

4th Annual

Native CDFI Capital Access Convening

June 25-27, 2019 • Lihue, Hawaii











Reducing Poverty. Building Prosperity.









Administration for Native Americans
An Office of the Administration for Children & Families



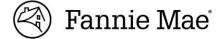


Easy Financial Controls











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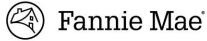


White Buffalo CDC



























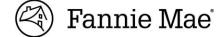


Pacific Financial Services















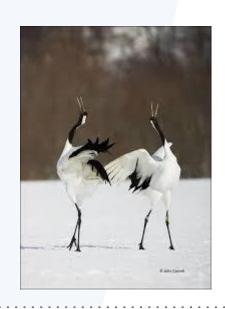






Dancing Crane CDFI

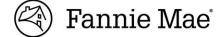






























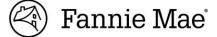




























What is Internal Control?

Internal control is the process by which management structures an organization.

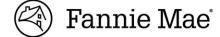
























Internal Controls: Defined



In accounting and auditing internal control is defined as:















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Principles of Internal Controls

Control Environment

Control Activities

Risk Assessment

Information & Communication

Monitoring Activities

- Demonstrates commitment to integrity and ethical values
- Exercises oversight responsibility
- Establishes structure, authority and responsibility
- Demonstrates commitment to competence
- Enforces accountability
- 6. Specifies suitable objectives
- Identifies and analyzes risk
- Assesses fraud risk
- o. Identifies and analyzes significant change
- 10. Selects and develops control activities
- 11. Selects and develops general controls over technology
- 12. Deploys through policies and procedures
- 13. Uses relevant information
- 14. Communicates internally
- 15. Communicates externally
- 16. Conducts ongoing and/or separate evaluations
- 17. Evaluates and communicates deficiencies















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The Five Components of a Strong **Internal Control Framework**

Monitoring **Control Activities** Assessment of a control system's Policies/procedures that ensure performance over time. management directives are carried out. Combination of ongoing and separate evaluation. Range of activities including approvals, authorizations, Management and supervisory verifications, recommendations, activities. performance reviews, asset Internal audit activities. security and segregation of Control Environment duties Information and Communication Control Environment **Risk Assessment** Pertinent information identified. Sets tone of organization- Risk assessment is the influencing control consciousness identification and analysis of captured and communicated in a of its people. relevant risks to achieving the timely manner. entity's objectives-forming the Access to internal and externally Factors include integrity, ethical basis for determining control generated information. values, competence, authority, activities. responsibility. Flow of information that allows for successful control actions from Foundation for all other instructions on responsibilities to components of control. summary of findings for management action.

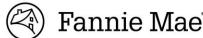






INIVERSITY OF MICHIGAN





Center for Indian Country

Development



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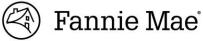












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Internal controls function to:

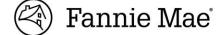


- minimize risks and protect assets
- ensure accuracy of records
- promote operational efficiency
- encourage adherence to policies, rules, regulations, and laws





















Seven Examples of Internal Controls



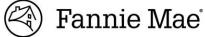
- separation of duties
- access controls
- physical audits
- standardized documentation
- trial balances
- periodic reconciliations
- approval authority
- cash control



















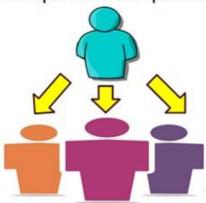




Segregation of Duties Definition



- Segregation of Duties(SOD) is a concept of separating "incompatible duties" so that 1 person doesn't have all 3 duties
 - Authorization = approving
 - Safekeeping = holding the asset or access to asset
 - Record keeping = keeping track of the asset/liability
- Having 2-3 person required to complete a process

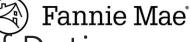
























Examples of Segregation



- Vendor Maintenance & Posting Invoices
- Purchase Orders & Approvals
- Payments & Bank Reconciliation
- Paychecks & Bank Reconciliation
- Journal Entry & Approvals























More Examples of Segregation



- Custody of Cash & Account Receivable Reconciliation
- Hire & Set Compensation
- Expenses & Expense Approvals
- Asset Custody & Asset Inventory
- Sales & Approvals
- Customer Maintenance & Credit Notes























PERSON A

Opens mail and removes checks Restrictively endorses checks

Makes a log of the checks received and forwards checks to accounts receivable

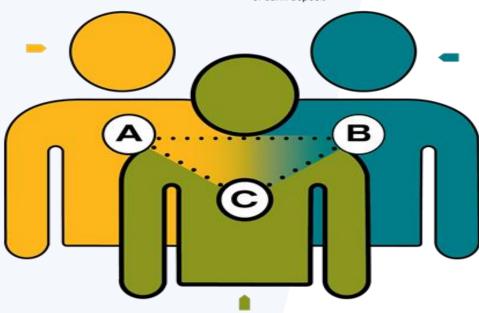
PERSON B (accounts receivable)

Prepares deposit and sends to Person C for review and deposit in bank

Applies check payments to outstanding accounts

Compares total payments recorded to copy of bank deposit





PERSON C

Reviews deposit and deposits checks at bank

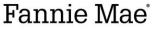
























Cash Controls

Internal Control over Cash Receipts

Establishment of Responsibility

Only designated personnel are authorized to handle cash receipts (cashiers)

Segregation of Duties

Different individuals receive cash, record cash receipts, and hold the cash

Illustration 8-5

Chapter

Documentation Procedures

Use remittance advice (mail receipts), cash register tapes, and deposit slips

Physical, Mechanical, and Electronic Controls

Store cash in safes and bank vaults: limit access to storage areas: use cash registers

Independent Internal Verification

Supervisors count cash receipts daily; treasurer compares total receipts to bank deposits daily

Other Controls

Bond personnel who handle cash; require employees to take vacations; deposit all cash in bank daily

LO 3 Explain the applications of internal control principles to cash receipts.





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Board Oversight

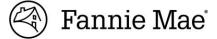




























The "Three D's" of sitting on a Board of Directors

OWEESTA

Duty of Care

 Board members are expected to actively participate in organizational planning and decision-making and to make sound and informed judgments.

Duty of Loyalty

 When acting on behalf of the organization, board members must put the interests of the nonprofit before any personal or professional concerns and avoid potential conflicts of interest.

Duty of obedience

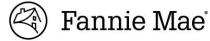
 Board members must ensure that the organization complies with all applicable federal, state, and local laws and regulations, and that it remains committed to its established mission.

In addition to its legal responsibilities, the board acts in a fiduciary role by maintaining oversight of the nonprofit's finances. Board members must evaluate financial policies, approve annual budgets, and review periodic financial reports to ensure that the organization has the necessary resources to carry out its mission and remains accountable to its donors and the general public.











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Board Oversight Options

- A strong, involved treasurer
- A quality finance committee
- Recruiting a mix of board members, but at least a few strong enough with financials

Board Financial Responsibilities

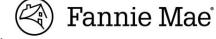


- Understand and review the financial statements
- Review and approve the annual budget
- Review auditor qualifications and audit, annually





















Signs The Org is in Trouble



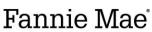
- 1. Not sharing financial statements with board at least quarterly; not able to produce easily
- More than two years with a net loss, especially large unrestricted net asset losses
- 3. Dwindling cash
- 4. Dwindling loan capital























More Signs The Org is in Trouble

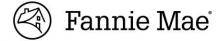


- 5. A lot of loans to family or board members
- 6. Irregular board meetings
- Board members leaving/not full board
- 8. Any "secretive" staff or board members









TAMALPAIS TRUST













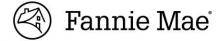
Audit Control Procedure



























Audit Tests

- inquiry
- observation
- examination or inspection of evidence
- re-performance
- computer assisted audit technique (CAAT)



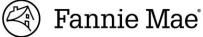






















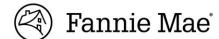


Policies



























POLICY

The formal guidance needed to coordinate and execute activity throughout the district. When effectively deployed, policy statements help focus attention and resources on high priority issues - aligning and merging efforts to achieve the district's vision. Policy provides the operational framework within which the district functions.

- Widespread application
- Changes less frequently
- Usually expressed in broad terms
- States "what" and/or "why"
- Answers operational issues

PROCEDURE

The operational processes required to implement district policy. Operating practices can be formal or informal, specific to a department or building or applicable across the entire district. If policy is "what" the district policy expressions.

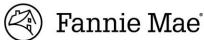
- Narrow application
- Prone to change
- Often stated in detail
- States "how", "when", and/or "who"
- Describes process

























Must Have Policies

- Employee Handbook
- Financial Management Policy
- Procurement Policy
- Loan Policy
- Travel Policy



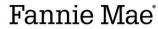
























Conflict of Interest Policies

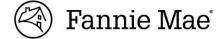




























Conflicts of Interest- Disclose

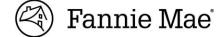


- Direct financial relationships with the organization
- Familial relationships with staff members





















Whistleblower Policies





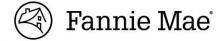
























Whistleblower Policies



- Federal law prohibits retaliation against employees who report fraud
- Everyone in the organization has the responsibility to report violations of law, regulations, or ethics
- Designate a point person or committee to receive and investigate possible violations
- Violations don't need to be true to receive protection, but they must be made in good faith























AAA Administration for Native Americans

An Office of the Administration for Children & Families

Protecting Whistleblowers



Confidentiality

- Identity is kept as secret as possible
- May need to be disclosed to conduct investigation or allow for legal defense

No Retaliation

- Termination
- Cut in pay or hours
- Threats
- Poorer work assignments

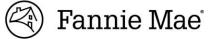


















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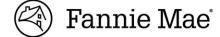
























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