

EXHIBIT E
ASOR FINANCIAL MANAGEMENT
PROCEDURE AND CAPACITY

Finance Manager's signature (provisional until Finance Committee and Board certifies):

_____ (Date)

Treasurer's Signature (provisional until Finance Committee and Board certifies):

Executive Director's Signature (provisional until Finance Committee and Board certifies)

Andrew J. Naughton 3/23/2023

Finance Committee Provisional Approval Date _____

Note: Finance Committee will approve provisionally subject to ASOR receiving external review report from the DRL-appointed auditing firm. Once report has been received, ASOR will have 90 days to revise these policies and procedures. The report has not been received as of March 22, 2022 (the date this paragraph was last updated).

Date when we will review this document: May 30, 2024 (and each year following)

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Introduction

To ensure that the American Society of Overseas Research (ASOR) is meeting the requirements for grant financial management outlined in 2 CFR Part 200, the following procedures have been developed. These procedures ensure that ASOR is spending federal grant dollars on eligible expenses, and that the proper audit trail exists to document that fact.

Internal Controls

ASOR's Finance Department is responsible for the receipt and disbursement of all ASOR funds, including Department of State, National Endowment for Humanities, and other federal agency grant dollars. Internal control procedures have been developed to ensure that all cash and assets of ASOR are properly accounted for and are safeguarded against loss. In addition, controls exist to ensure that assets are used in accordance with law, regulations, and agreements, and all expenditures are supported by proper documentation. Internal controls include the following elements:

- Assurance that internal controls are an integral part of ASOR's Finance Department; and
- Existence of a positive and supportive attitude among ASOR managers and employees; and
- Assignment of internal control functions to competent and experienced employees; and
- Identification of specific internal control objectives to ensure that needs are identified and that valid controls are planned and implemented; and
- Adoption of internal control policies, plans and procedures that reasonably ensure their effectiveness, such as organizational separation of duties, such as receipt of funds, payment of bills, and reconciliations of accounts; and
- Regular program of testing to identify vulnerabilities in the internal control system.

Financial Management Systems

Financial Reporting

ASOR's Finance Department has assigned the monthly reconciliation of all cash, credit, and investment to an external accounting firm (Charity CFO). To separate duties, the reconciliation is not done by the Financial Manager or the Executive Director, and Charity CFO produces monthly reports for review by ASOR's Treasurer, Executive Director, and Finance Manager. Charity CFO has several CPAs on staff, and they can report any concerns directly to ASOR's Treasurer or President if the need should arise. Charity CFO also consults with ASOR's Finance Manager and Executive Director on a regular basis as needed. See Appendix A for instruction procedures.

The ASOR Finance Manager and Executive Director (in consultation with the ASOR Treasurer) prepare the following financial statements which are included in the Board of Trustees bi-annual board packets. These reports include year-to-date results of operations, as well as updated bank and investment statements. A comparison to budget is included to highlight whether revenues and expenditures are in-line with approved budgeted amounts. The Board of Trustees meets twice a year (in May and November).

Accounting Records

All federal expenditures are recorded in QuickBooks (online). Invoices submitted for payment are coded with the proper general ledger account [see Appendix B for instruction procedures], identify the federal grant covering the expense, the activity line item of the grant, and show the breakdown of federal vs. non-federal share (if applicable). All invoices are approved by the Finance Manager or Executive Director. Recurring payments are paid by ACH transfer or other automated payment system. Non-recurring invoices are paid by the Finance Manager or the Executive Director. If invoices are greater than \$3,000, both Executive Director and Finance Manager provide an approval (with the "second signature" being provided by email if a physical signature is not practical).

A copy of invoices and all supporting documentation are kept in a file, and monthly, the Finance Department compiles all information for review. The Finance Department compiles all information for frequent drawdowns—preferably monthly or more, and no less than quarterly. See **Appendix C** for instruction procedures for detailed reports (Appendix C: Instructions for Creating Detailed Quarterly Federal Financial Reports). Whenever possible, a payment request is made by the Finance Manager or Executive Director through the Payment Management System (PMS). The Executive Director or Finance Manager notifies the other person when this has been done by email or by updating a shared spreadsheet. See **Appendix D** for instruction procedures (Appendix D: Procedures for Submitting Drawdown and Payment Requests). When use of the PMS is not possible for a federal grant, the Finance Manager or Executive Director makes payment requests by submitting SF270 (or a similar form if instructed by the granting federal agency or bureau of the federal agency).

Unless the granting federal agency asks that ASOR submit request(s) for advance(s) of grant funds, expenditures will be made prior to a reimbursement drawdown request being performed. In the case of a large expense, a drawdown will be performed prior to the invoice being paid, and

once funds are received, the Finance Manager or Executive Director will ensure that the invoice is promptly paid, no later than 3 business days after receipt of the grant funds. (see below for instruction procedure on paying advances).

Once reimbursed funds are received, the monies are recorded by the Finance Manager into QuickBooks Online as Federal Grants revenue (51000 Grant income: Federal grant). Each federal grant should receive a separate account in QuickBooks under 51000 Grant Income (e.g., 51006 Libya AFCP 2020 Grant or 51007 DRL Grant 2021). See Appendix D below for instruction procedure on recording federal monies received.

If the granting federal agency asks that ASOR submit request(s) for advance(s) of grant funds, the Finance Manager will enter funds when received into QuickBooks as “2306 Deferred Income: Deferred Income – Grants” with a description specifying the name of the grant and the grant award number [See Appendix K below for instruction procedure on recording Deferred Income for Federal Grants]. As soon as reasonably possible, the Finance Manager or Executive Director will deposit advance funds into a separate interest-bearing, savings account (currently a High Performance Money Market Account [HPMM] with Truist Bank) (see Appendix I for how to record transfer in QuickBooks). Funds will remain in this separate account until expenses have been incurred. The interest earned from these federal grant advances will held in HPMM account and used for direct expenses. Every quarter after the SF425 has been submitted, the expenses incurred will be transferred from the HPMM account by the Finance Manager or Executive Director. The Finance Manager will enter the transfer amount as Federal Grants revenue using one of the 51000 Grant Income QuickBooks numbers as referenced in the preceding paragraph (see performance instruction procedure below in Appendix J). When the fiscal year ends and ASOR is owed a reimbursement, create an Accounts Receivable entry in QuickBooks to record that amount (see Appendix K for instructions on how to create A/R entry for reimbursement grants; for grants with advances, see Appendix J instructions).

Fixed Asset - Internal Controls for Equipment (Assets Greater than \$5,000)

ASOR staff perform an annual audit of capital assets (equipment) valued at or above \$5,000 to ensure everything is accounted for. A fixed asset listing (of equipment greater than \$5,000) is prepared by the Finance Department, which is reconciled to the accounting records to ensure accuracy. This listing documents all equipment assets purchased with federal grant dollars. Items costing less than \$5,000 are treated as “supplies” in the grant budgets. This listing is used by ASOR staff to perform and document the inventory count was completed, and any discrepancies are noted and reported to the Finance Manager and Executive Director immediately for proper follow-up.

Budget Control

Monthly financial reports of bank statements, investment accounts, and credit accounts are prepared by the external accounting firm, Charity CFO, and forwarded to the Finance Manager and to Executive Director for review.

Quarterly, the Finance Manager will prepare a General Ledger Report and Budget to Actual Report for each federal grant. These reports will include an analysis of budget to actual for the

period, as well as a cumulative summary for the entire grant period. These Quarterly Reports will be used to create the Quarter Federal Financial Reports (SF425). Either the Finance Manager or the Executive Director will submit the FFRs using the PMS system or a PDF version of SF425 (according to the guidance from the appropriate Grants Officer). As needed, the Finance Manager and Executive Director may review the General Ledger and Budget to Actual Report(s) more frequently than quarterly to assist with grant analysis.

Quarterly, the Finance Manager or Executive Director will review the budget analysis with the Program Director for each grant and with the Co-Directors of ASOR Cultural Heritage Initiatives (if different from the Grant Program Directors).

If there is a large change in any section of the budget for a federal grant (10% or more), the Co-Directors must discuss this change with granting office. See 2 CFR 200.308 for further detail.

Annual Budget Control (not necessarily for federal grants)—need to complete:

- For May Board Meeting: Update budget to forecast spreadsheet with March P&L, and generate the budget forecast from the March P&L (see **appendix**). Create next fiscal year budget based on CY Budget Forecast and expectations for next fiscal year.
- For External Audit Preparation
 - Update Net Investment Spreadsheet, DOS advance payment spreadsheet, Temporary Restricted Spreadsheet, and restricted accounts roll-forward spreadsheet (see **appendix**)
 - Reconcile all spreadsheets to Working Trial Balance (WTB) from Quickbooks and P&L from QuickBooks
 - Perform a quick confirmation that prior year trial balance matches audited financial statements (see Appendix L for instructions)
 - Update preliminary Budget to Actual Spreadsheet from WTB and P&L
- For November Board Meeting
 - Using final audit financial statements, update and finalize the Budget to Actual Spreadsheet (long version) and create a short version for the Board Meeting
 - Analyze the final Budget to Actual spreadsheet and report, and share observations, conclusions, and suggestions with Board at November Meeting.
 - Using final Budget to Actual report, share observations (if any) about CY Budget with Trustees during Finance Committee and Board Meetings

Allowable Costs

The following criteria are used to determine whether project costs are eligible for reimbursement from a federal grant:

- Be **necessary and reasonable** for efficient administration of the grant, and allowable under 2 CFR Part 200; and
- Be **allocable** to federal awards under the provisions of 2 CFR Part 200; and
- Authorized and not prohibited under state or local laws and regulations; and
- Conform to any limitation or exclusions set forth in the principles, federal laws, or other governing limitations as to types or amounts of cost items; and

- Consistent with policies, regulations, and procedures that apply uniformly to both federally assisted and other activities of ASOR; and
- Treated consistently. Unless authorization is received from the Grants Officer, costs are not assigned to a federal grant as a direct cost if other costs incurred for the same purpose in like circumstances are normally allocated to the federal grant as an indirect cost; and
- Are in accordance with GAAP and appropriate to the circumstances; and
- Are not allocable to or included as a cost of any other federally financed program in either current or prior periods; and
- Are net of all applicable credits;¹ and
- Are adequately documented; and
- Are not incurred prior to grant award unless specifically provided for in a Letter of No Prejudice (LONP) or similar document approved by the Grants Officer, or in the pre-award authority as described in the *Federal Register* listing of the Annual Apportionments.

Non-allowable Costs

Alcohol may not be purchased with federal grant funds. Any large equipment (over \$5,000) purchased for a federal grant must be approved by the grants officer prior to purchase. See 2 CFR Part 200 for all unallowable costs. Purchasers should consult with the Executive Director if they have any questionable costs.

Allocation Policy

If any cost is split between multiple grants, include a brief note of your justification for the allocation. This is applicable for both purchases and time. For time, the justification must be included on the Google Time Sheet in the comments for that time period. For purchases, include the written justification on the receipt or expense report.

Supplies will generally be used only for one grant for ease of accounting. However, if a supply is used for more than one purpose or grant, a written justification must be submitted to the Finance Manager and the split cost must be clear in the QuickBooks entries.

Cost transfers

Any costs charged to a federal award that do not meet the allowable cost criteria must be removed from the award account and charged to an account that does not require adherence to federal guidelines covered under 2 CFR Part 200. If ASOR Finance Manager and/or Executive Director determine that a cost is not allowable, the Finance Manager and Executive Director will discuss how best to transfer the cost in QuickBooks to an account that does not require adherence to guidelines covered under 2 CFR Part 200. If the Executive Director and Finance Manager are

¹ The term “applicable credits” refers to those receipts or reduction of expenditures that operate to offset or reduce expense items allocable to the federal award. Typical examples of such transactions are: purchase discounts; rebates or allowances; recoveries or indemnities on losses; and adjustments of overpayments or erroneous charges. To the extent that such credits accruing to or received by ASOR relate to a federal award, they shall be credited to the federal award, either as a cost reduction or a cash refund, as appropriate.

uncertain about the allowability of the cost, they will seek guidance from the Grants Officer of the appropriate federal agency.

Direct and indirect costs

Allowable and allocable costs must be appropriately classified as direct or indirect. **Direct costs** are expenses that are specifically associated with a particular grant program that can be directly assigned to such activities relatively easily with a high degree of accuracy. Common examples of direct costs include the project staff salary and fringe benefits, equipment and supplies for the program, travel associated with the program, subcontracted service provider(s), fixed amount awards directly related to the program, or other materials consumed or expended in the performance of the grant.

Indirect costs are those that are:

- (a) incurred for a common or joint purpose benefiting more than one cost objective, and
- (b) not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved
- (c) beneficial to more than one grant or other ASOR program
- (d) common examples of indirect costs include utilities, local telephone charges, shared office supplies, and administrative salaries not directly related to program activities.

It is essential that each item of cost be treated consistently in like circumstances either as a direct or an indirect cost. If an indirect cost rate is going to be utilized for charging indirect rates, the rate must first be approved by the applicable approving authority.

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Source Documentation

All expenditures are supported by a properly approved invoice, purchase order (if applicable), receiving report, and check or electronic payment copy. See Appendix B for instruction procedures. All expenditures of \$3,000 and above (other than payroll costs) will be approved by two ASOR signatories (e.g., by the Finance Manager and Executive Director [emails may qualify as a “second signature”]).

Any payroll costs reimbursed by a federal grant are noted on individual timesheets using a Google Sheet and are coded to separate general ledger accounts. Timesheets are signed electronically by the employee and are reviewed and approved by the Finance Manager before submission to the third-party payroll company (currently Paychex) for processing. Another ASOR Director (either the Programs Director or Executive Director) will review and approve timesheets for the Finance Manager. Because the Executive Director is the direct supervisor for the Finance Manager, any concerns about the Executive Director’s timesheets may be shared by the Finance Manager with the ASOR Treasurer or ASOR President in a confidential manner. See Appendix E for time sheet instruction procedures.

Cash Management

Unless otherwise requested by the granting federal agency, expenditures will be made prior to

drawdown of federal funds. See above under “Accounting Records” for procedures of documenting and managing cash advances when requested by the granting federal agency.

In cases where the federal agency does not request advances, and where expenses are large and cannot be covered by cash reserves, the funds are drawn down after receipt of a properly approved invoice. When the funds are received (ACH and wire transfers are monitored by the Finance Manager or Executive Director on a regular basis), the Finance Manager or Executive Director will make payment (electronic payment is preferred) within 5 business days of receipt of the funds from the federal agency.

Financial Plan

Annual budgets are prepared and submitted to Board of Trustees for approval in advance of the next fiscal year (starting July 1). In addition, the ASOR Finance Committee will meet annually to ensure that ASOR has adequate liquidity and cash resources to cover its obligations (current and expected). The Finance Committee may meet more often than annually.

Annual Audit

ASOR receives an annual financial audit performed by an independent CPA firm. If \$750,000 or more is spent during the fiscal year in federal funds, a single audit is also performed in accordance with 2 CFR Part 200. A copy of the audited statements, single audit report (if any), and management letter response will be reviewed by the ASOR Finance Committee. The Finance Committee will make a report to the ASOR Executive Committee and ASOR Board of Trustees. Any audit findings are addressed in the single audit report, and any corrective actions are taken immediately. All ASOR audits (for at least the past 20 years) are posted for public review on the ASOR website.

Payment Procedures

If the Finance Manager and/or Executive Director determine that ASOR has incurred expenses eligible for reimbursement from a federal grant in excess of \$5,000.00, and those expenses are not covered by an “advance” mentioned elsewhere in this Policies and Procedures document, either the Finance Manager or Executive may submit a drawdown request using the PMS system. If the PMS system is not used by the federal granting agency, a drawdown request will be made using the Form SF270 (or another form if requested by the federal granting agency). Before submitting a drawdown request before the end of a quarter, the Finance Manager will produce an expense report for the federal grant to ensure that expenses have been incurred before a drawdown is requested. The Finance Manager will use this report to fill in the Federal Grant Drawdown Worksheet for the current quarter. The worksheet will confirm the amount to be requested for drawdown. Upon confirmation that more than \$5,000 of expenses have been incurred for a particular grant, either the Finance Manager or Executive director will submit a drawdown request on the PMS system and attach the appropriate supporting documentation to the QuickBook entry for the grant income.

On a quarterly basis, all expenses eligible for reimbursement from a federal grant are compiled by the Finance Manager using the General Ledger Report and Budget to Actual Report for each federal grant (see above under Budget Control). After completion of the FFR (or PDF copy of

the SF425 if the PMS System is not available), the Executive Director or Finance Manager will submit a drawdown request using the PMS System, subtracting funds that have been received during the prior quarter using the drawdown method described in the preceding paragraph. When the granting federal agency has requested advanced funds, the drawdown will be made from the separate savings account (currently a Truist HPMM account), also subtracting funds that have been recognized during the prior quarter using the drawdown method described in the preceding paragraph. Once the advance payments have been exhausted, the Finance Manager or Executive Director will request a drawdown by submitting a form SF270.

All expenses are tracked in QuickBooks for each active grant, and the Finance Manager can produce an Excel spreadsheet for each active grant upon request. All credit card and bank statements are reconciled monthly, and the total expenses are reconciled quarterly to ensure accuracy.

When reimbursements for grants are received, the Finance Manager will book the grant receipts in QuickBooks as Grant Income (see above under Accounting Records).

Procurement Procedures

Standards of Conduct

In accordance with 2 CFR Part 200, ASOR maintains the following standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award, and administration of contracts, goods, or services.

No employee, officer, or agent may participate in the selection, award, or administration of a contract, goods, or services supported by a federal award if they have a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, contractor, or agent, any member of their immediate family, their partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract, goods, or services.

The officers, employees, contractors, and agents of ASOR may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts, unless the gift is an unsolicited item of nominal value. See Exhibit F: Procurement Conflict of Interest Form.

Awards to Responsible Contractors

Awards will be made only to responsible contractors. Consideration shall be given to such matters as contractor integrity, compliance with public policy, record of past performance, record of past relationships with ASOR, and financial and technical resources.

Mandatory Disclosures

Disclosure must be made, in a timely manner, in writing to all Federal awarding agencies or pass-through entities of all violations of Federal Criminal law involving fraud, bribery, or gratuity violations potentially affecting Federal awards. Failure to make required disclosures can result in any of the remedies described in 2 CFR 200.338 “Remedies for noncompliance, including suspension or debarment.”

A. Responsibility for Purchasing

All ASOR employees are charged with the responsibility of making purchases. The purchases must be necessary for the completion of the work for that employee’s department or the federal grant that the employee is working on. For all purchases, the employee must keep detailed records on the purchase including invoice and receipt. The receipt must include an item list, the total amount spent, the date of purchase, the accounting category for the purchase (the QuickBooks account, if known by the employee, or a brief description to let the Finance Manager know which QuickBooks account should be used for the purchase), and the name of the federal grant (if applicable). The employee will send these records via email to the Finance Manager who will record the purchase in QuickBooks and keep the records on file. [See Appendix B for the instruction procedures and Source Documentation for more information.]

For all purchases above \$3,000, two signatories (currently the Finance Manager and the Executive Director) must approve of the purchase. One of them approves by requesting the

“second signature” of the other. The second signature may be on a check, in person, or may be sent via email to approve the purchase. If sent electronically, the “second signature” is kept on file with the other documentation of the purchase. [See Source Documentation for more information.] A “second signature” approval may also be sent by the ASOR Treasurer. The Treasurer is an authorized signatory on Schwab Accounts, and the Treasurer may be one of the two ‘signatories’ on a purchase over \$3,000 for any accounts regardless of whether or not they are an actual signatory on the account.

B. Procurement Methods and Procedures

1. Full and open competition. All procurement transactions over \$25,000 must be conducted in a manner providing full and open competition consistent with the standards of 2 CFR 200.319. Some of the situations considered to be restrictive of competition include, but are not limited to the following:
 - a. Unreasonable requirements place on firms in order for them to qualify to do business; and
 - b. Noncompetitive pricing practices between firms or between affiliate companies; and
 - c. Noncompetitive contracts to consultants that are on retainer contracts; and
 - d. Organizational conflicts of interest; and
 - e. Any arbitrary action in the procurement process.
2. Procurement Solicitations for transactions over \$25,000. All solicitations must have the following:
 - a. A clear and accurate description of the technical requirements for the material, product, or service to be procured.
 - b. Identify all requirements which the offerors must fulfill and all other factors that ASOR plans (at the time to of the solicitation) to use in evaluating bids and proposals.
3. Cost and Price Analysis: only required for procurements over the Simplified Acquisition Threshold (currently \$250,000).
 - a. Price analysis may be accomplished in various ways, including the comparison of price quotations submitted, market prices and similar indicia, together with discounts.
 - b. Cost analysis is the review and evaluation of each element of cost to determine reasonableness, allocability, and allowability.
4. Micro Purchases: For the purposes of this section, the micro-purchase threshold is the amount of \$25,000. Procurement by micro-purchase is the acquisition of supplies or services, the aggregate amount of which does not exceed \$25,000.
 - a. A purchase not greater than \$25,000 may be made without obtaining competitive quotations if the Executive Director (or other responsible position) determines that the price of the purchase is reasonable.
 - b. To the extent reasonable and practical given ASOR’s size and capacity, purchases should be distributed equitably amount qualified suppliers.
5. Small Purchases: For the purposes of this section, small purchases are greater than \$25,000 and less than the Simplified Acquisition Threshold (currently \$250,000). Small purchase procedures are relatively simple and may have informal procurement methods for securing services, supplies, or other property that do not cost more than the Simplified Acquisition Threshold.

Purchases exceeding \$25,000 and less than the Simplified Acquisition Threshold (currently \$250,000) for labor, equipment, supplies or services purchased, leased, or contracted for shall be made only after receiving whenever possible, oral or written quotations from at least three (3) vendors and approval of the Executive Director. The

relevant program manager or ASOR employees shall provide a selection recommendation to the Executive Director for approval with documented quotations attached for review.

6. Noncompetitive proposals (sole source). Sole source procurements are accomplished through solicitation or acceptance of a proposal from only one source, or after solicitation of a number of sources, competition is determined inadequate.
 - a. Procurement by noncompetitive proposals may be used only when one of the following circumstances applies:
 - i. The item is available only from a single source; or
 - ii. The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation; or
 - iii. The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from ASOR; or
 - iv. The source was specifically named in the grant application or approved budget of a Federal agency award; or
 - v. After solicitation of a number of sources, competition is determined inadequate.
 - b. For purchases over \$25,000, the Program Manager or Director, after obtaining approval from the Executive Director, should request approval from the Federal awarding agency in writing for any procurements that are going to be sole sourced (unless named in the grant budget or grant application). This should be done only after determining that the price for the budget is reasonable.
7. Verification of debarment or suspension. ASOR must check www.SAM.gov to confirm that the potential contractor is not debarred or suspended. A verification should be included in the file for all procurements over \$25,000.
8. Contract Approval. All contracts between ASOR and outside parties must be reviewed and approved by the Executive Director (or responsible position). For federally funded Fixed Amount Awards, all FAAs must have prior approval from the related Federal agency. These policies apply to renewals of existing contracts or FAAs.
9. Procurement records: For purchases over \$25,000, procurement records and files for purchases shall contain sufficient information to document the history of the procurement. These records will include, but are not limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for contract price.

C. Conflict of Interest

Procurement Conflict of Interest Policy

Employees conducting business on behalf of ASOR have a responsibility to do so in a manner that is objective and ethical. The goal of all such business dealings must be to benefit ASOR.

The following policies apply:

1. Violation of this Policy

Employees who violate any of these policy provisions will be subject to disciplinary actions up to and including termination.

2. Financial Gain or Avoidance of Financial Loss

Employees are responsible for being good stewards of the resources entrusted to them. As such, employees are prohibited from using or attempting to use their positions to gain financial benefit or to avoid a financial cost for themselves, a relative, or a member of their household or their business if the opportunity is available only because of the position held by the employee.

Employees should not engage directly or indirectly in a personal financial transaction that primarily relies upon information obtained through ASOR employment and is not otherwise common knowledge. It is inappropriate for employees to purposely direct or influence an ASOR purchase in a manner that provides them with personal financial gain that would not be available to them or avoid a financial loss, if it were not for their position as an ASOR employee.

3. Personal Purchases using ASOR Funds

Employees may not make personal purchases using ASOR funds.

4. Ethical Questions

Employees who are uncertain about whether or not to accept any gift or offer from a supplier are advised to not accept the gift or offer if there are any doubts at all. Supervisors should be made aware of all gifts or offers made to employees. In turn, supervisors should contact ASOR's executive director to discuss any questionable offers and any known violations of this policy.

5. Purchasing from or Contracting with ASOR Employees or the Related Parties of ASOR Employees

Any purchase or contract for the provision of goods or services, regardless of the dollar value, is subject to the provisions of this policy. ASOR may only purchase from or contract with ASOR employees or related parties of ASOR employees (related party as defined below) **if the ASOR employee is not involved in the selection, award or administration of the purchase / contract** and all of the following requirements are met:

- A. The ASOR employee must complete the Procurement Conflict of Interest form and submit to the Executive Director for review.
- B. It has been determined by the Executive Director, through the procedure below, that no real conflict of interest exists.
- C. The ASOR employee or employee's related party must be determined to be an Independent Contractor for the services being proposed. In the case of an ASOR employee as a vendor, the goods or services sought for purchase or contract must be substantially different from the work the employee performs in their employment with ASOR.
- D. If the Executive Director is the employee with a possible conflict of interest, then the Executive Director must complete the conflict-of-interest form and submit it to the President or Treasurer. If President or Treasurer determines that the Executive Director has a potential conflict-of-interest, the Executive Director must be removed from the procurement process and replaced by a person deemed appropriate by the President or Treasurer (who may appointment themselves as a replacement).

For the purposes of this policy, related party includes a spouse, domestic partner, direct descendent, direct ascendant, sibling, dependent, or member of the household.

Procedure:

When a procurement is taking place above \$25,000, the ASOR employees involved in the procurement must submit a completed Procurement Conflict of Interest form to the Executive Director and Finance Manager. The Executive Director or Finance Manager must determine that:

- i. There are no current ASOR contracts in place for the subject goods and services that will meet the department's needs;
- ii. A best effort is made to obtain price comparisons, documenting that the purchase or contract represents the best value to ASOR; and
- iii. The ASOR employee, relative or member of the household has no additional knowledge or information about the purchase that would place them in an unfair advantage to receive this business from ASOR.
- iv. An appropriate process has been conducted to resolve or mitigate the real or potential conflict of interest while complying with ASOR's policies.

See Exhibit F: Procurement Conflict of Interest Form

D. Oversight. ASOR is responsible for the oversight of the operations of the Federal award supported activities. ASOR must monitor its activities under Federal awards to assure compliance with applicable Federal requirements and performance expectations are being achieved. Monitoring by ASOR must cover each program, function, or activity.

E. Contract Provisions. All contracts should include provisions to fully define the relationship between the parties and to protect the interest of ASOR. These include:

- a. Administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, including sanctions and penalties as may be appropriate. (All contracts in excess of the small purchase threshold).
- b. Termination for cause or for convenience by organization including the manner by which it will be effected and the basis for settlement. (All contracts in excess of \$25,000).

F. Competition

When bids are required for certain purchases according to ASOR policy, the Executive Director and/or the Director of the relevant department will lead the process. For example, the Executive Director will organize the bidding process for auditing firms every **five** years and the Director of Meetings will organize the bidding process for audio/visual firms for the Annual Meeting each year (unless AV at a greatly discounted rate has been negotiated as part of the hotel contract).

G. Overseas purchases

When purchases are made outside of the United States, the purchaser should follow local guidelines and make a reasonable effort to have market-accepted prices for the region.

H. Using cash for purchases

When using a credit card or other electronic payment is not possible, cash may be used. Cash should only be used when no other reasonable method is possible. For cash amounts under \$35.00, the spender must write a brief note about the expense (including applicable grant name, amount of purchase, date of purchase, and brief description of what was purchased and by whom). For cash amounts over \$35.00, the same note as described above is required. If feasible and possible, a second traveler should verify the cash purchases. This will not be possible if the purchaser is alone, but if another traveler is present, a second verification should be included when feasible. If the note described above is made on paper, both purchaser and second traveler should sign the note to confirm the note is true and accurate of the cash purchase(s). The note may also be made electronically and sent as an email to the Finance Manager. The second traveler may reply to the email to confirm the accuracy of the note. If the spender is using cash from their personal funds, the Expense Report will need to be completed as instructed in these policies and procedures.

I. Cash advances

When traveling in a country where electronic payments are not possible, cash may be used. If it is anticipated that cash will be required during a trip, the traveler may take out a cash advance from ASOR. The traveler must write a brief description of the advance and how it will be used (amount, grant name, and the purpose of the funds) and send the description to the Executive Director, Finance Manager, or ASOR Treasurer for approval. Once the Executive Director, Finance Manager, or Treasurer has approved the payment, the traveler can make a withdrawal from ASOR funds to bring on their travel. As the cash is spent, the spender must follow the above instructions for Using cash for purchases. If the traveler is unable to access ASOR funds for the advance and uses personal funds, the Expense Report must be completed as required by these policies and procedures upon return for reimbursement.

J. Lost cash

If any cash is lost during travel, that loss cannot be billed to a federal grant and must be billed to ASOR.



Monitoring and Management of Consultants and Contractors

For all federal grant awards, consultants and contractors are monitored by their direct supervisors at ASOR Cultural Heritage Initiatives. The flow of supervision follows the organizational chart. [See Exhibit 2 for the ASOR organizational chart and Exhibit 3 for the ASOR Cultural Heritage Initiatives organizational chart.] Ultimately, the federal grants and their consultants and contractors are all managed and monitored by the Cultural Heritage Initiatives Co-directors.

Monitoring and management includes checking completed work and weekly meetings.

Payments for contractors follow the payment schedule as laid out in the signed contracts. When approaching a payment date, the Finance Manager or Executive Director will check in with the contractor's direct supervisor and inquire if the contractor has met the benchmarks for the next payment. Upon confirmation of benchmarks being met, the Finance Manager or Executive Director will send payment to the contractor and update the Federal Grant Contractor Payments spreadsheet in Dropbox. This spreadsheet tracks the current contracts and payments sent. If benchmarks have not been met, contractors will not be paid on the dates on the contract. The dates are to be used as a guideline for the timeline of payments, but meeting the benchmarks will be the determining factor for payment.

Payments for Fixed Amount Award partners follow the payment schedule as laid out in the signed MOUs. If the MOU includes payment dates, the Finance Manager will check in with one of the Co-Directors of Cultural Heritage Initiatives or another appropriate CHI staff member and inquire if the partner has met the benchmarks for the next payment. Upon confirmation of benchmarks being met, the Finance Manager or Executive Director will send payment to the partner and update the Federal Grant Contractor Payments spreadsheet in Dropbox. This spreadsheet tracks the current MOUs and payments sent. If the MOU includes benchmarks, but no estimated payment dates, the CHI Co-Directors (or other appropriate staff) will alert the Finance Manager when benchmarks have been met and a payment should be made. The Finance Manager or Executive Director will send payment to the partner and update the Federal Grant Contractor Payments spreadsheet in Dropbox. If benchmarks have not been met, Fixed Award Partners will not be paid on the dates on the contract. The dates are to be used as a guideline for the timeline of payments, but meeting the benchmarks will be the determining factor for payment.

When creating contracts with contractors and Fixed Award recipients, milestones are specific so that payments are made when appropriate benchmarks are met. Clauses are also included so that either party can terminate the contract with reasonable (often 30 days) notice.

See 2 CFR 200.331 for more information.

Consultants cannot be paid excessive compensation. See 2 CFR 200.459 for more information.

Travel and Entertainment Policy

Approved by the ASOR Board of Trustees

November 20, 2016

[need to add amendment passed at May 2022 Board Meeting]

[green highlights indicate recommended changes]

I. Purpose

The Board of Trustees of the **American Society of Overseas Research** (ASOR) recognizes that from time to time, ASOR and Cultural Heritage Initiative (CHI) employees, representatives, and agents (excluding the Executive Director) (individually, a “Representative,” and collectively, “Representatives”), and the Executive Director must travel to conduct ASOR business and further ASOR’s mission.

The ASOR Board of Trustees further recognizes that from time to time, the Executive Director must travel and entertain prospective donors, government representatives, and other persons critical to ASOR’s business and mission. In doing so, the Board of Trustees imposes the business judgment rule on the Executive Director; to wit, in deciding whether to incur a travel or entertainment expense, the Executive Director must act on an informed basis, in good faith and in the honest belief that the action taken is in the best interests of ASOR. The Executive Director’s travel and entertainment is subject to review by the ASOR President or ASOR Board Chair at any time upon request.

As a 501(c)(3) non-profit learned society, stewardship of ASOR resources is essential. Representatives and the Executive Director, therefore, are expected to minimize the costs of travel and entertainment wherever possible and reasonable. Thus, the purposes of this Travel and Entertainment Policy are to (i) ensure that travel, entertainment, and other related expenditures are appropriate and reimbursable, (ii) implement and maintain adequate cost controls, and (iii) provide a uniform and consistent protocol for identifying and reporting reimbursable travel and entertainment expenses.

ASOR’s policy is to pay for or reimburse only authorized, reasonable, and necessary travel and entertainment expenses actually incurred by a Representative and the Executive Director. When incurring such expenses, ASOR expects Representatives and the Executive Director to:

- Exercise discretion and good judgment when incurring such expenses;
- Be cost conscious and spend ASOR’s money carefully and judiciously;
- Report travel and entertainment expenses, supported by required documentation, that were actually incurred; and
- Report travel and entertainment expenses on a timely basis.

II. Expense Report

Expenses will not be reimbursed or paid for unless the Executive Director or Representative requesting reimbursement timely submits a written expense report on the ASOR Expense Report form (see Exhibit 5). If possible, the ASOR Expense Report should be submitted to the **Finance**

Manager within ten (10) days of completing travel. If the Finance Manager is the one requesting reimbursement, the Expense Report should be sent to the Executive Director for approval.

Unless there are extraordinary circumstances, all forms must be submitted to the Assistant Director within thirty (30) days of completing the travel. The request must include, *inter alia*:

- The Executive Director's or Representative's name;
- Date, origin, destination and purpose of the trip or entertainment, including a description of each ASOR-related activity conducted during the trip or entertainment;
- Name and affiliation of all people, if any, for whom such travel and entertainment expenses were incurred (*e.*, people on whom the Executive Director spent money conducting ASOR business and furthering ASOR's mission); and
- Itemized list of all expenses incurred (*e.*, date, amount (including tips), vendor, and description).

Expense reports must be approved by the Finance Manager for reimbursement. If the Executive Director is requesting reimbursement, the Expense Report must be approved by both the Finance Manager and the ASOR Treasurer or ASOR President. If the Finance Manager is requesting reimbursement, the Executive Director must approve the Expense Report. No reimbursement funds will be disbursed until the Expense Report is approved.

III. Receipts

Receipts are required for all travel and entertainment expenses greater than \$5.00 regardless of whether they are billed directly to ASOR. No expense greater than \$5.00 will be reimbursed unless the Executive Director or Representative requesting reimbursement submits individual transaction receipts from each vendor (not a payment card statement) with the ASOR Expense Report showing the date, amount, vendor, and description of each expense incurred. Scanned copies or photocopies of individual transaction receipts are acceptable provided the original receipts are retained for inspection by ASOR if requested. If a receipt is not available (*e.g.*, for mileage or tips), a signed explanation must be included.

IV. General Travel Parameters

- A. **Advance Approval.** All trips involving air travel or at least one overnight stay by Representatives must be approved, in advance, by the Executive Director or his/her designee. All trips involving air travel or at least one overnight stay by the Executive Director are subject to the business judgment rule.
- B. **Necessity of Travel.** In determining the reasonableness and necessity of travel expenses, including their authorization, a Representative, the Executive Director, and the President must consider the cost/benefit to ASOR of the proposed travel expenses. The same considerations also must be taken into account in deciding whether the presence of a particular Representative or the Executive Director on a trip is necessary. In determining whether the benefits to ASOR outweigh the costs, less expensive alternatives, such as participation by telephone or video conferencing, or the availability of local programs or training opportunities, must be considered.

- C. **Business and Personal Travel Expenses.** With prior approval, a Representative or the Executive Director traveling on behalf of ASOR may incorporate personal travel into ASOR business trips. ASOR travel, however, may not be arranged at a time that is less advantageous to ASOR, or results in a greater expense to ASOR, in order to accommodate personal travel plans. Any additional expenses incurred as a result of personal travel, including, *inter alia*, airline, train, hotel and rental car upgrades, extra hotel nights, additional stopovers, meals, transportation, incidentals, or other expenses are the sole responsibility of the Representative or the Executive Director and will not be reimbursed by ASOR. Upon request, a Representative or the Executive Director combining ASOR business travel and personal travel must furnish a documented “with and without” travel expense analysis to ensure that ASOR does not reimburse any otherwise non-reimbursable expenses.
- D. **Spouse, Family Members, and Friends.** With prior approval, a spouse, family member, or friend may accompany a Representative on ASOR business travel when the presence of a companion will not interfere with the successful completion of ASOR business objectives. The Executive Director’s spouse, family member, or friend also may accompany the Executive Director on ASOR business travel when the presence of a companion will not interfere with the successful completion of ASOR business objectives. Travel expenses pertaining to a Representative’s or the Executive Director’s spouse, family or friends will not be reimbursed by ASOR. Upon request, a Representative or the Executive Director accompanied by a spouse, family member, or friend on ASOR business travel must furnish a documented “with and without” travel expense analysis to ensure that ASOR does not reimburse any otherwise non-reimbursable expenses.

V. Air Travel

1. **General Parameters.** Air travel reservations must be made as far in advance as possible to take advantage of reduced airfares. If a Representative does not have an ASOR credit card to purchase an airline ticket, the Executive Director, Assistant Director Finance Manager, or their designee may purchase the ticket for the Representative. ASOR will only pay for, or reimburse, the cost of the lowest, non-restrictive coach or economy class fare actually available for direct, non-stop flights (if available) from the airport nearest the Representative’s or Executive Director’s home or the ASOR office to the airport nearest the destination. Domestic airline tickets exceeding \$750 \$500, and international airline tickets exceeding \$1,400 \$1,200, must be approved in advance by the Executive Director or the President or Treasurer, as applicable. If the travel is supported by federal funding, the Fly America Act will take precedence over the least expensive airfare available (see below).
2. **Sufficient Advance Purchase Required.** The most cost beneficial time to purchase an airline ticket is twenty-one (21) days prior to departure, followed by fourteen (14) days prior to departure, and then seven (7) days prior to departure. Absent extenuating circumstances, all airline tickets must be purchased as soon as a Representative or Executive Director becomes aware of the need for air travel at a time consistent with the above purchase window parameter in effect at the time the

Representative or Executive Director becomes aware of the air travel need. If a Representative or Executive Director becomes aware of the need for air travel, but fails to purchase his or her airline ticket in compliance with the above purchase window parameters, ASOR will only pay for or reimburse that portion of the purchase price equal to the cost of the ticket had it been properly purchased in compliance with the above purchase window parameters. The Representative or Executive Director will be responsible for the difference.

3. **Exceptions.** Consistent with federal guidelines, ASOR Representatives, federal grant beneficiaries or contractors, or others seeking reimbursement from ASOR may only be reimbursed for airfare costs up to the basic least expensive unrestricted airfare accommodations offered by commercial airlines that include seat assignments with the following exceptions:
 - When such flights would require circuitous routing; or
 - When such flights would require travel during unreasonable hours; or
 - When such flights would excessively prolong travel; or
 - When such flights would result in additional costs that would offset the transportation savings; or
 - When such flights are not reasonably adequate for the traveler's medical needs. ASOR and the traveler must document these conditions on a case-by-case basis in order for the use of first-class or business-class airfare to be allowable. If the purchase of a business or first-class ticket necessitated by a proposed traveler's medical needs would have a disproportionate impact on the travel budget or allocation, ASOR at its sole discretion may determine that another person should make the trip.
4. **Saturday Stays.** Representatives and the Executive Director traveling on behalf of ASOR are not required to stay over a Saturday night in order to reduce the price of an airline ticket. A Representative or Executive Director who chooses to stay over a Saturday night will be reimbursed for reasonable lodging and meal expenses incurred over the weekend to the extent the expenses incurred do not exceed the difference between the price of the Saturday night stay airline ticket and the price of the lowest price available ticket that does not include a Saturday night stay. To receive reimbursement for such weekend lodging and meal expenses, the Representative or Executive Director must supply, along with the Expense Report, documentation of the amount of the difference between the price of the Saturday night stay and a non-Saturday night stay airline tickets.
5. **Frequent Flyer Miles, Compensation for Denied Boarding, and Hotel and Other Travel Points.** Representatives or the Executive Director traveling on behalf of ASOR may accept and retain frequent flyer miles, compensation for denied boarding, and hotel and other travel points for their personal use. Representatives or the Executive Director may not deliberately patronize a single airline to accumulate frequent flyer miles, or patronize a single hotel or hotel chain to accumulate travel points, if less expensive comparable airline tickets or hotels are available.

VI. Lodging

Representatives or the Executive Director traveling on behalf of ASOR will be reimbursed for the reasonable cost of hotel accommodations at the single room rate. Convenience, the cost of staying in the city in which the hotel is located, and proximity to other destinations on the Representative's or Executive Director's itinerary will be considered in determining reasonableness. Representatives and the Executive Director must make use of available corporate and discount rates for hotels. "Luxury" or "resort" hotel rates will not be reimbursed, in whole or in part, unless prior approval is secured by the Executive Director, **Finance Manager, Treasurer, or President Assistant Director**.

VII. Out-Of-Town Meal and Incidental Expenses (M&IE)

A Representative's or the Executive Director's M&IE (including tips) while traveling out-of-town within the United States on behalf of ASOR will be reimbursed in their entirety subject to a maximum daily allowance equal to the GSA M&IE per diem rate in effect at the Representative's or the Executive Director's destination.

See <http://www.gsa.gov/portal/category/100120> to compute the domestic per diem rate.

Representatives and the Executive Director will be responsible for any M&IE exceeding the domestic per diem rate. A Representative's or the Executive Director's M&IE (including tips) while traveling outside the United States on behalf of ASOR will be reimbursed in their entirety subject to a maximum daily allowance equal to the U.S. Department of State M&IE per diem rate in effect at the Representative's or the Executive Director's destination.

See https://aoprals.state.gov/web920/per_diem.asp to compute the international per diem rate.

Representatives and the Executive Director will be responsible for any M&IE exceeding the international per diem rate.

Notwithstanding the allowed M&IE per diem rates, Representatives and the Executive Director are encouraged to be careful with their expenses. The M&IE per diem rates are the maximum allowed per day; spending less would be better.

For travel paid for by federal grants, Representatives or Implementers may be reimbursed on a per diem basis for lodging and/or M&IE if the Executive Director, Treasurer, or President concludes that the per diem reimbursements are the most expedient and practical way to provide travel reimbursement.

VIII. Ground Transportation

Representatives and the Executive Director are expected to utilize good judgment and use the most economical ground transportation appropriate under the circumstances.

1. **Courtesy Shuttles.** Most hotels near airports have courtesy shuttles running to and from the airport at no charge. This free service should be utilized whenever possible and practical.

2. **Airport Shuttles or Buses.** Airport shuttles generally travel to and from all major hotels outside of the airport area, downtown, and significant suburbs for a small fee.
3. **Taxi** are often the most economical and convenient form of transportation when the trip is for a limited time, minimal mileage is involved, or parking fees or tolls are substantial.
4. **Uber, Lyft, and Other Private Car Services.** The lower cost categories of Uber, Lyft, and other private car services may be utilized in lieu of taxis unless a rental vehicle is more economical and convenient.
5. **Rental** Although rental vehicles are generally the most expensive form of ground transportation, when the trip is for a significant amount of time, substantial mileage is involved, or parking fees or tolls are negligible or nonexistent, a rental vehicle may be the most economical and convenient form of ground transportation. Representatives and the Executive Director are allowed to rent a vehicle while traveling on behalf of ASOR provided the cost is less than alternative methods of transportation and advance approval is secured from the Executive Director or President, as applicable. Representatives and the Executive Director are permitted to rent a vehicle at the cost of a vehicle in the full-size class or lower. The cost of additional options (*e.g.*, GPS, satellite radio, car seats, and insurance) will not be reimbursed; they must always be declined. Representatives and the Executive Director also must decline the “full tank” option and make every effort to refuel the rental vehicle prior to returning it to avoid high refueling costs.

IX. Personal Vehicles

Provided approval is secured in advance from the Executive Director or President **or Treasurer**, as applicable, Representatives and the Executive Director may use their personal vehicles to travel for ASOR business. The actual expenses incurred to operate a personal vehicle, including maintenance and repair expenses, will not be reimbursed. Rather, the use of a personal vehicle for ASOR business will be reimbursed at the current IRS mileage rate for business travel. Unless otherwise agreed or approved in advance by the Executive Director or President **or Treasurer**, as applicable, commuting expenses (*e.g.*, mileage from a Representative’s home to the ASOR office, parking, tolls, and other commuting expenses) will not be reimbursed.

X. Parking/Tolls

Parking and tolls incurred by Representatives and the Executive Director traveling on ASOR business (other than parking and tolls incurred when commuting to the ASOR office as set forth above) will be reimbursed. Traffic and parking tickets, fines, car washes, valet service, and similar vehicle expenses will not be reimbursed. Airport terminal parking is permitted for short business trips. For extended trips, Representatives and the Executive Director should use off-airport, long term parking lots if possible and practical.

XI. Business Entertainment

Reasonable, necessary, and appropriate entertainment expenses incurred to conduct ASOR business and further ASOR’s mission will be reimbursed only if approved in advance by the

Executive Director or President, as applicable, and only if they otherwise qualify as tax deductible expenses. Detailed documentation for such expenses must be provided, including:

- date and place of the entertainment;
- nature of the expenses;
- names, titles, and affiliations of the persons entertained;
- a description of the business purpose for the activity, including the matters discussed; and
- individual transaction receipts from each vendor (not a payment card statement) showing the vendor's name, a description of the services provided, the date, and total expense, including tips (if applicable). Scanned copies or photocopies of individual transaction receipts are acceptable provided the original receipts are retained for inspection by ASOR if requested.

XII. Non-Reimbursable Expenses

ASOR maintains a strict policy that expenses in any category, including otherwise reimbursable travel and entertainment expenses, that are (or could be) perceived as lavish or excessive will not be reimbursed. Such expenses are inappropriate for reimbursement by a nonprofit, charitable organization. Unless otherwise determined in advance to be reimbursable, a Representative's non-reimbursable expenses include, *inter alia*:

- Otherwise reimbursable travel and entertainment expenses that are determined to be lavish or excessive.
- Travel insurance (unless considered prudent by the ASOR Executive Director, Treasurer, or President).
- U.S. Government-funded travel that does not comply with the Fly America Act (see below for possible exceptions).
- First class tickets or upgrades (ASOR will only reimburse up to the price of a non-restrictive, economy / main cabin [or similar] ticket with seat assignment).
- When lodging accommodations have been arranged by ASOR and the Representative elects to stay elsewhere, reimbursement will be limited to an amount no higher than the rate negotiated by ASOR. Transportation between the alternate lodging and the lodging arranged by ASOR will not be reimbursed.
- Hotel upgrades.
- Telephone and internet (unless required to conduct ASOR business and/or program activities. E.g., daily cell service outside U.S., or hotel internet service required to conduct ASOR business).
- Limousine travel.
- Personal entertainment, such as movies, theater, and sporting events.
- Alcoholic beverages.
- Tobacco products.
- Membership dues at any country club, private club, athletic club, golf club, tennis club or similar recreational organization.
- Golf, tennis, or other participatory sporting events.
- Sporting equipment purchase.
- Spa or exercise charges.

- Clothing and shoe purchases.
- Toiletry articles and personal items (unless required because of lost luggage or other travel-related reason that is not covered by travel provider or insurance).
- Expenses for spouses, friends or relatives. If a spouse, friend or relative accompanies a Representative on an ASOR business trip, it is the responsibility of the Representative to determine to make the appropriate adjustments to the Representative's expense reimbursement request.
- Overnight retreats.
- Vehicle maintenance and repairs.
- Personal and incidental expenses.
- All expenses specifically identified as non-reimbursable in this Travel and Entertainment Policy.

This list of non-reimbursable expenses is provided by way of example, and in no way implies that categories of expenses not included on the list are automatically reimbursable.

XIII. Fly America Act Requirement for federally-funded travel

General comments and requirement for the Fly America Act and ASOR Travel:

All air travel and cargo transportation services funded by the federal government are required to use a "U.S. flag" air carrier service. This requirement applies to consultants, contractors, and grantees receiving U.S. government funds, and it applies to other travelers whose travel is paid for by the federal government. A traveler cannot cross the U.S. border to use a foreign airline to avoid being subject to the Fly America Act. If an ASOR employee, contractor, grantee, or beneficiary travels using U.S. government funding, that person must comply with the Fly America Act, or ASOR will not pay for or reimburse that person for airline travel.

Codesharing and ASOR Travel:

Occasionally, two or more airlines will "codeshare" a flight by publishing and marketing the same flight under their own airline designators and flight numbers. A traveler can purchase a seat on either airline's designator and flight number, but the flight is only operated by one of the cooperating airlines. To comply with Fly America regulations, ASOR-funded travelers must purchase such a flight via the U.S. airline's designator and flight number if the flight is shared between a U.S. and a foreign airline.

Exceptions to the Fly America Act

There are some circumstances where it's not reasonable to use a U.S. flag air carrier, and an ASOR-funded traveler can make an exception to the Fly America Act if one of the following circumstances is met:

1. When a U.S. air carrier is not available.
2. When using a U.S. carrier service would extend the travel time by 24 hours or more.
3. When a U.S. carrier does not offer a nonstop or direct flight between origin and destination, and using a U.S. carrier:
 - a. Increases the number of aircraft changes outside the United States by two or more; or
 - b. Extends travel time by six hours or more; or

- c. Requires a connecting time of four hours or more at an overseas interchange point.

Note: To comply with the Fly America Act, the ASOR traveler must use a U.S. flag carrier service for every portion of the route for which it is available unless one of these exceptions is met.

- 4. When the flight time from origin to destination is less than three hours and using a U.S. flag carrier doubles the flight time.
- 5. When there is an applicable [Open Skies Agreement](#) in effect that meets the requirements of the Fly America Act.
 - a. The exceptions provided by the Open Skies Agreements for government-funded travel do not apply if your transportation is funded by the Department of Defense (DOD).

Summary and ASOR Travel Exception Form

Ticket cost and convenience are NOT exceptions to the Fly America Act. If an ASOR traveler does not use a U.S. Flagship or U.S. Codeshare flight, the traveler must complete the ASOR Travel Exception Form (see Appendix I) and have it approved before ASOR funds can be used to purchase or reimburse an airline ticket. If an ASOR-funded traveler is traveling on a U.S. Government-funded project, and if that traveler does not comply with the Fly America Act, ASOR will not purchase and will not reimburse the traveler's airline ticket.

XIV. Final Authority (change number)

The President and Treasurer, or the President's and Treasurer's designee, has the final authority to determine whether an expense is reimbursable under this Travel and Entertainment Policy. Abuse of this Travel and Entertainment Policy, including falsifying expense reports to include expenses not actually incurred or expenses a Representative or the Executive Director knows are not reimbursable, constitutes grounds for immediate disciplinary action.

XV. Policy review (change numbers)

This Policy will be reviewed by the Finance Committee at least every two years; proposed amendments must be submitted to, and approved by, the ASOR Executive Committee and Board of Trustees.

Records Retention Policy

Purpose

In accordance with the Sarbanes-Oxley Act, which makes it a crime to alter, cover-up, falsify, or destroy any document with the intent of impeding or obstructing any official proceeding, this policy provides for the systematic review, retention, and destruction of documents received or created by American Schools of Oriental Research (hereinafter, ASOR) in connection with the transaction of organization business. This policy covers all records and documents, regardless of physical form, contains guidelines for how long certain documents should be kept, and how records should be destroyed (unless under a legal hold). The policy is designed to ensure compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of records, and to facilitate ASOR's operations by promoting efficiency and freeing up valuable storage space.

Document Retention

ASOR follows the document retention procedures outlined below. Documents that are not listed, but are substantially similar to those listed in the schedule, will be retained for the appropriate length of time.

1. Corporate Records
 - a. Annual Reports to Secretary of State / Attorney General: Permanent
 - b. Articles of Incorporation: Permanent
 - c. Board Meeting and Board Committee Minutes: Permanent
 - d. Board Policies / Resolutions: Permanent
 - e. Bylaws: Permanent
 - f. Construction Documents: Permanent
 - g. Fixed Asset Records: Permanent
 - h. IRS Application for Tax-Exempt Status (Form 1023): Permanent
 - i. IRS Determination Letter: Permanent
 - j. State Sales Tax Exemption Letter: Permanent
 - k. Contracts (after expiration): 7 years
 - l. Correspondence (general): 3 years
2. Accounting and Corporate Tax Records
 - a. Annual Audits and Financial Statements: Permanent
 - b. Depreciation Schedules: Permanent
 - c. IRS Form 990 Tax Returns: Permanent
 - d. General Ledgers: 7 years
 - e. Business Expense Records: 7 years
 - f. IRS Form 1099: 7 years
 - g. Journal Entries: 7 years
 - h. Invoices: 7 years
3. Sales Records
 - a. Petty Cash Vouchers: 3 years
 - b. Cash Receipts: 3 years

- c. Credit Card Receipts: 3 years (after 3 months the credit number will be “blacked” out)
 - d. Membership and Subscription Records: 5 years
 - e. Book Sales: 5 years
4. Bank Record
- a. Check Registers: 7 years
 - b. Bank Deposit Slips: 7 years
 - c. Bank Statements and Reconciliations: 7 years
 - d. Electronic Fund Transfer Documents: 7 years
5. Payroll and Employment Tax Records
- a. Payroll Registers: Permanent
 - b. State Unemployment Tax Records: Permanent
 - c. Earnings Records: 7 years
 - d. Garnishment Records: 7 years
 - e. Payroll Tax Returns: 7 years
 - f. W-2 Statements: 7 years
6. Employee Records
- a. Employment and Termination Agreements: Permanent
 - b. Retirement and Pension Plan Documents: Permanent
 - c. Records Relating to Promotion, Demotion or Discharge: 7 years after termination
 - d. Accident Reports and Worker’s Compensation Records: 5 years
 - e. Salary Schedules: 5 years
 - f. Employment Applications: 3 years
 - g. I-9 Forms: 3 years after termination
 - h. Time Cards: 2 years
7. Donor and Grant Records
- a. Donor Records and Acknowledgment Letters: 7 years
 - b. Grant Applications and Contracts: 7 years after completion
8. Legal, Insurance, and Safety Records
- a. Appraisals: Permanent
 - b. Copyright Registrations: Permanent
 - c. Environmental Studies: Permanent
 - d. Insurance Policies: Permanent
 - e. Real Estate Documents: Permanent
 - f. Stock and Bond Records: Permanent
 - g. Trademark Registrations: Permanent
 - h. Leases: 6 years after expiration
 - i. OSHA Documents: 5 years
9. Federal Grant Awards: 3 years from date of submission of final expenditure report

Electronic Documents and Records

Electronic documents will be retained as if they were paper documents. Therefore, any electronic files, including records of donations made online, that fall into one of the document types on the above schedule will be maintained for the appropriate amount of time. If a user has sufficient reason to keep an email message, the message should be printed in hard copy and kept in the

appropriate file or moved to an “archive” computer file folder. Backup and recovery methods will be tested on a regular basis.

Emergency Planning

ASOR’s records will be stored in a safe, secure, and accessible manner. Documents and financial files that are essential to keeping ASOR operating in an emergency will be duplicated or backed up at least every week and maintained off-site.

Document Destruction

ASOR’s accountant (in consultation with its treasurer) is responsible for the ongoing process of identifying its records, which have met the required retention period, and overseeing their destruction. Destruction of financial and personnel-related documents will be accomplished by shredding.

Document destruction will be suspended immediately, upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.

Compliance

Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against ASOR and its employees and possible disciplinary action against responsible individuals. The Executive Director and Chair of the Finance and Audit Committee (ASOR’s treasurer) will periodically review these procedures with legal counsel or the organization’s certified public accountant to ensure that they are in compliance with new or revised regulations.

Records Retention Policy was approved by the ASOR executive committee on September 12, 2009.

Subrecipients:

ASOR does not currently have subrecipients for any federal grants or programs, nor does it plan on having subrecipients in the future. ASOR is utilizing fix-amount awards or contracts with consultants and other entities / organizations.

ASOR Guidelines Regarding Employment Hours and Time Off (Updated January 20, 2022)

The information provided herein supersedes prior additions. Our published policies serve as a reference to you; however, the American Society of Overseas Research (referred to hereon as ASOR) reserves the right to modify, suspend, or delete policies, procedures and programs in whole or in part, at any time, with or without notice. These policies do not confer any rights, privileges or create an entitlement to continued employment at ASOR, establish conditions of employment or create a contract between staff members and ASOR. Unless otherwise stated in a staff members' employment agreement (contract), all ASOR staff members are employed at will and may be terminated with or without cause, and with or without prior notice, at any time at the option of ASOR.

Purpose of these policies

The policies are intended to be a helpful guide to questions that employees may have about employment hours and time off at ASOR. It is not a comprehensive manual of all policies and procedures, but should answer many basic questions about work hours, vacation days, flex-time, and compensatory time off.

Policies and procedures will change from time to time to accommodate changes in circumstances and applicable law. At any given time, existing policy and law(s) will prevail over inadvertent errors or outdated material in this list of policies.

We welcome your constructive feedback and suggestions for future editions, and request that you direct them to the Executive Director.

Working Hours/Flex-Time

Office Hours

The normal working hours of all ASOR staff members are 8:30 a.m. to 5 p.m., Monday through Friday, which equates to a 40-hour workweek. Each staff member is entitled to take a half-hour lunch break daily. If staff members prefer an hour lunch break, he or she may choose either an 8:00AM to 5:00PM or an 8:30AM to 5:30PM workday. Employees may also choose to work from 9:00AM to 5:30PM with a 30-minute lunch break.

Flexitime

At the discretion of the Executive Director, full-time staff members may be allowed to complete the normal 40-hour workweek on a flexitime basis. Normally, under the flexitime policy, the staff member is required to be in the office between the hours of 10:00AM and 3:00PM. The staff member is expected to work the full 40 hours, NOT using the lunch break to make up the 40 hours. Exempt (salaried) employees may need to work beyond 40 hours per week, and exempt employees are not paid for overtime.

If staff members utilize flextime during the normal 40-hour workweek, the times between 9:00AM to 5:00PM that the staff member is out of the office and/or unavailable should be noted on his or her Google calendar that is visible to other staff members. Such notice on the Google calendar should be posted with as far in advance as possible so that other staff members can plan accordingly. The overriding principal with posting unavailable hours on the Google Calendar is to be considerate and fair to your colleagues and team members. Flextime is at the sole discretion of the Executive Director, and permission for individual staff members may be withdrawn at any time for any reason.

Compensatory Time

Exempt (salaried) employees are paid to complete the job, and the normal workweek is 40 hours per week. If the completion of the job requires more than 40 hours in a given week, exempt employees are not paid overtime or given compensatory time off. However, with the permission of the executive director, exempt employees may be able to utilize the flextime policy described above.

Even though exempt employees are not paid for overtime, ASOR offers compensatory time off under certain circumstances.

- If a staff member is required to work at least a half-day on the weekend or on a holiday, he or she may receive compensatory time off. For example, if a staff member is required to work all day on a Saturday for an ASOR board meeting, the staff member may take a compensatory day off. Likewise, if a staff member is required to work all day on Saturday or Sunday to complete a time-sensitive project, the staff member may take a compensatory day off.
- Compensatory time must be approved in writing by the Executive Director and reported to the Finance Specialist (or noted somehow on the Google Form time sheet). If possible, approval of the Executive Director should be received in advance.
- Unlike accumulated vacation time, all compensatory days (or half days) should be expended within forty-five (45) days after they are earned. If this is not practical or feasible, a request for an extension of the compensatory time earned should be made to the Executive Director. Approval of such requests is at the sole discretion of the Executive Director.
- While compensatory days may be used in conjunction with vacation, it is not meant to be accumulated for the express purpose of creating additional extended vacation periods.

Sick Leave

Regular sick time, accumulated by each full-time staff member at the rate of specified in his or her contract or letter of employment, is a privilege to be used only when necessary. Fulltime employees accrue one (1) day of sick time per month. Parttime employees accrue a proportional amount of sick time. Staff members may accumulate a maximum of days of sick leave as specified in his or her contract. Any sick time over and above that specified in his or her contract

shall be forfeited. The sick leave policy is designed to protect a staff member's income should he or she become ill. Sick leave is not intended for personal business. Staff members are not paid for sick leave days they do not use, and if a staff member leaves the employment of ASOR, unused sick days will not be paid. Abuse of sick leave is grounds for disciplinary action and/or termination.

Vacation, Paid Holidays, and Personal Days

Vacation: Except when specified differently in a staff members' contract, all ASOR staff members are entitled to the following vacation schedule. Vacation days are accrued on a monthly basis (at the end of each month), as follows:

0 – 1 year of service	10 working days	(.83/month) (5/6)
2–4 years' service	12 working days	(1/month) (1)
5–8 years' service	15 working days	(1.25/month) (1 ¼)
9+ years' service	20 working days	(1.66/month) (1 2/3)

During the first fiscal year of a staff member's employment, vacation time earned will be prorated in proportion to the number of days the staff member works for ASOR during that fiscal year. A staff member who is terminated during three-month probationary period (if any) is not entitled to vacation benefits. Upon successful completion of the probationary period, however, the vacation time earned during this first three months will be credited to the new staff member's account. Normally, requests to use accumulated vacation days will be granted only after a new staff member has completed four months of continuous service. Each staff member must submit his/her vacation request in writing to the Executive Director as far in advance as possible. Except in extraordinary circumstances, the Executive Director typically will not approve requests submitted less than 3 weeks in advance. Vacation time is not earned during leaves of absence without pay. As with flextime, the overriding principal for notice about vacation time is to be considerate to other ASOR staff and to take into account critical work that needs to be completed.

Accumulating Vacation Time:

All staff members are encouraged to take regular vacations. At the end of each month, the maximum amount of vacation time that a staff member can have accumulated on the books cannot exceed what is specified in his or her contract. Vacation time in excess of this number will be forfeited. At the sole discretion of the Executive Director, and with the written permission of the Executive Director, forfeiture of vacation time accrued may be extended to June 30. At the termination of one's employment, each staff member is entitled to receive the current value of any unused vacation time.

Paid Holidays

Staff members are allowed paid holidays per year as specified on the ASOR website. Currently, the following is a list of those paid holidays (this list is subject to change at the sole discretion of ASOR, but it will be consistent and the same for all ASOR employees):

- (1) New Year's Day
- (2) Martin Luther King, Jr. Day

- (3) President's Day
- (4) Memorial Day
- (5) Independence Day
- (6) Labor Day
- (7) Thanksgiving Day
- (8) Day after Thanksgiving Day
- (9) Christmas Day
- (10) Day after Christmas Day

When a holiday falls on a weekend, the holiday shall be observed on the preceding Friday or following Monday, or such other day, as communicated in advance to staff members. ASOR currently communicates the schedule of observed holiday on the ASOR website. There may be special circumstances, such as the Annual Meeting, that will necessitate staff members working on a paid holiday. When these occasions arise, the Executive Director will inform you in advance and special accommodations will be made.

Personal Days

In addition to the holidays and vacation time listed above, each staff member is entitled to up to two paid personal days. These personal days are earned at the beginning of each fiscal year (July 1). If a staff member is hired after the beginning of the fiscal year, he or she is entitled to a prorated number of days. Personal days must be expended during the fiscal year in which they are earned, and they cannot be carried over from year to year.

Bereavement and Jury Leave

Bereavement: Staff members may be granted up to 3 days of paid emergency leave in any one fiscal year for serious illness and/or death of an immediate family member. All emergency leaves are subject to the approval of the Executive Director. In exceptional circumstances, the Executive Director may grant up to 2 additional days of paid emergency leave in any one fiscal year. Approval of paid emergency leave (bereavement leave) is at the sole discretion of the Executive Director.

Jury Duty: In the event a staff member must be absent because of jury duty, he/she will be compensated at his/her regular rate of pay minus jury duty payments. Exempt employees will make reasonable efforts to keep up with critical ASOR work while on jury duty.

Office Closing for Severe Weather or Other Emergencies

If Fairfax County Public Schools are closed due to severe weather or other emergencies, ASOR employees may choose to work from home, or they may come into the James Strange Center if they feel that it is safe. If an employee was previously scheduled to be off or on vacation for that day, that employee should use the planned vacation day. Employees who normally work remotely should maintain their normal schedule regardless of weather or other emergencies in the Alexandria-area. If employees choose to work from home, they should work the normal number of hours that they would have worked if they had come into the office.

Appendix A: Deadlines for Monthly Reconciliations and Journal Entries

To fulfil ASOR's duties to Charity CFO, the Finance Manager has a deadline of the 10th of the month by which to finish entering all QuickBooks entries for the prior month. On the 10th, the Finance Manager sends an email to ASOR's Charity CFO representative (currently Leea Hudson-Wilson) informing them of the completion of the books for the prior month. The Finance Manager responds promptly to all questions and requests from Charity CFO so Charity CFO can complete its reports and reconciliations on the 15th which they then send to ASOR.

Appendix B: Instructions for submitting or coding general ledger expenses

When an expense has been incurred, the staff member making the purchase keeps a record of the invoice and receipt. That staff person then sends an email to the Finance Manager with the documentation attached (forwarding a receipt or invoice is also acceptable as long as all other information is included in the email). The documentation must include an item list of what has been purchased, the date of purchase, the total amount spent, a brief description of what it is for/why the purchase has been made, and also the method of purchase (e.g. their ASOR credit card or an ASOR bank account ACH transfer via Truist). If the purchase is a federal grant expense, the purchaser must also include in the documentation email the name of the grant, the general category of the expense (e.g. Supplies or Other Direct), and a more detailed description of what has been purchased.

If the purchase is not allocated to a single QuickBooks category then the breakdown of allocation and the reasoning for this allocation must also be included in the documentation email. The allocation must follow the Allocation policy.

If the purchase is for or regarding certain individuals, those individuals must be listed in the documentation email as well. For example, if it is a flight for Hanan Mullins, that must be stated explicitly. If it is a dinner for Andy Vaughn and Will Raynolds, then that must be stated.

When the Finance Manager receives the documentation, they will book it into QuickBooks as an expense listing the appropriate account as found in the documentation along with the amount, date, and the description. If it is a federal grant expense, the Finance Manager will select the appropriate name of the grant as the customer and assign the Federal Grants class to the expense. Throughout the month, as bank activity is imported into QuickBooks, these expenses will be matched to the appropriate bank or credit card account.

Appendix C: Instructions for Creating Detailed Quarterly Federal Financial Reports

Quarterly, the Finance Manager runs a Profit and Loss report in QuickBooks filtered by Customer. The Customer selected is the name of the grant. The date range is selected. All Dates will encompass the entire length of the grant, but reports may be run for a single quarter or from start date to a specific date to capture only a certain date range. To view the detailed ledger, the Finance Manger will click on the Total Expenses amount. This newly-generated report will then be exported as an Excel file. Once downloaded, the file will be renamed according to ASOR's current naming convention and the date the report is saved: Calendar Year Quarter Report for Grant Year Grant Number saved YEAR-MO-DATE. For example, 2022 Qtr 1 Report for DRL 2021 SLMAQM21GR3180 saved 2022-04-13.

The Finance Manager will then add clarifying labels to each total on the far right and add a budget to actual table on the very bottom, left-hand side. This budget can be copied and pasted from any other report for the same grant since it was originally entered directly from the actual budget. The Federal Spent column is then populated by linking each cell to the total for each category. The Remaining column should auto populate, but the Finance Manager will check each one to make sure it calculates correctly.

The Finance Manager then calculates the grand total spent and total direct spent (putting these totals at the very bottom on the right) to double check that the calculations in the budget to actual are correct.

The Finance Manager then creates budget to actual tables for Salaries, Fringe, Travel, and any other categories, as needed. These tables will be created on the right side of each category on the ledger.

Finally, the Finance Manager will utilize the total direct costs amount to calculate the indirect costs for the quarter. This is done by multiplying the total direct spent for the entirety of the grant by .1 then subtracting the total indirect taken so far.

As needed, or as directed by the Executive Director, the Finance Manager may created these reports more frequently than quarterly.

Appendix D: Procedures for Submitting Drawdown and Payment Requests

For all reimbursement grants, the Finance Manager or Executive Director will submit drawdown / payment requests through the PMS system at least monthly, and more frequently as warranted by expenditures or anticipate payments / expenditures.

When the Finance Manager submits the drawdown / payment request, they will save this notification in the folder of Expected Payments. When the Executive Director submits the drawdown / payment request, they will forward notification by email to the Finance Manager so that this notification may be saved in a folder of Expected Payments.

When a ACH payment arrives in Truist, the Finance Manager checks the amount against any notifications in the Expected Payments folder. When the amount is matched, the notification document is attached to the QuickBooks entry of the received payment. See procedures for booking advances and reimbursements.

For advance grants (currently embassy grants and grants from Near Eastern Affairs), the Finance Manager or Executive Director will make monthly drawdowns or withdraws from the High Performance Money Market (HPMM) Account with Truist. If needed, drawdowns or withdraws may be made more frequently. The interest in the HPMM is segregated and used for the purpose of the embassy or other grants in the HPMM.

When reimbursement funds are received from the Department of State for a federal grant, the Finance Manager and Executive Director will notify each other (whoever sees the payment first in the bank activity will notify the other).

The Finance Manager will then create a Bank Deposit in QuickBooks. The Finance Manager will enter the Date of the deposit, select the correct Account in which the funds were deposited, and select Department of State in the Received From field. The Finance Manager will select the appropriate grant income account (the named grant account under the 51000 Grant income: Federal grant account). For example, for funds received for the DRL grant, the account will be 51007 DRL Grant 2021. This account is a subaccount of 51000 Grant income. The Finance Manager will write a concise description in the Description field that will include the time period that these funds relate to and the name of the grant. For example, DRL 2021 Q4 2021 payment. The Finance Manager will select the appropriate Payment Method and enter the Amount in the Amount field. For Class, the Finance Manager will select Federal Grants. In the Memo field, the Finance Manager will type in the date and very concise description. For example, 2022-06-16 DRL Grant fund received. The Finance Manager will then attach any relevant documents to the QuickBooks entry. Relevant documents in this case will include the notification that payment was requested and any other paperwork that has been saved in the same file as that notification.

See the screenshot below for an example of the QuickBooks Bank Deposit:

Bank Deposit Help X

1 online banking matches

Account: 1074 BB&T BB&T Checking - Gen Balance \$404,010.94 Date: 02/02/2022

AMOUNT
\$24,619.45

Tags Manage tags
Start typing to add a tag

Select the payments included in this deposit

<input type="checkbox"/>	RECEIVED FROM	DATE	TYPE	PAYMENT METHOD	MEMO	REF NO.	AMOUNT
<input type="checkbox"/>	(Name not specified)	08/21/2007	Sales Receipt	Check		7066	

Total 0.00
Selected Payments Total 0.00

▼ Add funds to this deposit

#	RECEIVED FROM	ACCOUNT	DESCRIPTION	PAYMENT METHOD	REF NO.	AMOUNT	CLASS
1	Department of State	51007 Grant income: Federal grants: DRL Grant 2021	DRL 2021 Q4 2021 payment	electronic		24,619.45	PROGRAMMING-CULTURAL HERITAGE IN
2							

Other funds total **\$24,619.45**

Add lines Clear all lines

Track returns for customers

Memo
2022-02-02 DRL 2021 income

Cash back goes to Cash back memo Cash back amount
Choose an account

Total **\$24,619.45**

Attachments Maximum size: 20MB

2022-02-02 SF-425 ASOR DRL 2021 grant SLMAGM21GR3180 2021 Qtr 4 signed.pdf (105.3 kb) x
Drag/Drop files here or click the icon

[Show existing](#)

Appendix E: Reviewing Time Sheets and Submitting Payroll:

At the end of each pay period, the Finance Manager will look at the Google Sheet for each salaried employee and check that the employee has filled in their hours and added in comments for all time spent on federal grants. All time must be recorded on this Google Sheet including vacation, sick time, holidays, and personal days. The Finance Manager will also check that the employee has entered their signature and date in the appropriate boxes on the Google time sheet (this procedure will begin with the July 15, 2022, payroll; for both June payrolls, the salaried employee is instead sending a statement of hours confirming the Google time sheet along with a signature). Once satisfied that everything has been completed correctly by the employee, the Finance Manager enters their own signature into the appropriate box on the Google Sheet approving the hours along with the date (for the June payrolls, the Finance Manager will instead sign a brief statement approving the hours and keep these statements on file as well as attaching them to the QuickBooks entry of the payroll).

At the end of each pay period, the Finance Manager will notify the Director of Programs that the Finance Manager time sheet is complete, signed, and dated. The Director of Programs will then sign and date the Google time sheet to approve the hours (this procedure will begin with the July 15, 2022 payroll; for both June payrolls, the Finance Manager is instead sending a statement of hours confirming the Google time sheet along with a signature to the Director of Programs). The Executive Director may also approve of the Finance Manager's time sheet. (For the June payrolls, the Director of Programs will sign a statement approving of the Finance Manager's time sheet and this statement will be kept on file and attached to the QuickBooks entry of the payroll).

When the time to submit payroll is approaching, the Finance Manager sends an email to each hourly employee reminding them of the pay period dates and the deadline to turn in hours. Once the deadline has arrived (or alternatively, when all hourly employees have notified the Finance Manager that their Google time sheets are complete), the Finance Manager looks at each Google time sheet for the pay period and the comments for all federal grant hours. The Finance Manager also checks that the Google time sheet is signed and dated for the pay period (this procedure will begin with the July 15, 2022, payroll; for both June payrolls, the hourly employee is instead sending a statement of hours confirming the Google time sheet hours along with a signature). If the Finance Manager approves of the hours, they will sign and date the Google time sheet (this procedure will begin with the July 15, 2022, payroll; for both June payrolls, the Finance Manager will instead sign a brief statement approving the hours and keep these statements on file and attach them to the payroll entry in QuickBooks). At this point, the Finance Manager will also check the hours for the previous pay period against the payroll journal for that period. This is to ensure that the hours still match. Because the hourly employees need to submit their hours before the end of the pay period, there are occasionally discrepancies between the number of hours worked and the number of hours paid. This discrepancy is resolved with the next payroll. If the hours match, there is no need to do anything. If the hours do not match, the number is added or subtracted, as appropriate, to the current pay period. The Finance Manager will email the hourly employee to notify them of this.

When it is time to turn in payroll, the Finance Manager will submit the salaried employees pay according to the annual salary on file and the hours submitted by the hourly employees (along with any adjustments, if needed) to the Paychex Flex Payroll portal. The Finance Manager then runs a test to produce a payroll journal. This journal is then compared to the previous pay period to check that nothing is amiss. Payroll is then submitted officially via the Paychex Flex Payroll portal.

Appendix F: Procurement Conflict of Interest Form

Procurement: _____

Please give a brief description above of the procurement that this form relates to.

1. Describe any direct or indirect financial interest or other interest you have that poses or may pose a real, apparent, or potential conflict of interest under the policy relevant to this procurement:

2. List any known related party in which you hold a direct or indirect financial interest or other interest relevant to this procurement:

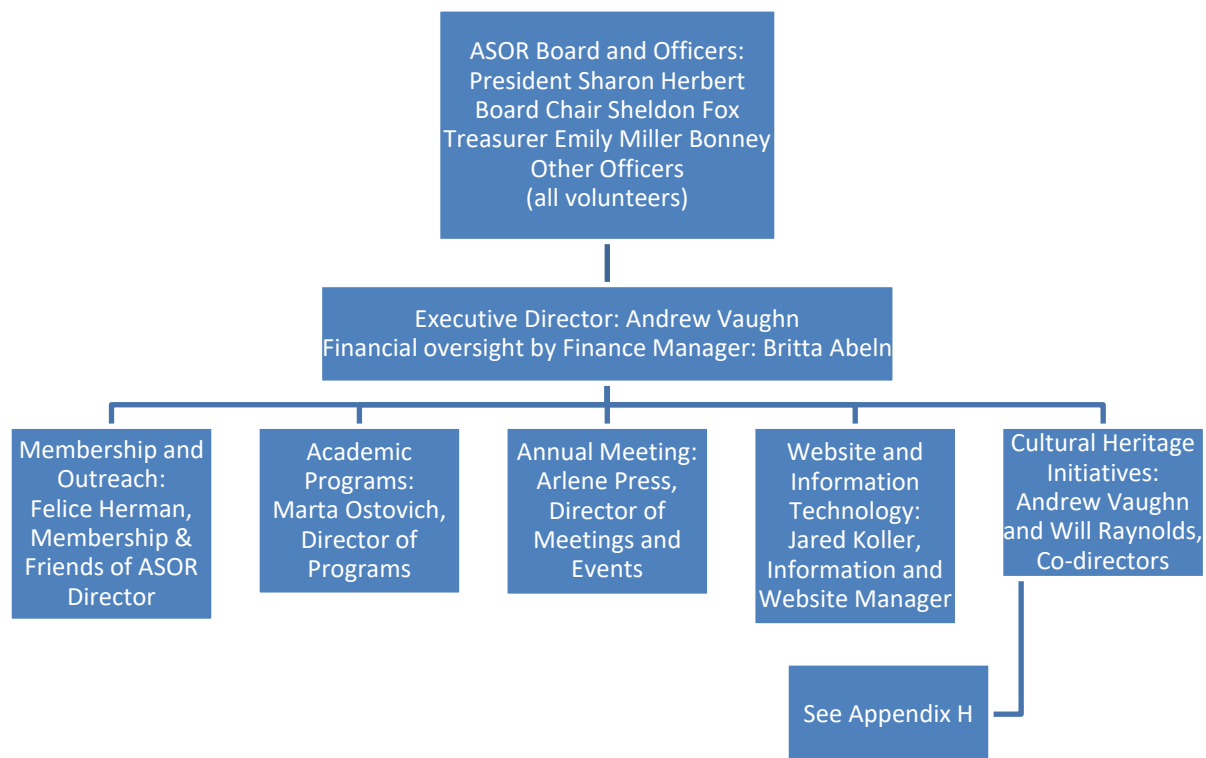
I have read and understand ASOR's Procurement Conflict of Interest Policy. I agree to immediately report any direct or indirect financial interest or other interest and any related party situation that arises during this procurement.

Name: _____

Title: _____

Signature: _____

*When completing the form above, the Procurement line should be concise, but include enough information for someone to be able to determine what this form relates to in the future. For example, "AM22 Open Water A/V contract" would be enough for someone in the future to understand that this is a form related to the contract for audio/visual for the 2022 Annual Meeting since AM## is how ASOR employees commonly refer to a particular year's Annual Meeting.

Appendix G ASOR Organizational Chart:

Appendix I:

ASOR "FLY AMERICA ACT" EXCEPTIONS FORM

INSTRUCTIONS

When a traveler uses a non-U.S.-flag carrier on travel to be charged to federally sponsored awards, this form, along with any relevant supporting documentation, must be completed and submitted for reimbursement.

REQUIRED INFORMATION

Traveler's Name _____ Grant Name _____

Travel Origin _____ Travel Destination _____

Foreign Carrier _____ Dates of Travel _____

EXCEPTIONS

All air travel on federal awards must comply with the Fly America Act (see ASOR's travel policy). In some instances, your airline may use a non-U.S. flag air carrier if it meets one or more of the exception criteria listed in the Federal Travel Regulation guidelines FTR sections 301-10.135-138. **Please check all applicable boxes below where exception criteria are met.** Please note that lower cost and personal convenience are not acceptable criteria for justifying the non-availability of a U.S. flag air carrier.

I. There was no U.S. flag air carrier service available for this itinerary at the time of booking:

Yes No

II. Using a U.S. carrier service would extend travel time by 24 hours or more:

Yes No

III. You must use a U.S. carrier service on every portion of your route that it provides services, unless such use would:

- Increase the number aircraft changes you must make outside of the U.S. by 2 or more; or
- Extend your travel time by 6 hours or more; or
- Require a connection time of 4 hours or more at an overseas interchange point.

IV. The flight time from origin to destination is less than 3 hours and using a U.S. flag carrier would double the flight time:

Yes No

V. There is an applicable Open Skies Agreement in effect that meets the requirements of the Fly America Act (not applicable if transportation is funded by Department of Defense):

Yes No

Certification: I hereby certify that no U.S. flag carriers met the Fly America Act criteria at the time of my trip and that traveling on the foreign air carrier was a matter of necessity. The air travel expense is in compliance with the Federal Travel Regulations and ASOR's policies. Per ASOR's travel policy, I have attached a) a detailed travel itinerary and b) search results performed at the time of booking from an online travel service that document all available flights and the existence of the Fly America exception identified on this exception form.

Traveler's Signature

Date

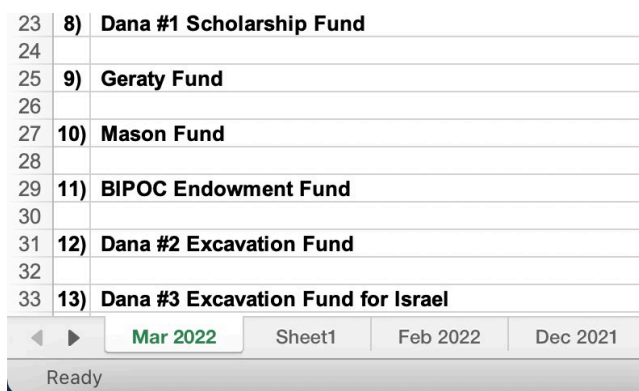
ASOR Approval (if not traveler)

Date

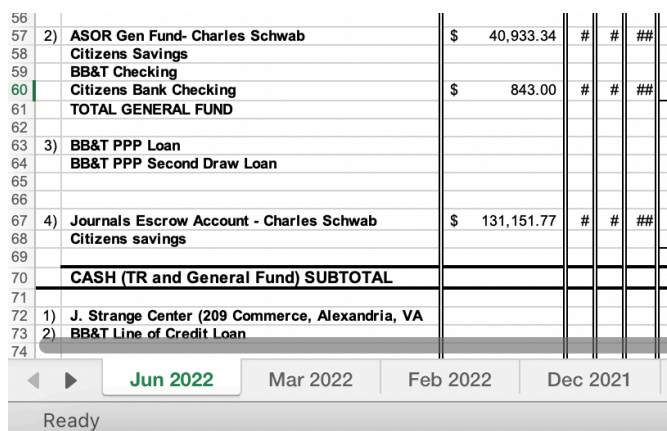
Appendix J—Preparation of Quarterly spreadsheets for Finance Committee (not part of federal grant requirements)

J.1 Net Investment Report: “ASOR Net Investment Report FY22 – as of 2022-09-30”

Location of this spreadsheet: This excel spreadsheet is saved every quarter in the DropBox folder shared by the Executive Director, Finance Manager, Treasurer, other volunteer(s) (if any). The spreadsheet has a separate worksheet for every quarter dating back 17 or 20 years. Care should be taken to create a new worksheet and copy the worksheet from the prior quarter to the new quarter.



Creating a new copy for the new quarter: The screenshot above shows a new worksheet being created for the quarter after “Mar 2022”. After that worksheet is created, the entire worksheet from Mar 2022 should be copied and pasted into the new worksheet and named for the next quarter—in this instance, Jun 2022. The screenshot below shows the new worksheet. Care should be taken to name the new spreadsheet with a filename that reflects the new quarter. All previous spreadsheets should be saved in DropBox in case there is an error in one quarter—one only needs to correct the most recent quarter with the error.



Populating and update the new worksheet: The screenshot below shows the columns that must be updated each quarter. Instructions are below for each column. Some columns are only updated with the new fiscal year.

	Prior Year	Current Qtr	Col S - T	CY Gifts	Dist & Admin	Col (T-U+V)	Col W / R		
	Q	R	S	T	U	V	W	X	Y
'19	FY20	FY21	FY22				FY20 to date	FY20 to date	ASOR
###	30-Jun-20	30-Jun-21	30-Jun-22	Net Change	Contributions	Distributions	Investment Return	% Return	Custom
									Benchmark
							\$ -		-1.0%
###	\$ 137,786.96	\$ 179,808.07	\$ 148,378.27	\$ (31,429.80)		\$ 9,187.00	\$ (22,242.80)		
###	\$ 137,786.96	\$ 179,808.07	\$ 148,378.27	\$ (31,429.80)	\$ -	\$ 9,187.00	\$ (22,242.80)	-12.4%	-1.0%
				\$ -	\$ -				
###	\$ 243,943.50	\$ 317,900.16	\$ 259,199.34	\$ (58,700.82)	\$ -	\$ 18,930.00	\$ (39,770.82)		
###	\$ 243,943.50	\$ 317,900.16	\$ 259,199.34	\$ (58,700.82)	\$ -	\$ 18,930.00	\$ (39,770.82)	-12.5%	-1.0%
###	\$ 85,270.05	\$ 111,319.21	\$ 100,294.88	\$ (11,024.33)	\$ 10,000.00	\$ 5,703.00	\$ (15,321.33)	-13.8%	-1.0%

Prior Year (Column R above): This column does not change except when creating the First Quarter of a fiscal year (i.e., the September 30 worksheet). For the Sept 30 spreadsheet, prior quarter worksheet will have 30-Jun-YY as the “current quarter.” Insert a new column to the right of what is shown as “Column S = 30-Jun-22” above. The new column would be named “FY23 / 30-Sep-22”. For all other quarters (Dec 31, Mar 31, Jun 30), what is shown above as “Prior Year” would not change. Obviously, if you create a new column, the column numbers will change by one letter for columns to the right.

Current Quarter (Column S above): This column will contain the name and data from the previous quarter that was copied in the step above (creating a new spreadsheet). This column in the new worksheet should be renamed to reflect the current quarter. In the screenshot above, 31-Mar-22 was copied from the prior quarter, and it was renamed “30-Jun-22.” After the column has been renamed, you should open every financial statement for the end of the quarter (in this case, June 30, 2022). Toggling between the PDF files for the financial statement, you should copy the ending market value for each account and paste that value into the cell in “Current Qtr” for the name account. In this way, what is shown as Column S above will contain all of the updated market values for each investment and bank account.

For the September 30 worksheet only, use the instructions above under “Prior Year” for creating a new column. The new column will be name 30-Sep-YY, and the market values placed in that columns. The shading for Prior Year should be removed, and the column with 30-Jun-YY becomes your prior year column. If you have questions, look back to archived spreadsheets from September 30 in prior fiscal years.

Appendix K: Procedures for entering federal advancements

When advanced funds are received from the State Department:

Book them as deferred grant income:

1. Book funds as a Bank Deposit.
 - a. Select the bank account in which the funds were deposited.
 - b. Select the date of the deposit.
 - c. Under Add funds to this deposit, select Department of State. under Received From.
 - d. Select Account 2306 Deferred Income: Deferred Income – Grants.
 - e. Include “advance” and the name of the grant in the Description.
 - f. Select the appropriate Payment Method.
 - g. Enter the Amount.
 - h. Select Federal Grants under Class.
 - i. Attach any relevant documentation such as a SF270.

Bank Deposit
Help X

Account: T Checking - General Fund - 0870

Balance: \$257,442.41

Date: 06/13/2022

AMOUNT

\$160,000.00

Tags: Start typing to add a tag Manage tags

Select the payments included in this deposit

<input type="checkbox"/>	RECEIVED FROM	DATE	TYPE	PAYMENT METHOD	MEMO	REF NO.	AMOUNT
<input type="checkbox"/>	(Name not specified)	08/21/2007	Sales Receipt	Check		7066	

Total: 0.00
Selected Payments Total: 0.00

▼ Add funds to this deposit

#	RECEIVED FROM	ACCOUNT	DESCRIPTION	PAYMENT METHOD	REF NO.	AMOUNT	CLASS
1	Department of State	2306 Deferred Income:Deferred Income - Grants	Advance for CPAIG SLY80021GR3016	electronic		160,000.00	PROGRAMMING: CULTURAL HERITAG
2							

Other funds total: **\$160,000.00**

Memo: 2022-06-13 DOS CPANG Advance

Cash back goes to: 1061 Charles Schwab:Checking

Cash back memo:

Cash back amount:

Total: **\$160,000.00**

Attachments: Maximum size: 20MB

SF270-V1 Exp2022 CPAIG 2021 SLY80021GR3016 submitted 2022-03-10 wet scanned signature.pdf

SF270 SLY80021GR3016 for CPAIG 2021 grant as of March 10 2022.docx (39.8 kb)

Drag/Drop files here or click the icon

Show existing

Cancel Clear
Print Make recurring
Save and close

Appendix L: Transferring Federal Advanced Funds to Segregated Savings Account

:
After advanced funds are deposited, Executive Director or Finance Manager will make a transfer from the General Fund (in which the funds arrived) to the HPMM grant funds bank account. When transfer of advance funds is made from Checking to HPMM, book it like this:

1. Book transfer of funds
 - a. Select the bank accounts from and to which the amount was transferred. Enter the amount and date.
 - b. The Memo should name the grant and the relevant time period.
 - c. Attach the transfer documentation.

Transfer ? Help X

1 online banking matches

Transfer Funds From	Balance
1074 BB&T BB&T Checking - Gen	\$117,557.10
Transfer Funds To	Balance
1077 BB&T BB&T DOS Grant Fund	\$148,992.06

Transfer Amount **Date**

Memo

Attachments Maximum size: 20MB

- 2022-06-20 SLY80021GR3016 advance payment.pdf (6.2 kb)
- SF270-V1 Exp2022 CPAIG 2021 SLY80021GR3016 submitted 2022-03-10 wet scanned signature.p
- SF270 SLY80021GR3016 for CPAIG 2021 grant as of March 10 2022.docx (39.8 kb)

Drag/Drop files here or click the icon

Show existing

Cancel Make recurring More Save and close

Appendix M: Procedures for drawdowns or withdraws of federally advanced funds

When a transfer of advance funds is made from HPMM to Checking you must do two separate steps: record the transfer and release the funds.

1. Book transfer of funds
 - a. Select the bank accounts from and to which the amount was transferred. Enter the amount and date.
 - b. The Memo should name the grant and the relevant time period.
 - c. Attach the transfer documentation.

Transfer ? Help X

Transfer Funds From 1077 BB&T:BB&T DOS Grant Func	Balance \$215,879.71
Transfer Funds To 1074 BB&T:BB&T Checking - Gen	Balance \$234,721.26
Transfer Amount 15,784.36	Date 06/20/2022

Memo
To release CPAIG grant funds for use - 2022 Q1

Attachments Maximum size: 20MB
2022-06-20 CPAIG SLY80021GR3016 1st Qtr 2022 grant income transfer.pdf (6.2 kb) x
Drag/Drop files here or click the icon
[Show existing](#)

Cancel Clear Make recurring Save and close

2. Book Journal Entry to release funds:
 - a. Enter the date and journal number (JE M-D-YR).
 - b. Select the deferred grant income account, 2306 Deferred Income: Deferred Income - Grants under Account. Enter the amount in the Debit column.
 - c. In Description, write "To release [specific grant] grant funds for use."
 - d. Select the specific grant under Name.
 - e. Select Federal Grants under Class.
 - f. Select the specific grant income account (it will be under the 51000 Grant income: Federal grants umbrella account) under Account. Enter the amount in the Credit column.
 - g. In Description, copy the description from the line above and paste it here.
 - h. Select the specific grant name under Name (as in step D).
 - i. Select Federal Grants under Class (as in step E).
 - j. Attach the transfer documentation.
 - k. Note: if the transfer takes place in July for a quarter ending in June (aka last fiscal year), date the release JE as 6/30/XX instead of the date of the transfer.

Journal Entry #JE 6-20-22

Help

Journal date

06/20/2022

Journal no.

JE 6-20-22

#	ACCOUNT	DEBITS	CREDITS	DESCRIPTION	NAME	CLASS
1	2306 Deferred Income: Deferred Income - Grants	15,784.36		To release CPAIG SLY80021GR3016 Q1 2022 grant funds for use	CPAIG 2021	PROGRAMMING:CULTURAL HERITAGE INITI
2	51008 Grant income: Federal grants: CPAIG Grant 20		15,784.36	To release CPAIG SLY80021GR3016 Q1 2022 grant funds for use	CPAIG 2021	PROGRAMMING:CULTURAL HERITAGE INITI
3						
4						
5						
6						
7						
8						
Total		15,784.36	15,784.36			

Add lines Clear all lines

Memo

2022-06-20 Release of CPAIG grant funds for use

Attachments Maximum size: 20MB

2022-06-20 CPAIG SLY80021GR3016 1st Qtr 2022 grant income transfer.pdf (6.2 kb) x
Drag/Drop files here or click the icon

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Reverse

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Appendix N: Procedure for making A/R entry for federal reimbursement grant

When A/R entry is needed for a reimbursement grant:

When funds are owed from State Department (used in July for last quarter of last fiscal year), an A/R entry is needed. This is only for grants that reimburse.

1. Book A/R entry.
 - a. Create Journal Entry.
 - b. Enter last day of the quarter this entry is working with (6/30).
 - c. Number the journal as JE 6-30-xx Grants.
 - d. Select 1191 Accounts Receivable and enter the amount in the Debit column.
 - e. With a reimbursing grant, write in Description “To record amount spent in YEAR Q2 on XXX grant to be paid to ASOR.”
 - f. Select the specific grant under Name.
 - g. Select Federal Grants under Class.
 - h. Select the specific grant income account (it will be under the 51000 Grant income: Federal grants umbrella account) under Account. Enter the amount in the Credit column.
 - i. In Description, copy the description from the line above and paste it here.
 - j. Select the specific grant name under Name (as in step F).
 - k. Select Federal Grants under Class (as in step G).
 - l. Attach the transfer documentation.

Journal Entry #JE 6-30-22 Grants
⚙️ Help ✕

Journal date

Journal no.

#	ACCOUNT	DEBITS	CREDITS	DESCRIPTION	NAME	CLASS
1	1191 Accounts Receivable	92,736.41		To record amount spent in 2022 Q2	DRL 2021 Grant	PROGRAMMING-CULTURAL HERITAGE INITIATIVE
2	51007 Grant income-Federal grants:DRL Grant 2021		92,736.41	To record amount spent in 2022 Q2	DRL 2021 Grant	PROGRAMMING-CULTURAL HERITAGE INITIATIVE
3						
4						
5						
6						
7						
8						
Total		92,736.41	92,736.41			

Add lines Clear all lines

Memo

2022-06-30 DRL 2021 A/R

Attachments Maximum size: 20MB

2022-07-21 AR for DRL 2021 Tunisia and Morocco.pdf (37.5 kb) ✕
SF-425 ASOR DRL 2021 grant SLMAGM21GR3180 2022 Qtr 2 signed.pdf (101.5 kb) ✕

Drag/Drop files here or click the icon

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Cancel
Clear
Make recurring
Save
Save and close

Appendix O: Quick Confirmation for PY Trial Balance Matching Audited Financial Statements

After the audit each year (perhaps early December), perform a quick check to make sure everything is in balance. It is also good practice to do this check again before the next audit (July or August). Complete the check with two steps:

Check Trial Balance: To check that the books are in balance with the prior year audit, download a Trial Balance from the fiscal year of the last audit. Find the sum of everything below the balance sheet items. Use the SUM function to add up the entire column of credits below row 3900 Unrestricted Net Assets. Then do the same for the debits column (SUM everything below row 3900 Unrestricted Net Assets). Find the difference between these two sums. This number should match the difference between the total net assets of the two prior years on the audit. To find that number, go to the prior year audit.

Check Audited Financial Statements: Using the prior year audit, go to Statements of Financial Position and find TOTAL NET ASSETS. Take the most recent one (on the left) and subtract it from the year before (on the right). This number should match the difference between the sum of debits and sum of credits from the step above.

With donor restrictions:

Other than endowments	143,383	293,581
Held under endowments	3,855,167	2,735,950
Total net assets with donor restrictions	<u>3,998,550</u>	<u>3,029,531</u>

TOTAL NET ASSETS	<u>6,070,798</u>	<u>4,669,413</u>
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TOTAL LIABILITIES AND NET ASSETS	\$ <u>6,547,519</u>	\$ <u>5,081,043</u>
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If the numbers do not match, it may be a problem with Adjusting Journal Entries from the prior year. Investigate further to see what adjustments need to be made.

Appendix P: Travel Expense Report

COURTESY OF THE UNITED STATES AIR FORCE

Notes:
 Check this box if a travel report for the expense has previously been reported for the same purpose.
 Check this box if a travel report is required for the expense.
 Check this box if a travel report is required for the expense, but no report was filed for the expense.
 Check this box if a travel report is required for the expense, but no report was filed for the expense.
 Check this box if a travel report is required for the expense, but no report was filed for the expense.

No.	Date	Location	Accommodation			Transportation			Per Diem		Other	Total	Remarks	Receipt #	Approved
			Hotel	Rate	Tax	Vehicle	Other	Per Diem	Other						
Cap 1	04/24/12	Fort Worth, TX							150.00		150.00				
Cap 2	04/25/12	Fort Worth, TX							150.00		150.00				
Cap 3	04/26/12	Fort Worth, TX							150.00		150.00				
<p>Report to: _____</p> <p>Approved: _____</p> <p>Signature: _____</p>															

Instructions for completing a TRIP expense report:
 Please submit ALL TRIP expense reports to the appropriate agency (ICAF) if your expense is not listed under the terms of the reporting agency. If your expense is not listed under the terms of the reporting agency, you must submit to your agency for approval. If your expense is not listed under the terms of the reporting agency, you must submit to your agency for approval. If your expense is not listed under the terms of the reporting agency, you must submit to your agency for approval. If your expense is not listed under the terms of the reporting agency, you must submit to your agency for approval.