

**ASOR FINANCIAL MANAGEMENT
PROCEDURE AND CAPACITY**

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

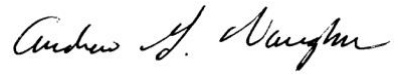


9/15/23

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

(Date)

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



3/23/2023

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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 policies and 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.

See Appendix Q for Separation of Duties Charts

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), identifying the federal grant covering the expense, the activity line item of the grant, and showing 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). The ASOR Treasurer may provide an additional signature if either the Finance Manager or Executive Director is not available for approval. The ASOR Treasurer can also provide a second signature for payments over \$3,000 or payments (reimbursements) to the Executive Director.

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 of federal grants—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 may 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, section Payment Procedures, page 11).

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 for procedure for 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:

- For May Board Meeting:
 - Update Budget to Forecast spreadsheet with March P&L report, and generate the budget forecast from the March P&L report (add appendix).
 - Create next fiscal year budget based on current year budget forecast and expectations for next fiscal year.
- For External Audit Preparation:
 - Update Net Investment spreadsheet (ASOR Net Investment Report), DOS advance payment spreadsheet (DOS revenue and releases), Grants Roll-forward spreadsheet (C-08), Temporary Restricted spreadsheet (C-9.2), Board Designated accounts spreadsheet (C-9.3), and restricted accounts roll-forward spreadsheet (C-09) (add appendix).
 - Check Donations spreadsheet against Contributions report from QuickBooks.
 - Check all restricted gifts on Donations spreadsheet against Temporary Restricted spreadsheet (C-9.2) and transfers/deposits to named accounts.
 - Reconcile all spreadsheets to Trial Balance 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 Trial Balance report and Profit and Loss (P&L) report.
- For November Board Meeting:
 - Using final audited financial statements, update and finalize the Budget to Actual Spreadsheet (long version) and create a short version (summary) 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 current year 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. Lobbying is not an allowable cost. See Lobbying section on page 13.

Allocation Policy

If any cost is split between multiple grants, include a brief note of the 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.

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.

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 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.

Add a section for NICRA and 10% de minimis

ASOR is in the process of working with ASOR volunteers with financial expertise to submit a request for a NICRA.

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 QuickBooks 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).

Using Federal Funds for Fringe Benefits

The cost of fringe benefits (e.g. FICA, employer contributions to retirement) are allowable costs as part of federal awards. ASOR will allocate these fringe costs in the same way that wages and salaries are allocated.

Procedure for allocating federal funds for salaries, wages, and benefits:

To calculate that all wages, salaries, and benefits are allocated fairly, payroll costs are calculated in the same way each pay period. The Finance Manager copies each employee's total hours for the pay period (aggregated by category) from their Google Time Sheet into the Payroll Class Breakdown spreadsheet. This spreadsheet is set up to then calculate the percentage of time spent on each federal grant and each major category of non-federal time at ASOR (e.g. Annual Meeting and Events, Journals, etc.) based on the actual hours worked. The formulas set up in this spreadsheet then use those percentages to calculate the dollar amount for each person's paycheck that is spent on each category or grant based on their total pay for that pay period. The dollar amounts for each category and grant are then entered into QuickBooks for each employee's pay and benefits by the Finance Manager. The Payroll Class Breakdown spreadsheet's formulas use the same percentages by category/grant for both pay and benefits.

Paid leave has not been included in the calculations for any federally-funded grant pay or benefits up to the time of this writing (September 15, 2023).

Paid leave is another part of fringe benefits that is an allowable cost under federal awards. This leave must be documented on the Google Time Sheet of the employee in the same way that all paid time is documented. The paid leave must then be allocated equitably to all related activities, including federal awards, for it to be allowable.

Procedure for allocating federal funds for paid leave:

To calculate that all paid leave is allocated fairly across federal grants and non-federal categories, the paid leave is allocated based on the percentage of time the employee has worked on each of those grants/categories for the past twelve (12) pay periods (i.e., the past six months). The Finance Manager will calculate the average of the percentage of time spent on each grant or category for the past twelve (12) pay periods (using the same Payroll Class Breakdown spreadsheet). These percentages will be used to allocate the paid leave (pay and benefits) across all categories and federal grants. If an employee has not been employed for six months, the average for paid leave will be calculated on as many pay periods as possible (up to 13 pay periods).

Lobbying

ASOR does not allow any costs associated with lobbying as a part of federal spending as per 2 CFR 200.450. This includes costs associated with attempts to influence (directly or indirectly) an employee or officer of the executive branch of the federal government or influence the outcomes of any Federal, state, or local election, referendum, initiative, or similar procedure, through in-kind or cash contributions, endorsements, publicity, or similar activity. These unallowable costs also include any attempt to influence the introduction of legislation (Federal or state) or the enactment or modification of any pending legislation. Legislative liaison activities are also considered unallowable lobbying costs if they are in support of or preparation for engaging in unallowable lobbying activities.

In following this policy, ASOR does not enter into contractual agreements with persons intending to engage in unallowable lobbying activities or incur unallowable lobbying costs on ASOR's behalf.

For exceptions to the unallowable lobbying policies, see 2 CFR 200.450.

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 Appendix 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.

Prohibition on Certain Telecommunications Services or Equipment

ASOR and its subrecipients are prohibited from obligating or expending grant funds to procure or obtain, or enter into a contract to procure or obtain equipment, services, or systems that use covered telecommunications equipment or services as a substantial or essential part of any system, or as critical technology as part of any system. Covered equipment or services include technology produced by Huawei Technologies Company or ZTE Corporation (or any subsidiary or affiliate of such entities). This is in accordance with 2 CFR Part 200.216

Domestic Preferences for Procurements

In accordance with 2 CFR Part 200.322, as appropriate and to the extent consistent with law, ASOR should, to the greatest extent practicable under a Federal award, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States. The requirements of this section must be included in all subawards including all contracts and purchase orders for work or products under this award.

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.”

Emergency or Exigent Circumstances Exception

ASOR may award non-competitive contracts to address threats to life, public health or safety, or other dangerous situations in cases of emergency or exigency.

In the case of an emergency, there is a threat to life, public health or safety, improved property, or some other form of dangerous situation that requires immediate action to alleviate the threat. Emergency conditions are generally more short-lived than exigency circumstances.

In the case of an exigency, there is a need to avoid, prevent, or alleviate serious harm or injury, financial or otherwise, to the applicant, and use of competitive procurements would prevent the urgent action required to address the situation. Thus, a noncompetitive procurement may be appropriate.

In an emergency or in exigent circumstances, ASOR should take the following steps:

- A. Write a justification to describe the emergency or exigent circumstances: Explain why sole-sourcing is necessary based on the specific conditions and circumstances that demonstrate why immediate or urgent action is needed. Include specific steps taken to determine why full and open competition could not have been used. A separate justification is required for every sole-sourced contract. Include which of the four circumstances justify a noncompetitive procurement:
 1. The item is available only from a single source.
 2. The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation.
 3. The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from ASOR.
 4. After solicitation of a number of sources, competition is determined inadequate.
- B. Provide a brief description of the goods or services: Justify the need for the specific good or service being contracted to address the emergency or exigency circumstances.
- C. Estimate the expected dollar amount of the goods or services: A cost or price analysis is required for all procurement transactions above \$250,000.
- D. Describe any known conflicts of interest and efforts made to identify possible conflicts of interest. If no efforts were made, explain why.
- E. Define and justify the period of emergency or exigency for the specific situation: The period of emergency or exigency circumstances may vary per incident.
- F. Transition to a competitively bid contract as soon as the emergency or exigent period ends: Failure to plan for transition to a competitively bid contract cannot be the basis for continued use of the emergency or exigency exception.

ASOR may sole-source during emergency or exigent circumstances, but must still following these federal procurement regulations:

- Contracts must include the required contract clauses (see section Monitoring and Management of Consultants and Contractors, page 22).
- Contract must be awarded to a responsible contractor.
- Complete a cost or price analysis to determine that the cost or price of the contract is fair and reasonable if the contract exceeds or is expected to exceed the Federal simplified acquisition threshold (currently \$250,000).

- Contract must not be a cost-plus-percentage-of-cost contract type.
- Document any known conflicts of interest and any efforts that were made to identify possible conflicts of interest before the sole-sourced contract was awarded.

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.

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.
10. Unnecessary purchases: Anyone making a purchase on behalf of ASOR must be careful to avoid unnecessary or duplicative purchases. To do so, the purchaser will check with other staff members or implementers who may already have the item or may have an alternative that could be used instead of making a new purchase.
11. Procurement disputes: ASOR is responsible for the settlement of all issues and disputes relating to procurement. ASOR will use alternate means of dispute resolution or other mutually agreeable procedures for resolving claims whenever possible. In all instances of disputes involving federally-awarded funds, the awarding agency will be notified of the dispute. Violations of law will be referred to the local, state, or federal authority having proper jurisdiction.
To avoid issues and disputes, ASOR will be proactive in being clear in its intentions and requisites. ASOR will be clear and accurate in its technical requirements for items or services to be procured. ASOR will also be clear and accurate in its expectations and obligations in contracts.
12. Security exemptions: see Emergency or Exigent Circumstances Exception (page 15).

Procurement 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 (Appendix F) 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 (see Appendix F) 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 Appendix F: Procurement Conflict of Interest Form

Procurement 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.

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).

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 (5) 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).

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.

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.

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.

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

Consultants and Contractors Monitoring

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 Appendix G for the ASOR organizational chart and Appendix H 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.

Consultants and Contractors Payments

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.

Consultants and Contractors Contracts

When creating contracts with contractors and Fixed Award recipients, milestones are specific so that payments are made when appropriate benchmarks are met.

When writing contracts, a number of certain clauses must be included.

Termination clauses are included so that either party can terminate the contract with reasonable (often 30 days) notice. Termination for cause and for convenience clauses are required for all contracts over \$10,000, but it is recommended to include them in all contracts even when not

required. Clauses addressing termination for cause and for convenience must include the manner by which it will be effected and the basis for settlement.

ASOR must include in its contracts that the choice of law is the Commonwealth of Virginia in the United States. An example of that clause is as follows:

CHOICE OF LAW. Regardless of its place of physical execution or performance, the provisions of this Agreement will in all respects be construed according to, and the rights and liabilities of the Parties will in all respects be governed by, the laws of the Commonwealth of Virginia, USA, without regard to the law of conflicts. Consultant will submit to the jurisdiction of the courts of Virginia, USA with regard to any claim, action, or proceeding arising out of and/or pertaining to this Agreement.

If ASOR enters into any funding agreements with the federal government, it is required to include a rights to invention clause. A funding agreement is defined as any contract, grant, or cooperative agreement entered into between any federal agency, other than the Tennessee Valley Authority, and any contractor for the performance of experimental, developmental, or research work funded in whole or in part by the federal government. This includes any assignment, substitution of parties, or subcontract of any type under a funding agreement. Examples of this clause are as follows:

RIGHTS TO INVENTION. All rights to inventions and materials generated under this contract are subject to regulations issued by the federal government and the sponsor of the federal grant under which this contract is executed.

RIGHTS TO INVENTIONS. CONSULTANT agrees to comply with all applicable provisions of 37 CFR Part 401, "Rights to Inventions Made by Non-Profit Organizations and Small Business Firms Under Government Grants, Contracts, and Cooperative Agreements.

A disbarment and suspension clause must be included in all contracts greater than \$25,000, all contracts that require the consent of an official of a federal agency, and all contracts for federally required audit services. These are all considered covered transactions. This clause will exclude parties that are debarred, suspended, or otherwise ineligible or excluded from participation in federal assistance programs and activities. No one listed on the SAM Exclusions list may participate in a covered transaction. An example of a debarment and suspension clause is as follows:

SUSPENSION AND DEBARMENT. 1) This contract is a covered transaction for purposes of 2 C.F.R. Part 180 and 2 C.F.R. Part 3000. As such, the contractor is required to verify that none of the contractor's principals (defined at 2 C.F.R. § 180.995) or its affiliates (defined at 2 C.F.R. § 180.905) are excluded (defined at 2 C.F.R. § 180.940) or disqualified (defined at 2 C.F.R. § 180.935). 2) The contractor must comply with 2 C.F.R. Part 180, subpart C and 2 C.F.R. Part 3000, subpart C, and must include a requirement to comply with these regulations in any lower tier covered transaction it enters into. 3) This certification is a material representation of fact relied upon by (insert

name of recipient/subrecipient/applicant). If it is later determined that the contractor did not comply with 2 C.F.R. Part 180, subpart C and 2 C.F.R. Part 3000, subpart C, in addition to remedies available to (insert name of recipient/subrecipient/applicant), the federal government may pursue available remedies, including but not limited to suspension and/or debarment. 4) The bidder or proposer agrees to comply with the requirements of 2 C.F.R. Part 180, subpart C and 2 C.F.R. Part 3000, subpart C while this offer is valid and throughout the period of any contract that may arise from this offer. The bidder or proposer further agrees to include a provision requiring such compliance in its lower tier covered transactions.”

See 2 CFR 200.331 for more information.

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

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 Travel and Entertainment Policy

**Approved by the ASOR Board of Trustees November 20, 2016.
Amended by the ASOR Board on May 8, 2022 and April 16, 2023.**

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. Requests by the Executive Director for reimbursement under this policy should be reviewed and approved by the Treasurer or the President.

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 Appendix P). 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 Finance Manager 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, 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, and international airline tickets exceeding \$1,400, 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.

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 travelers 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

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

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.

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) Memorial Day
- (4) Juneteenth 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.

CONFLICT-OF-INTEREST POLICIES

1. Reason for Statement

American Society of Overseas Research (hereafter, ASOR), as a nonprofit, tax-exempt organization, depends on charitable contributions from the public. Maintenance of its tax-exempt status is important both for its continued financial stability and for the receipt of contributions and public support. Therefore, the operations of ASOR first must fulfill all legal requirements. They also depend on the public trust and thus are subject to scrutiny by and accountability to both governmental authorities and members of the public.

Consequently, there exists between ASOR and its board, officers, and management employees a fiduciary duty that carries with it a broad and unbending duty of loyalty and fidelity. The board, officers, and management employees have the responsibility of administering the affairs of ASOR honestly and prudently, and of exercising their best care, skill, and judgment for the sole benefit of ASOR. Those persons shall exercise the utmost good faith in all transactions involved in their duties, and they shall not use their positions with ASOR or knowledge gained there from for their personal benefit. The interests of the organization must have the first priority in all decisions and actions.

2. Persons Concerned

This statement is directed not only to board members and officers, but to all employees who can influence the actions of ASOR. For example, this includes all who make purchasing decisions, all other persons who might be described as “management personnel,” and all who have proprietary information concerning ASOR.

3. Key Areas in Which Conflict May Arise

Conflicts of interest may arise in the relations of directors, officers, and management employees with any of the following third parties:

- Persons and firms supplying goods and services to ASOR
- Persons and firms from whom ASOR leases property and equipment
- Persons and firms with whom ASOR is dealing or planning to deal in connection with the gift, purchase or sale of real estate, securities, or other property
- Competing or affinity organizations
- Donors and others supporting ASOR
- Recipients of grants from ASOR
- Agencies, organizations, and associations that affect the operations of ASOR
- Family members, friends, and other employees

4. Nature of Conflicting Interest

A material conflicting interest may be defined as an interest, direct or indirect, with any persons and firms mentioned in Section 2. Such an interest might arise, for example, through

- Owning stock or holding debt or other proprietary interests in any third party dealing with ASOR.
- Holding office, serving on the board, participating in management, or being otherwise employed (or formerly employed) by any third party dealing with ASOR.
- Receiving remuneration for services with respect to individual transactions involving ASOR.
- Using ASOR's time, personnel, equipment, supplies, or good will other than for approved ASOR activities, programs, and purposes.
- Receiving personal gifts or loans from third parties dealing with ASOR. Receipt of any gift is disapproved except gifts of nominal value that could not be refused without discourtesy. No personal gift of money should ever be accepted.

5. Interpretation of This Statement of Policy

The areas of conflicting interest listed in Section 3, and the relations in those areas that may give rise to conflict, as listed in Section 4, are not exhaustive. Conceivably, conflicts might arise in other areas or through other relations. It is assumed that the trustees, officers, and management employees will recognize such areas and relation by analogy.

The fact that one of the interests described in Section 4 exists does not mean necessarily that a conflict exists, or that the conflict, if it exists, is material enough to be of practical importance, or if material that upon full disclosure of all relevant facts and circumstances that it is necessarily adverse to the interests of ASOR.

However, it is the policy of the board that the existence of any of the interests described in Section 4 shall be disclosed on a timely basis and always before any transaction is consummated. It shall be the continuing responsibility of board, officers, and management employees to scrutinize their transactions and outside business interests and relationships for potential conflicts and to immediately make such disclosures.

6. Disclosure Policy and Procedure

Disclosure should be made according to ASOR standards. Transactions with related parties may be undertaken only if all of the following are observed:

1. A material transaction is fully disclosed in the audited financial statements of the organization;
2. The related party is excluded from the discussion and approval of such transaction;
3. A competitive bid or comparable valuation exists; and
4. The organization's board has acted upon and demonstrated that the transaction is in the

best interest of the organization.

5. Staff disclosures should be made to the chief executive (or if he or she is the one with the conflict, then to the designated committee), who shall determine whether a conflict exists and is material, and if the matters are material, bring them to the attention of the designated committee.

7. Disclosure involving directors should be made to the designated committee.

The board shall determine whether a conflict exists and is material, and in the presence of an existing material conflict, whether the contemplated transaction may be authorized as just, fair, and reasonable to ASOR. The decision of the board on these matters will rest in their sole discretion, and their concern must be the welfare of ASOR and the advancement of its purpose.

For the purposes of making such determinations, the ASOR board designates this responsibility to the Finance and Audit Committee. The chair of said committee (the Treasurer) will make reports as necessary to the board chair and the ASOR board.

DATA PROTECTION & PRIVACY POLICY

The American Society of Overseas Research (ASOR) is serious about protecting the information that is collected from ASOR members, donors, meeting attendees, authors, and others who interact with ASOR via our website, Online Store, Abstract Management System, Mobile App, and Social Media sites. ASOR's [Privacy Policy](#) (page 46) explains why information is collected, how it is used, how long it is stored, and includes information on how you can change or delete the information that is retained by ASOR. You always have the option to opt-out of receiving communications from ASOR at any time by contacting ASOR's Data Protection Officer at data-protection-officer@asor.org. We are committed to implementing our Privacy Policy in conjunction with the European Union's [General Data Protection Regulation](#) (GDPR) and require that the processors we partner with are GDPR compliant.

Contact Us

ASOR's Data Protection Officer will respond to all inquiries regarding our privacy policy and GDPR compliance. You can send an "opt-out" request to the Data Protection Office if you would like to be deleted from ASOR's records. Please note that this will end all communication from ASOR, including Annual Meeting updates, event reminders, scholarship and award notices, and other reminders.

E-mail ASOR's Data Protection Officer at: data-protection-officer@asor.org
American Society of Overseas Research
209 Commerce St.
Alexandria, VA 22314
E-mail: info@asor.org
Telephone: 703-789-9229

ASOR Privacy Policy May 2018

The American Society of Overseas Research (ASOR) is committed to protecting the privacy of those who use our website, social media outlets, mobile App, and other services. ASOR does not use illegal or misleading methods to mine public data. All data is obtained through normal business practices including, but not limited to, donations, membership applications, online registrations, authorship, online purchases, purchased lists, and trade shows. Users are informed when their personal information is requested and it is their choice to submit this information.

By using the ASOR website, our database/Online Store, our mobile App, our abstract management system, and any of our services, you consent to the practices outlined in this Privacy Policy. You “opt-in” when submitting your personal information to any of ASOR’s databases, or requesting that ASOR staff enters information on your behalf. If you do not agree with this policy, or any part of the policy, you should not use any of ASOR’s services including, but not limited to, the website, mobile Apps, our Online Database/Store (powered by **Rhythm**), and our abstract management system.

Your Personal Information

ASOR collects full names, mailing addresses, e-mail addresses, telephone numbers, and other information (including demographic) when you register for a meeting, purchase a membership, submit a paper or poster proposal, make a donation, register as a Friend of ASOR, or use any of the features provided in our Online Database/ Store (hosted by **Rhythm**). There may be other times when your data is collected, but you will always be notified and asked to opt-in before submitting information.

Use of Your Information

ASOR uses the information we collect to contact members, conduct business, promote meetings and opportunities, and to enhance the services we provide. This information helps us to track membership, meeting attendance and demographic trends, as well as to fulfill contractual obligations and respond to your concerns. We recognize that the information you provide is private and limit the use of your personal data to provide services such as:

- **Membership** – to maintain your membership benefits and to provide membership renewal reminders and ensure accurate billing information
- **Registration** – to contact you regarding meetings and events that you are currently registered for or that you may be interested in attending
- **Publications** – to send you journals or publications to which you have subscribed or requested
- **Outreach** – to enhance and promote ASOR’s services including membership, meetings, donations, and publications

Sharing and Storing Your Information

Third-Party Providers: ASOR stores personal information in servers hosted by third-parties (for example, **Rhythm** services our Online Database and Store; Oxford Abstracts services our Abstract

Management System, and Mobile App providers change regularly). These providers are GDPR compliant, however, ASOR is not responsible for third-party compliance and security.

Credit Card Information: When purchasing a product or service online, users are asked to provide a credit card number to complete their transaction. ASOR does not store credit card information after the transaction is complete, however, it does maintain a reference number provided by its credit card gateway, **Clover Connect**. ASOR follows Payment Card Industry (PCI) standards for all online and paper sales, and this practice is accepted by PCI.

External Sites and Links: Any information you elect to make publicly available on our sites, including social media and the ASOR Blog, will be available to others. Even if that information is removed, cached or archived pages may retain that information, as well as any person who has copied and saved the information. As a service to our users, our website and the ASOR Blog include links to other sites of interest. ASOR is not responsible for the content or use of information of non-ASOR sites and disclaims all liability for damages arising out of their use or for their privacy policies.

Cookies: When a user visits our website or the ASOR Blog, a temporary cookie (or file) is used to aid navigation on our website, but the cookie is not used to collect information. ASOR does not use tracking cookies or third party cookies. Third-party sites that you may be linked to (such as FaceBook, YouTube, Google, etc.) may install cookies depending on their configuration. You are not required to accept any cookies to use our sites. You can [disable cookies](#) on your browser to prevent from being recognized on return visits.

Mailing lists: ASOR occasionally rents mailing addresses to advertisers for one-time use, but does not release telephone numbers. ASOR maintains systems that guard against unauthorized or multiple uses of addresses.

Data Collected Automatically: We use a tool called “Google Analytics” to collect information about use of the ASOR website and Blog. Google Analytics collects information such as how often users visit these sites, what pages they visit when they do so, and what other sites they used prior to coming to these sites. We use the information we get from Google Analytics only to improve the ASOR website for our users. Google Analytics collects only the IP address assigned to you on the date you visit these sites, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personal information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit a site, the cookie cannot be used by anyone but Google. Google’s ability to use and share information collected by Google Analytics about your visits to this site is restricted by the [Google Analytics Terms of Use](#) and the [Google Privacy Policy](#). You can prevent Google Analytics from recognizing you on return visits to our sites by [disabling cookies](#) on your browser.

Retaining Your Information

ASOR will retain the personal data you supplied for membership, meeting registration, donations, publications, or other services for as long as the event, product, or contractual agreement is active, and for a period of time after that in order to contact you regarding ASOR’s services. In addition, ASOR retains member records for statistical and demographic information. When you create a profile in ASOR’s database (hosted by **Rhythm**), you will choose which information you share with ASOR and have the opportunity to opt out of making this information public in the ASOR member

database. If you correspond with ASOR via e-mail, the postal service, social media, web-forms, and other forms of communication, we may retain the correspondence and the information it contains. Please read [ASOR's Policy on Record Retention](#) for further information.

Protecting Your Information

ASOR is committed to making reasonable efforts to secure the information that you choose to provide. The company that we use to process credit card payments has implemented security technologies and procedures to protect against unauthorized access to your information. They do not retain, share, store or use personal information for any other purposes. Unfortunately no method of transmission over the Internet or method of electronic storage is 100% secure. As a result, ASOR cannot guarantee that your information may not be accessed, disclosed, altered or destroyed by a breach of any of our methods of safeguarding data. ASOR has no responsibility or liability for the security of information transmitted via the Internet. If you have any questions about this Privacy Policy or concerns regarding security on our sites you can contact ASOR's Data Protection officer at data-protection-officer@asor.org.

Accessing and Updating Your Information

ASOR acknowledges that you have the right to access your personal data. Upon request, ASOR will provide you with information about the personal data we hold and if it has been shared in any way. Our website and mobile App allow you to access, correct, amend, or delete inaccurate data. When you create a profile in any of our online servers, you should carefully consider the personal information you submit and the information you make public. Current ASOR members may access an ASOR membership directory containing the names and addresses of ASOR members who have not opted out of the membership directory.

To manage your personal data, [login to your account](#) or email our [Data Protection Officer](#) to submit a request. Any changes you make, or that ASOR staff make on your behalf, will be reflected in the database instantly or within a reasonable period of time. We may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that there is a legitimate reason to do so.

Opting Out and Erasing Your Information

ASOR uses email addresses to correspond with individuals regarding a variety of reasons, including invitations to write for ASOR, scholarship announcements, membership information, meeting information and publications. You may opt out of these emails by clicking the optout link at the bottom of the email or by contacting ASOR's [Data Protection Officer](#).

In accordance with the EU's GDPR legislation, individuals have "the right to be forgotten." You may request to have your personal information deleted from our records, and we will comply if it is no longer needed to conduct necessary business. We may not delete your data when legitimate interests outweigh your right to erasure, such as outstanding invoices, legal proceedings, security, and conducting business essential to our organization. If we have shared your data with others, we will tell them about the erasure where possible. You have the right to file a complaint if you have a concern about the way we have handled your personal data and/or request for erasure.

Privacy Policy Changes

ASOR may update this Privacy Policy as our services and products change, or as necessary to improve data protection. We reserve the right to amend the Privacy Policy at any time, for any reason, and may do so by posting a new version online. Your continued use of the website and other services, as well as providing personal data to us, will be subject to the terms of the then-current Privacy Policy. If we make any material changes or if otherwise required by the applicable law, we will notify you by email (sent to the email address specified in your account) or post a notice on this website prior to the change becoming active. We encourage you to periodically review this page for the latest information on our privacy practices.

Contact Us

If you have any questions regarding ASOR's Privacy Policy, GDPR compliance, or general concerns about your personal data, please send an email to ASOR's Data Protection Officer. Please note that if you opt out from receiving ASOR e-mails or if you delete your e-mail from the ASOR database, this will end all communication from ASOR, including Annual Meeting updates, membership information, scholarship and award announcements, and other reminders.

E-mail ASOR's Data Protection Officer at: data-protection-officer@asor.org

American Society of Overseas Research

209 Commerce St.

Alexandria, VA 22314

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Telephone: 703-789-9229

**ASOR Gift Acceptance Policy
November 2017**

I. Introduction and Purposes of the Policy

- 1.1.** The Board of Trustees of the American Society of Overseas Research (ASOR) recognizes that from time to time, ASOR solicits and receives gifts of money and other property. Stewardship of ASOR resources, including the solicitation, evaluation, acceptance, and management of gifts made to the organization, is essential. ASOR Trustees have a fiduciary duty to carefully evaluate gift solicitation programs and prospective gifts to insure the financial stability of the organization in a manner that is consistent with, and supports, ASOR's Bylaws, Policies, Policy on Professional Conduct, Mission, Programs, and Strategic Plan.
- 1.2.** This Gift Acceptance Policy (Policy) governs the evaluation, acceptance, and management of gifts made to ASOR. It addresses outright gifts and planned gifts. ASOR may accept gifts only as authorized by this Policy. This Policy is undergirded by the Donor Bill of Rights (Appendix A), which is incorporated, by reference.
- 1.3.** The purposes of this Policy, therefore, are to (a) provide guidelines for soliciting, evaluating, accepting, and managing gifts in a manner that is consistent with, and supports, ASOR's Bylaws, Policies (including, inter alia, the Investment and Spending Policies and the Conflict of Interest Policy), Policy on Professional Conduct, Mission, Programs, and Strategic Plan, (b) provide guidance to prospective donors and their advisors when making gifts to ASOR, (c) ensure that tax-deductible gifts are received in a manner consistent with the Internal Revenue Code (IRC) and so do not jeopardize ASOR's tax-exempt status, (d) eliminate or, at the very least, minimize the incurrence of liabilities (including tax liability) in connection with, or as a result of, accepting a gift, and (e) provide guidelines for limiting or declining the acceptance of gifts that are difficult to administer, or not in the best interests of the organization.

II. Overarching Principles

- 2.1.** The Executive Director and his or her designees are authorized to negotiate gift agreements with prospective donors subject to review and approval by the Finance Committee and Executive Committee.
- 2.2.** ASOR's policy is to inform, serve, guide, or otherwise assist donors who wish to support ASOR activities, but never, under any circumstances, pressure or unduly persuade prospective or current donors. ASOR will always seek to serve its donors' charitable giving needs and objectives by encouraging contributions and volunteerism and properly recognizing its donors' material and personal contributions.
- 2.3.** ASOR will maintain the highest level of integrity with its donors, always acting in the best interest of philanthropy and scrupulously attempting to avoid actual or apparent conflicts of interest or any conduct that may bring discredit to a donor or ASOR.
- 2.4.** ASOR will safeguard the confidentiality of a donor relationship, providing full disclosure to a donor and ensuring that gifts are recorded, allocated, and used according to donor intent and designation, if any.

- 2.5. ASOR will remain open and accessible to its donors, providing full communication of its activities, use of funds, and policies and procedures.
- 2.6. ASOR will honor donors' requests for anonymity. That said, ASOR will assume permission to publicly recognize a donor and his or her gift unless otherwise requested.
- 2.7. ASOR will provide written acknowledgement to donors of all gifts made to ASOR in compliance with current IRS requirements. Donations will be acknowledged in compliance with IRS guidelines and regulations.
- 2.8. Donors and prospective donors are encouraged to give unrestricted gifts. But in all cases, donors and prospective donors are encouraged to seek the assistance and advice of independent advisors, including legal counsel and tax and financial advisors, prior to and in matters relating to making a gift.
- 2.9. ASOR and its employees and agents are prohibited from advising donors about the legal, financial, or tax consequences of their donations. Gifts are also subject to the provisions of other ASOR Policies, including, inter alia, the Investment and Spending Policies and Conflict of Interest Policy.
- 2.10. A donor will be responsible for all federal, state, and local taxes, if any, pertaining to making a gift to ASOR.
- 2.11. As an overarching policy, ASOR will not accept routine or non-routine gifts (as defined below) that (a) violate the terms of this Policy, (b) jeopardize ASOR's status as a tax- exempt organization under federal or state law, (c) are too difficult or expensive to administer, (d) are inconsistent with, and do not further or support, ASOR's Bylaws, Policy on Professional Conduct, other Policies, Mission, Programs, and Strategic Plan, (e) are from entities or individuals with whom ASOR, in its sole discretion, declines to be associated because it would not be in the best interests of the organization, (f) are from entities or individuals with operations or philosophies that ASOR, in its sole discretion, determines are inconsistent with or violate the ASOR Policy on Professional Conduct, (g) are from anonymous entities or individuals who refuse to identify themselves to the organization even if their identities are not to be publicized to the membership at large, or (h) could damage ASOR's reputation.
- 2.12. ASOR reserves the right to consult with independent advisors, including legal counsel and tax and financial advisors, prior to and in matters relating to the acceptance of gifts. ASOR's legal counsel will review and approve all gift agreements requiring ASOR's execution.
- 2.13. Absent any restrictions imposed by the donor that ASOR elects to accept, ASOR reserves the right, in its sole discretion, to sell or hold any gift of real or personal property.

III. Gift Review and Evaluation Process

- 3.1. **Routine gifts.** Determinations whether to accept routine gifts may be made by the Executive Director. For purposes of this Policy, routine gifts include outright gifts of (a) cash made in response to direct mail solicitations, other direct developmental programs, and foundation grants in response to an ASOR-generated application, (b) publicly traded securities, and (c) and life

insurance. All other gifts are non-routine gifts. Completion of the Donor Disclosure and Waiver Form (Appendix B) is not required for routine gifts.

3.2. Non-routine gifts. All non-routine gifts will be directed to the Finance Committee for its review, evaluation, and recommendation to the Executive Committee and Board of Trustees as to whether such gifts should be accepted. For purposes of this Policy, non-routine gifts include, without limitation, (a) gifts that are not regularly encountered in the ordinary course of ASOR's business, (b) gifts that may not align with ASOR's Bylaws, Policy on Professional Conduct, other Policies, Mission, Programs, and Strategic Plan, (c) gifts with a potential administrative, financial, or other burden on ASOR, (d) outright gifts that are not readily marketable (such as, *inter alia*, real estate, closely held stock, partnership interests, tangible personal property (other than in-kind contributions), and other real and personal property interests), (e) deferred gifts (including bequests, charitable gift annuities (immediate and deferred), charitable remainder trusts, charitable lead trusts, retained life estates, pooled income funds, and donor-advised funds), (f) gifts of restricted stock where ASOR is the beneficiary (applying a higher degree of scrutiny where the fair market value of such restricted stock is less than \$5,000), and (g) other unique or unusual gifts designated as non-routine gifts by the Executive Director or the Executive Committee. Completion of the Donor Disclosure and Waiver Form (Appendix B) may be required for non-routine gifts as determined on a case-by-case basis by the Executive Director.

3.3. Review by Finance Committee and Executive Committee. ASOR recognizes that offers of non-routine gifts may be made by a prospective donor when it is not practical to discuss the proposed gift during a scheduled meeting of the Finance Committee, the Executive Committee, and the Board of Trustees. In such instances, the Treasurer and Executive Director (in consultation with the President and Board Chair) may request the Finance Committee and Executive Committee review the proposed gift by a conference call or an e-mail vote.

IV. Guidelines for Reviewing and Evaluating Specific Forms of Gifts

4.1. General guidelines regarding all gifts. In addition to the specific considerations described below, and other relevant considerations unique to a particular gift, ASOR may consider one or more of the following in determining whether to accept a proposed gift:

- a) Whether the proposed gift is overly restrictive, including, *inter alia*, (i) gifts that are inconsistent, or do not support, ASOR's Bylaws, Policy on Professional Conduct, other Policies, Mission, Programs, Strategic Plan, or other governance documents or recognized procedures, or (ii) gifts that place undue burdens on ASOR;
- b) Ease of administration;
- c) Marketability of the gift;
- d) Projected financial benefit to ASOR;
- e) Any existing leases, restrictions, reservations, easements, liens, covenants, mortgages, pledges as collateral, or other encumbrances and limitations;
- f) Maintenance, repairs, insurance, taxes, mortgages, or other carrying costs;
- g) Restrictions imposed by the donor that might cause ASOR to incur undue expense or other undesirable consequences;
- h) Detrimental tax effect;
- i) The value of the gift as determined by an independent appraisal which, in its sole discretion, may be commissioned by ASOR. The cost of an appraisal will be borne by the donor;

- j) Regarding a proposed gift of real estate, any issues revealed by an inspection or environmental audit. Prior to accepting a gift of real estate, a formal inspection and Phase I environmental audit (if determined to be necessary) will be performed by appropriate licensed professionals. The cost of the inspection and environmental audit, if conducted, will be borne by the donor; and
- k) When trips or special events involve a charitable contribution, the fair market value and charitable contribution components will be stated specifically in the promotional literature and donor acknowledgment letter. Donations given to offset the costs of a special event must be recorded as a gift, rather than as a credit to an expense account.

4.2. General guidelines regarding gifts of property.

- a) It is ASOR's policy to comply fully with the valuation rules set out in IRS Publication 561 and the relevant income, gift, and estate tax laws and regulations. Property contributions with a value in excess of \$5,000 must be accompanied by an appraisal unless such contributions consist of (i) cash, (ii) marketable securities, (iii) life insurance, (iv) a vehicle or boat, the value of which will be determined by its sale, or (v) stock-in-trade, inventory, or other property otherwise held by the donor for sale to customers in the ordinary course of the donor's business.
- b) The fee for the appraisal may not be based on the value of the appraised property, and the appraiser must be "qualified," as defined in IRS Publication 561. A "qualified appraiser" is a person who is ordinarily in the business of appraising similar property, performs appraisals for many different people, entities, and purposes (i.e., not primarily for ASOR or the donor), has appropriate educational and experiential background, and is not employed by ASOR, the donor, any relative of the donor, or any entity controlled by the donor or members of the donor's family. Duplicate originals of each appraisal must be prepared for ASOR and the donor.

4.3. Cash, checks, and credit card gifts. ASOR may accept gifts paid by cash, checks, and credit cards (including online giving through the ASOR website or third-party websites (such as PayPal, etc.).

4.4. Marketable securities. ASOR may accept gifts of publicly-traded securities, including, inter alia, stocks, bonds, mutual funds, and other marketable investments. Publicly-traded securities may be transferred to an account maintained by ASOR at one or more brokerage firms or delivered physically with the transferor's signature or stock power attached. As determined in ASOR's sole discretion, marketable securities received as a gift may be sold following receipt or held as an investment. That said, it is ASOR's normal practice to sell all gifts of publically traded securities as soon as reasonably practical.

4.5. Closely-held securities. ASOR may accept gifts of non-publicly traded, closely-held securities and equity positions, including debt and equity positions in closely-held non-publicly traded companies and interests in partnerships, LLPs, and LLCs. Other forms of equity ownership also may be deemed to be closely-held securities and considered for acceptance.

4.6. Restricted stock. ASOR may accept gifts of restricted stock. The donor must pay all of the expenses to lift the restriction and any other expenses associated with the administration of the gift.

4.7. Life Insurance.

- a) ASOR may accept a designation as the owner of a life insurance policy. ASOR also may be named as a beneficiary or contingent beneficiary of a life insurance policy. Gifted life insurance policies must possess a minimum face value of \$5,000. If the donor contributes future premium payments, ASOR will include the entire amount of the additional premium payment as a gift in the year the premium payment is made. A life insurance policy designation will not be recorded as a gift until it is irrevocable. When such occurs, the gift will be recorded in accordance with Generally Accepted Accounting Principles (GAAP).
- b) If a policy is a “vanishing premium” policy, the donor must clarify the risk of “reappearing premiums” if assumed interest rates or dividends decrease. Often premiums vanish only to reappear later when an economic environment becomes less favorable. Annual illustrations are required for these types of policies. The donor also must deliver to ASOR a copy of the contract and a current vanishing in-force illustration. If a policy is not fully paid, the donor also must deliver a second illustration assuming a 1-2% reduction in interest or dividend rates.
- c) ASOR encourages gifts of paid-up life insurance policies. If the policy is not paid-up, the donor also must contribute all future premium payments on the life insurance policy to ASOR. If the donor does not cover future premium payments, ASOR, in its sole discretion, may (i) continue to pay the premiums, (ii) convert the policy to paid-up insurance, or (iii) surrender the policy for its current cash value.

4.8. Real Estate.

- a) ASOR may accept a gift of real estate. Gifts of real estate may include developed property, undeveloped property, or remainder interests (provided the carrying costs, such as, *inter alia*, maintenance, repairs, insurance, property taxes, mortgages, notes, owners’ association dues, country club membership dues, and transfer charges, are paid by the donor or primary beneficiary). The donor must deliver to ASOR the deed, property tax bill, title report, survey, site plans or development surveys relating to the property, plot plan, any existing leases or agreements encumbering the property, substantiation of zoning status, and verification of title insurance. ASOR will arrange for an appraisal of the property and obtain a title binder when deemed appropriate, the cost of which will be borne by the donor. The property may also undergo an environmental audit, the cost of which will be borne by the donor, to ensure that ASOR will have no current or potential exposure to environmental liability.
- b) As a general rule, ASOR will sell a gift of real estate within a reasonable period of time to avoid further potential liability. Depending on a variety of factors, including the value and desirability of the gift, ease of administration, the donor’s connection with ASOR, the donor’s past giving record and contributions, the donor may be asked to pay all or a portion of the following additional expenses: maintenance, taxes, insurance, real estate broker’s and auctioneer’s commissions, other costs of sale, and any additional legal or other expenses relating to the administration or sale of the property.

4.9. Oil, gas, and other mineral interests. ASOR may accept gifts of oil, gas, or other mineral interests according to the following criteria: (a) gifts of surface rights must have a value of at least \$20,000, and (b) gifts of oil, gas, or other mineral interests must generate at least \$3,000 per year in royalties or other income (as determined by the average of the three calendar years prior to the calendar year in which the gift will be made). Working interests only may be accepted where there is a plan to minimize potential liability and tax consequences to ASOR. Gifts of oil, gas, or other mineral interests must undergo an environmental audit, the cost of which will be borne by the donor, to ensure that ASOR will have no current or potential exposure to environmental liability.

- 4.10. Tangible personal property.** ASOR may accept gifts of tangible personal property (e.g., *inter alia*, artwork, rare books, archival materials, coin and stamp collections, musical instruments, theatrical props, furniture, fixtures, equipment, and the like, but specifically excluding antiquities addressed below). ASOR, in its sole discretion, may keep or sell such property. That said, it is ASOR’s normal practice to sell all gifts of tangible personal property as soon as reasonably practical.
- 4.11. Antiquities.** ASOR will not accept gifts of antiquities. ASOR, however, may help facilitate a donation of antiquities to a museum or other appropriate curation facility provided (a) documentation acceptable to ASOR is provided to demonstrate that such antiquities were not acquired by an individual or institution, including the prospective donor, through purchase or donation after April 24, 1972, the effective date of the 1970 UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property, (b) the facilitated donation would not otherwise be disqualified by Section 2.11 of this Policy if ASOR were to accept, rather than help facilitate, the gift, (c) the facilitation is approved by the Board of Trustees, (d) under no circumstances will ASOR take physical possession of such antiquities or otherwise derive any benefit from them or their facilitated donation, and (e) under no circumstances will ASOR provide appraisals or estimates of the value of any antiquity. For purposes of this Policy, the term “antiquities” means, *inter alia*, coins, texts, pottery, statues, artworks, textiles, and other portable relics pertaining to the history and cultures of the Near East and wider Mediterranean, from earliest times.
- 4.12. Deferred gifts—general considerations.** ASOR may accept deferred gifts. As a general rule, ASOR will not accept deferred gifts where it is not the outright beneficiary; provided, however, that ASOR may consider on a case-by-case basis proposed gifts where ASOR is a contingent beneficiary or one of several beneficiaries. Deferred gifts may include charitable lead trusts, charitable remainder trusts, bequests, charitable gift annuities, deferred gift annuities, pooled income funds, retained life estates, and donor-advised funds.
- 4.13. Charitable lead trusts.** ASOR may accept a designation as the income beneficiary of a charitable lead trust. ASOR, however, will not accept appointment as the trustee of a charitable lead trust or an irrevocable life insurance trust—unless it is in the donor’s and ASOR’s best interest, or when it is impractical to name another trustee. The Finance Committee and Executive Committee, in consultation with ASOR’s legal counsel, must approve any agreement to serve as the trustee of a charitable lead trust. When ASOR is the income beneficiary, ASOR may engage a trust institution to manage its interests.
- 4.14. Charitable remainder trusts.** ASOR may accept a designation as the remainder beneficiary of a charitable remainder trust. ASOR, however, will not accept appointment as the trustee of a charitable remainder trust—unless it is in the donor’s and ASOR’s best interest, or when it is impractical to name another trustee. The Finance Committee and Executive Committee, in consultation with ASOR’s legal counsel, must approve any agreement to act as the trustee of a charitable remainder trust. When ASOR is the remainder beneficiary, ASOR may engage a trust institution to manage its interests.
- 4.15. Charitable gift annuities.**
- a) ASOR may enter into a contract with a donor providing a fixed dollar return for life to the donor or other beneficiaries in exchange for a contribution to ASOR according to the terms and conditions set forth in (b)-(d) (below). A charitable gift annuity is a binding contract

between a donor and ASOR; it is not a trust. A donor must transfer cash, marketable securities, or other acceptable assets to ASOR. In exchange, ASOR will pay a fixed amount of money to one or two individuals (“annuitants”) for their lifetime. ASOR must be the 100% remainder beneficiary.

- b) ASOR will not accept real estate, tangible personal property, or any other non-liquid asset in exchange for a current gift annuity. ASOR, however, may accept real estate, tangible personal property, or other non-liquid assets in exchange for a deferred gift annuity so long as there is at least a five year period before the initial annuity payment date, the value of the property is reasonably certain, and the Finance Committee and the Executive Committee, in consultation with ASOR’s legal counsel, approve the gift arrangement. All gift annuities must be reinsured through a reputable reinsurance provider, the cost of which will be paid by the donor or beneficiary.
- c) The amount of the annuity payment will depend on the age of the donor and the size of the gift. Income payments to a beneficiary may be deferred. The annuity contract will be a general obligation of ASOR. The American Council on Gift Annuities sets and publishes recommended annuity rates, anticipating that any remainder (i.e., assets remaining upon the death of the annuitant(s)) will be at least 50% of the initial contribution, which ASOR will follow.
- d) (i) Any remainder must be placed in an ASOR endowment fund, (ii) the Uniform Annuity Rates published by the American Council on Gift Annuities will not be exceeded without Finance Committee and Executive Committee approval, (iii) disclosure to the donor must follow state and federal laws and regulations, (iv) the minimum gift to fund an annuity contract is \$25,000, (v) if a donor’s objective is to create a named component fund with the remainder, the donor must fund the annuity contract with \$50,000 to ensure that the remainder will meet the \$25,000 minimum to create a named fund, (vi) if the remainder is less than \$25,000, it may be added to an already existing ASOR fund, (vii) annuity contracts may provide for income payments to no more than two successive life beneficiaries, (viii) the minimum age for life income beneficiaries of a gift annuity will be 55, (ix) the minimum age for life income beneficiaries of a deferred gift annuity will be 45, and (x) annuity payments to beneficiaries will be made on a quarterly basis, although the Executive Director, in consultation with the Finance Committee and the Executive Committee, may approve exceptions to this payment schedule.

4.16. Bequests. ASOR may accept a bequest under a donor’s will or trust. A bequest will not be recorded as a gift until the gift is irrevocable. When such occurs, the gift will be recorded in accordance with GAAP.

4.17. Retirement plan beneficiary designations. ASOR may accept a designation as the beneficiary of a donor’s retirement plan. Such designation will not be recorded as a gift until the gift is irrevocable. When such occurs, the gift will be recorded in accordance with GAAP.

4.18. Named endowed funds. A donor may create, name, and contribute to a fund, and restrict the use of the income or principal of the fund. As of the date this Policy was approved by the ASOR Board of Trustees, named funds require a minimum initial contribution of \$50,000. Distributions from a named fund will be made in accordance with ASOR’s Investment and Spending Policies. The minimum initial contribution required for a named fund may be changed by the ASOR Board of Trustees by amending the Investment and Spending Policies.

4.19. Other gifts. ASOR may consider accepting other unusual or unique gifts not specifically referenced above, including, *inter alia*, memorials, honorariums, intangible property, intellectual property (e.g., patents, copyrights, and trademarks), promissory notes, and assignments of promissory notes. All such gifts will be considered non-routine gifts for purposes of their review and evaluation for acceptance.

V. Donor-Advised Funds

5.1. General. ASOR may create a donor-advised fund (DAF). Pursuant to the IRC and corresponding regulations, a DAF is (a) a fund owned and controlled by ASOR (b) that is separately identified with reference to the contribution(s) of a donor or donors (c) where the donor(s) (or their appointee(s)) have, or reasonably expect to have, the privilege of advising ASOR regarding the DAF's investments or distributions.

5.2. Creation. A DAF will be created by an affiliated fund agreement between the donor and ASOR. The fund agreement will name advisor(s) who may recommend DAF investments or distributions (grants). A DAF may be non-permanent (all contributions may be expended), may be permanently endowed (invested with only a portion of the earnings and appreciation available for expenditure in accordance with the ASOR Investment and Spending Policies), or may have both a non-permanent account and a permanently endowed account. A minimum contribution of \$25,000 is required to establish a DAF.

5.3. Naming a DAF. The donor may name the DAF, subject to ASOR's approval. Unless the donor requests that a DAF be anonymous, it will be listed by name in ASOR's annual report. The DAF and its advisor(s) will be identified to grant recipients unless the advisor(s) request anonymity on a case-by-case basis.

5.4. Contributions to a DAF. Contributions to a DAF are irrevocable. Contributions may be made at any time, in any amount, and in many forms, including cash, securities, real estate, and retirement plan assets, subject to acceptance by ASOR in accordance with this Policy, the Pension Protection Act of 2006 (regarding ownership interests in a business (i.e., the "excess business holdings" rule and avoiding the corresponding IRC § 4943 tax)), and other applicable laws and regulations. Donors may establish or add to a DAF through a bequest or other estate gift.

5.5. DAF Distributions (grants).

- a) Donors or their appointees may recommend grants to qualified charitable organizations. Qualified charitable organizations generally include organizations described in IRC § 501(c)(3) that are not private foundations and certain governmental entities. ASOR will not allow DAF grants to non-charitable organizations. ASOR, in its sole discretion, will make the final decision regarding all DAF grants. The minimum amount of a DAF grant will be \$5,000.
- b) Pursuant to IRS rules, however, DAF grants specifically (i) may not be used to satisfy all or a portion of any pledge or other financial obligation of the donor(s), advisor(s), or any related parties, (ii) may not result in the donor(s), advisor(s), or any related parties receiving goods, services or other benefits that are more than incidental (such prohibited benefits include, *inter alia*, event tickets, memberships, meals, preferred parking, preferred seating, discounted merchandise, or other preferential treatment from a donee organization), (iii) may not be made directly to individuals (such as in the form of scholarships, emergency hardship grants, or disaster relief grants, including payments directly to an individual or to an entity for the

benefit of a specified individual (e.g., to a university for a scholarship for a particular student)), and (iv) may not be made to donor(s), advisor(s), or any related parties in any form, including, inter alia, grants, loans, expense reimbursements, compensation, or similar payments.

5.6. Expenditure responsibility. Pursuant to IRS rules, certain types of DAF grants require the exercise of “expenditure responsibility.” Expenditure responsibility is a process designed to ensure that a DAF grant is used for charitable purposes, and ASOR is maintaining appropriate oversight and documentation of such grants. Expenditure responsibility is required for grants to (a) organizations not described in IRC § 170(b)(1)(A), (b) type III supporting organizations that are not functionally integrated with the grantee organization, and (c) supporting organizations of any type if they are controlled by the donor(s), advisor(s), or any related parties. ASOR’s normal practice, subject to a case-by-case review by the Finance Committee and Executive Committee, is not to make DAF grants requiring expenditure responsibility.

VI. Other Administrative Provisions

6.1. Tax Deductions. A donor will be responsible for substantiating the amount claimed as a deduction for federal and state income, gift, and estate tax purposes. ASOR will assist donors by providing reasonable assistance and information, and when required, signing an appropriately completed IRS Form 8283, Noncash Charitable Contributions. ASOR will provide each donor with a written receipt or other acknowledgement of the donor’s gift that, to the extent possible, complies with the then-existing IRC requirements and regulations regarding substantiation of charitable contributions. In acknowledging the receipt of any noncash gift, ASOR will accurately describe any restrictions to which the property is subject, but will not indicate any monetary value attributable to the gift.

6.2. Ethical standards and compliance. ASOR will administer gifts properly, comply with all applicable laws and regulations, including those governing reporting and retention, and provide formal acknowledgments for gifts. ASOR will not furnish property appraisals or gift valuations to donors for tax purposes. ASOR gift acknowledgment letters, however, may state the value of a cash, check, or other monetary gift, or if required by applicable law. Otherwise, the donor is solely responsible for determining gift valuations for his or her own tax purposes. ASOR may consult with independent advisors where it deems such action to be appropriate. ASOR will strive to consider the interests of the donor and disclose to the donor all essential information, including any related fees or expenses, prior to accepting a gift. Donors are strongly encouraged to consult with their own independent legal or tax counsel or other appropriate advisors at their own expense regarding all prospective gifts.

6.3. Exceptions to the Policy. The Board of Trustees, at the recommendation of the Finance Committee, the Executive Committee, or on its own motion, may grant exceptions to this Policy as the Board deems appropriate. Exceptions may be made based on a variety of factors, including, inter alia, the value and desirability of the gift, ease of administration of the gift, the donor’s connection with ASOR, and the donor’s past giving record and contributions to ASOR.

6.4. Audit of planned gift arrangements. The Executive Director will audit existing planned gift arrangements periodically and submit a report to the Finance Committee.

6.5. Review of Policy. The Finance Committee, Executive Committee, and the Board of Trustees have reviewed and approved this Policy. The Finance Committee will periodically review this Policy, and propose any necessary changes for consideration by the Executive Committee and the Board. The Board may revise or revoke this Policy at any time it deems appropriate.

APPENDIX A: DONOR BILL OF RIGHTS

Philanthropy is based on voluntary action for the common good. It is a tradition of giving and sharing that is primary to the quality of life. To assure that philanthropy merits the respect and trust of the general public, and that donors and prospective donors will have full confidence in ASOR and its Mission and Programs, ASOR declares that all donors have the following rights:

1. To be informed of ASOR's Mission and Programs, the way in which ASOR will use donated resources, and its capacity and ability to use donations effectively for their intended purposes.
2. To be informed of the identity of those serving on ASOR's Board of Trustees, and to expect the Board to exercise prudent judgment in its stewardship responsibilities.
3. To have access to ASOR's most recent audited financial statements.
4. To be assured that their gifts will be used for the purposes for which they were given.
5. To receive appropriate acknowledgment and recognition.
6. To be assured that information about their donations is handled with respect and confidentiality to the extent provided by law.
7. To expect that all relationships with individuals representing ASOR will be professional in nature.
8. To be informed whether those seeking donations are volunteers, ASOR employees, or hired solicitors.
9. To have the opportunity for their names to be deleted from mailing lists that ASOR may intend to share.
10. To feel free to ask questions when making a donation, and receive prompt, truthful, and forthright answers.

APPENDIX B: DONOR DISCLOSURE AND WAIVER

Fiduciary Responsibility

ASOR is a Massachusetts nonprofit, public-benefit corporation governed by its Officers and Board of Trustees.

Privacy Notice

All information supplied to ASOR by Donor will be kept confidential, and not disseminated to any other person or entity except as required by law.

Consent to Publish Donor's Name and Contribution

One of the ways in which ASOR expresses appreciation of its Donors is by recognizing them in various ASOR publications. Unless you request otherwise, we will assume you consent to being identified as an ASOR Donor in this manner.

Independent Counsel and Advice

The ASOR Gift Acceptance Policy requires us to advise you to consult your own independent legal or tax counsel or other appropriate advisors regarding any gift. Donor acknowledges, understands, and agrees that ASOR and its representatives will not provide any legal, investment, tax, financial, or other advice to Donor regarding any gift.

Recovery of Operating Expenses from Private Gifts

By making a contribution, Donor acknowledges, understands, and agrees that ASOR may annually set aside a percentage of any restricted gift specified in the Investment and Spending Policies to support ASOR's administrative expenses.

UNDERSTOOD AND AGREED:

Donor

Signature: _____ Date: _____

Donor Name (Print): _____

Signature of ASOR

Representative: _____ Date: _____

WAIVER

Should the purpose designated for my gift no longer exist or become impractical in the opinion of the ASOR Board of Trustees, I hereby direct the Board to designate an alternate use for the gift that will most nearly accomplish my wishes while meeting the needs of ASOR.

Donor

Signature: _____ Date: _____

This policy was developed on November 12, 2017.

**THE AMERICAN SCHOOLS OF ORIENTAL RESEARCH
INVESTMENT AND SPENDING POLICIES**

Approved by the ASOR Board of Trustees on November 18, 2012, and amended by the ASOR Board of Trustees on April 17, 2016, April 6, 2019, November 24, 2019, December 15, 2020, May 8, 2022, and April 16, 2023.

INVESTMENT POLICY

General

It is the general policy of The American Society of Overseas Research (ASOR) to invest funds to achieve growth in principal value over time sufficient to preserve or increase the purchasing power of the funds, thus protecting the funds against inflation. The funds include permanently restricted funds, temporarily restricted funds, Board-designated funds, and unrestricted funds.

Notwithstanding this general policy, all restrictions placed by donors on the interest and investment earnings on donated funds will be honored.

Fund Categories, Objectives and Authority

Unrestricted Funds

- Description. These funds are not restricted in their use and are sometimes referred to as short-term funds or operating funds. They include cash, surplus from current operations, unexpended portions of unrestricted grants, and other unrestricted funds received.
- Investment Objective. Preservation of principal. These funds will be invested in a manner that minimizes the risk of loss of principal while seeking to maximize earnings in a way that allows for immediate liquidity to meet ongoing operational requirements.
- Authority. The Executive Director and Treasurer have authority to invest the funds, and to spend principal and interest to meet the operational needs of ASOR.

Board-Designated Funds

- Description. These funds are designated by the Board to be held in reserve to support future years' operations or specific programs. They may include accumulations from past years' annual results of operations, investment income, and other funds designated by the Board.
- Investment Objective. The objective for funds held in reserve to support future years' operations is the same as the objective for Unrestricted Funds. For funds held in reserve to support specific programs, which may be similar to endowment funds, the objective is the preservation of real purchasing power of principal, while seeking to maximize earnings in a way that allows for sufficient liquidity to meet ongoing program requirements.
- Authority. The Executive Director and Treasurer have authority to invest the funds, and to spend principal and interest to meet the operational needs of ASOR. With regard to funds that are similar to endowment funds, the Finance Committee will establish the appropriate asset allocation targets or ranges for investment of these funds.¹

¹ See Appendix I for specific asset allocation targets or ranges for existing ASOR funds overseen by the Finance Committee.

Temporarily Restricted Funds

- Description. These funds are restricted in time or purpose. They include donated funds that are restricted to program use or, over time, expected to be used for operating expenses. They also include accumulated earnings on endowments that have not yet been distributed in accordance with the purpose of the particular endowment.
- Investment Objective. The objective for donated funds that are expected to be used for operating expenses within five years or less is the same as the objective for Unrestricted Funds. The objective for accumulated earnings on endowments, except for funds that are expected to be used for the intended purposes within the next twelve months or less, is the same as the objective for Permanently Restricted Funds.
- Authority. The Executive Director and Treasurer have authority to invest the funds, and to spend principal and interest to meet the operational needs of ASOR in accordance with donor restrictions. With regard to the accumulated earnings on endowments, the authority will follow the authority for investment of the underlying endowment funds.

Permanently Restricted Funds

- Description. Permanently Restricted Funds are endowments that have been given in perpetuity, through which the principal of the fund remains intact and the income used by the organization.
- Investment Objective. Preservation of real purchasing power of principal, while seeking to maximize earnings in a way that allows for sufficient liquidity to meet ongoing distribution requirements.
- Authority. The Finance Committee will establish the appropriate asset allocation targets or ranges for investment of these funds.

Authorized and Unauthorized Investments

Authorized Investment Types

- Cash or cash equivalents, including money market instruments and certificates of deposit.
- Fixed income obligations of the U.S. government, its agencies, or corporations.
- Mutual funds or exchange traded funds that own fixed income or equity securities.

Unauthorized Investment Types

- Individual equity securities.
- Hedge funds.
- Private equity funds.
- Commodities.
- Real estate.

Exceptions

The Finance Committee may authorize additional investment types on an exception basis to cover unusual situations, provided such authorization is obtained in advance and the Finance Committee concludes that permitting the additional investment type does not cause undue risk to ASOR.

SPENDING POLICY

ASOR adopts spending policies for its endowments in compliance with the Uniform Prudent Management of Institutional Funds Act (UPMIFA), which has been adopted by both Virginia and the District of Columbia. The spending policies set forth in Appendix II for each of ASOR's existing endowments can be applied consistently over time regardless of short-term fluctuations in the market value of the funds. Each policy sets spending rates allowing for long-term growth in the corpus of its corresponding endowment, while also providing funds for ASOR to spend fulfilling its mission.

This Spending Policy and amendments (if any) supersede any previous spending policies adopted by ASOR.

ROLES AND RESPONSIBILITIES

Finance Committee Responsibilities

- The Finance Committee is responsible for the oversight of all of ASOR's funds.
- The Finance Committee is responsible for reviewing the Investment and Spending Policies on a periodic basis, and recommending any necessary changes to the ASOR Board of Trustees.
- The Finance Committee will review investment performance and portfolio allocations for Permanently Restricted Funds and the related accumulated earnings, as well as any appropriate Board-Designated Funds, on at least a semi-annual basis, and will direct the Executive Director and Treasurer to make any changes as appropriate.
- The Finance Committee will also oversee investment performance for Unrestricted Funds, Board-Designated Funds, and Temporarily Restricted Funds, where the investment objective is preservation of principal, to ensure that the Executive Director and Treasurer are using appropriate investment vehicles consistent with the investment objectives.

Executive Director and Treasurer Responsibilities

- The Executive Director and Treasurer are 1) responsible for monitoring the investment performance and portfolio allocations between periodic reviews by the Finance Committee, and 2) delegated the authority to take action to rebalance funds in between such reviews.
- The Executive Director and Treasurer are responsible for the appropriate investment of Unrestricted Funds, Board-Designated Funds, and Temporarily Restricted Funds where the investment objective is preservation of principal.
- At least semi-annually, the Executive Director and Treasurer will provide the Finance Committee information about 1) asset allocation, 2) investment performance, 3) future investment strategies, and 4) any other matters of interest to the Committee.
- At least annually, the Executive Director and Treasurer will report on overall investment performance to the ASOR Executive Committee and Board of Trustees, including a comparison of investment results to appropriate indices.
- Subject to Finance Committee approval, the Executive Director and Treasurer may agree that one or the other is primarily responsible for the duties above, and will consult with the other party as necessary.

- The Executive Director and Treasurer will make reasonable efforts to rebalance new gifts to according to the schedule below.
 - Under \$3,000: Will normally rebalance during the next periodic rebalancing.
 - \$3,001 – \$10,000: Will normally rebalance as soon as practical.
 - \$10,001 – \$24,999: Will normally rebalance over three months.
 - \$25,000 – \$100,000: Will normally rebalance or invest over three months.
 - \$100,000 – \$250,000: Will normally rebalance or invest over six to twelve (6–12) months.
 - > \$250,000: Will normally rebalance or invest the account over twelve (12) months.
- For gifts > \$25,000, the President and Board Chair will be consulted.
- If a donor recommends a schedule different from above, ASOR will strongly consider such a recommendation.
- With consultation of the President and Board Chair, the Executive Director and Treasurer may, at their sole discretion, rebalance or invest according to an accelerated or extended schedule. They will consult the Finance Committee as appropriate.

OTHER POLICIES

Fees for Administrative Oversight of Endowed Scholarships and Fellowships

- Description. ASOR has existing endowment funds whose earnings are used to support fellowships or scholarships for archaeological fieldwork or support. Additional funds may be created in the future for similar purposes. The principal of endowment funds will be kept intact, and the income distributed to support the purpose of the funds.
- Fees. The process for reviewing grant applications and selecting recipients of fellowships and scholarships can require significant support from ASOR staff. Accordingly, unless prohibited by the endowment fund guidelines, the Executive Director is authorized to charge a fee against fund assets of an appropriate amount, not to exceed one percent (1%) of the average fair market value of the fund at the end of the last twelve (12) quarters, in order to recoup ASOR staff costs. For purposes of computing the average fair market value of a fund, quarters where a new fund has not reached a minimum market value of \$50,000 will not be used. No fees will be charged for endowment funds that have not reached a minimum threshold principal amount of \$50,000.

Fees for Administrative Oversight of Current Gifts of Scholarships and Fellowships

- Description. In addition to endowment funds whose earnings are used to support fellowships or scholarships for archaeological fieldwork or support, ASOR also receives current gifts that are designated to support similar programs, such as the Heritage fellowships. These designated funds normally are given with the intent that they be spent within the fiscal year of donation for the designated purposes.
- Fees. The process for reviewing grant applications and selecting recipients of fellowships and scholarships can require significant support from ASOR staff. Accordingly, unless specifically prohibited by the donor, the Executive Director is authorized to charge a fee against current designated gifts of an appropriate amount, not to exceed twenty percent (20%) of the designated gift amount (*e.g.*, \$500 for a designated gift of \$2,500, consistent with the existing Heritage fellowship program).

APPENDIX I – INVESTMENT TARGETS AND RANGES
Approved by the ASOR Board of Trustees on November 18, 2012.
Amendments approved on November 24, 2013, April 17, 2016, November 24, 2019,
December 16, 2020, and May 8, 2022.

ASOR General Endowment (including accumulated earnings)

- Large Cap Equities 45%
- Small Cap Equities 15%
- International Equities 20%
- Fixed Income 15%
- Cash 5%

Board-Designated Building Fund (including accumulated earnings)

- Large Cap Equities 45%
- Small Cap Equities 15%
- International Equities 20%
- Fixed Income 15%
- Cash 5%

Board-Designated Kershaw Fund (including accumulated earnings)

- Large Cap Equities 45%
- Small Cap Equities 15%
- International Equities 20%
- Fixed Income 15%
- Cash 5%

Board-Designated Publications Opportunity Fund (including accumulated earnings)

- Large Cap Equities 45%
- Small Cap Equities 15%
- International Equities 20%
- Fixed Income 15%
- Cash 5%

Lawrence T. Geraty Community Archaeology Endowment (including accumulated earnings)

- Large Cap Equities 45%
- Small Cap Equities 15%
- International Equities 20%
- Fixed Income 15%
- Cash 5%

Harris Endowment (including accumulated earnings)

- Large Cap Equities 45%
- Small Cap Equities 15%
- International Equities 20%
- Fixed Income 15%
- Cash 5%

MacAllister Fellowship Endowment (including accumulated earnings)

- Large Cap Equities 45%
- Small Cap Equities 15%
- International Equities 20%
- Fixed Income 15%
- Cash 5%

Herbert Warren Mason Fellowship Endowment (including accumulated earnings)

- Large Cap Equities 45%
- Small Cap Equities 15%
- International Equities 20%
- Fixed Income 15%
- Cash 5%

Eric and Carol Meyers Fellowship Endowment (including accumulated earnings)

- Large Cap Equities 45%
- Small Cap Equities 15%
- International Equities 20%
- Fixed Income 15%
- Cash 5%

Shirlee Meyers / G. E. Wright Fellowship Endowment (including accumulated earnings)

- Large Cap Equities 45%
- Small Cap Equities 15%
- International Equities 20%
- Fixed Income 15%
- Cash 5%

Platt Fellowship Endowment (including accumulated earnings)

- Large Cap Equities 45%
- Small Cap Equities 15%
- International Equities 20%
- Fixed Income 15%
- Cash 5%

Joe D. Seger Endowment (including accumulated earnings)

- Large Cap Equities 45%
- Small Cap Equities 15%
- International Equities 20%
- Fixed Income 15%
- Cash 5%

Stevan B. Dana Endowment #1 for Scholarships to Support Fieldwork Participation in Israel (including accumulated earnings)

- Large Cap Equities 45%
- Small Cap Equities 15%
- International Equities 20%
- Fixed Income 15%
- Cash 5%

Stevan B. Dana Endowment #2 for Grants to ASOR-Affiliated Excavation Projects (including accumulated earnings)

- Large Cap Equities 45%
- Small Cap Equities 15%
- International Equities 20%
- Fixed Income 15%
- Cash 5%

Stevan B. Dana Endowment #3 for Grants to ASOR-Affiliated Excavation Projects in the State of Israel (including accumulated earnings)

- Large Cap Equities 45%
- Small Cap Equities 15%
- International Equities 20%
- Fixed Income 15%
- Cash 5%

Strange/Midkiff Fellowship Endowment (including accumulated earnings)

- Large Cap Equities 45%
- Small Cap Equities 15%
- International Equities 20%
- Fixed Income 15%
- Cash 5%

APPENDIX II – SPENDING POLICIES

Approved by the ASOR Board of Trustees on November 18, 2012.

**Amended by ASOR Board on November 24, 2013, April 17, 2016, November 24, 2019,
December 16, 2020, and May 8, 2022**

Endowment and Investment Fund Distributions

Unless otherwise specified, endowment and investment fund distributions will be made quarterly in an amount equal to one fourth (1/4) of a fund’s Annual Spending Percentage multiplied by the Calculated Distribution Value of the fund.

The Calculated Distribution Value of a fund is the average of its closing market values at the end of the preceding twelve (12) calendar quarters (the “Quarterly Closing Market Value”). A fund’s Quarterly Closing Market Value will comprise all assets in the fund including, without limitation, principal and retained income, adjusted for all gains and losses, whether realized or unrealized, and determined as of the last business day of the quarter.

Endowment and investment fund distributions will be made promptly following the close of each quarter.

To prevent erosion of the principal of a fund, if the Quarterly Closing Market Value is less than seventy-five percent (75%) of the fund’s historic dollar value, the distribution calculated above will be reduced by fifty percent (50%).²

Annual Spending Percentages

• ASOR General Endowment	5.0%
• Board-Designated Building Fund	5.0%
• Board-Designated Kershaw Fund	5.0%
• Board-Designated Publications Fund	5.0%
• Geraty Community Archaeology Fund	5.0%
• Harris Endowment	5.0%
• MacAllister Fellowship Endowment	5.0%
• Mason Fellowship Endowment	5.0%
• Meyers Fellowship Endowment	5.0%
• Meyers/Wright Fellowship Endowment	5.0%
• Platt Fellowship Endowment	6.0%
• Seger Endowment	5.0%
• Stevan B. Dana Endowment #1	5.0%
• Stevan B. Dana Endowment #2	5.0%
• Stevan B. Dana Endowment #3	5.0%

² Notwithstanding the above, the Harris Endowment governing instrument precludes distributions when the fund’s Quarterly Closing Market Value is at any amount below its historic dollar value.

JOINT VENTURE POLICY

Purpose

The American Society of Overseas Research (hereinafter referred to “ASOR”) has adopted this Joint Venture Policy to safeguard ASOR’s tax exempt status if ASOR invests in, contributes assets to, or participates in a joint venture or similar arrangement with a taxable entity.

Definition

Joint Venture: A joint venture or similar arrangement means any joint ownership or contractual arrangement through which there is an agreement to jointly undertake a specific business enterprise, investment, or exempt-purpose activity without regard to (i) whether ASOR controls the venture or arrangement; (ii) the legal structure of the venture or arrangement; or (iii) whether the venture or arrangement is treated as a partnership for federal income tax purposes, or as an association, or corporation for federal income tax purposes. Ventures or arrangements that meet both of the following conditions shall be disregarded: (i) ninety-five percent (95%) or more of the venture’s or arrangement’s income for its tax year ending with or within ASOR’s tax year is excluded from unrelated business income taxation in accordance with 26 U.S.C. Section 512(b)(1)-(5), which, for example, includes, but is not limited to, (a) dividends, interest, and annuities; (b) royalties; (c) rent from real property and incidental related personal property, except to the extent of debt-financing; and (d) gains or losses from the sale of property; and (ii) the primary purpose of the ASOR’s contribution to, or investment or participation in, the venture or arrangement is the production of income or appreciation of property.

Policy

ASOR will evaluate its participation in Joint Ventures with taxable entities under applicable federal and state tax law and take steps to safeguard its exempt status with respect to such Joint Ventures.

Some examples of safeguards include the following: (i) control over the Joint Venture sufficient to ensure that the Joint Venture furthers the exempt purpose of ASOR; (ii) requirements that the Joint Venture give priority to exempt purposes over maximizing profits for the other participants; (iii) the Joint Venture not engage in activities that would jeopardize ASOR’s exemption (such as political intervention or substantial lobbying for a section 501(c)(3) organization); and (iv) all contracts entered into with ASOR be on terms that are at arm’s length or more favorable to ASOR.

Approval of Joint Ventures

All Joint Ventures shall be governed by written agreement and approved in writing by the executive director, president and treasurer, and, where required under applicable governing documents, ASOR’s Board of Trustees. Details of joint ventures, if any, will be reviewed at least annually by ASOR’s Finance and Audit Committee.

Approved by the ASOR Executive Committee on September 12, 2009

NON-DISCRIMINATION POLICY

ASOR is an Equal Opportunity Employer. ASOR affirms its commitment to equality of opportunity and pledges that it will not practice or permit discrimination in employment on the basis of race, color, gender, national origin, age, religion, creed, disability, veteran's status, sexual orientation, or gender identity.

The ASOR Policy on Professional Conduct

Approved by the ASOR Board of Trustees on April 18,
2015 and amended by the ASOR Board on November 24, 2019



I. Introduction

In 2010, then-ASOR President Tim Harrison heeded ASOR members' call for a comprehensive professional conduct policy that would be consistent with ASOR's Mission and Strategic Plan. To accomplish this goal, President Harrison created an *ad hoc* Ethics Working Group to support a broad consultation and policy development process. This process has continued with robust support from current ASOR President Susan Ackerman.

This document details ASOR's Policy on Professional Conduct. It is intended as a guide for ASOR members and those who serve ASOR in any capacity. This document will be reviewed annually by a subcommittee of ASOR's Board of Trustees that is empowered to record concerns and to bring forward for discussion to ASOR's Board of Trustees any action that may contravene the guidelines contained in this policy.

It is assumed that ASOR's standing committees will create written policies that relate to their sphere of action. Where any conflict exists between this policy and another policy created by an ASOR committee, this document shall serve as the guide, alongside the provisions of ASOR's policies on Investment and Spending, Joint Ventures, Non-Discrimination, Records Retention, Whistleblowers, and Website and Social Media Privacy; and the Conflict of Interest Statement for the American Schools of Oriental Research.

II. Preamble

As scholars, scientists, archaeologists, historians, epigraphers, museum professionals, and educators who are interpreters of material traces of the human past, ASOR members seek to support ASOR in achieving its Mission.

ASOR's Mission is to initiate, encourage and support research into, and public understanding of, the cultures and history of the Near East from the earliest times:

- by fostering original research, archaeological excavations, and explorations.

- by encouraging scholarship on the basic languages, cultural histories and traditions of the Near Eastern world.

- by maintaining an active program of timely dissemination of research results

and conclusions.

by maintaining the highest ethical standards of scholarship and public discourse.

by promoting and advocating the highest academic standards in teaching about the Near East and in interdisciplinary research.

by offering educational opportunities in Near Eastern history and archaeology to undergraduates and graduates in North American colleges and universities, and through outreach to the general public.

In keeping with ASOR's mission, the guidelines contained in this policy are focused on our individual and collective responsibilities in four areas:

1. *Training* to the highest standards of professional expertise, and education for future generations;
2. *Stewardship* of archaeological heritage, which is the limited, irreplaceable record of the human past.¹ Stewards of archaeological heritage act as both caretakers and advocates.
3. *Discovery* of new knowledge about the human past derived from investigations in field sites, libraries, archives, museums, and other locations that enable research;
4. *Dissemination* of knowledge through publication and archiving of data, analysis and interpretation.

III. In order to achieve ASOR's Mission, which includes maintaining the highest ethical standards of scholarship and public discourse;

A. with respect to **EDUCATION AND TRAINING**, ASOR members endeavor to:

1. educate diverse publics regarding historical and archaeological interpretations of the past and the methods used in archaeology and history to understand human behavior and culture;
2. enlist public support for the preservation and scientific study of the archaeological heritage;

¹ As set forth in the European Convention on the Protection of the Archaeological Heritage at Valetta in January, 1992, the notion of archaeological heritage also explicitly includes structures, constructions, groups of buildings, developed sites, moveable objects, monuments of other kinds as well as their context, whether situated on land or under water. All artifacts of any type, including those in which are preserved traces of language, creativity, cultural activity, technology or other indications of humankind from past times are considered elements of the archaeological heritage. The text of this document is available at this URL: <http://conventions.coe.int/Treaty/en/Treaties/Html/143.htm>

3. provide the public and elected/appointed representatives of the public the necessary data to ensure appropriate decision making with respect to preservation of archaeological heritage;
 4. promote understanding of and adherence to the guidelines contained in this Policy on Professional Conduct.
- B. with respect to **STEWARDSHIP**, ASOR members endeavor to:
1. consider appropriate site protection, artifact storage and data management in initial research designs and funding plans; so that all objects of study and research data are properly curated in perpetuity. In the case of site excavation, such plans include the protection of sites after the conclusion of research, taking into account the natural conditions affecting the site and the demands of multiple uses. In the case of artifact studies, exhibits, and surveys, such plans consider the environment and security of future display and/or storage;
 2. avoid the alteration of archaeological heritage and cultural property which is intended to conceal or destroy cultural, historical or scientific evidence;
 3. protect archaeological heritage from adverse effects resulting from military actions, warfare, and local political instability, including support for the provisions of the Convention for the Protection of Cultural Property in the Event of Armed Conflict and its First Protocol;²
 4. explore innovative strategies and support legislation designed to eliminate the illicit trade of antiquities and to enhance the protection of the world's archaeological and cultural heritage, whether on land or under water, as called for in the 1970 UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property;³ the 1972 UNESCO World Heritage Convention,⁴ the 2001 UNESCO Convention on the Protection of the Underwater Cultural Heritage,⁵ and the 2013 Noto Statement on the Future of Underwater Cultural Heritage Protection and Preservation in the Mediterranean;⁶ and, where relevant, encourage States to ratify and implement these conventions;
 5. urge all governments to adhere to the terms of the Convention for the Protection of Cultural Property in the Event of Armed Conflict and its First Protocol, and, where not already ratified, encourage States to ratify and implement them at the earliest

² <http://www.unesco.org/new/en/culture/themes/armed-conflict-and-heritage/the-hague-convention/text-of-the-convention-and-its-1st-protocol/>

³ <http://www.unesco.org/new/en/culture/themes/illicit-trafficking-of-cultural-property/1970-convention/>

⁴ <http://whc.unesco.org/en/conventiontext/>

⁵ <http://www.unesco.org/new/en/culture/themes/underwater-cultural-heritage/2001-convention/>

<http://honorfrostfoundation.org/wp/wp-content/uploads/2014/02/Noto-Statement.pdf>

possible opportunity;

6. co-operate with competent national authorities of any occupied territory in which research is planned;
7. encourage all state parties and all international and national funding bodies, including UNESCO, ICOM, ICOMOS, and the World Bank, to play a leadership role in efforts to protect the world's archaeological and cultural heritage from destruction; and encourage partnerships among governments, developers, and specialists such as archaeologists, historians and conservators for the study and conservation of archaeological heritage;
8. use archaeological heritage for the benefit of all people and not as a commodity to be exploited for private enjoyment or profit;
9. support efforts that are in accordance with national law and international conventions to establish, fund and enforce the prohibition and prevention of the looting of archaeological sites and the trade in illicit antiquities; and cooperate with law enforcement by providing authentications and valuations upon request from such entities;
10. refrain from activities that contribute directly or indirectly to the illicit markets for antiquities and to the value of artifacts in such markets through their publication, authentication, or exhibition.

C. with respect to **DISCOVERY**, ASOR members endeavor to:

1. conduct research according to highest possible professional standards current in the various disciplines;
2. support and encourage efforts to document the archaeological heritage through surveys, inventories, display and study of artifacts;
3. ensure that all individuals participating in the excavation, survey, study or other research shall be fully qualified to carry out their responsibilities or, in the case of apprentice team members, that they be appropriately supervised;
4. refuse to practice discrimination based on categories such as gender, religion, age, race, disability, and sexual orientation in assembling a research team;
5. take all necessary steps to minimize personal risks and hazards to co-workers, the public, and the environment; including, but not limited to, avoiding harassment based on categories noted in paragraph C.4; and developing action plans in the event of civil or military disturbance, or injury;

6. develop a research design and include, where relevant, a curation plan for excavated objects and a conservation plan, prior to the start of research, and inform colleagues of their role in the overall project;
 7. show sensitivity toward and respect for groups affected by research, and make every effort to act cooperatively with them.
- D. with respect to the **DISSEMINATION of KNOWLEDGE**, ASOR Members endeavor to:
1. undertake a prompt and complete final publication, including the use of venues and languages accessible to the general public, including the general public in the host nation of the research project;
 2. acknowledge others' material contributions and intellectual products with citation of the source or other appropriate courtesy, such as listing of team members or authorial credit;
 3. obtain permission from project, archive, collection or museum directors prior to the first publication or initial presentation of material from a project, archive, collection or museum;
 4. consider Open Access repositories in data management plans, so that, following publication, the resulting collections, records, and associated documentation, whether in traditional or digital formats and with the metadata necessary to allow these data to remain intelligible, can be preserved and made accessible to other scholars and, where appropriate, to the public.
- E. with respect to **PROGRAMS AND PUBLICATIONS**, ASOR Members recognize that
1. studies of the past are enhanced when an artifact is clearly associated with an intact archaeological context. Artifacts which lack a defined archaeological findspot or provenience have a greater potential to undermine the integrity of archaeological heritage in view of the possibility of admitting suspect artifacts into archaeological heritage. Looting is an illegal act that breaks the association between artifact and context. A looted artifact may be considered stolen property. Therefore, archaeological heritage that is looted is more likely to travel through illicit channels of distribution and/or exportation, which involve processes that may mask or confuse the identification of the artifact or its true findspot.
 2. authors of publications or presentations should be transparent when introducing data of uncertain reliability to the realm of public knowledge, particularly when research and publication involves artifacts that lack an archaeological findspot or that are illegally exported.
 3. *authors of publications or presentations should identify clearly any artifact that lacks an archaeological findspot in a prominent manner in the text of the publication and the caption of its illustration and, if intermixed with artifacts*

having provenience, also in the index or catalog.

4. the publications and presentation venues of ASOR shall not serve as the initial place of publication or announcement of any object acquired by an individual or institution after April 24, 1972, which is the date of entry into force of the 1970 UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property, with the following exceptions:⁷
 - a. the object was documented as already being in a collection before April 24, 1972; and further, if that object is no longer in its country of origin, it must have been legally exported;
 - b. the object was acquired after April 24, 1972 but it is considered to be a forgery and is published as a forgery;
 - c. the object's publication or announcement serves *primarily* to emphasize the degradation of archaeological heritage.

5. a limited exception to the publication and presentation policy noted immediately above is available for cuneiform texts because
 - a. in zones of conflict since the early-1990s, most prominently in Iraq and Syria but also elsewhere, looting of cuneiform tablets has occurred on a *truly massive scale*;
 - b. cuneiform texts may be authenticated *more readily* than other categories of epigraphic archaeological heritage;
 - c. the content of a cuneiform text can provide information *independent* of archaeological provenience.

Therefore, in accord with the policy that was established by ASOR's Board of Trustees in November, 2004, the Journal of Cuneiform Studies ("JCS"), its related annual book publications, and the ASOR Annual Meeting may serve as the initial place of publication or announcement of a cuneiform text that lacks archaeological provenience and that was acquired by an individual or institution after April 24, 1972, if all the conditions outlined in paragraph E.6 have been satisfied. This is to be known as "the cuneiform exception" and its limits will be reviewed every three years.

⁷ See footnote 3 *infra*.

6. the conditions that shall enable the cuneiform exception to be exercised are as follows:
 - a. the author notes that the text-bearing artifact lacks archaeological provenience in a prominent manner in the text of the publication, in the caption of its illustration, and, if intermixed with objects having archaeological provenience, also in the index or catalog; and
 - b. the author demonstrates that an effort has been made to determine the probable country of origin, which is the location of its final archaeological deposition within a modern nation-state; and prior to publication, the author receives and is willing to transmit to ASOR a written commitment from the owner of the artifact asserting that the artifact will be returned to the Department of Antiquities or equivalent competent authority of the country of origin following any conservation or publication, once permission for its return has been received; *or alternatively*, that its title has been ceded to the determined country of origin, or to some other publicly-accessible repository, if return to its country of origin is not feasible.
 7. they may consider for inclusion in ASOR publications and presentation venues research that has been undertaken in occupied territory and its contiguous waters as defined by customary International Law when that research is required strictly to safeguard, record or preserve the archaeological heritage of the occupied territory, or when permission of the competent national authorities of the occupied territory has been obtained by the researcher.
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ASOR Code of Conduct for Fieldwork Projects

1. Statement of Purpose and Principles

Archaeological fieldwork is an important element of training and professional practice for many ASOR members. The special conditions and challenges of fieldwork combine separation from familiar institutional resources and support systems with intensive academic and social interaction. Archaeological fieldwork also takes place in settings with varied norms and laws. These contexts require that those leading archaeological fieldwork take extra care to avoid violations of professional conduct.

The rules and standards of our home institutions for appropriate workplace behavior apply to these fieldwork settings. U.S. colleges and universities that receive federal funds are further bound by Title IX protections against sex discrimination.² Beyond these policies, since 2015, ASOR's [Policy on Professional Conduct](#) has held up the expectation that members “refuse to practice discrimination based on categories such as gender, religion, age, race, disability, and sexual orientation in assembling a research team” (paragraph III.C.4), and “take all necessary steps to minimize personal risks and hazards to co-workers, the public, and the environment; including, but not limited to, avoiding harassment based on categories noted in paragraph C.4; and developing action plans in the event of civil or military disturbance, or injury” (paragraph III.C.5). This document takes gender to include real or perceived gender identity and adds the other federally-protected categories of familial status (i.e., marital and parental situation, including pregnancy), color, and national origin.

This document is intended as a resource for all participants in ASOR-affiliated fieldwork projects. It outlines ASOR's expectations for ethical conduct in the field and recommends the implementation of best practices by which projects can promote the safety and well-being of all members, avoid conduct violations, and respond appropriately to problems that arise. ASOR is not the adjudicating body for violations of these standards; however ASOR members, all persons involved in ASOR-affiliated projects, and all persons interacting with ASOR-funded field students are expected to adhere to these guidelines.

2. Defining the Problem

Recent studies, including the “Survey on Field Safety: Middle East, North Africa, and Mediterranean Basin,”³ have shown that harassment, discrimination, bullying, and even assault are common experiences in fieldwork settings among both female and male participants.⁴ Such behavior includes unwanted physical contact; negative, inappropriate, or intimidating comments regarding real or

² For more information about the requirements of Title IX, see U.S. Department of Education, “[Title IX and Sex Discrimination](#).”

³ Nakhai, B.A. 2017a. “[Keeping Archaeological Field Work Safe from Sexual Harassment and Physical Violence](#).” *genderstudies.science*, May 21, 2017; ead. 2017b. “[Keeping archaeological field work safe from sexual harassment and physical violence](#).” The International Association for Assyriology, July 17, 2017.

⁴ Clancy, K.B.H., R.G. Nelson, J.N. Rutherford, and K. Hinde. 2014. “Survey of Academic Field Experiences (SAFE): Trainees Report Harassment and Assault.” *PLOS ONE* 9(7). doi:10.1371/journal.pone.0102172; Nelson Robin G., Rutherford Julianne N., Hinde Katie, and Clancy Kathryn B. H. 2017. “Signaling Safety: Characterizing Fieldwork Experiences and Their Implications for Career Trajectories.” *American Anthropologist* 119(4):710–22. doi:10.1111/aman.12929; Rocks-MacQueen, Doug. April 14, 2018. “[91 Stories of Archaeology](#).” *Doug's Archaeology: Investigating the Profession and Research*; Meyers, M.S., E.T. Horton, E.A. Boudreaux, S.B. Carmody, A.P. Wright, and V.J. Dekle. 2018. “[The Context and Consequences of Sexual Harassment in Southeastern Archaeology](#).” *Advances in Archaeological Practice*. doi:10.1017/aap.2018.23

perceived gender, sexual orientation, familial status, race, color, national origin, religion, age, or disability; and inequitable access to fieldwork assignments and opportunities on the basis of these characteristics. Female respondents experienced these behaviors more often than males, and more commonly from senior project participants, while male respondents most commonly experienced them from peers.⁵ Further discriminatory and alienating behaviors and situations sometimes found on field sites include a) different sets of rules and experiences for male and female project participants; b) gendered divisions of labor (for example, assigning shopping and cooking labor to female project participants);⁶ c) unnecessary tests of physical prowess and endurance;⁷ d) requiring participants with family obligations to be present for the entirety of very long field seasons; and e) unnecessarily forbidding children of participants to be present on projects.⁸

The consequences of these negative experiences, especially those perpetrated by superiors, can be very grave both for individuals' well-being and for their careers, contributing to systemic disparities in professional outcomes.⁹ Yet many fieldwork projects lack basic provisions for the prevention and management of conduct violations, including a clear code of conduct, reporting structures, and/or consequences for violations.¹⁰ The presence of explicit rules regarding appropriate behavior and clear and observable enforcement of these rules results in more positive field experiences for project participants.¹¹ In addition, it is important to have multiple individuals to whom violations of policies can be reported and to provide examples of unacceptable behavior to student participants, who may not know exactly what constitutes appropriate professional behavior versus harassment or bullying.¹²

Furthermore, in the countries of the Middle East and wider Mediterranean where ASOR-affiliated projects take place, political volatility and military conflict have increased in the last decade. These developments require project leaders to plan for and respond to potential changes that affect the safety of the field team, according to governmental recommendations, the policies of sponsoring institutions, and norms of reasonable risk-taking. In such situations, conflicts over the appropriate course of action can arise among project participants that must be mediated in ways that minimize negative consequences for all.

The data collected by these recent studies concerning negative behavior in fieldwork settings¹³ have been used to make several recommendations for how principal investigators, field directors, and others in positions of authority within field projects can help ensure that field participants have a safe and positive experience. ASOR members should take these best practices into account when planning, carrying out, or participating in fieldwork.

⁵ Clancy et al. 2014.

⁶ Meyers et al. 2018.

⁷ Nelson et al. 2017.

⁸ Family separation during long field seasons is an important reason that people in field-based disciplines change careers, are discouraged from entering such fields, or decide to forgo having children, and this problem disproportionately affects women (Lynn, C. D., M. E. Howells, and M. J. Stein. 2018. Family and the Field: Expectations of a Field-Based Research Career Affect Researcher Family Planning Decisions. *PLOS ONE* 13(9). doi: 10.1371/journal.pone.0203500).

⁹ Nelson et al. 2017 ; Meyers et al. 2018

¹⁰ Nakhai 2017a; 2017b; Meyers et al. 2018

¹¹ Clancy et al. 2014; Nelson et al. 2017.

¹² Muckle, R. J. 2014. [On Sexual Harassment and Abuse in Archaeology](http://onlinedigeditions.com/publication/?i=232900). *SAA Archaeological Record* 14 (5): 32-33. <http://onlinedigeditions.com/publication/?i=232900>.

¹³ Clancy et al. 2014; Nelson et al. 2017; for a summary, see also Muckle 2014.

3. Guidelines for the Promotion of Safety and Ethical Conduct in Fieldwork Settings

ASOR members endeavor to establish a professional, safe, and non-discriminatory environment for archaeological field research.

Regarding discrimination, ASOR members should:

- Refuse to practice discrimination based on the categories of race, color, religion, national origin, gender, sexual orientation, age, disability, and familial status including pregnancy in assembling a research team;
- Allocate fieldwork opportunities and responsibilities regardless of gender and the other above-mentioned categories, except where precluded by local regulations;
- When the need arises and conditions allow, permit participants' children to accompany them to the project;
- Avoid discrimination against project members whose family obligations do not allow their presence throughout long field seasons, where possible within institutional rules and grant guidelines, as well as logistical and budgetary constraints;

Regarding harassment, bullying, and violence, ASOR members should:

- Educate themselves and other supervisory staff regarding a) signs of intolerance, harassment, or discrimination, b) their ethical responsibilities for safe and effective intervention and reporting misconduct, c) the policies and procedures of the project's sponsoring institution(s) (e.g., university, museum, agency, or private nonprofit), and d) the laws and emergency procedures in the fieldwork area;
- Establish field-site procedures, guidelines, and resources pertaining to harassment, bullying, intimidation, and violence that adhere to the policies of the project's sponsoring institution(s) and/or local institutions in the fieldwork area and that include multiple identified individuals to whom misconduct can be reported and clear consequences for conduct violations;
- Communicate to all project members before the start of fieldwork, in both written and oral form (including in the relevant local language, when advisable), the following: appropriate behaviors and potential forms of misconduct, including participants' rights and obligations, procedures for reporting violations of project policies, consequences for violations, and the following definition of harassment: harassment is conduct that unreasonably interferes with an individual's work or educational performance, or creates "a work environment that would be intimidating, hostile, or offensive to reasonable people."¹⁴ Sexual harassment is "unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, when this conduct explicitly or implicitly affects a person's employment" or education.¹⁵

Regarding safety, ASOR members should:

- Take all necessary steps to minimize personal and health risks and hazards to project members, including taking extra precautions in case emergency services are unavailable at the field site (e.g., bringing a health professional), monitoring the security situation and keeping in contact with officials in the home and host countries, and making an evacuation plan;

¹⁴ U.S. Equal Employment Opportunity Commission, "[Harassment.](#)"

¹⁵ U.S. Equal Employment Opportunity Commission, "[Facts About Sexual Harassment.](#)"

- Provide clear on-site safety and health-care procedures and guidelines, including contact information for emergency services, in both written and oral form (including in the relevant local language, when advisable);
- Respect the ability of project participants and their families to make different informed evaluations of current political and military situations and their implications for safety and to reconsider their fieldwork participation accordingly, even in the midst of a field season;
- Treat individuals equally who choose to leave or withdraw their project participation because of political or safety concerns and support these individuals equally with regard to their future project participation and/or career advancement;

Finally, ASOR members endeavor to promote understanding of and adherence to the guidelines contained in this Code of Conduct and foster a culture of tolerance and respect while conducting fieldwork.

DEFINITION OF “INITIAL PUBLICATION OR ANNOUNCEMENT”

April 2017

I. The Starting Point

According to the ASOR Policy on Professional Conduct, Section III.E.4, the publications and presentation venues of ASOR shall not serve as the initial place of publication or announcement of any object acquired by an individual or institution after April 24, 1972, (1) which is the date of entry into force of the 1970 UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property, with the following exceptions:

- a. the object was documented as already being in a collection before April 24, 1972; and further, if that object is no longer in its country of origin, it must have been legally exported;
- b. the object was acquired after April 24, 1972 but it is considered to be a forgery and is published as a forgery;
- c. the object’s publication or announcement serves primarily to emphasize the degradation of archaeological heritage.

II. The Problem

Not defined here is what counts as an initial place of publication or announcement of such an object, and therefore it is unclear what sort of prior publication or announcement would need to have been made before an object could subsequently be presented at an ASOR meeting or published in an ASOR journal or monograph.

III. A Definition

Vehicle/Venue: Any one of the elements below constitutes a vehicle or venue for an “initial publication or announcement”:

- A peer-reviewed or similarly vetted publication in a scholarly book or journal, whether in print or online, that conforms to the specifications detailed under “Form” below.
- A peer-reviewed or similarly vetted presentation at a meeting of a learned society, whether in a paper or on a poster, that conforms to the specifications detailed under “Form” below.
- Publication in a scholarly catalog, whether in print or online, that conforms to the specifications detailed under “Form” below. “Scholarly catalogue” in this context refers to a catalog produced by an academically affiliated or educationally oriented organization (e.g., a museum catalog), and not catalogs produced by for profit and/or commercial organizations (e.g., an auction house catalog). Moreover, for a museum’s catalog to be considered a scholarly catalog, the museum would need to adhere to acquisition practices consistent with those stated in the ASOR Policy on Professional Conduct.

Form: Within the vehicles above, initial publication or announcement must include (1) an illustration (e.g., a photograph, a drawing, or similar graphic), (2) along with a commentary specific to the object (such as dimensions and a description, including, as applicable, details of ware and decoration and details regarding production technology). Initial publication or announcement of epigraphic material should also include (3) a transcription, and (4) if appropriate, a translation. Initial publication or announcement does not attach if an object is only referenced

generally, for example, by its purchase, owner, or as part of an unspecified cache (e.g., “X purchased a hoard of 100 artifacts/coins/ostraca/papyri, etc.”).

Citation: In order to ensure that any object acquired by an individual or institution through purchase or donation after April 24, 1972, has been previously published or announced, the place of initial publication or announcement should be cited in the abstract submitted for a paper or poster to be presented in the Annual Meeting or in a footnote following the first mention of said object in an article or monograph submitted for publication in an ASOR journal or monograph series.

IV. Oversight

Decisions regarding the application of this policy reside with the Annual Meeting Section Chairs and, finally, with the Programs Committee (for papers or posters proposed for presentation at the ASOR Annual Meeting); with the editorial boards of *BASOR*, *JCS*, *NEA*, *AASOR*, and *ARS* and, finally, with the Publications Committee (for articles and monographs submitted for publication in ASOR publications); and with the Honors and Awards Committee (for books submitted for the various ASOR book awards).

(1) Which is to say: any object acquired by an individual or institution through purchase or donation after April 24, 1972; this policy does not refer to legally excavated objects that are among, say, materials added to the collection of a museum within the objects’ country of origin after April 24, 1972, nor does it refer to illegally exported objects that are returned to the objects’ country of origin after April 24, 1972.

**Code of Conduct for the
ASOR Annual Meeting and Other ASOR Sponsored Events
May 2020**

I. Introduction

In 2015 the Board of Trustees for ASOR approved a Policy on Professional Conduct that laid out the basic principles ASOR members are expected to follow in their professional activities. Subsequently ASOR adopted the Code of Conduct for Fieldwork Projects. While these documents address most professional activities, they do not provide specific guidance for behavior at the ASOR Annual Meeting. While this silence may have been predicated on the assumption that the aforementioned policies should suffice, events at other professional conferences in 2018 and 2019, including the promulgation of codes of conduct for such events, suggested to the ASOR Board that the organization should follow these other professional organizations such as SCS, SAA, and the European Association of Archaeologists and adopt a policy on conduct at the ASOR Annual Meeting or other ASOR sponsored events.

II. Statement on Harassment

The annual meeting and other ASOR sponsored events provide opportunities for ASOR members to engage in the active exchange of ideas both within and outside formal sessions and to interact and network with colleagues. This policy does not seek to limit the subjects of inquiry or in any way to constrain robust debate and dialogue. Participants in the annual meeting must feel free to explore the ideas that are raised in and out of the formal sessions. At the same time this activity should always occur within an atmosphere of mutual respect, recognizing the diversity of ASOR membership and of those who participate in the conference. Attendees, participants, speakers, volunteers, exhibitors and vendors (hereinafter attendees) at any ASOR- sponsored event, including online venues and official or unofficial social events occurring at ASOR-sponsored meetings, are entitled to expect an atmosphere that is free from any kind of disrespect and are expected to adhere to the provisions of this code irrespective of whether they are members of ASOR.

To that end, ASOR will not tolerate harassment in any form. The policies referenced above, as well as ASOR's non-discrimination policy, emphasize the organization's commitment to a professional environment in which the dignity of every individual is recognized and valued and individuals are not subjected to discrimination based on categories such as gender, which includes real or perceived gender identity, religion, age, race, disability, and sexual orientation and adds the other federally-protected categories of familial status (i.e., marital and parental situation, including pregnancy), color, and national origin.

This means that harassment, intimidation, and bullying of any kind have no place at the ASOR Annual Meeting. For purposes of this policy harassment includes, but is not limited to, sexual harassment such as unwelcome sexual advances, or other verbal or physical contact of a sexual nature. Harassment also pertains to activities/behaviors such as stalking, queer/trans bullying, or hostility or abuse based on age, disability, religion, race or ethnicity. Such conduct is harmful, disrespectful, and unprofessional. Attendees at the Annual Meeting shall not engage in

harassment, bullying, or intimidation of other attendees whether in person or online or through other forms of media, such as unwanted photography/recording whether in or outside a session, or through sustained disruption of talks or other events, and their attendance at the meeting is an express acceptance of the obligation to follow the directives of this policy. Attendees should be mindful that they are bound by the codes of conduct at their own institutions and, as applicable, the provisions of Title IX, and that this policy reinforces those codes.

In the event that an ASOR attendee experiences or witnesses harassment, bullying, or intimidation at the meeting that is inconsistent with the values articulated in ASOR's Policy on Professional Conduct, the attendee should contact ASOR's Executive Director or other member of the Executive Committee or such other third party as the Executive Committee shall have identified and is encouraged to make a report in writing or electronically to them immediately or as soon as is practicable and is encouraged to make a report in writing to them immediately or as soon as is practicable. The Executive Committee will delegate two members of that body to work together to investigate the reported behavior, to contact the person who has reported the behavior, and, if warranted, to contact the person about whom the complaint has been made. Pursuant to that determination the Executive Committee or its delegate(s) may take further and immediate action at the annual meeting, including notifying the individual that he/she is barred from attending any further events at the meeting without providing any refund of registration or membership fees, if complaints are made onsite and such a response is deemed necessary. The Executive Committee or its delegate(s) may, if circumstances warrant it, bar the individual from attending one or more subsequent meetings or revoke the individual's membership in ASOR depending on the severity of the matter. The Executive Committee or its delegate(s) may also exclude from the Annual Meeting or other ASOR sponsored events any individual censured by his or her home institution for harassment of any kind as described above if the Executive Committee learns of such censure prior to the commencement of the Annual Meeting or other ASOR sponsored event. In order to facilitate the process for giving notice of harassment ASOR shall provide attendees with a flyer or other handout or badge identifying the members of the Executive Committee or such other persons as attendees should contact in the event of an incident of harassment. Placards with the text of this policy and contact information shall be posted in the venue of the Annual Meeting.

Website and Electronic Communications Policy

I. Introduction and Purpose.

1.1. The American Society of Overseas Research (ASOR) is committed to providing a confidential and secure website environment for its members, social media users, friends, and visitors to electronically communicate with the organization and carry out online transactions.

1.2. ASOR does not use illegal or misleading methods to mine data, including email addresses, telephone numbers, facsimile numbers, physical addresses, and other personally identifiable information. All such data is obtained only through normal business transactions, including through processing membership applications and event registrations, online sales transactions, purchased data lists, and attending and participating in trade shows.

1.3. To these ends, the ASOR Board of Trustees enacts this Website and Electronic Communications Policy governing the collection and use of such data.

II. Data Collection and Dissemination Practices.

2.1. Names and Mailing Addresses. ASOR collects names, mailing addresses, telephone numbers, and other demographic information through website transactions, and uses such data to communicate with members and prospective members, conduct business, and enhance services. ASOR occasionally shares such data (excluding telephone numbers) with like-minded partner learned societies and other nonprofit organizations. ASOR also occasionally rents such data (excluding telephone numbers) to relevant external vendors for one-time use. ASOR maintains systems guarding against unauthorized or multiple uses of such data.

2.2. Email Addresses. ASOR also collects email addresses through website transactions, and uses such data to disseminate information about the organization and communicate with members, prospective members, writers, visitors, friends, meeting and event attendees, and e-newsletter and journal subscribers. Persons registered on the ASOR website, blog, and social media sites may opt out of email communications by changing their profiles in Informz, ASOR's email software system. ASOR does not, as a matter of course, send emails to its registered website, blog, and social media site users on behalf of publishers and other advertisers of interest, although it may occasionally do so. All such emails are marked as originating from ASOR. Recipients may opt out of such emails by clicking the opt-out link at the bottom of the emails or contacting ASOR Membership and Subscriber Services. ASOR also occasionally rents email lists to advertisers for one-time use. ASOR maintains systems guarding against unauthorized or multiple uses of such email lists.

2.3. Credit Card Information. When purchasing a product or making a donation through the ASOR website, a credit card number must be provided to complete the transaction. Although ASOR does not store credit card information after each completed transaction, ASOR maintains a transaction reference number provided by PayPal, ASOR's electronic payment processor. ASOR adheres to the Payment Card Industry Data Security Standards (PCI-DSS) for all electronic payment transactions.

2.4. Cookies. When a visitor accesses the ASOR website, blogs, or social media sites, a temporary cookie (or file) is created solely to aid navigation. Cookies are not used to collect information from users. ASOR also does not use tracking cookies or third-party cookies on its website, blogs, or social media sites.

2.5. Accessing and Updating Information. All records in the ASOR database are accessible online by ASOR personnel, but not by outside parties. Registered ASOR website, blog, and social media site users may access their personal information by logging into their ASOR accounts. ASOR members also may access the ASOR online membership directory containing the names and addresses of ASOR members who

have not opted out of the online membership directory. Registered ASOR website, blog, and social media site users may modify their personal information, or opt out of ASOR electronic communications, by [logging into their accounts](#) or contacting ASOR Membership and Subscriber Services.

2.6. Copyright and Trademark. Unless otherwise noted, ASOR website, blog, and social media site content is owned by ASOR and protected by U.S. and international copyright and trademark laws. All rights in such content are reserved by ASOR. Visitors may not copy, reproduce, download, upload, republish, disseminate, post, distribute, transmit, or use any ASOR website, blog, or social media site content unless prior written permission is secured from ASOR. Copyright and trademark infringement is a violation of federal law; violators are subject to civil and criminal penalties.

III. Disclaimers.

3.1. General information only. ASOR website, blog, and social media site content is provided by ASOR for general information purposes only. None of such content is intended, or should be construed, as legal advice or a legal opinion. While every effort is made to ensure that ASOR website, blog, and social media site content is accurate, errors or omissions may occur. Moreover, because of the nature of website and social media site development, maintenance, and updating, such content may not always reflect the most current developments.

3.2. Disclaimer. Use of the ASOR website, blogs, and social media sites is at the user's risk. ASOR and its trustees, officers, employees, volunteers, contributing authors, agents, and representatives expressly disclaim any liability to users of the ASOR website, blogs, and social media sites or any third-party for compensatory, direct, indirect, incidental, special, exemplary, punitive, or consequential damages, or attorneys' fees, arising out of the use of, or reliance upon, in whole or in part, ASOR website, blog, and social media site content, the inability to gain access to or use such content, or out of any breach of warranty.

3.3. External Links. As a service to users, the ASOR website and ASOR social media sites include links to other websites and social media sites of interest. Such third-party sites contain information created, published, maintained, or otherwise posted by institutions or organizations independent of ASOR. ASOR does not endorse, approve, certify, or control these third-party sites, and, therefore, does not guarantee the accuracy, completeness, efficacy, timeliness, or correct sequencing of their content. Content on the ASOR website, ASOR social media sites, and third-party sites is provided "as is" and without warranties of any kind. To the fullest extent permissible by applicable law, ASOR disclaims all warranties, express or implied, including, without limitation, title, non-infringement, and the implied warranties of merchantability and fitness for a particular purpose. Nor is ASOR responsible for the content of such third-party sites, and expressly disclaims any liability for injury or damages arising out of their use. Use of any information obtained from such third-party sites is voluntary, and reliance upon it should only be undertaken after an independent review of its accuracy, completeness, efficacy, and timeliness. Reference therein to any specific product, process, or service by trade name, trademark, service mark, manufacturer, or otherwise does not constitute or imply endorsement, recommendation, or favoring by ASOR.

WHISTLEBLOWER POLICY

The whistleblower policy is intended to provide a mechanism for the reporting of illegal activity or the misuse of ASOR assets while protecting the employees who make such reports from retaliation.

1. Questionable Conduct

This policy is designed to address situations in which an employee, board member, or officer suspects another employee, board member, or officer has engaged in illegal acts or questionable conduct involving ASOR's assets. This conduct might include outright theft (of equipment or cash), fraudulent expense reports, misstatements of any accounts to any manager or to ASOR's auditors, or even an employee's conflict of interest that results in financial harm to ASOR. ASOR encourages staff, board members, and officers to report such questionable conduct and has established a system that allows them to do so anonymously.

2. Making a Report

If an employee, board member, or officer suspects illegal conduct or conduct involving misuse of ASOR assets or in violation of the law, he or she may report it, anonymously if the employee wishes, and will be protected against any form of harassment, intimidation, discrimination, or retaliation for making such a report in good faith.

Employees, board members, and officers can make a report to any of the following ASOR executives at any time: president or executive director. ASOR will promptly conduct an investigation into matters reported, keeping the informant's identity as confidential as possible consistent with our obligation to conduct a full and fair investigation.

Alternatively, employees, board members, and officers can make a report by calling either the board chair or the chair of the finance committee (the treasurer). Their names and phone numbers are posted on ASOR's intranet.

3. No Retaliation

An employee, board member, or officer who has made a report of suspicious conduct and who subsequently believes he or she has been subjected to retaliation of any kind by any ASOR employee, board member, or officer is directed to immediately report it to the chief executive, the president, or the head of human resources as appropriate.

Reports of retaliation will be investigated promptly in a manner intended to protect confidentiality as much as practicable, consistent with a full and fair investigation. The party conducting the investigation will notify the employee of the results of the investigation.

ASOR strongly disapproves of and will not tolerate any form of retaliation against employees, board members, or officers who report concerns in good faith regarding ASOR's operations. Any employee who engages in such retaliation will be subject to discipline up to and including termination.

4. ASOR Reporting Procedures

The "whistleblower" procedure is intended to describe the process through which concerns about the possible misuse of ASOR assets are handled pursuant to ASOR's whistleblower policy.

- a. An employee, board member, or officer makes a report of suspected misuse of ASOR assets by reporting in person to an ASOR executive, or reporting anonymously to the board chair or the audit committee chair (the treasurer).
- b. The report is promptly reviewed by the chief executive, as well as the president, to determine whether the report constitutes a complaint or a non-complaint, unless one of them is allegedly involved in the misconduct, in which case the report should be reviewed by only one of them. (If both of them are alleged to be involved, the report should go directly to the board chair or the audit committee chair (the treasurer).)

* A complaint means any report involving (i) questionable accounting, auditing, financial reporting, or internal controls; (ii) suspected fraud, theft, or improper use of company assets; (iii) a violation of ASOR's conflict-of-interest policy that results in a financial harm to ASOR; or (iv) a claim of retaliation against any employee making a good-faith report regarding any of the preceding matters.

* A non-Complaint means a report of any other matter not involving a misuse of ASOR's assets

- c. If the report is deemed to be a complaint, it will be promptly investigated and forwarded to the audit committee chair (the treasurer). If the report is deemed to be a non-complaint, it will be referred to the appropriate executive or manager for follow-up. Some non-complaints may involve serious matters and may require prompt investigation, but may nevertheless not involve misuse of ASOR's assets.
- d. Each complaint is fully investigated, and as far as possible handled so as to protect the privacy of the employee making the complaint. A written report of the outcome of each investigation is prepared and delivered to the audit committee chair (the treasurer).
- e. The audit committee chair (the treasurer) decides whether the report involves a matter that is material. If it is deemed material, it is reviewed by the full committee, which may forward it for disposition to the board or may direct senior management to take actions to resolve the situation. If the report is deemed nonmaterial, it is not reviewed by the committee but is instead addressed by the chief financial officer, as appropriate.

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 Reynolds, 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 anticipated 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 an 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

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

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	

1-1 Total 0.00

Select all Clear all

Selected Payments Total 0.00

▼ Add funds to this deposit

#	RECEIVED FROM	ACCOUNT	DESCRIPTION	PAYMENT METHOD	REF NO.	AMOUNT	CLASS
1	Department of State	S1007 Grant income: Federal grants: DRL Grant 2021	DRL 2021 Q4 2021 payment	electronic		24,619.45	PROGRAMMING-CULTURAL HERITAGE IN
2							

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:

Other funds total \$24,619.45

Total \$24,619.45

Attachments Maximum size: 20MB

2022-02-02-SF-425-ASCR-DRL-2021-grant-SLMAQ21GR3180-2021-Q4-4-signed.pdf (105.3 kb) ×

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 review the Google Sheet for each 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. 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 of approval.

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. The Executive Director may also approve of the Finance Manager's time sheet.

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 and the hourly workers' time sheets to check that everything is in order. Payroll is then submitted via the Paychex Flex Payroll portal.

Appendix F: Procurement Conflict of Interest Form

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: _____

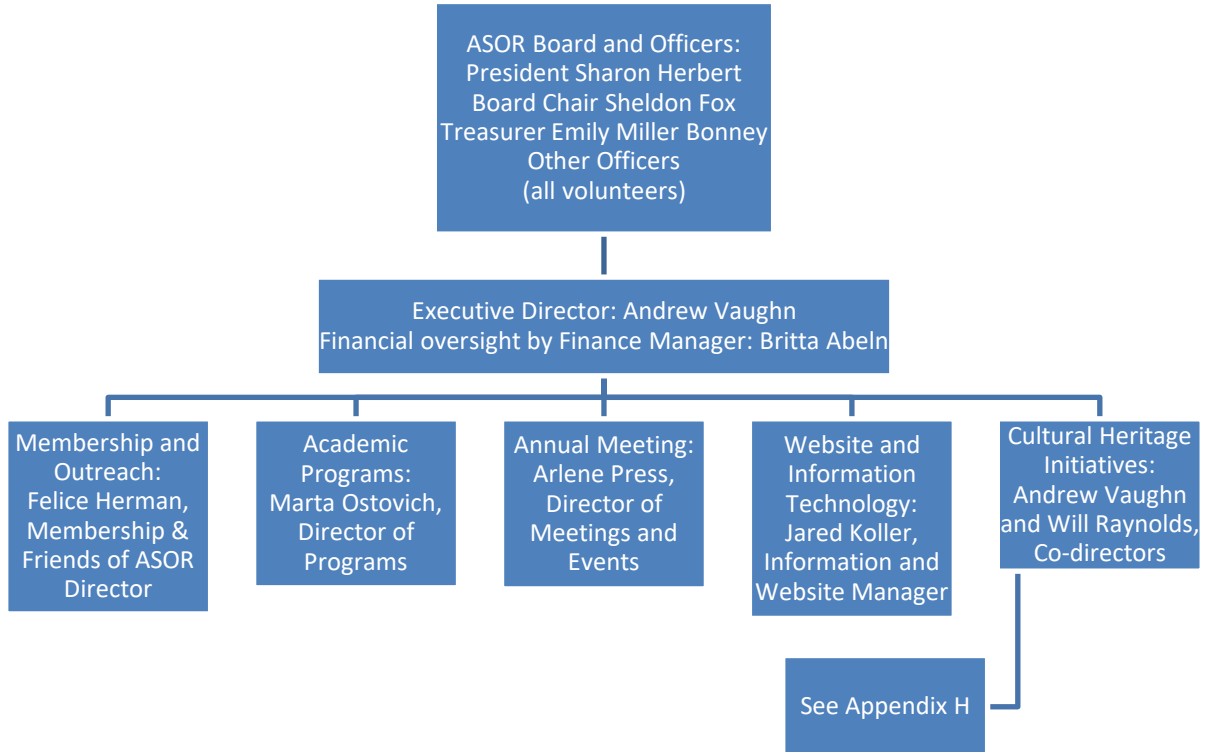
Title: _____

Signature: _____

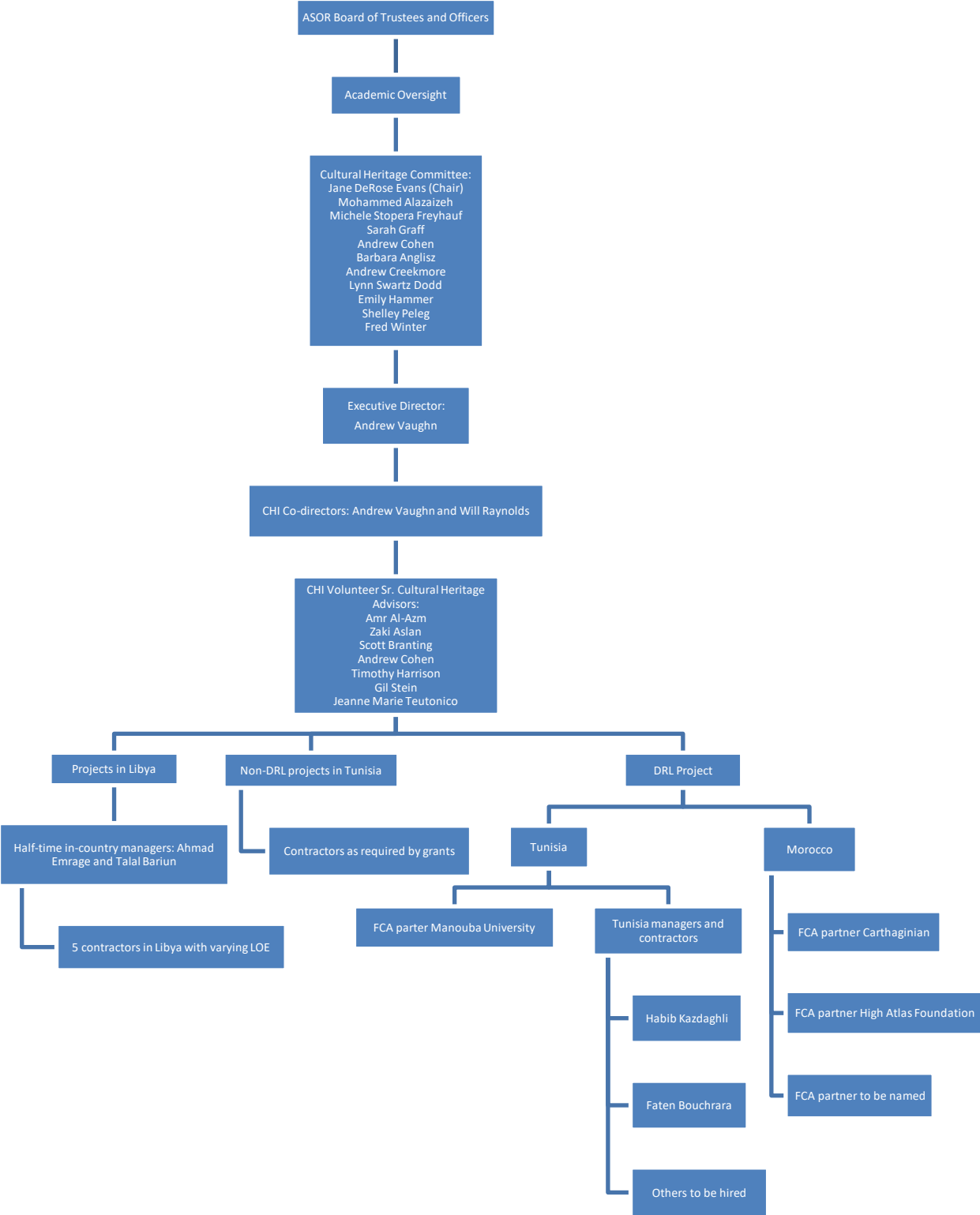
*When completing the form above, the Procurement line should be concise, but include enough information for someone to be able to determine what this form relates to in the future. For example, “AM22 Open Water A/V contract” would be enough for someone in the future to understand that this is a form 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

ASOR Organizational Chart



Appendix H: ASOR Cultural Heritage Initiatives Organization Chart



Appendix I: Fly America Exemption Form



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

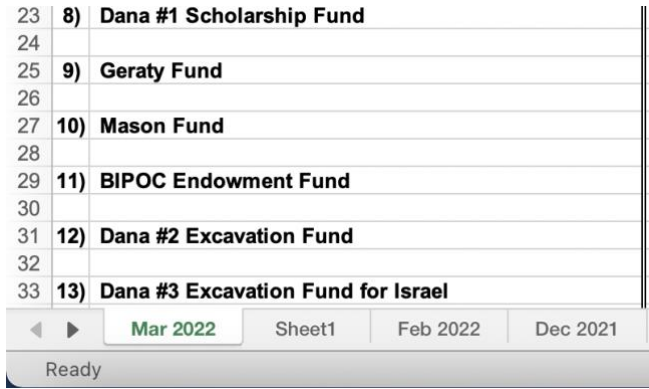
ASOR Approval (if not traveler)

Date

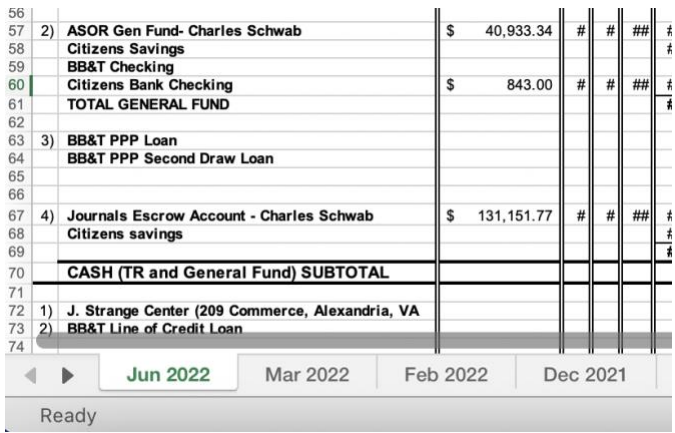
Appendix J: Preparation of Quarterly Spreadsheets for Finance Committee
(not part of federal grant requirements)

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	Benchmark	Custom
							\$ -			-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: [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	

1-1 of 1 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

Track returns for customers

Memo: 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](#)

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 1074 BB&T BB&T Checking - Gen	Balance \$117,557.10
Transfer Funds To 1077 BB&T BB&T DOS Grant Func	Balance \$148,992.06
Transfer Amount 160,000.00	Date 06/20/2022

Memo
Transfer of CPAIG (SLY80021GR3016) advance from GF to HPMM DOS

Attachments Maximum size: 20MB

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

Drag/Chop 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 Fund	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: Journal no.:

#	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			

Memo

Attachments Maximum size: 20MB

Drag/Drop files here or click the icon
[Show existing](#)

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

Journal date: 06/30/2022 Journal no.: JE 6-30-22 Grants

#	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			

Memo: 2022-06-30 DRL 2021 A/R

Attachments: 2022-07-21 AR for DRL 2021 Tunisia and Morocco.pdf (37.5 kb), SF-425 ASOR DRL 2021 grant SLMAQMG1GR3180 2022 Qtr 2 signed.pdf (101.5 kb)

Buttons: Add lines, Clear all lines, 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	<u>3,855,167</u>	<u>2,735,950</u>
Total net assets with donor restrictions	<u>3,998,550</u>	<u>3,029,531</u>
	<u>6,070,798</u>	<u>4,669,413</u>
	<u>6,070,798</u>	<u>4,669,413</u>
TOTAL LIABILITIES AND NET ASSETS	\$ <u>6,547,519</u>	\$ <u>5,081,043</u>

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

EXPENSE REPORTING FOR ASOR

Name: _____
 Description: Give a description of the reason for your reimbursement request: location, purpose
 Dates: Dates of expenses and/or travel
 Note: Supporting documentation (receipts, invoices, etc.) is required for all purchases. If no receipt is available (for example, a cash tip), include an explanation for an amount under \$5; if over \$5 with no receipt, a signed statement is required.
 Note: Description required for all expenses.
 *For mileage, see directions below.

Item Number	Date	Location	Grant Expenses											Mileage*		SUBTOTAL	Description	Grant	Receipt Submitted?						
			International Travel			Local Travel			Non-Travel Grant Expenses					Current rate:	\$/Mile										
			Lodging	Airfare/ground transportation	M&I	Lodging	Airfare/ground transportation	M&I	Equipment	Supplies	Contractual	Other Direct	CHI General	Annual Meeting	Development	# of Miles	Amount	Category							
Exp. 1	1/30/22	Home to DCA airport													\$ 14.41	22	\$ 14.41	Development	\$ 14.41			Dropoff at DCA airport for development trip to California		No, calculation of mileage included	
Exp. 2	11/24/19	Westin San Diego												\$ 5.00						\$ 5.00			Cash paid to valet at AM19 at Westin San Diego		No, note included
Exp. 3	5/4/22	LAX to Morocco		\$ 155.15																\$ 155.15			Airfare for Haroon Mallins to travel to Morocco for training sessions with High Atlas Foundation	DRL 2021	Yes
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25																									
																	TOTAL:	\$ -							

Signature _____ Date _____
 Approval _____ Date _____
 Second Signature** _____ Date _____
 **Second signature required for payments over \$3,000 (and for all payments to Executive Director)

Directions for completing ASOR expense report:
 Please submit ASOR credit card receipts and reimbursement requests on separate expense reports.
 For reimbursement requests, you must state in your email to Britta that you are requesting a reimbursement.
 Name: fill in your name.
 Description: give a concise, but complete description of the activities or travel relevant to these expenses. Be sure to include location(s) of travel and purpose.
 Dates: enter the dates of your travel.
 Use a separate line for each receipt. If a receipt is allocated to multiple categories, use one line for each category.
 Date: enter the date of the purchase.
 Location: enter the location of the purchase.
 Enter the amount of the expense in the appropriate category (columns D-P). If your category is not there, enter the name of the category in place of one of the named categories and highlight the cell in yellow. Restate the category name in the Description field as well.
 For mileage, enter the number of miles in # of Miles (column Q) then enter the calculated amount from Amount (column R) in the box of the appropriate category. For example, in Line 13, 22 miles were entered in cell Q13. R13 automatically calculated the amount of \$12.87. T
 The Subtotal (column T) will autopopulate with the amount for each line.
 Description: give a concise, but complete description of the expense. Keep in mind: who, what, when, where, why, how. If the receipt is not in US\$, also state the amount in local currency in the Description field.
 Grant: if it is a federal grant expense, enter the name of the grant here.
 Receipt Submitted?: this should almost always be "yes," but if the answer is no, then a written explanation must be given for that expense. See Note above.
 Double check that your amounts match your receipts.
 Sign and date the expense report before submitting.
 Submit the completed expense report along with all supporting documentation to Britta at finance@asor.org.

Please do not change the cells that have formulas in them (columns R, T, rows 41, 42)

Appendix Q: Separation of Duties

CASH DISBURSEMENTS	Admin. Asst.	Director of Programs	Finance Manager	Executive Director	Treasurer	Charity CFO
Administrative assistant opens mail and stamps with date received	x	x				
Administrative assistant scans all invoices and uploads to secure Dropbox for Finance Manager to review	x	x				
Finance Manager reviews invoices and approves for payment (Executive Director sometimes reviews and approves) seeking additional approvals, if necessary			x	x		
If over \$3,000, two approvals are needed. Finance Manager and Executive Director email approvals. Treasurer can also approve >\$3,000 payments			x	x	x	
Any payments (reimbursements) to Executive Director must be approved by Finance Manager and Treasurer			x		x	
Finance Manager (sometimes Executive Director) makes online payment or writes check			x	x		
Finance Manager records payments in QuickBooks			x			
Checks mailed	x	x	x			
Charity CFO reconciles bank accounts						x

CASH RECEIPTS	Admin. Asst.	Director of Programs	Finance Manager	Charity CFO
Administrative assistant opens mail	x	x		
Administrative assistant scans checks and stamps "for deposit only"				
Administrative assistant uploads scans to secure Dropbox for Finance Manager	x	x		
Administrative assistant records all checks into Cash Log	x	x		
Administrative assistant prepares deposit slip and deposits checks at Charles Schwab	x	x		
Finance Manager compares check copies to deposit slip			x	
Finance Manager records deposit into QuickBooks			x	
Charity CFO reconciles bank statements				x

PAYROLL	Executive Director	Finance Manager	Paychex	Charity CFO
Executive Director approves new hire info (salary, date of hire, etc.)	x			
Finance Manager maintains time sheets for employees		x		
Paychex deposits paychecks directly into employees' accounts			x	
Finance Manager enters payroll into QuickBooks		x		
Finance Manager reconciles payroll to General Ledger		x		
Charity CFO reconciles bank statements				x

Appendix R: Conflict of Interest Disclosure Form

The term “affiliated persons” in this Questionnaire includes the following:

- Any immediate family member,
- Any corporation, partnership, organization or other entity of which you are an officer, director, and/or partner or own, directly or indirectly, 10% or more of any class of equity securities and/or other ownership units, or
- Any trust or other estate in which you have a substantial beneficial interest or of which you serve as a trustee, executor, representative, agent and/or other similar capacity.

1. Name (please print) _____

2. Capacity within ASOR: board of trustee executive committee officer
 committee member ASOR staff other, specify: _____

3. Have you or any of your affiliated persons provided services or property to ASOR in the past twelve months? yes no

If yes, please describe the nature and value of the services or property provided.

4. Have you or any of your affiliated persons purchased services or property from ASOR in the past twelve months? yes no

If yes, please describe the nature and value of the services or property purchased.

5. Have you or any of your affiliated persons had a direct or indirect interest in any business transaction(s) in the past twelve months to which ASOR was a party. yes no

If yes, describe the transaction(s):

6. Were you or any of your affiliated persons indebted to pay money to ASOR at any time in the past year (other than travel advances or the like)? yes no

If yes, please describe the indebtedness.

7. In the past twelve months, did you or any of your affiliated persons receive, or were entitled to receive, directly or indirectly, any benefits resulting from your relationship with ASOR in the aggregate value of over \$1,000 that were not compensation directly related to your duties to ASOR?

yes no

If yes, please describe the benefit(s).

8. Are you or any of your affiliated persons a party to, or have an interest in, any pending legal proceedings involving ASOR? yes no

If yes, please describe the proceeding(s).

9. Are you aware of any other events, transactions, arrangements, agreements, relationships, or other situations that you believe should be examined by ASOR's board or the executive committee in accordance with the terms and intent of ASOR's conflict-of-interest policy? E.g., if you are a member of the board of trustees of another learned society or of one of ASOR's affiliated research centers, please list that situation. yes no

If yes, please describe the situation(s):

I HEREBY CONFIRM that I have read and understand ASOR's Conflict-of-Interest Policy and that my responses to the above questions are complete and correct to the best of my knowledge and belief.

Signature

Date

Appendix S: Donor Disclosure and Waiver

Fiduciary Responsibility

ASOR is a Massachusetts nonprofit, public-benefit corporation governed by its Officers and Board of Trustees.

Privacy Notice

All information supplied to ASOR by Donor will be kept confidential, and not disseminated to any other person or entity except as required by law.

Consent to Publish Donor's Name and Contribution

One of the ways in which ASOR expresses appreciation of its Donors is by recognizing them in various ASOR publications. Unless you request otherwise, we will assume you consent to being identified as an ASOR Donor in this manner.

Independent Counsel and Advice

The ASOR Gift Acceptance Policy requires us to advise you to consult your own independent legal or tax counsel or other appropriate advisors regarding any gift. Donor acknowledges, understands, and agrees that ASOR and its representatives will not provide any legal, investment, tax, financial, or other advice to Donor regarding any gift.

Recovery of Operating Expenses from Private Gifts

By making a contribution, Donor acknowledges, understands, and agrees that ASOR may annually set aside a percentage of any restricted gift specified in the Investment and Spending Policies to support ASOR's administrative expenses.

UNDERSTOOD AND AGREED:

Donor

Signature: _____ Date: _____

—

Donor Name (Print): _____

Signature of ASOR

Representative: _____ Date: _____

—

WAIVER

Should the purpose designated for my gift no longer exist or become impractical in the opinion of the ASOR Board of Trustees, I hereby direct the Board to designate an alternate use for the gift that will most nearly accomplish my wishes while meeting the needs of ASOR.

Donor

Signature: _____ Date: _____

—

This policy was developed on November 12, 2017.