked on simultaneously.

§ 6.2602 Scholarship Waivers, Tuition Waivers, and Employee Tuition Waivers

Tuition and fee waivers are an agreement between the student and the University to reduce or eliminate tuition and/or fees. Discretionary waivers, including statutory waivers, are granted at the discretion of the University. Each waiver program has specific eligibility requirements and selection criteria. Each waiver program may offer tuition waivers, fee waivers, and/or other reimbursement in accordance with specific program requirements.

The following categories have been approved for discretionary waivers and entitlement programs at the University:

- (1) Employee Discount Waiver. Please see details at policy 9.8 Training Leave in the Employee Handbook.
- (2) Elder Discount Waiver: Please see details in the Student Handbook under Elder Discount.
- (3) Early University Credit Program. This program allows Wisconsin high school student to take University classes for high school and/or University credit. The Lac Courte Oreilles Ojibwe University will apply 1/3 of the tuition rate for ECCP students. For more details on this program please visit:
<https://www.lco.edu/eccp?rq=early%20University%20credit%20>
- (4) LCOOC Waiver. The LCOOC waiver is for specific continuing education courses offered at the University that the materials for the course are completely covered by grant funds.

§ 6.2603 Student Billing

The ERP system was established to provide each student with a billing statement of payments made to the University and debts owed to the University (see the Accounts Receivable Policy for details of the specific charges included.) The statements are distributed electronically and show the total charges, payments and current amount due. Online account access allows students and parents the ability to see the most current activity, balance and make payments on the account.

§ 6.2604 Refunds

Each week the ERP system is checked for cash in excess of charges. A refund run is done for the three different types of excess cash in the account. These types are:

1. Withdrawals from school or individual courses
2. Excess cash paid
3. Refundable scholarships in excess of charges

A withdrawal from school may cause a reduction of financial aid resulting in repayment of a refund already issued to the student.

Excess payments on the account are refunded after all outstanding charges have been paid. There is a 14-day delay in refunding excess payments. Refundable scholarships applied to the account, after paying all eligible charges are refunded based on the timing of the financial aid distribution (see the Financial Aid Distribution policy).

The preferred method of refund distribution is by direct deposit. Students are encouraged to sign up for direct deposit through MyLCOOU. This provides a more secure and timely distribution of refunds. For those not on direct deposit, a check is cut and mail to the appropriate address on file.

§ 6.2605 Course Material Fees

There are many courses on campus that require the consumption of materials or require a service expense for the student to receive the full educational benefit from the course. Examples would be the utilization of clay for an art project or extra supplies for labs. These charges are placed in the ERP system and billed directly to the student. All departments must apply to the Chief Academic Officer for the assessment of a materials fee for a specific course. ERP will bill the student for any materials fee that is assigned to each course registered for. The materials fee charge is billed on the first bill generated after the class is added to the student's account. To see a list of our course fees, go to the website at <https://www.lco.edu/tuition-and-fees>

§ 6.2606 Tuition and Fees

Tuition and mandatory fee rates are authorized by action of the Board of Regents of the Lac Courte Oreilles Ojibwe University on an annual basis. Tuition and mandatory fees are assessed on a per credit hour per semester basis. To see our current tuition rates, go to our website at <https://www.lco.edu/tuition-and-fees>

§ 6.2607 Financial Aid Distribution

The Financial Aid Office processes all financial aid applications. Once completed, reviewed, approved, and/or received, aid is applied to the student's account. There are five types of financial aid: grants, scholarships, waivers, loans, and work-study.

- (1) Grants. Financial aid that is often based on student need. Grant monies typically are no-cost, no-interest and do not have to be repaid by the student. They are specific to the semester for which they are awarded, can only apply to specific charges, and align with the grant's stipulated rules. Grant monies are typically applied to the student's account at the start of each semester or as soon as the funds are approved and/or received. If the grant award amount exceeds allowable charges, those monies may be refunded to the student (see the Refunds policy).
- (2) Scholarships. Financial aid that is awarded based on eligibility criteria, often based on students' academic or other achievements, or on financial need. Scholarships typically do not require repayment by the student. They are specific to the semester in which they are awarded, can only be applied to specific, stipulated charges, and align with the specific scholarship's stipulated rules. Scholarship aid is typically applied to the student's account at the start of each semester or as soon as the funds are approved and/or received. If the scholarship award amount exceeds allowable charges, those monies may be refunded to the student (see the Refunds policy).
- (3) Waivers. Tuition and fee waivers are an agreement between the student and the University to reduce or eliminate tuition and/or fees. Waivers are applied to the student's account once received. They are specific to the semester and can only be applied to a student's tuition and fees. Please note certain state aid programs referred to in policy 6.2602 as scholarships may be classified as tuition and/or fee waivers based on program requirements.
- (4) Loans. The Lac Courte Oreilles Ojibwe University doesn't currently offer student loans. At the student's discretion, students can obtain private loans on their behalf to pay off any remaining student account balances. This would be the responsibility of the student and not processed through the University.
- (5) Federal Work-Study. Work-study is available for those units that hire an eligible student worker. The student receives a paycheck for hours worked. Lac Courte Oreilles Ojibwe University receives federal funds which it applies toward the expense of having a student as an employee. Federal Work-Study funds are paid through University's Payroll office.

Disbursement of financial aid begins after the financial aid census date. The Business Office and financial aid department will send out a refund schedule to notify students of when they plan to disburse funds.

§ 6.2608 Bad Debt Write-Off

Bad debt Write-Offs are compiled and submitted by the lead accountant and reviewed by the CFO on an annual basis. Accounts Receivable are considered uncollectable and removed from the General Ledger after all customary efforts to collect have been exhausted or the balance does not warrant ongoing collection action. The following Write-Off criteria has been established and adopted by the Board of Regents.:

- (1) Student and Non-student Accounts Receivable determined to be uncollectible are to be written-off when they become five (5) years old as of 6/30/xx (current year), and has not recorded payment activity within twelve (12) months prior to 6/30/xx (current year);
- (2) Sponsored Program Accounts Receivable that are two (2) years old as of 6/30/xx (current year) will be identified by the CFO and reviewed with the grant manager for inclusion in the annual Write-Off. This review pertains to both governmental and industrial sponsored accounts;
- (3) Regardless of the age of the account; legal notification that an account balance has been discharged through bankruptcy or notification of death of the debtor, will result in the balance being be written off immediately;
- (4) All Accounts Receivable that are written off with the exception of bankruptcy and death, are still considered due and payable in full by the debtor; and/or
- (5) Student Financial Holds and court-ordered judgments, with the exception of bankruptcy and death, will remain in effect until the bad debt Write-Off balance is either cancelled or paid in full.

§ 6.2609 Collection of Past Due Accounts Receivable

The following minimum collection efforts will occur for past due accounts:

- (1) Collection notices will be sent electronically or via U.S. mail;
- (2) A business office hold will be placed on the record of any student who has a past due payment and the student will be notified as such;
- (3) Payment plans will be offered to assist in the collection of past due items;
- (4) After the above collection efforts have been exhausted, the account will be reviewed for further action. The oldest charge will generally determine the collection action, which may include student being unable to enroll in future courses, the filing of a lawsuit in small claims court, tribal court, or tax offset recovery through the Wisconsin Department of Revenue. Lac Courte Oreilles Ojibwe University may assess interest charges, late fees, court costs and/or attorney fees associated with the collection of past due accounts receivable as allowed by applicable laws and the sales contract covering the good or

service. In the event efforts to collect past due accounts receivable are unsuccessful, bad debt write-off procedures are outlined in 6.2608.

ADDENDUM TO
FISCAL POLICIES AND PROCEDURES MANUAL
CODE OF CONDUCT

(1) No employee, officer or agent of the University or any sub-grantee will participate in selection or in the award or administration of a contract or grant if a conflict of interest, real or apparent is involved, including without limitation:

(a) If the employee, officer or agent, any member of his/ her immediate family; his or her partner; or any organization which employs, or is about to employ, any of the above, has a financial interest in the firm selected for the award; or

(b) If a conflict of interest is deemed to exist under applicable law, including without limitation rules and regulations of the awarding agency.

(2) No employee, officer, or agent of the University, or any sub-grantee or its officers, employees or agents will solicit or accept gratuities, favors or anything of monetary value from contractors, potential contractors, or parties to sub agreements.

(3) Any employee, officer or agent of the University who is aware that a conflict of interest may exist is required to immediately and fully disclose the nature of the relationship to the Tribal Governing Board so as a determination can be made as to whether an actual or potential conflict of interest exists and if so, what remedies can be taken to correct the situation.

(4) Any employee, officer or agent of the University who is found to be in violation of this Code of Conduct or any other provision of this Manual is subject to disciplinary action, up to and including termination of their employment and possible civil or criminal penalties.

Chapter 6
Fiscal Policy & Procedure for the Lac Courte Oreilles Ojibwe University


Date approved: 10/20/23

Review date: 10/20/23

Signature



President



Board Chair