

Consumer Credit Counseling Service

of Forsyth County, Inc.

D/B/A Financial Pathways of the Piedmont

Revised and Updated Agency Policies

Adopted by CCCS of Forsyth County, Inc.

Board of Directors

Updated September 23, 2016

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ADMINISTRATION and MANAGEMENT

Ethical Practice (ETH)

POLICY #ETH/101 - Conflict of Interest	
Formerly Policy #GA/101	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS shall require each member of the Board, Staff, Advisory Boards, volunteers and/or agency consultants to disclose if they have any direct or indirect financial or managerial interest in any proposals the agency is considering that affect agency assets, leases, business transactions or professional services.</i>	

Rationale

Prior disclosure of such relationships must be insisted upon in order to ensure that no commercial transaction undertaken by the agency will have the appearance of having resulted from inside information, contacts, or influence. Board and Advisory Board members of CCCS are required to serve without compensation and without personal benefit. Agency staff and volunteers are expected to keep any outside professional interests entirely separate from their CCCS duties and responsibilities. Decisions made by the Board and Agency Management must be based solely upon the best interests of the agency and its clients.

Procedure

In the procurement of goods and services for CCCS, management shall inquire of all vendors as to existing relationships between the vendor and members of the agency's Board and Advisory Boards. Should any relationship be found to exist, the agency's President/CEO should immediately be contacted. In the event that any impropriety within the meaning of this policy is discerned, the President/CEO shall immediately consult with the Chair of the agency's Board of Directors (or Vice Chair if the Chair is involved with the vendor), who shall determine the action necessary and the final disposition of the matter. If a conflict exists between a Board and a proposed vendor, the Board member shall not participate in any voting regarding such business transaction or services.

In the procurement of goods and services for CCCS, agency management team shall ask all vendors if any relationship exists between the vendor and CCCS employees and the families of CCCS employees. Should any relationship be found to exist, the agency's President/CEO should immediately be contacted. In the event that any impropriety within the meaning of this policy is discerned, the President/CEO shall take appropriate steps with regard to disciplinary action and/or the invalidation of the proposal. Should the President/CEO be involved in any impropriety, a member of the agency management team will report such information to the Board Chair, who shall take appropriate action.

Willful failure to disclose to the agency such relationship may result in removal from the Board of Directors, Staff, Advisory Boards or consultative status and/or invalidation of the proposal.

POLICY #ETH/102 – Conflict of Interest – Nepotism	
Formerly Policy #GA/103	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS will not employ relatives of current employees or current members of the Advisory Boards, Committees, or Board of Directors in positions involving the delivery of agency services, or in positions supporting the delivery of agency services.</i>	

Rationale

CCCS shall discourage the employment of relatives of current employees or members of Advisory Boards, Committees, or Board Members. A relative, for these purposes, include those persons related to employees or governing body or advisory board members through family of origin, extended family, or marital affiliation. No employment or placement will be made when it would result in an employee or Board Member having influence over a relative’s employment, promotion, salary administration or other related management or personnel consideration in providing favoritism. No employment or placement will be made when it would result in any employee supervising a relative. The Personnel Committee of the Board of Directors will act to interpret any issue of nepotism.

Nepotism, or perceived nepotism, in hiring for responsible positions can damage staff morale, and can result in the hiring of individuals who are not the most qualified applicants for the positions. Giving preferential treatment or favoritism to any individual that assumes governance, administration, management, supervisory or financial functions within the organization would be in conflict with CCCS core values, and cause disruption of agency operations and service delivery.

Procedure

In screening applicants for CCCS with responsibility for any facet of client services, management shall specifically inquire as to whether any relationship exists between the applicant and current staff or board members. In the event of such a relationship careful consideration to hiring will be given prior to employment.

POLICY #ETH/103 - Resource Development and Public Fundraising
Formerly Policy #FM/110
Policy Effective Date: <i>July 27, 1997</i>

Policy Updated: *January 21, 2011*

Supersedes Policy No.:

Dated:

1. CCCS shall conduct all its resource development and public fundraising activities in an ethical manner, including how the agency and its programs are presented to potential funding sources and how CCCS will account for the funds received.

2. CCCS will respect the confidentiality of all its donors and will not disclose nor sell donor information to any external organizations.

3. CCCS will engage in resource development and public fundraising activities that align with its vision and mission and meets the financial and programmatic needs of the agency and/or its collaborative partners.

4. The CCCS Board of Directors will be kept abreast of all resource development and public fundraising efforts made by board committees and/or staff and will require prior Board and President and CEO approval for all public fundraising activities.

5. CCCS will adhere to the fundraising standards of the local United Way agency.

Rationale

CCCS's community reputation is critical to organizational success. As such, all agency resource development and public fundraising efforts must be conducted in an ethical manner. Individual, public, corporate, and other agency stakeholders expect the agency to be accurate in describing who we are and what we can do to benefit residents in our community. Adherence to the above policy is the right thing to do and CCCS supporters have accountability standards that must be met to continue to receive their support.

Procedure

- A. Resource development and fundraising processes are to be conducted in an ethical manner.
 1. In the process of resource development, the agency will disclose:
 - a. An accurate description of the agency and its program;
 - b. Financial needs for which the solicitation is intended;
 2. Funds will be utilized for the purposes for which they were solicited, with the exception of reasonable costs used for the administration of the fundraising program which will be disclosed to all donors.
- B. Fundraising procedures and policies of the Agency are consistent with local, state, and/or federal regulations.
 1. CCCS will submit annual documentation to secure a Solicitation License from the State of North Carolina.
- C. The Agency implements controls regarding the handling and acknowledgement of contributions.
 1. The agency procedures regarding the proper handling and acknowledgement of monetary as well as in-kind contributions are included in the CCCS Internal Financial Management Manual. Agency staff records all donor information in its donor base software.
- D. Board and management provide oversight and direction for the agency's resource development process.
 1. The resource development process involves several groups and individuals, including the Board of Directors, Sustainable Funding Committee members, and the Executive Staff of the agency.
 2. Together (and with the delegated responsibility to other staff as needed) this Board-staff team annually assesses programmatic and community needs as well as the agency's capacity to address those needs as part of the agency's annual strategic planning process.
 3. When current or proposed programs are identified which need funding, this team will:

- a. Identify potential funding sources;
 - b. Prepare funding proposals to the various groups outlined above in the Policy statement. Specific examples for which these groups and individuals have responsibility include:
 - (1) Annual fund campaign: utilized to solicit gifts from past donors;
 - (2) Capital campaigns and special events;
 - (3) Grant proposals (foundations, churches, government, etc.);
 - (4) United Way proposals;
 - 4. Board and management establish and exercise controls over resource development activities carried out by its personnel, contractors and/or consultants – see CCCS Internal Financial Management Manual.
 - 5. Written agreements are required when using any outside contractors or consultants in the area of resource development. These agreements must insure that the outside providers adhere to all relevant agency standards, including those related to ethical practices – see CCCS Internal Financial Management Manual..
- E. The Agency analyzes the cost and benefits of each fundraising activity.
- 1. CCCS conducts a comprehensive analysis of the costs vs. benefits of each fundraising activity, taking into account factors that affect the reasonableness of fundraising costs in comparison to dollars raised and exposure for the agency – see CCCS Internal Financial Management Manual.
 - 2. Costs include staff time necessary in completing the project, administrative costs, (i.e. postage and printing) and costs associated with hiring a consultant/event planner (if applicable).
- F. The agency has discretion over the types of gifts it is willing to accept from donors.
- 1. Donors may sometimes offer gifts (financial or tangible) which raise financial, liability, or ethical concerns for the agency.
 - 2. When the agency learns about such gift offers, management staff will consult with the Board Sustainable Funding Committee (“Committee”).
 - 3. The Committee may recommend further review by the full Board of Directors or by outside consultants to assess the appropriateness of the offer.
 - 4. Examples of gifts which will be or could be rejected by the agency include, but are not limited to:
 - a. Gifts that are made by clients or others in exchange for services or as a way to secure special privileges or benefits from the agency or its employees (not allowed as per Conflicts of Interest Policy)
 - b. Gifts that expose the agency to potential financial loss, e.g. gift of house/property that may require significant repair or environmental clean-up costs
 - c. Gifts in which the agency is being asked to serve as trustee.
 - d. Gifts with specific requirements by the donor that the agency might not be willing to accept:
 - (1) To invest the gift with specific financial institutions;
 - (2) To invest the gift in a specific investment vehicle (stock, bond, etc.);
 - (3) To take direction from the donor with regard to the sale of the asset;
 - e. Gifts that may embarrass the agency if details become public.
 - f. Gifts from donors of questionable public reputation.
 - g. Gifts from organizational donors which have practices that is in conflict with agency’s core values.
 - h. Gifts from those whose intellectual capacity/competency may be questioned or challenged.
 - i. Gifts that tie up too much time and effort of the agency relative to the funds that could be produced.
 - j. Gifts that are deferred so long as to be of questionable value, relative to the agency’s obligations during the deferral period
 - k. Gifts that cause the agency to be in litigation.
 - 5. Offers of sizeable tangible assets will be scrutinized by the agency.
 - a. The agency will examine the offers in terms of their financial, liability, and tax implications.

- b. The agency will encourage the prospective donor to discuss the offer with his/her tax advisor to fully understand the implications of such a gift.
- 6. Decisions not to accept offered donations will be communicated in writing with the prospective donor
- G. Agency discloses descriptive and financial information for fee-generating services.
 - 1. CCCS discloses descriptive and financial information for revenue-generating activities including fee-for-services programs, and related and unrelated business ventures whenever requested by a donor.
 - 2. The CCCS annual report, annual external audit report or any other pertinent records are made available to funding sources upon request and at CCCS's website.

POLICY #ETH/104 – Whistle-blower Policy	
Policy Effective Date: <i>March 19, 2010</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<p><i>Consumer Credit Counseling Service of Forsyth County (CCCS-FC) will not retaliate against employees who disclose or threaten to disclose to a management team member or a public body, any activity, policy, or practice of CCCS-FC that the employee reasonably believes is in violation of a law, or a rule or regulation mandated pursuant to law or is in violation of a clear mandate or public policy concerning the health, safety, welfare, or protection of the environment.</i></p> <p><i>CCCS-FC will not retaliate against an employee who, in good faith, has made a protest or raised a complaint against some practice of CCCS-FC, or of an employee of CCCS-FC, or of another individual or entity with whom CCCS-FC has a business relationship, on a basis of a reasonable belief that the practice is in violation of law, or a clear mandate or public policy.</i></p>	

Rationale

The agency earns and sustains the public trust through honest, truthful, and responsible transactions, partnerships, and relationships with individuals, communities, providers, businesses, donors, and government entities.

The agency prohibits employment-related retaliation against employees and others affiliated with the organization, who come forward with information about suspected misconduct or questionable practices, and provides an appropriate, confidential channel for reporting such information.

Procedure

If any employee reasonably believes that some policy, practice, or activity of CCCS-FC is in violation of law, or a clear mandate or public policy, a written complaint must be filed by that employee with the President and CEO or Board Chair.

An employee is protected from retaliation only if he or she brings the alleged unlawful activity, policy, or practice to the attention of CCCS-FC and provides CCCS-FC with a reasonable opportunity to investigate and correct the alleged unlawful activity.

POLICY #ETH/105 – Payment for Referrals
Formerly Policy #BE/105

Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS shall not pay money or extend other considerations in exchange for client referrals.</i>	

Rationale

To guard against the commercialization of the agency’s service programs and to maintain the charitable nature and intent of the agency any form of payment for client referrals must be prohibited.

Procedure

Agency management team shall make no cash payment nor provide other considerations to any organization or individual for making referrals to any of the agency’s service programs. This prohibition will be made clear to all providers of services or goods for the agency.

POLICY #ETH/106 – Truth in Marketing	
Formerly Policy #SD/102	
Policy Effective Date: <i>January 15, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS shall make every effort to provide truthful and ethical facts in all forms of official communications, including marketing and counseling.</i>	

Rationale

A truthful, open and totally non-deceptive approach to all agency communications and outreach advertising is essential to maintaining trust between CCCS and the clients, creditors, and the communities that we serve. This is especially true since CCCS works in a field which has attracted some organizations and individuals who are less concerned with ethical and truthful communication and who have thus fostered considerable public distrust. To be true to its mission and purpose CCCS must do everything possible to gain and maintain the trust of everyone with whom the agency interacts.

Procedure

In all communications, whether in advertising, letters to creditors and clients, counseling sessions, providing assistance via telephone or any other form, CCCS will never knowingly use or approve the use of any untrue or misleading statements. Further, CCCS will strive to assume a higher duty; to ensure that no statement or fact used by the agency is used in an unethical manner. Unethical usage can be defined as any use of a fact that is nominally true, but from which an erroneous conclusion can be easily drawn.

For communications to be a trust building tool, it is also necessary that CCCS refrain from presenting negative facts about other organizations to promote our services. We shall instead point out the value and effectiveness

of our own services and decline to comment on other programs. In counseling and other direct assistance efforts utmost care must be taken to present only factual information and to decline to interpret legal or other technical issues which are beyond our area of expertise. If such information is needed, referral to the appropriate resource will be made. Staff and volunteers are directed to contact the agency's President/CEO should any further guidance on this issue be required.

POLICY #ETH/107 – Competence In Counseling	
Formerly Policy #SD/105	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS shall require that all counseling services provided by the agency will be done by a certified counselor, or by a qualified counselor under the supervision of a certified counselor.</i>	

Rationale

As the front line of our service effort in the community, agency counselors must be highly skilled, thoroughly trained, and professional in the conduct of their work. A steadfast requirement that all counselors become certified as soon as possible will work to ensure that this is the case. All clients seeking help from CCCS have the right to expect to meet with capable and well-trained counselors.

Procedure

From their first day of employment, counselors begin a five-week curriculum of training with the program supervisor and experienced counselors as mentors, along with having open access to the on-line course of study for the counselor certification examinations. It is expected that all counselors will be fully prepared to take the exam immediately upon reaching eligible status, as defined by the National Foundation for Credit Counseling. The agency shall bear the costs for testing and materials for certification, with each counselor being responsible for scheduling and successfully completing each part of the examination.

Counselors have six months to one year to successfully complete the entire examination once they become eligible to begin testing. Thereafter, the non-complying counselor may be placed on probation or discharged. The agency shall designate a coordinator for all counselor certification activities, and shall monitor compliance with this policy and procedure.

POLICY #ETH/108 - Continuity of Services	
Formerly Policy #SD/111	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>The CCCS Board of Directors shall transfer its service programs to an appropriate service provider capable of assuming the agency's service mission, while preserving client confidentiality in the event of the dissolution of the agency.</i>	

Rationale

It is vital that agency clients and services be as unaffected as possible in the event of agency closure. Counseling and debt management services are especially sensitive to upheavals of any sort, and a clear procedure is necessary to minimize the effects of an agency closure. It is also our duty to ensure that the successor to CCCS be an organization that is as similar to this agency as possible; that it be a non-profit entity, and that it meets all the necessary requirements to carry our service mission forward.

Procedure

In the event of the closing of CCCS, the Board of Directors, after soliciting consultation and advice from our national organization, shall immediately seek agreement with a similar and appropriate non-profit, IRS Code 501(c)(3) tax-exempt organization to transfer our debt management and counseling caseload to that organization, and shall do everything possible to ensure that the provision of services for our clients will be uninterrupted during the transition period. It will be especially critical that provision be made for the issuance of checks on behalf of debt management clients during this time, and appropriate expertise and/or services should be sought immediately to ensure that CCCS's day-to day fiduciary responsibilities are met without delay.

The caseload transfer will include all electronic data as well as hard copies of all client records, and may also include the transfer of certain equipment as may be necessary. In this process, the Board of Directors will ensure that all clients of the agency are kept informed, so that client confidence will be maintained and confusion minimized. Generally, every effort should be made to develop the transfer of services agreement with a CCCS office that has its main offices in the closest geographic proximity to our clients, that has the capacity and qualifications to assume our service mission, and that is financially able to continue all service activities at all our existing branch office locations with little or no delay.

POLICY #ETH/109 – Client Waiting Time for Appointment	
Formerly Policy #SD/112	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>Consumers shall be provided timely access to agency services.</i>	

Rationale

Because clients typically call CCCS in financial stress or crisis, no client should have to wait in excess of 5 business days for an appointment with our agency. It is the responsibility of the President/CEO to monitor client demand for services and carry out this policy. It is the responsibility of the Board of Directors to provide the funding needed to address increases in staff to meet client demand.

Procedure

All inquiries from prospective clients shall be responded to promptly. Phone calls shall be answered live or the phone system will prompt the caller to leave a message that will be responded to in 24 hours. Inquiries by written correspondence shall be responded to within 2 working days. Electronic (email) inquiries shall be responded to within 24 hours. Prospective clients shall be advised of the options available for receiving agency services, either traditional face-to-face service or alternatives such as telephone or electronic correspondence.

The standard waiting time for a client appointment with Consumer Credit Counseling Service of Forsyth County, Inc. shall not exceed five business days. If, at any time, the client waiting time exceeds five business days for three consecutive months, the President/CEO is authorized, within the constraints of the approved operating budget, to hire the additional counseling staff needed to reduce the waiting time for client appointments to within five working days.

The CCCS Receptionist shall keep the President/CEO informed of client wait times for appointments. Monthly, the President/CEO will review cumulative client wait time data for the most recent three months. The President/CEO will consider altering appointment scheduling and staff patterns in an attempt to comply with the five-day waiting period for client appointments. However, at such time that the President/CEO determines the wait time has exceeded 5 business days for three consecutive months, he/she will inform the Executive Committee and proceed (within the constraints of the approved operating budget) with the hiring of additional staff to reduce client wait time to within 5 business days. Should the hiring of additional staff not be possible within the constraints of the approved operating budget, the President/CEO shall inform the Executive Committee and the Board of Directors shall determine how the position will be funded.

Client Urgent or Emergency Needs

All inquiries from prospective clients shall be responded to promptly. Phone calls shall be answered live or the phone system will prompt the caller to leave a message that will be responded to in 24 hours. Inquiries by written correspondence shall be responded to within 2 working days. Electronic (email) inquiries shall be responded to within 24 hours. Prospective clients shall be advised of the options available for receiving agency services, either traditional face to face service or alternatives such as telephone or electronic correspondence.

Should the caller reveal an urgent or emergency need, the receptionist will attempt to locate a counselor to provide initial telephone counseling to the caller or will have the first available counselor call the prospective client. The counselor will determine the extent of the emergency and the ability of the agency to meet the needs of the caller. If the need can be met through CCCS services, the counselor or receptionist will schedule an appointment on an emergency basis, circumventing normal wait times and appointment schedules.

If the client's need exceed the scope or limitations of the agency's services, the caller shall be referred to other organizations that might address the need in a timely fashion. The caller shall also be advised as to other community referral sources that might have knowledge of additional resources for the client.

POLICY #ETH/110 - Client Fee /Contribution Policy Procedure	
Formerly Policy #SD/113	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS shall charge an intake and assessment fee for credit and housing counseling at the time of service, as approved by the Board of Directors and for bankruptcy counseling , as approved by the U.S. Bankruptcy Administrator . These fees may be waived in client hardship cases.</i>	

Rationale

The fees provide much needed revenue to increase staff to meet growing demand. The intake and assessment fee may improve the percentage of clients keeping their initial appointment, thereby decreasing wait time for appointments in other CCCS offices statewide. The DMP setup fee has helped to cover up-front costs of establishing repayment plans for clients. The monthly DMP maintenance fee, applied on a sliding scale, helps offset increasing cost in disbursement of DMP client funds.

Procedure

CCCS requests a \$30 counseling fee for the initial visit, at the time of service for credit and housing counseling. Additional counseling services shall be provided at a rate of \$10 per session. CCCS requests a \$50 counseling fee for bankruptcy counseling in advance of issuing a certificate for filing; \$30 fee individual and \$40 fee couple in advance of issuing a certificate for discharge. Senior Financial Care® requests a \$10 fee for the initial visit and subsequent visits are based on a sliding fee scale. . Program Directors will approve fee waivers and adjustments.

Debt Management Client Fees

Clients who elect to participate in the CCCS Debt Management Program shall pay an initial set up fee of \$25 to offset the initial program setup costs and will pay a monthly account maintenance sliding fee to offset monthly processing of their account payments. These fees will be established by the CEO and reviewed by the Board.

CCCS will accept client donations as well, should the consumer so choose. Such fees and/or contributions provide revenue to assist in meeting the demand for services; however at no time will CCCS deny services to clients based upon their ability to pay or make a donation to the agency. For clients enrolled in the CCCS of Forsyth County Debt Management Program after 11/1/06, the maximum monthly DMP account maintenance fee that may be requested from each client is \$30.00.

POLICY #ETH/111 – Transportation of Agency Clients	
Formerly Policy #SD/114	
Policy Effective Date: <i>March 13, 2002</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS will not provide transportation services to its clients.</i>	

Rationale

Transportation of clients is not a service provided by CCCS or any of its programs. It exposes the agency to risk of lawsuits should an accident causing the injury or death of a client occur while the client is in the automobile of an employee of CCCS.

Procedure

Transportation services are not provided by CCCS or its staff members. If transportation services are needed or requested by our clients, staff members should utilize referrals to known providers of transportation services. In the event of a medical emergency, staff members should follow emergency procedures and utilize emergency service providers.

In the event of a medical emergency, which occurs during service delivery by agency staff, staff members will seek 911 assistance to provide necessary medical attention.

While the agency seeks to assist clients in meeting as many of their needs as are reflected in our mission, the client transportation policy is to provide information and referrals. Existing transportation services should be explored for clients, and if they are not adequate, advocacy should be the action taken by the staff. At no time, either during work or non-work hours should staff members provide client transportation services. The client/counselor relationship established during working hours may establish liability as an agent of CCCS. Failure to abide by agency policies will result in disciplinary action, up to and including termination.

POLICY #ETH/112 – In-Home Visitations	
Formerly Policy #SD/115	
Policy Effective Date: <i>September 1, 1993</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS will only provide services to clients whose custodial level of care indicates ability to work with an agency counselor as a partner in handling financial matters.</i>	

Rationale

The goal of the CCCS Senior Financial Care® program is to assist seniors in maintaining their independence for as long as possible. When a client enters a nursing home, he or she no longer meets the requirements for services from Senior Financial Care®.

Procedure

Many assisted living facilities now provide one or more independent levels of living, with increasing care on an “as needed” basis. When a client who lives in such a facility is still independently able to work with a counselor, SFC® can continue to provide services until that client loses the ability to make financial decisions. CCCS would not provide services to clients residing in a traditional “nursing home” or “rest home” since these facilities are not independent living.

Senior Financial Care® cannot accept responsibilities as Power of Attorney, Guardian or Protective Payee status for any client.

Children or relatives of clients who live in a facility, at any level of care, are invited to bring their relatives’ insurance to our office for assistance.

ADMINISTRATION and MANAGEMENT

Financial Management (FM)

POLICY #FM/101 - Financial Reporting	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS shall prepare monthly financial reports for the Board of Directors to include such reports as directed by the Board of Directors. At a minimum, these reports shall consist of a statement of revenue and expense, and a balance sheet.</i>	

Rationale

Between annual audits, the regular monitoring of a variety of the agency's financial reports, in conjunction with reports from the agency Treasurer, will provide a basis for the proper fulfillment of the board's oversight responsibilities with regard to the agency's financial management.

Procedure

Agency staff maintains comprehensive monthly records with regard to payroll, accounts payable, accounts receivable, pre-paid expenses, assets and depreciation, and the general ledger. In connection with these records, the following reports shall be generated: consolidated financial report, balance sheet, budget and balance sheet summary, detailed payroll summary and report, general ledger report, transaction reports, accounts payable reports, functional expense spreadsheet, and other backup reports as generated by the end-of-month computer processing routine. Staff and/or volunteers shall generate all such reports, and have them available for board review, no later than fifteen (15) days following the end of any month.

POLICY #FM/102 – Acceptable Client Funds	
Policy Effective Date: <i>December 4, 1996</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS will accept cash, money orders, certified checks, ACH bank drafts or other guaranteed funds for deposit in a central location as designated by the Finance and Audit Committee.</i>	

Rationale

In order to safeguard the Client Trust Fund, it is necessary that funds deposited therein be useable by the time of their disbursement to creditors. The voiding of a deposit for any reason would leave CCCS and its client's dependent upon the prompt refund of such funds by creditors. This is a time consuming process, during which time the funds would be unavailable for other debt management. In the worst case, this could result in a loss that must be borne by the agency.

The deposit of all client funds to a central location is good management practice that permits the installation of a rigorous set of internal controls to further safeguard client deposits.

Procedure

CCCS shall only accept client funds in the forms as specified above, and only at the agency’s main corporate offices or designated financial institution engaged to provide a lock box arrangement for the banking and management of client funds. Since February 1, 1997 CCCS has not accepted personal checks from debt management program clients for their monthly program deposits. CCCS will offer DMP clients as many other options for program deposits as approved by the Finance Committee.

POLICY #FM/103 – Audits	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>September 23, 2016</i>	
Supersedes Policy No.:	Dated:
<p><i>CCCS shall provide for an annual audit of the financial statements taken as a whole by an independent CPA or CPA firm. These audits shall be performed in accordance with Generally Accepted Auditing Standards (GAAS) and the financial statements are prepared in accordance with Generally Accepted Accounting Principles (GAAP).</i></p> <p><i>A copy of each audit report shall be sent directly to the individual designated by the Executive Committee to oversee the annual audit process.</i></p>	

Rationale

The annual audit report, along with SAS 114 and SAS 115 reporting letters, and a management letter if necessary, is the agency’s primary proof of sound financial management, which provides validation of the agency’s financial reports, and a requirement of membership with area United Ways and accreditation by the Council on Accreditation. The audit process itself helps management to search out and strengthen internal financial controls.

Procedure

There shall be an annual audit of the financial statements. The audit shall be accomplished within one hundred and twenty (120) days of the end of the agency’s fiscal year by a CPA or CPA firm selected by the Executive Committee of the agency’s Board of Directors.

Since CCCS has a combined Finance and Audit Committee and does not have an independent Audit Committee the Board of Directors has decided to address any appearance of conflict of interest with respect to the audit process by putting in place the following procedures:

- The selection and oversight of the auditor is handled by the board's executive committee;
- The board’s executive committee shall designate someone other than the chair of the finance or executive committee to be in charge of the board’s audit oversight function. This individual shall be a board member.
- No organization staff, including the CEO and Financial Specialist, shall participate in any aspect of overseeing the audit process. The CEO and Financial Specialist can provide information to the auditors to complete the agency's audit.

The agency will arrange for an audit rather than a review or compilation.-The audit report will be sent directly to the individual designated by the Executive Committee to oversee the annual audit process. The individual that oversaw the audit process will present the completed audit report to the Finance and Audit Committee with a representative of the audit firm (CEO and Financial Specialist not in attendance). Following this review, the

audit is presented to the Board of Directors for their approval. Thereafter, copies of the audit report will be circulated to all board members, affiliated organization and other interested parties.

POLICY #FM/104 - Placement of Funds	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS shall deposit client funds in a Trust Account and shall maintain a separate operating account, both to be maintained in federally insured accounts in amounts below the insured limit. The appropriateness of accounts will be determined by the Finance and Audit Committee.</i>	

Rationale

The Client Trust Account must be maintained in a separate account designated as a special trust account so that the \$100,000 insured limit will apply to each client whose funds are on deposit therein. (Re FDIC rules regarding trust accounts.) As a matter of operating philosophy, the CCCS board has opted for insured accounts that eliminate risk for the investment of agency operating funds.

Procedure

Agency management team shall ensure that the Client Trust Fund is placed in a separate account, and that no agency operating funds are co-mingled with such funds. The only exception to the above would be prearranged client and creditor donations, along with interest earnings on the account, which may be deducted from the Client Trust Account for deposit to the agency’s operating account. Management shall also monitor operating accounts to ensure that the insured limit is not exceeded in any one account or within any single institution.

After complying with these conditions, the decision as to which financial institution will be used for the Client Trust Account or any operating accounts will be based primarily upon interest rates, service available, service charges and overall value to the agency. The Finance Committee of the Board of Directors shall make the final determination for the placement of funds.

POLICY #FM/105 – President/CEO’s Budgetary Authority	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS delegates authority to the agency President/CEO to approve all expenditures falling within the adopted operating and capital budgets of the organization. In order to meet unforeseen and special needs, the President/CEO is also authorized to approve unbudgeted expenditures in an amount not to exceed \$10,000 per annum. All such expenditures are to be reported at the earliest subsequent meeting of the board.</i>	

Rationale

Budget administration clearly is the province of the operational manager of the agency, and provision must also be made to provide the President/CEO with limited authority for emergency expenditures in order to meet operational imperatives.

Procedure

The agency’s President/CEO shall authorize, whenever reasonably possible, all expenditures for goods and services, which are within the approved agency budgets. All such expenditures will be routinely reviewed by CCCS Treasurer or other Board officer, and reported to the board via the monthly financial statements.

In extraordinary circumstances necessitated by major equipment failure or similar mishap, the President/CEO may also authorize the spending of unbudgeted funds as necessary to resolve the problem, up to a maximum of \$10,000 per year. As a matter of prudence, the President/CEO will advise the Board Chair, Treasurer and/or Finance Committee, and will in all cases report the action at the next meeting of the full board.

POLICY #FM/106 - Proper Care in Funds Handling	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS will exercise proper care in the handling, collection, posting and deposit of all client or contributory funds under its control. CCCS will notify any and all concerned parties when any error is discovered which involves a material amount of funds, and will attempt to promptly rectify all discovered errors, with consultation of the appropriate parties involved in or effected by the error.</i>	

Rationale

It is extremely important that clients and creditors have a high degree of confidence in the agency and its practices in the handling of both Client Trust Funds and contributions being made by the credit community, and the community overall. Regularly demonstrated competence in this area is essential to the agency’s overall credibility

Procedure

Through normal internal control procedures, regular review of appropriate computer generated reports, and regular review of all accounting records, management shall do its utmost to ensure that every effort is made toward the earliest possible discovery and resolution of errors made in the handling of funds. Upon discovery of an error, whether in the handling of a donation or of a client deposit, the creditors and/or clients involved will be promptly notified, and their input will be sought as to the best possible resolution of the error. North Carolina Escheat laws will be adhered to with regard to the agency’s handling of all client funds.

POLICY #FM/107 - Investment of Agency Funds	
Policy Effective Date: <i>March 16, 2012</i>	
Policy Updated: <i>March 16, 2012</i>	

Supersedes Policy No.:

Dated:

CCCS shall invest agency Operating Reserve Funds in federally insured accounts in amounts below the insured limit, in financial institutions located within the agency's service area. Investment vehicle rates will be reviewed annually to ensure the most favorable rate of return for the agency.

Rationale

This Investment Policy Statement (IPS) governs the investment management of CCCS. This investment policy applies to the assets of CCCS for which it has direct oversight. Any and all investment recommendations made by the Finance and Audit Committee will require final approval of its Board of Directors. The policy is effective until modified by the Board of Directors.

Procedure

Agency management shall ensure that the investment portfolio shall be designed with the objective of attaining at least a market rate of return throughout budgetary and economic cycles, taking into account the CCCS's investment risk tolerance, budget constraints and cash flow needs. The policy objective is to invest in a manner that maximizes returns but preserves and protects the assets as set forth by this Investment Policy Statement.

After complying with these conditions, the decision as to which financial institution will be used for the investment of agency operating reserve funds will be based primarily upon interest rates, service available, service charges and overall value to the agency. The Finance Committee of the Board of Directors shall make the final determination for the placement of funds.

This policy adopts a conservative risk tolerance. We are not willing to tolerate "noticeable downside market fluctuations," and we are willing to forego most all significant upside potential, relative to the markets, to achieve this goal. In English, we really don't want to get our monthly statement and see less money than they had before (unless it was due to withdrawals).

The majority of our money should be held in cash and high-quality short- and intermediate-maturity bonds. Very risky asset classes are to be avoided altogether.

Investing is not without risk. There is no way to eliminate all risks when investing. Because Conservative investors are still "investing," they should have a higher return over most rolling three-year periods than investing in fixed annuities, CDs, and other bank investments.

The typical range of annual returns we expect in down financial markets are -3% to +1%, in flat markets 2% to 5%, and in up markets 6% to 8%. Conservative portfolios produce the highest annual income yields - typically in the range of 4% to 8%. We are aware that Conservative portfolios produce very little capital gains distributions.

The standard of prudence to be used by the Board of Directors and the Audit and Finance Committee shall be the "prudent person rule," which obligates a fiduciary to ensure that: ".....Investments shall be made with the exercise to that degree of judgment and care, under circumstances then prevailing, which persons of prudence, discretion, and intelligence exercise in the management of their own affairs, not for speculation but for investments, considering the probable safety of their capital as well as the probable income to be derived."

The Finance and Audit Committee and the Board of Directors jointly hold responsibility for establishing, monitoring, evaluating and revising the CCCS investment policy. They are responsible for hiring and terminating portfolio managers, custodians and consultants, and complying with this IPS. Selected money managers shall be engaged to operate the investment program consistent with this investment policy. The Audit

and Finance Committee shall perform due diligence to determine that each money manager, custodian and consultant is adequately insured and can properly perform its duties.

Custodians are selected and retained at the sole discretion of the Finance and Audit Committee with approval of the Board of Directors. It is the custodian's performance and the committee's confidence in future performance and compliance with this ISP that ultimately determines retention or termination.

CCCS maintains 3 months operating funds in its reserves. Beyond that, money accumulated through its investments is available for funding CCCS program expansions and/or new programs. Program directors and CCCS committees should present program ideas and cost projections to the Finance and Audit Committee for review and a recommendation to the Board of Directors.

Maximum spending policy shall be no more than one half of the amount in excess of an average of the last 3 months operating expenses. Once specified program spending has been approved by the board, the full amount does not have to be expended but can be accumulated for future spending.

Asset allocation is likely to be an important determinant of CCCS's investment returns. Allowable Securities consist of: Equities, Derivatives, US Domestic Exchange Listed Securities, New York Stock Exchange, NASDAQ, American Stock Exchange, Regional Stock Exchange, Electronic Stock Exchange Closed End Mutual Funds, Exchange Traded Mutual Funds, Unit Investment Trusts

Fixed Income, US Treasury Bills, US Treasury Notes and Bonds, US Agency Notes and Bonds, Corporate Bonds, Mortgage Backed Securities, International bonds, Mutual Funds, Common & Collective Trust Funds, Commercial Paper/CDs.

Investment diversification is required to minimize risk. No single security shall represent more than 10% of the association's funds. No single industry sector shall represent more than 20% of the association's funds. Whenever applicable, CCCS operating and investment account funds are to be maintained in federally insured accounts in amounts below the insured limit (FDIC limit is \$250,000). Preference should be given to financial institutions located within the agency's service area provided their rates are competitive with those outside the service area.

Professional money managers / custodians are charged with the responsibility of preparing a quarterly investment report within (30) days of each quarter's end for the presentation to CCCS Finance and Audit Committee who will then report the results to the CCCS

Board of Directors. Custodians hold securities for safekeeping, collect interest and dividends, and if required, effect trades.

Committee members have responsibility to report all real or perceived conflicts of interest to the Board of Directors immediately. The Board will be the sole arbiter of the situation and any actions required.

This Investment Policy Statement was recommended by the Audit and Finance Committee and approved by the Board of Directors on March 16, 2012.

The Audit and Finance Committee is responsible for periodically reviewing this IPS and recommending changes. Official changes can only be adopted by CCCS's Board of Directors.

POLICY #FM/108 - State and Local Taxes	
Formerly Policy #FM/109	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:

CCCS shall seek and maintain legal exemptions from property taxes, sales and use taxes, and any other form of taxation, so as to preserve agency revenues for the accomplishment of our service mission.

Rationale

Agency funding is donated to enable CCCS to accomplish its stated service mission. By taking full advantage of our charitable status exempting the organization from certain taxes, we are ensuring that all available funding will be used for services to the communities we serve.

Procedure

Agency management team shall ensure that application for exemption is made to any taxing authorities in any service location where agency property is situated immediately upon receipt of any tax assessment notification from such authorities. Agency Management Team will coordinate necessary follow-up meetings between the agency’s board and the appeals board of any tax authority making a determination on CCCS exemption request. Agency management team will thereafter provide all required periodic reports required by the taxing authority once exemption has been granted.

POLICY #FM/109 - Capitalization Policy	
Formerly Policy #FM/111	
Policy Effective Date: <i>July 1, 2000</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>Management will ensure that the staff will classify, as <u>Capital Acquisitions</u>, all office equipment, electronic equipment, furniture, leasehold, and other assets, purchased or obtained by donation, (Namely those items which can be reasonably depreciated). This classification will be limited to a value of \$1,000.00 or more.</i>	

Rationale

A dollar limit must be established for capital acquisitions, to facilitate reasonable depreciation expenses, as per Auditor.

Procedure

Any items purchased of \$500.00 or more will be recorded and posted as a Capital Acquisition. Any other items purchased or obtained at a value of \$490.00 or less, will be expensed as a supply, donation, service, or equipment, in the year of purchase or receipt, instead of capitalized.

POLICY #FM/110 - Accounts Receivable Collection	
Formerly Policy #FM/112	
Policy Effective Date: <i>March 13, 2002</i>	
Policy Updated: <i>January 21, 2011</i>	

Supersedes Policy No.:	Dated:
<i>CCCS will bill all accounts receivables for services rendered in a timely manner.</i>	

Rationale

This timetable of collection procedures is necessitated by:

- Customer’s request to be billed monthly.
- Labor intensive workload, volume, staff, and sufficient time to pay.

Procedure

Invoices will be sent out to the lenders, brokers or customers, on the 5th business day after the end of the month in which the service was rendered. This timing is necessary because the reports from the system are not received until month’s end, and many customers have a multiple number served within that month.

A “Statement of Account” will be sent out quarterly, but every attempt will be made to approach a monthly mailing.

Contact will be made with all customers that have open balances still outstanding 60 days from billing. If no response is received, RMIC, or other representatives of the companies will be enlisted for payment.

After management notification, a final notice will be sent to outstanding accounts. The notice will state that no further service will be performed after a specified date, until the outstanding invoice is paid.

At or before 75 days from billing, a list will be submitted to the President/CEO, noting those invoices, which are, based upon past experience, still collectible and those which will be written off as a “bad debt”.

POLICY #FM/111 - Credit Card Usage Policy	
Formerly Policy #FM/113	
Policy Effective Date: <i>September 13, 2000</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS will allow a CCCS staff access to agency credit card(s) for purchases related to agency and/or its services upon President/CEO or his designee’s approval.</i>	

Rationale

Certain agency staff need, from time to time, access to an agency credit cards to perform their position responsibilities.

Procedure

Agency credit cards may be used for program supplies, office supplies, travel, training and approved equipment purchases. Other purchases may be made on a case-by-case basis, approved by the CEO.

Receipts must be submitted in a timely manner to the Financial Administrator for reconciliation with the monthly Credit Card Statement.

Adherence to credit limits is required.

Failure to follow credit card policy will result in the loss of use of the credit card and may result in disciplinary action up to and possibly including termination of employment and/or legal action.

POLICY #FM/112 Accounts Payable	
Formerly Policy #FM/117	
Policy Effective Date: March 20, 2009	
Policy Updated: January 21, 2011	
Supersedes Policy No.:	Dated:
<i>1. The Board Chair, Vice Chair, Secretary and President/CEO or his designee is authorized to sign checks.</i>	
<i>2. All checks equal to or less than a \$1000 may be signed by the President/CEO or his designee or an authorized Board member.</i>	
<i>3. All checks greater than a \$1000 require two (2) authorized signatures. The second signature must be from an authorized Board member. (The preferred practice is for the first signature to be that of the President/CEO or his designee unless extenuating circumstances prevent such occurrence.)</i>	
<i>4. The Finance Director and/or President/CEO or his designee will approve all expenditures prior to payment.</i>	
<i>5. The Board Chair or Treasurer will approve payments to the President/CEO.</i>	
<i>6. Approved files will be maintained for accountability and audit.</i>	

Rationale

Agency accounts payable activities must ensure that agency funds are properly handled in compliance with agency internal financial control procedures and non profit accounting best practices as recommended by agency independent auditors.

Procedure

To ensure that all agency accounts payable expenditures are properly authorized and disbursed the following procedures are to occur:

1. Authorized individual(s) will approve all expenditures prior to payment. An individual will not approve an expenditure if the check is payable to himself/herself.
2. In the absence of the President & CEO a senior staff member may be designated to be one of the check signatures, provided the President & CEO has been informed of this situation in advance and has approved their signing checks. Upon the return of the President & CEO to the CCCS office the checks and related accounts payable documentation signed by the designated senior staff member will be reviewed, initialed and dated.
3. The President & CEO and Board Treasurer will initial and date the accounts payable summary report that includes all check amounts included in each accounts payable cycle.

POLICY FM/113 – Anti-Fraud	
Formerly Policy #GA/101	
Policy Effective Date: April 16, 2012	
Policy Updated: May 18, 2012	
Supersedes Policy No.:	Dated:
<i>It is the policy of Consumer Credit Counseling Service of Forsyth County, Inc. to prevent fraud, waste and abuse of federal and state funds</i>	

Rationale

It is the policy of Consumer Credit Counseling Service of Forsyth Count, Inc (CCCS). to prevent fraud, waste and abuse of federal and state funds

Procedure

In the case that fraud needs to be reported all employees and contractors must report suspected fraud, in a timely manner.

All suspected Federal fraud should be reported to the North Carolina Office of Economic Recovery and Investment department. All suspected state fraud should be reported to the Office of the State Auditor which investigates allegations of improper governmental conduct by state agencies or state employees within our statutory authority. Improper governmental conduct includes alleged fraud, misappropriation, mismanagement or waste of state resources. It also includes alleged violations of state or federal law, rule or regulation in administering state or federal programs, and substantial and specific danger to the public health and safety. Incidents may be reported anonymously. In addition, incidents may be reported to the President & CEO or the Board of Directors of the Consumer Credit Counseling Service of Forsyth County, Inc.

An example of fraud would be waste and abuse of federal and state funds include, but not limited to, embezzlement, misappropriation, alteration or falsification of documents, false claims or reimbursement requests.

POLICY #FM/114 - Operating Reserves	
Policy Effective Date: March 20, 2015	
Policy Updated:	
Supersedes Policy No.:	Dated:
<i>Operating Reserves policy for Consumer Credit Counseling Service of Forsyth County Inc. dba Financial Pathways of the Piedmont (FPP) is to ensure the stability of the mission, programs, employment, and ongoing operations of the organization.</i>	

Rationale

Agency Operating Reserves are intended to provide an internal source of funds for situations such as a sudden increase in expenses, one-time unbudgeted expenses, unanticipated loss in funding, or uninsured losses.

Operating Reserves may also be used for one-time, nonrecurring expenses that will build long-term capacity, such as staff development, research and development, or investment in infrastructure. Operating Reserves are not intended to replace a permanent loss of funds or eliminate an ongoing budget gap. It is the intention of FPP Operating Reserves to be used and replenished within a reasonably short period of time.

The FPP Operating Reserve policy will be implemented in concert with the other governance and financial policies of FPP and is intended to support the goals and strategies contained in these related policies and in strategic and operational plans.

Procedure

Definitions and Goals

The Operating Reserve Fund is defined as the designated fund set-aside by action of the FPP Board of Directors. The minimum amount to be designated as Operating Reserve will be established in an amount sufficient to maintain ongoing operations and programs for a set period of time, measured in months. The Operating Reserve serves a dynamic role and will be reviewed and adjusted in response to internal and external changes.

The target minimum Operating Reserve Fund is equal to three months of average operating costs. The calculation of average monthly operating costs includes all recurring, predictable expenses such as salaries and benefits, occupancy, office, travel, program, and ongoing professional services. Depreciation, in-kind, and other non-cash expenses are not included in the calculation. The calculation of average monthly expenses also excludes some expenses such as pass-through programs, one-time or unusual, capital purchases.

The amount of the Operating Reserve fund target minimum will be calculated each year after approval of the annual budget, reported to the Finance and Audit Committee/FPP Board of Directors, and included in the regular financial reports.

Accounting for Reserves

The FPP Operating Reserve Fund will be recorded in the financial records as FPP Board-Designated Operating Reserve. The Fund will be funded and available in cash or cash equivalent funds. Operating Reserves will be maintained in agency investment funds in accordance with investment policies, and will, from time to time, be commingled with the general cash and investment accounts of the organization.

Funding of Reserves

The Operating Reserve Fund will be funded with surplus unrestricted operating funds. The FPP Board of Directors may from time to time direct that a specific source of revenue be set-aside for Operating Reserves. Examples may include one-time gifts or bequests, special grants, or special appeals.

Use of Reserves

Use of the Operating Reserves requires three steps:

1. Identification of appropriate use of reserve funds.

The President/CEO and leadership team members will identify the need for access to reserve funds and confirm that the use is consistent with the purpose of the reserves as described in this Policy. This step requires analysis of the reason for the shortfall, the availability of any other sources of funds before using reserves, and evaluation of the time period that the funds will be required and replenished.

2. Authority to use operating reserves

Authority for use of Operating Reserves is delegated to the President/CEO in consultation with the Treasurer and/or Chair of the Finance and Audit Committee. The use of Operating Reserves will be reported to the FPP Executive Committee/Board of Directors at their next scheduled meeting, accompanied by a description of the analysis and determination of the use of funds and plans for replenishment to restore the Operating Reserve fund to the target minimum amount. The President/CEO must receive prior approval from the FPP Executive Committee/Board of Directors if the Operating Reserves will take longer than 12 months to replenish. In the event the President/CEO and the Treasurer and/or Chair of the Finance and Audit Committee of the FPP Board Of Directors do not agree on the use of Operating Reserves as recommended by the President/CEO, the President/CEO shall submit the request to use Operating Reserves to the Finance and Audit Committee, along with the analysis and determination of the use of funds and plans for replenishment, and it shall be the responsibility of the Finance and Audit Committee to make a final determination on the use of the Operating Reserves.

3. Reporting and monitoring.

The President/CEO is responsible for ensuring that the Operating Reserve Fund is maintained and used only as described in this Policy. Upon approval for the use of Operating Reserve funds, the President/CEO will maintain records of the use of funds and plan for replenishment. He/she will provide regular reports to the Finance and Audit Committee/Board of Directors of progress to restore the fund to the target minimum amount.

Relationship to Other Policies

FPP shall maintain the following board-approved policies, which may contain provisions that affect the creation, sufficiency, and management of the Operating Reserve Fund.

- **Investment Policy**
- **Budget Policy**
- **Audit Policy**
- **Disaster Preparedness Plan**
- **Investment Policy**
- **Planned Giving Policy**

REVIEW OF POLICY

This Policy will be reviewed every other year, at minimum, by the Finance and Audit Committee, or sooner if warranted by internal or external events or changes. The Finance and Audit Committee will recommend changes to the Policy to the FPP Board of Directors.

POLICY #FM/115 - Planned Giving	
Policy Effective Date: <i>March 20, 2015</i>	
Policy Updated:	
Supersedes Policy No.:	Dated:
<i>Planned Giving policy for Consumer Credit Counseling Service of Forsyth County Inc. dba Financial Pathways of the Piedmont (FPP) welcomes all gifts for its use or its benefit and will endeavor in all instances to work with donors and their advisors to help assure that the goals of each contributor are accomplished. Unrestricted gifts and gifts for specific programs and purposes may be accepted by President/CEO, provided they are consistent with FPP's mission, purposes or priorities.</i>	

Rationale

FPP seeks to encourage funding of programs and operations without encumbering the agency with gifts that may possibly generate more costs or liabilities than benefits, or which are restricted in a manner not consistent with FPP's mission. FPP reserves the right to determine the appropriateness and acceptability of a gift and to refuse a gift. The policy set forth herein gives general guidelines. Specific gifts will be considered on their individual merits and final action will be taken as authorized by FPP's Board of Directors.

Procedure

This policy shall be administered, interpreted, and amended where necessary and appropriate by the FPP Executive Committee. The Finance Committee will offer guidance on acceptance of gifts and use. FPP will comply with all applicable laws and regulations in its gift acceptance efforts, will register with the proper authorities and complete any required reports. Valuation of non-cash gifts will be recorded at its value on the date of the gift. Questions regarding any portion of this material may be directed to the FPP President & CEO.

Donor's Rights and Interest

No agreement will be made between FPP and any agency, person, company, or organization on any matter, whether investment, management, sale, or other interest, which would knowingly jeopardize or compromise the donor's interests.

In keeping with this policy, all staff or consultants employed by FPP to administer or promote gifts will be paid on a fixed salary or other basis and not receive a commission related to gifts received in such a way as to create a personal financial interest in any agreement or receipt of gift to FPP.

FPP shall never sell, rent, trade or otherwise disseminate donor information to any third party or other organization for the purpose of generating revenue or in exchange for information except in the case wherein a third party organization, acting as a consultant to FPP under the auspices of a confidentiality agreement, is providing direct planning or program services to FPP.

FPP will hold all information obtained from or about donors or prospects in strictest confidence subject to legally authorized and enforceable requests for information by government agencies and courts. Neither the name, amount nor the conditions of any gift will be published when specifically requested not to do so by a donor.

Outright Gifts

Gifts of cash are the most common form of outright gift. Cash gifts include credit card commitments, checks, check drafts and/or payroll deduction arrangements and may be put into the immediate use of Agency. Additional general gifts include: in-kind gifts, bargain sales, etc.

Special Purpose Endowment Funds

FPP may approve the establishment of special purpose endowment funds upon receipt of gifts or endowments that meet the approved funding levels and criteria established for the endowment.

Endowed Scholarships or Awards

An endowed scholarship or award may be established with a minimum commitment of not less than \$5,000. An endowed award means that the initial funds given to establish the award are invested and that only the investment income from the principal may be distributed. This initial endowment amount may be paid to FPP over a period of two years with subsequent gifts accepted anytime thereafter.

Scholarships or Awards

Non-endowed scholarships or awards may be accepted at any time and may be expended immediately or at discretion of FPP.

Naming Opportunities

Naming opportunities associated with a gift may be used to honor living individuals or friends or family members of the donor or in memory of a loved one. Minimum criteria for individuals to be considered as namesakes for program and/or facilities are as follows:

- Honoree must have made a notable contribution to society and the welfare of society, or
- Honoree should have made a significant contribution to FPP through service, leadership and/or financial support.

Special consideration for naming opportunities that may not meet the above criteria can be considered by the Executive Committee and upon their recommendation, approved by the Board.

Cash

1. All checks should be made payable to Financial Pathways of the Piedmont, Inc. and should not be made payable to any employee, volunteer or other individual.
2. All checks must be deposited in the ordinary course of business. No employee shall be authorized to delay deposit.

Securities

A. Publicly Traded Securities

1. Securities that are traded on the New York, American Stock Exchange or NASDAQ Market or readily marketable securities shall be accepted by FPP.
2. Securities accepted by FPP will be sold as soon as possible, unless a donor has stated or designated formally that such securities being offered as a gift are to be held for a designated time period. In such instance, the Executive Committee will decide as to accepting the gift and holding the securities as investments of the organization. No agreement shall be made with a donor prior to a gift acceptance that such securities will be held for any period of time until approval of Executive Committee.

B. Closely Held Securities

1. Non-publicly traded securities will be accepted upon prior approval of the Executive Committee which has reviewed the prospective donation for all and any special provisions.
2. Such securities may be sold as soon as possible with the approval of the Executive Committee.

Real Property

1. It is the policy of FPP to accept gifts of real property to the organization.
2. Gifts of real property shall be accepted only after prior approval of the Executive Committee and the Board of Directors.
3. Prior to acceptance of real property, an independent third party appraisal regarding environmental conditions, status of title, and any other relevant information to be determined by SHFB will be obtained.

A. Tangible Personal property

A donor's gift of artwork, collectibles, artifacts, library collections, or equipment may be accepted by FPP, but after detailed review by FPP and the approval of the Executive Committee and the Board of Directors.

Exceptions to this procedure can occur when connected to silent auctions and events approved and/or sponsored by FPP.

1. Jewelry, artwork, collections, and other personal property will be accepted by approval of Executive Committee and Board of Directors.

2. Personal property may not be accepted where FPP is obligated to maintain ownership of it. Property which will require additional insurance, special facilities or security may not be accepted without prior approval of Board of Directors.
3. If there is reason to believe such property has a value of \$5,000 or more, it may be accepted after receipt and review of an appraisal qualified under relevant Internal Revenue Code requirements.

B. Other Property

Other property such as mortgages, notes, copyrights, royalties, easements, whether real or personal, may be accepted by the Executive Committee. Debt encumbered property will not be accepted unless extraordinary circumstances prevail and approved by the Board of Directors.

1. Deferred Gifts

A charitable bequest to FPP is a gift of any amount made to FPP via a donor's will. Gifts may be made through the execution of a will or a codicil to an existing will. Bequests may be designated as restricted or unrestricted. Restricted bequests when accepted are used in accordance with the desires expressed by the donor and in consideration of any limitations placed on FPP by IRS Guidelines and other factors. Unrestricted bequests are used for general purposes and directed to the area of greatest need.

Bequests

1. Gifts through wills may be actively encouraged by FPP.
2. Gifts from the estates of deceased donors shall be accepted subject to the terms of this policy. The legal counsel of FPP shall expeditiously communicate the terms of applicable policies to the legal representatives of the estate.

Charitable Remainder Trusts

1. FPP encourages those interested in doing so to establish charitable remainder trusts for the benefit of the organization. It is understood that charitable remainder trusts and other deferred gifts shall be encouraged as vehicles for the primary purpose of which is to make gifts to FPP. Such trusts shall not be marketed as tax avoidances or as investment vehicles, as it is understood such activity may violate federal and/or state securities regulations.
2. FPP will not serve as trustee of a remainder trust of which it is also a beneficiary. FPP may, if necessary, assist in the selection of an appropriate and independent trustee.
3. The fees for management of a charitable remainder trust will only be paid by FPP upon approval of the Board of Directors.
4. FPP will make no representations as to performance of trust assets or the manner in which charitable remainder trust assets will be managed or invested by any corporate fiduciary.

Charitable Lead Trust

Major gift donors may use charitable lead trusts to fulfill pledge agreements with cash, stock, real estate or a combination) placed in trust. The periodic payments to charity from the lead trust will be gratefully received by FPP for general purposes.

Life Estate Gifts

1. Donors may make gifts of remainder in real estate to FPP.
2. Upon notification of the legal representative of the estate of a deceased life estate holder of the death of such a person, the legal counsel of FPP shall immediately research all applicable laws and regulations and

communicate with appropriate estate representative. A determination shall then be made as to the suitability of FPP accepting full title to such property.

Life Insurance

1. A tax-deductible gift may be made by irrevocably designating FPP as both policy owner and beneficiary of a new or existing policy. All policies must be paid in full at time gift is made to FPP.
2. FPP will not agree to accept gifts from donors for the purpose of purchasing life insurance on the donor's life.

Other

Other types of gifts that will be accepted after Executive Committee review are: retirement and qualified plans; charitable gift annuities; etc. FPP may at some time offer both current and deferred gift annuities to its donors. Should charitable gift annuities contracts be offered, they shall only be offered after all State registrations and authorizations are complete.

2. Payment of Fees Related to Gifts

Finders Fees or Commissions

1. In general, FPP will pay no fee to any person as consideration for directing a gift to the agency.
2. In no event will a commission or finder's fee be paid to any party in connection with the completion of a gift to FPP without prior written approval of the Executive Committee and subsequent written notification to the donor involved of the amount and recipients of any such fee.

Professional Fees

1. FPP prefers that professional services rendered in connection with the completion of a gift be assumed by the donor.
2. Fees shall be directly related to the completion of a gift and may include:
 - appraisal fees by persons who are competent and qualified via Expert Appraisal as under appropriate IRS guidelines, to appraise the property and who have no conflict of interest
 - environmental impact studies when deemed necessary
 - legal fees for the preparation of documents
 - accounting fees incident to the transaction
 - fees of financial planners
 - other

In the case of financial planners, such persons must agree in writing that they are compensated only through fees for services rendered and that they are not compensated for the sale of products to clients. The distinction is vital in avoiding the payment of commissions, which could violate securities regulation.

3. In situations where advisors retained by FPP prepare documents or render advice in any form to FPP and/or to a donor to FPP, the professional involved is in the employ of FPP and is not acting on behalf of the donor and any documents or advice rendered in the course of the relationship between FPP and the donor should be reviewed by the donor's counsel prior to completion of the gift.

3. Restrictions

1. It is recognized and understood that donors often wish to restrict their gifts but such restrictions must conform to the guidelines in this policy and be in compliance with laws and regulations.
2. Restricted gifts may be accepted and used by FPP without prior approval of the Executive Committee unless it is deemed by the Staff and Executive Director that a restriction is so unique as to be outside the standard restriction/designation received by FPP.
3. Restrictions on ways in which funds may be invested may only be agreed to as stated and allowed in the Investment Policy and with approval of Finance Committee prior to the transfer of any assets the investment of which is to be restricted.

4. Administration of Policies

1. Without specific written authorization, volunteers may not sign appraisal summaries or other documents legally required for the completion of a gift to FPP.
2. The Executive Director and appropriate staff are responsible for reviewing this policy at least annually or more often as needed to ensure that they remain consistent with applicable laws and FPP programs as well as to ensure efficient and effective operating procedures.
3. The policy outlined herein may be waived by action of the Board of Directors.
4. The Executive Committee may accept cash and publicly traded securities subject to the terms of this policy. In the event gifts are accepted which are not in keeping with the terms of this policy and no exception is subsequently made, every attempt shall be made to return the donated property or mend the terms of the gift in a way which is mutually acceptable to the donor of such property and FPP.

5. Use of Legal Counsel

FPP seeks the advice of legal counsel as appropriate on matters relating to acceptance of gifts. Review by legal counsel may be sought in connection with:

- Closely held stock transfers that are subject to restriction or buy-sell agreements
- Documents naming FPP as Trustee
- Gifts involving contracts requiring FPP to assume a legal obligation
- Gifts of patents and intellectual property
- Transactions with potential conflict of interest that may invoke IRS sanctions
- Other instances in which use of counsel is deemed appropriate by the Executive Committee or Board of Directors.

6. Conflict of Interest

FPP does not provide personal legal, financial or other professional advice to donors or prospective donors. Donors and prospective donors are strongly urged to seek the assistance of their own professional advisors in matters relating to their gifts and the resulting tax and estate planning consequences.

ADMINISTRATION and MANAGEMENT

Governance (GOV)

POLICY #GOV/101 - Delegation of Authority in the Absence of President/CEO	
Formerly Policy #GA/104	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS' Board of Directors authorizes the President/CEO to delegate authority to act on operational issues to a subordinate staff member or members in his or her absence of less than thirty (30) days. For periods in excess of thirty (30) days, the Executive Committee of the Board shall appoint designee(s) and define that person's scope of authority</i>	

Rationale

The agency management team must be continuously available to direct the operations and services of the organization. For any prolonged period of absence on the part of the President/CEO, the board's need for oversight would increase so as to ensure that this management is uninterrupted and is conducted in accordance with agency policy.

Procedure

The agency's President/CEO shall maintain an organizational structure in which staff member(s) is/are appointed and prepared to perform the President/CEO's duties during the President/CEO's short-term absence. After thirty continuous days of the President/CEO's absence, the Executive Committee of the Board of Directors will appoint designee(s) and define that person(s) scope of authority, which may be to continue in the role(s), or to assist the Executive Committee of the Board in preparing another to do so.

POLICY # GOV/102 – Board Composition	
Formerly Policy #GA/105	
Policy Effective Date: <i>December 12, 2002</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS Board members are selected to be representative of the community the agency serves and have the professional skills needed by the agency to fulfill its mission and vision. At least 60% of the Board will be from outside the credit granting, credit reporting and debt collection industries.</i>	

Rationale

To be sensitive and responsive to the needs of residents in our community, CCCS Board composition is determined by key community stakeholder demographics as well as areas of Board member professional and personal experience. CCCS endeavors to balance the diversity of community representation on the Board with key areas of Board effectiveness needed by the agency to fulfill its mission and vision.

The CCCS Board also recognizes that, to fulfill its mission, the Board composition cannot be weighted too heavily with representatives from the credit granting, credit reporting and debt collection industries. This could cause the agency’s counseling program to become overly focused on Debt Management Program services, and not on the overall best interests of the clients.

Procedure

Each year the Executive Committee reviews the areas of community representation currently reflected on the Board and the anticipated Board member professional skills needed by CCCS, taking into account expected Board turnover during the next year. The Executive Committee also looks at the composition of the Board in relation to credit grantor, credit reporting and debt collection representation percentage.

Based upon the above analysis, the Executive Committee begins recruiting new CCCS Board members, based upon the areas of community and organizational representation needed. Current Board and Staff members are asked to recommend potential new Board members, based upon the areas identified by the above Executive Committee Board composition analysis.

After interviewing prospective Board members, the Executive Committee identifies who they will present to the Board and presents their recommendations for new Board members at an appropriate Board meeting, to comply with its goal of maintaining an average of 80% Board member position filled rate.

Advisory Board Nominations and Utilization

Nominees for the Center for Homeownership Program Advisory Board may be elected at any board meeting during the year.

POLICY # GOV/103 – Board Orientation and Training; Board Meetings	
Formerly Policy #GA/106	
Policy Effective Date: <i>December 12, 2002</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS Board members are provided with a comprehensive agency orientation, and are assigned a Board mentor, within 30 days of their official appointment to the Board.</i>	

Rationale

To become an efficient and effective CCCS Board member, the agency conducts a comprehensive Board orientation process within 30 days of their official appointment to the Board. To assist new Board members in their acclimation to the agency, a Board mentor is assigned to them within 30 days of their official appointment to the Board, and supports them during their first six (6) months on the Board.

Procedure

The Executive Committee is also responsible for assigning mentors to new Board members. Each Board member is provided access to all official agency documents (available at CCCS website: www.cccsforsyth.org)

which includes, among other information, copies of Board policies and procedures, the Personnel Policy Manual, CCCS by-laws and other relevant information. Each new Board member is required to sign an agency confidentiality agreement and a conflict of interest disclosure statement.

Conduct of Board Meetings - Roberts Rules of Order

Roberts Rules of Order shall govern all board and committee meetings conducted by CCCS of Forsyth County.

POLICY # GOV/104 – Board Training	
Formerly a part of Policy #GOV/103	
Policy Effective Date: <i>December 12, 2002</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS Board will offer its members one Board training session each year that relates to their roles and responsibilities as a Board member.</i>	

Rationale

CCCS Board members will improve their effectiveness in carrying out their board responsibilities when given an opportunity to participate in annual board training sessions.

Procedure

Each year the Executive Committee is responsible for coordination of new Board member orientation and training activities, working closely with the CCCS Board Chair, President/CEO and appropriate agency staff.

POLICY # GOV/105 – Policy Review	
Policy Effective Date: January 21, 2011	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS Board will review all policies every four years.</i>	

Rationale

To ensure that agency policies are up to date and are carried out effectively CCCS policies need to be reviewed every 4 years.

Procedure

The Executive Committee is responsible for coordination of agency policy review activities, working closely with the CCCS Board Chair, President/CEO and appropriate agency staff.

ADMINISTRATION and MANAGEMENT

Human Resources (HR)

See HR Policy Manual

ADMINISTRATION and MANAGEMENT
Risk Prevention and Management (RPM)

POLICY #RPM/101 - Legal Compliance	
Formerly Policy #FM/108	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS shall comply with all legal requirements at the local, state and federal level.</i>	

Rationale

The maintenance of trust in CCCS by our clients, creditors, and all the communities served by the agency demands the agency’s compliance with all applicable legal requirements.

Procedure

The Board, management and staff of CCCS are all responsible for ensuring that CCCS is fully in compliance with all legal requirements. To this end the agency’s Board of Directors will employ or maintain within its membership at least one practicing attorney who is competent to provide legal guidance for the board and for agency management.

Further, agency management team will regularly obtain information and advice from a variety of other sources to include, but not limited to, a certified public accountant, United Way based management assistance programs, professional journals and periodicals, and the agency’s national organization.

All matters and issues relating to the agency’s compliance with legal requirements are to be brought immediately to the attention of the agency’s President/CEO, who bears the Board delegated responsibility for meeting this requirement.

SERVICE DELIVERY ADMINISTRATION

Administrative Service Environment (ASE)

POLICY #ASE/101 – Insurance	
Formerly Policy #SE/101	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS will maintain and review insurance coverage for the agency to ensure adequate coverage on an annual basis.</i>	

Rationale

Prudent management practice dictates that a comprehensive insurance program is in place to safeguard the agency's assets, volunteers and staff. Without such coverage, the agency would be exposed to a potentially catastrophic loss of assets, and its volunteers and staff would be exposed to great personal risk from even the most frivolous of lawsuits. Such uninsured risk would work against the agency's ability to attract quality volunteers for its Board of Directors and Advisory Boards, and would clearly have a negative impact on the agency's ability to conduct its community service programs.

Procedure

Agency management team shall ensure that agency assets, volunteers, Board of Directors, Advisory Boards, and staff are all protected by specific insurance coverage's adequate to meet the exposure to risk experienced by each in the course of agency operations. Such coverage will be obtained with the advice of an insurance professional, and shall at a minimum include coverage for: directors and officers liability, errors and omissions, professional liability, commercial liability, fidelity bonding, theft and robbery, all owned property for physical damage/destruction, non-owned vehicles used on agency business, workers' compensation, unemployment, and other coverage's against perils which may reasonably be anticipated.

Insurance coverage is reviewed for adequacy, scope of coverage and pricing at least annually by QA Forum members (agency Executive Committee & management team), and is then reviewed by the agency's Board of Directors. CCCS Board and Staff are updated annually regarding agency insurance coverage.

POLICY #ASE/102 – Emergency Preparedness and Disaster Recovery	
Formerly Policy #SE/102	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS shall maintain plans for emergency preparedness that shall include measures and procedures to recover from or to respond to 1) natural disasters, 2) robbery, 3) actual or threatened assaults on staff and others, 4) staff or client sudden illness or injury, and 5)</i>	

hostage or threat situations.

Rationale

Advance planning is essential in responding to or preventing emergency situations that may threaten the safety of staff, volunteers and clients, the continuity of agency services, and the safety of agency property. The President/CEO is responsible for undertaking a risk analysis at least once each year, and for developing and implementing steps to minimize or eliminate identified risks. All managers and staff share responsibility for identifying and reducing risk and in preventing or minimizing exposure to financial loss. All staff must have a clear understanding of their duties in any given situation, in order to ensure the best possible outcome.

Procedure

See Emergency Preparedness and Disaster Recovery Procedures Plan for current procedures

POLICY #ASE/103 – Handicap Accommodation	
Formerly Policy #SE/103	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS office locations will comply with the provisions of Americans with Disabilities Act.</i>	

Rationale

Aside from compliance with law, a successful community service must be all-inclusive by its very nature. It would do little good to offer agency services to everyone in the community, and to then permit barriers to exist that would prevent some segments of the community from seeking those services. Likewise, by having barriers to handicapped staff candidates, the agency would deprive the agency of access to an entire segment of the available workforce.

Procedure

The agency management team and the agency board of directors shall ensure that CCCS is in compliance with applicable laws regarding disabled persons. The goal is to make all of agency service locations accessible to handicapped clients, and to make all reasonable accommodation for agency staff that may be handicapped with consultation of facility owners.

Special Communication Needs of Clients

CCCS works with area deaf service providers for assistance in helping clients with hearing impairments, including the use of telephone amplification equipment. CCCS also utilizes available bilingual service providers to assist agency counselors during their counseling sessions, as needed.

SERVICE DELIVERY ADMINISTRATION

Client Rights (CR)

POLICY #CR/101 - Best Interest of Clients	
Formerly Policy #SD/109	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS will make consistent and prudent management decisions regarding the client's best interest.</i>	

Rationale

CCCS must balance a variety of interests in providing its service programs, but must retain as its central concern the well being of the consumer client who is the agency's primary customer. While it is hoped that a win-win solution will be found for every conflict of interest, it is not realistic to expect that this will always be the case. In the end, our charter and our mission dictate that the best interests of our consumer clients must be our primary focus.

Procedure

In all instances where various interests may be in competition with one another, the course of action to be followed is that which best serves the interests of the agency's consumer clients. The interests of creditors, the community and the agency itself must all be secondary to those of our consumer clients, both individually and as a group. However, in cases where the best interests of an individual client may conflict significantly with the best interests of the agency's entire consumer client caseload, the action taken must be aimed at benefiting the largest number of consumer clients.

This concept will primarily apply to the agency's Debt Management Program, where the issue of competing interests must routinely be addressed. Issues of fairness to creditors may be critical to the agency's ongoing ability to help all clients and thus must take precedence to the more narrow interests of an individual client. Alternatively, while a client's decision to file for protection under bankruptcy laws to avoid foreclosure of a home may harm the interests of creditors, it is not the place of CCCS to dissuade the client from taking the action -- particularly if that action may be clearly in the client's best interest.

Issues of practicality also limit the best interest policy. While it may be in a client's best interest to have 24 hour per day access to a counselor, it is simply not within the agency's financial capacity to provide such a level of service.

In any particular situation of uncertainty on an issue of the consumer client's best interests, the staff members are instructed to consult with a member of the agency management team for direction.

POLICY #CR/102 – Client Use of the Debt Management Program	
Formerly Policy #SD/106	

Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS shall offer its services to all eligible consumers.</i>	

Rationale

CCCS shall offer its debt management program to agency clients when the client(s) decide that the CCCS DMP option offers them the best solution to their debt problem(s) and they have the means to meet the monthly payment obligation.

Procedure

CCCS shall offer the agency’s Debt Management Program (DMP) to over-indebted consumers provided that all four of the following conditions are met: 1) the client is requesting some form of assistance in managing his/her debt situation; 2) the DMP will provide a viable solution to the client’s problems; 3) other solutions to the client’s problems are deemed unworkable or unacceptable by the client; and 4) the client specifically requests placement on the program after being made aware of all available options, and of the likely consequences of enrollment in the DMP.

The criteria for enrollment in the agency’s DMP, as expressed in this policy, shall be part of each counselor’s initial training, and each client placed on the program will be screened to ensure that the requirements of this policy are being strictly observed. In all cases, counselors must strive to assist the client in determining the best solution to existing problems. The best solution may be defined as that solution with the highest probability of success, given the situation and the client’s capabilities. Anytime that the DMP does not meet this best solution test, the client should be urged to consider a solution that is more advantageous.

The DMP is not considered by CCCS to be a panacea for every over-indebted consumer who is counseled by CCCS. The DMP is intended to help consumers to resolve serious debt problems only when (and/or if) other solutions are unworkable.

Agency DMP clients receive monthly account statements, and are encouraged to compare them with their creditors monthly account statements, and to contact CCCS if they identify any discrepancies.

DMP clients are also encouraged to review their DMP with their counselor at least once every six months, to review their progress on the program and see if they should adjust their monthly DMP program deposit, based upon their current financial circumstances.

POLICY #CR/103 – Counseling Recommendations and Referrals	
Formerly Policy #SD/110	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS shall not recommend any specific course of action for the resolution of debt problem and will work with each client to develop an array of options from which the client may select the</i>	

most appropriate course of action.

Rationale

Experience has shown that people seeking assistance from CCCS are doing so in order to find reasonable alternatives to bankruptcy, and in some cases, to learn more about bankruptcy. Therefore, while all over-indebted consumers being assisted by CCCS are to be provided with balanced and factual information about their options, including options under existing bankruptcy law, for the resolution of financial difficulties (via the distribution of approved informational materials), counselors must not substitute their judgment for that of the client. The counselor's responsibility is to provide each client with a number of workable options and to assist each client in selecting the option best suited to the client's circumstances. For any plan of action to be successful that plan must be the client's own -- not the counselor's.

The issue of bankruptcy must be raised with over-indebted clients so that each consumer will be made aware of the negative aspects of bankruptcy as well as the positive features. To ignore this issue would be shortsighted and would be doing CCCS clients a disservice. In order for any course of action to be workable, each client must have as much knowledge as possible about the probable effects of his/her choices.

Procedure

Counselors and others rendering client services must refrain from urging clients to follow any specific course of action until the client has selected the plan most suitable to their circumstances. In all cases, CCCS staff must strive to provide complete and factual information concerning each possible course of action to facilitate the client's decision-making process.

Client Participation in Service Plan: The goal of CCCS-Forsyth County is to help clients help themselves with in-depth assistance from the agency. CCCS strongly encourages all adult members of the family unit to be present and actively participate in counseling sessions and in the formulation of their service plan.

During the assessment and evaluation of each client's financial circumstances, the counselor and client(s) together determine the problem(s), create solutions, and develop a service plan ("Action Plan") to resolve or improve the existing circumstances. Clients are informed in advance about the benefits, risks, and alternatives to services offered. Clients are further evaluated for related service referrals during the assessment process.

Every standard counseling session includes a full budget analysis and the development of a spending plan for the family that sets priorities for housing cost, utilities, food, and transportation. The Action Plan developed for the client(s) to reach mutually agreed upon goals documents the need for service, the summary of the financial situation, and the client's goals and responsibilities.

In addition, CCCS encourages the participation of all family members in the implementation of their service plan. Any subsequent changes in the initial service plan are made with the participation of the client, are reviewed with the client, and documented in the client file.

New clients are encouraged to call their counselor in 90-days for a follow-up review of their circumstances and progress in their service plan.

Referral of Agency Clients: CCCS clients in need of services not provided by CCCS shall be referred to any of a variety of non-profit or governmental service providers that maintain high ethical standards of professionalism and fairness. Service providers receiving CCCS referrals must maintain applicable practices of confidentiality, reasonable cost, and client's best interest, but may not be directly referred to any profit making

entity. CCCS Counselors use a comprehensive Directory of Community Resources updated annually by the Forsyth County Public Library, plus other “hot line” referral resources available through United Way and Senior Services.

As an example, if a lawyer is needed, a referral is made to the North Carolina Lawyer Referral Service or a law firm that is known to provide knowledgeable advice in a timely manner and at a reasonable cost. CCCS maintains a list of Bankruptcy Attorneys which is provided to a client who is referred for consultation. It shall be expected of each recipient of a referral that they report the outcome of their service to CCCS so that we might track our service outcomes and be assured that our client’s needs are being met. No employee of the agency is permitted to receive payment or other consideration for making referrals, nor may an employee refer a client to services being provided by a relative of that employee. The agency's sole interest in making client referrals is to be responsive to the well-being and needs of each client.

POLICY #CR/104 - Non-Discrimination for Clients	
Formerly Policy #SD/104	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS shall not exclude anyone from receiving agency services based on his/her economic status, cultural heritage, race, color, religious faith, sex, sexual preference, marital status, national origin, age, political affiliation, disability or veteran status.</i>	

Rationale

CCCS is a community service, dedicated to serving any and every consumer who seeks our help. There can be no variance from this principle.

Procedure

CCCS will attempt to assist ANYONE who requests our services, and will exercise the same diligence and degree of effort for each and every consumer who calls on the agency for assistance. Discrimination of any kind is absolutely prohibited. Further, management, staff, and volunteers alike will actively seek to remove any barriers to client services whenever they are found to exist, whether such barriers are physical or psychological.

To ensure that non-discrimination in providing services is a reality, no application or other tool to qualify a client for services, except to ensure that agency services are what the client needs, is to be used. Clients needing counseling are scheduled for appointments when they contact CCCS.

The Senior Financial Care® program has an age 60-or-over requirement for services which are specifically offered for the senior population. These services are monthly check-writing and balancing bank statements, Medicare insurance counseling, assistance with filing medical insurance claims, prescription drug discount information, and reverse mortgage counseling. In-home service is also an option. Persons not meeting the requirement for direct service by SFC counselors will receive information and referral as appropriate.

In the agencies other service programs, such as debt management and consumer education, management will monitor reports and other data to ensure that our service program participants accurately reflect the demography

of the communities served by the agency. The client feedback and grievance process will also be actively monitored to ensure compliance with this policy.

POLICY #CR/105 – Confidentiality	
Formerly Policy #BE/101	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS employees, board members and other volunteers shall maintain the confidentiality of all records and information obtained in the conduct of their duties.</i>	

Rationale

Confidentiality of client data is essential to maintain trust between each client and the organization. Likewise, the confidentiality of employment records, salary information, etc., is fundamental to the maintenance of trust within the employment relationship. Utmost care must be taken in all circumstances to maintain confidentiality in order for the agency to be successful in fulfilling its mission.

Procedure

The need for complete confidentiality will be a leading topic in the initial orientation of all employees, board members and other volunteers. Any employee, volunteer, or board member having access to client data will execute an Agreement of Confidentiality.

Confidential client data may be released only with the authorization of the client, and then, only to parties who have a need to know the information in order to assist the agency in helping the client, or to accommodate the client's needs (e.g. to creditors). Since sharing of this information with a client's creditors is always necessary in a debt management program, no debt management program will be implemented without the client's signing a specific authorization and release form. Similarly, any client who seeks CCCS assistance in communicating with creditors and others in a crisis situation must sign a specific authorization. CCCS posts its client confidentiality privacy policy on the agency's web site.

Where a client has signed no authorization or release form, no client information will be shared with third parties, even when the client verbally directs the third party to contact CCCS. CCCS identifies clients interested in being interviewed by the media through annual client surveys. All such client volunteers will be asked to carefully consider the possible consequences of this undertaking, and will also be asked to sign a special release of liability for CCCS. The client's name and other information shall not be given to the media, but the client will be given information to contact the media representative.

Confidentiality - Review of Clients' Records by Invitees

Persons or entities performing functions related to:

- 1) The agency's annual audits;
- 2) Our national organization's monitoring and compliance committee;
- 3) Accreditation reviewers;

4) Document storage and destruction firms, and;

5) Other such purposes as may from time to time be so identified shall all be considered to be agents or employees of CCCS of Forsyth County, and shall therefore be permitted access to clients' records as may be necessary for the performance of their duties. In all cases the confidentiality of the client information shall be protected, and those reviewing records shall sign the confidentiality agreement (as applicable).

Client Information and Participation in Research

CCCS practice is to not participate in any client research projects or activities. If the agency were to consider participating in a client research project, CCCS would respect client confidentiality in conducting the research project. The agency will also secure client permission in writing before including them in any agency research activity, or using their CCCS client information in an agency research project.

POLICY #CR/106 – Record Retention and Destruction	
Formerly Policy #BE/102	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS shall retain all pertinent and relevant documentation obtained by the agency and will follow all State and Federal guidelines as it relates to the retention of legal agreements etc.</i>	

Rationale

To meet legal requirements and to maintain appropriate record keeping for the benefit of clients and others, with clearly defined maintenance criteria to guard against unnecessary record storage, the 7/10 general guidelines are the most appropriate. Upon the completion of storage periods, the agency has a continued obligation to maintain the confidentiality of client records until they have been destroyed.

Procedure

Consumer Credit Counseling Service of Forsyth County shall retain client documents pertaining to debt management for a minimum of seven (7) years from the completion of agency service; three (3) years for financial counseling services; agency financial records for seven (7) years; general operational documents for a minimum of three (3) years; Board minutes in perpetuity. CCCS shall maintain the security & confidentiality of records during the storage and destruction of said documents.

All client case files, records, computer printouts, and related paper documents will be maintained in designated storage areas or at an off-site archiving location for a period of time as described above.

All agency financial records, canceled checks, reconciliation reports, financial reports and analysis, financial documentation, vendor information, payroll records, operating reports, and all other material related to agency operations which may reasonably be seen as having continuing utility, will be maintained in designated secure storage area or at an off-site location for a total of ten years following their creation.

Operational records, which may reasonably be seen as having continuing value, will be maintained in designated secure storage area or at an off-site archiving location for a total of ten years following their creation. Records pertaining to audits, Board records, contracts and legal matters shall be maintained

permanently in a designated secure storage area or at an off-site archiving location. Upon conclusion of these storage periods, material to be retired will be destroyed by commercial means (shredding, incineration, etc.) in a process supervised by agency staff to ensure the confidentiality of all records until destruction. Agency shall ensure that storage facilities are licensed and bonded in accordance with state & local laws.

Protection of Agency Records

Access to agency client records shall be limited to CCCS staff, volunteers and others so authorized by the CEO, and only after they have signed an agency client confidentiality statement. Records shall be kept in filing cabinets in a locked, secure area, with a sign-out and sign-in card maintained on a daily basis. When a client's file is pulled, the name of the file will be written on an in/out-card which will be put in place of the file in the file drawer. If more than three files are pulled by one department or person at a time, the names of those files are to be listed on an in/out-card placed in the file holder for that purpose. These “in/out cards” shall identify the location of client files at any given time. When the file is returned, the name entered on the in/out-card is to be crossed off, indicating that the file was returned to its proper place. All files are to be returned to the file room nightly. For a new client DMP file that is incomplete, a staff member looking for that file should check with the counselor or with the DMP staff to determine if the DMP is in process at that time.

Retention of client records shall follow agency record retention policy. When client records are removed from agency file cabinets after the record retention expiration date, they will be disposed of in a manner that ensures client confidentiality.

Client records maintained electronically shall be protected from unauthorized access by the use of network passwords, software passwords and authorized levels of access. Staff access is restricted to the level needed to fulfill job duties, and individual passwords are to be known only by the President/CEO and designated staff members (for designated systems backup operations). Passwords shall be changed on a regular basis.

POLICY #CR/107 -Acceptance of Gifts by Employees	
Formerly Policy #BE/104	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS shall not permit its employees or agents to accept gifts from parties doing business with or being served by the agency, whether cash, merchandise, or other consideration, that may have the appearance of a conflict of interest or in any way reflect negatively on the agency.</i>	

Rationale

The agency must never allow perceived conflicts of interest to develop which would act to the detriment of the agency’s reputation and the character of its staff.

Procedure

All gifts valued at \$10 or more shall be reported to agency management team. Management team shall review the nature and conditions surrounding the gift, and determine whether the gift should be returned. Employees knowing in advance that such a gift is forthcoming should seek management’s determination as to the gift’s acceptability. Gift’s exceeding \$50 in value must be returned.

POLICY #CR/108 – Client Feedback and Grievances	
Formerly Policy #BE/106	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS shall maintain a commitment to continuous quality improvement through a system of anonymous client feedback and an established grievance process.</i>	

Rationale

Human service organizations such as CCCS have no reason to exist EXCEPT to serve the needs of clients and the community. There can be no profit motive - CCCS's bottom line is success in helping customers. Accordingly, CCCS must be responsive to those needs, and must be alert to ways in which the agency can improve its efforts. If these efforts are not fully successful, a grievance system must be in place to ensure that service personnel are doing their jobs and those no deliberate disservice or injustice is ever done to a client of CCCS.

Procedure

For all service programs from which client feedback can be obtained, staff will manage a program to actively solicit such feedback and evaluations of service.

In counseling, every new debt management client in each quarter is sent a customer service survey, which comes back to the counselor for review and is included in a quarterly QI summary to the Board of Directors. CCCS also sends out surveys on a quarterly basis to all clients counseled in the quarter. Management will provide quarterly summaries of these feedback forms to the agency's Board of Directors, along with a report on actions taken as a result of client input. Client surveys provide the foundation for regularly analyzing and revising policies and procedures, practices, personnel assignments, employee training, and programs.

All clients are afforded the opportunity to give feedback using the Client Suggestion / Grievance Form reviewed one on one with every agency client. The Client Suggestion and Grievance Policy is part of the Client Agreement for Counseling Form, which must be signed as understood by every client. This ensures that the policy to address grievances is explained and provided to every client.

In education, evaluation forms will be given to all participants in every venue in which this is permissible. The completed forms will be returned to management, who will provide quarterly summaries of these evaluations for the Board of Directors.

For debt management program clients, an end of year questionnaire and feedback form will be sent to a random sample of active clients, with the forms to be returned directly to the Quality Assurance Plan designee, who will review and report the results directly to the agency's Board of Directors.

New regular and occasional clients of Senior Financial Care are contacted by telephone within two weeks of their initial counseling sessions to give feedback on services received. These evaluations become a part of SFC's accountability for grant funds received.

All forms to be used in these client feedback efforts will be approved by the Quality Assurance Forum of the Board prior to use. All such forms will provide the client with the ability to respond anonymously.

All counseling and debt management clients will be informed of the agency’s grievance procedure. All clients have the right to have their complaints heard and responded to, starting with supervisors, progressing to the agency’s President & CEO, and ending with the Executive Committee of the Board.

CCCS periodically conducts comprehensive client surveys and external focus groups, assessing the quality of agency services provided and how CCCS can improve its programs and services in the communities it serves. Agency staff, utilizing outside consultants and area college faculty and students, facilitates these surveys and focus groups.

All information received via these techniques will be given the most serious possible consideration in the management, development and operation of agency service programs, and in the setting of priorities in the agency’s strategic planning process.

POLICY #CR/109 – Client Access to Client Files	
Formerly Policy #BE/107	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS shall permit any client to have access to their (his/her) case record during normal business hours, and in the presence of designated professional staff. The client shall be informed of the conditions and terms of access to their file.</i>	

Rationale

In order to enhance client confidence and maintain unbiased record keeping, it is important to allow clients, upon request, to review their case file.

Procedure

When any client requests access to his/her individual case file, such request shall be granted and an appropriate time will be set for the client to review his/her file on CCCS premises and in the presence of CCCS professional staff. Prior to the client review of their case file, designated CCCS professional staff will review all data included in the file to determine if any third party or individual case staff’s relationship with the client could be harmed by the client reviewing any portion of the file. Any portion of the file deemed to be harmful will not be included in the client review of the case file.

SERVICE DELIVERY

Financial Education and Counseling Services (FEC)

POLICY #FEC/101 – Counseling Conflicts of Interest	
Formerly Policy #BE/103	
Policy Effective Date: <i>July 27, 1997</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS shall not offer financial incentives to counselors based on establishing Debt Management Programs, nor shall counselors be penalized when clients take over their own Debt Management Programs or are unable to continue with their programs.</i>	

Rationale

The proper role of a credit counselor is that of an impartial professional who can lay out various courses of action for clients, but who refrains from recommending any specific course. DMP incentives could undermine the counselor's objectivity and agency professional standards.

Procedure

Agency management team shall ensure that no incentive or disincentive program is created that is based upon the generation or loss of debt management cases. Incentive or disincentive programs (if any) shall be based on an employee's overall job performance.

POLICY #FEC/102 - Making Loans to Clients/Debtors	
Formerly Policy #FM/114	
Policy Effective Date: <i>September 15, 2006</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS of Forsyth County shall prohibit the making of any loans to clients/debtors, and does not negotiate the making of loans on behalf of clients/debtors.</i>	

Rationale

CCCS of Forsyth County's purpose of existence is to help clients/debtors regain control of their personal finances, develop their money management skills, get out of debt, and achieve financial self sufficiency. There is nothing in our mission, vision or purpose statements that speaks to the agency making loans to clients/debtors, or negotiating the making of loans on behalf of clients/debtors.

Procedure

There will be no mention of making loans to clients/debtors, or negotiating the making of loans on behalf of clients/debtors in any agency internal or public documents.

POLICY #FEC/103 - Fees for Helping Consumers Improve Their Credit Record, Credit History, or Credit Rating	
Formerly Policy #FM/115	
Policy Effective Date: <i>September 15, 2006</i>	
Policy Updated: <i>January 21, 2011</i>	
Supersedes Policy No.:	Dated:
<i>CCCS will not charge a separate fee for services for the purpose of improving any consumer's credit record, credit history, or credit rating.</i>	

Rationale

CCCS of Forsyth County's comprehensive credit counseling sessions include, if requested by the client, information, advice and support in the areas of improving the client's credit record, credit history, or credit rating for the agency's standard counseling fee, which is waived in hardship cases.

Procedure

There will be no mention of charging a separately stated fee for services for the purpose of improving any client's credit record, credit history, or credit rating in any agency internal or public documents.