

Organizational Policy Manual

Old Brooklyn
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Effective/Revision Date: Revised June 12, 2007

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I. Introduction to the Old Brooklyn Community Development Corporation

What is the OBCDC?

Mission Statement

We are committed to uniting, engaging and empowering the community to improve the economic vitality and quality of life within the Old Brooklyn and Brooklyn Centre neighborhoods.

OBCDC History

Old Brooklyn Community Development Corporation (OBCDC) was founded by a dedicated group of Old Brooklyn business and community leaders in 1975. Soon after, the organization established the Old Brooklyn News, a monthly community newspaper with a circulation of 25,000. In 2000 the organization expanded its service area to include the diverse historic community of Brooklyn Centre, formerly known as Archwood-Denison.

Old Brooklyn Community Development Corporation continues a tradition of cooperation and facilitation of development efforts in both of these distinct and proud communities.

II. Employment Policies and Practices

Office Hours

The OBCDC office traditionally operates on a 40-hour workweek and the OBCDC office is open Monday through Friday from 8:30 a.m. to 5:00 p.m. Flextime is available with approval by the Executive Director. Days may be staggered and the Executive Director will schedule employees as necessary. All employees are expected to be at their work locations ready for work at their scheduled time (unless adjusted by their job description or approved by the Executive Director). Persistent late arrival to work and/or early leaving from work will result in disciplinary action, up to and including termination.

Employees are provided with a key to the office. It is each employee's responsibility, when the last to leave the building, to see that all doors and windows are locked at the end of the day.

Time Sheets

All employees shall be required to complete time sheets for submission on a monthly basis. Employees whose salary is funded from multiple federal, state or local sources are required to allocate their time accordingly to the various funding sources on their time sheet.

Pay Periods

Salary is paid on the 15th and the last day of the month. When a payday falls on a weekend or holiday, paychecks are distributed on the previous workday.

Equal Employment Opportunity

It is the policy of OBCDC to provide equal opportunity for all qualified persons and not discriminate against any employee or applicant for employment because of race, color, religion, sex, sexual orientation, age, national origin, veteran status, disability, or any other protected status.

This policy applies to recruitment and placement, promotion, training, transfer, retention, rate of pay and all other details and conditions of employment.

Employment and promotion decisions will be based on merit and the principle of furthering equal opportunity. The requirements we impose in filling a position will be those that validly relate to the job performance required.

All other personnel actions including compensation, benefits, transfers, layoffs, recalls from lay-offs, training, education, tuition assistance and recreation programs will be administered without regard to race, color, religion, sex, sexual orientation, age, national origin, disability, veteran status, or any other protected status, in accordance with appropriate law.

Affirmative Action

It is the policy of OBCDC that it will operate and conduct business without discrimination or segregation because of age, sex, race, color, religion, national origin, or handicap, except where there is a bona fide occupational qualification for the job tasks to be performed.

At Will Employment

OBCDC offers employment under the legal terms of the doctrine of **employment at will**. Under this doctrine, either the employee or OBCDC can terminate the employment relationship with or without cause, and with or without notice, at any time, except as otherwise provided by law.

No employee, manager or official of OBCDC is authorized to agree to any other terms or conditions of employment except in a written document signed by the Executive Director of the OBCDC and approved by the Board of Trustees.

Conflict of Interest

It is against OBCDC's policy for any employee or agent on behalf of OBCDC to offer, pay, promise or authorize payment of anything of value to any foreign government official, political candidate or political party to influence any act or decision by that person, candidate or party.

Gifts to Employees

Employees should not accept gifts or other favors from persons or organizations with whom OBCDC does business unless they are of nominal value and do not affect in any way the relationship between the OBCDC and the third party.

Employment

All positions not filled by internal promotion of existing employees will be advertised, and all applicants will be considered for employment in compliance with all applicable federal, state and local laws.

a. Hiring

The Board of Directors has the responsibility of hiring the Executive Director upon recommendation of the Executive Committee, which will interview and screen applicants. The Executive Director, with consultation of the Executive Committee and appropriate staff, has the responsibility of hiring all other staff.

b. Suspension

An employee may be suspended by the Executive Director without pay for breach of client confidentiality, unsatisfactory job performance, and/or just cause. The Executive Committee must review the facts of the case at or before the next regularly scheduled board meeting to either confirm or reverse the suspension. The decision of the Executive Committee will be given in writing.

c. Termination

The Board of Directors has the responsibility for the termination of the Executive Director upon recommendation of the Executive Committee in accordance with these policies. The Executive Director, with consultation of the Executive Committee, has the responsibility to oversee the termination of all employees in accordance with these policies.

Employee Classification

Your eligibility to participate in various OBCDC Benefit Plans and other programs is based upon your classification as an employee. While the OBCDC handbook with its rules and policies apply equally to all hourly and salaried employees, temporary or casual employees may not utilize certain benefits and programs. Please refer to the definitions below to determine employee classifications and eligible employees:

- a. Full-time employee** - an employee who is employed on a scheduled basis for a normal workweek, which is 40 hours/week including overtime and who is not classified as part-time, temporary, or casual.
- b. Part-time regular employee** - an employee who works on a scheduled basis for less than 40 hours/week. Occasionally, part-time employees are given the opportunity to increase working hours. This temporary increase in hours does not affect their part-time employment classification.
- c. Temporary employee** - an employee who is hired for a specific position for a designated length of time which is normally not more than twenty four (24) consecutive months in duration and is committed to leave the Company at the end of that time.
- d. Casual employee** - a person who may be called by the Company at any time for employment on a non-scheduled and non-recurring basis, and becomes an employee of the Company only after reporting to work, and for the period of time during which the person is working.

Temporary status definitions apply only to company employees. Individuals who work on temporary assignments as employees of an outside temporary agency are not eligible for any company-sponsored benefits or compensation.

Policy Prohibiting Unlawful Harassment, Including Sexual Harassment

OBCDC will not tolerate verbal or physical conduct by any employee that harasses, disrupts, or interferes with another's work performance or which creates an intimidating, offensive, or hostile environment.

As an equal opportunity employer, it is OBCDC's policy that every applicant and employee shall enjoy a work environment free from all forms of unlawful harassment, including sexual harassment. Unwelcome verbal, physical or visual conduct involving any individual's race, color, religion, sex, sexual orientation, pregnancy, age, national origin, ancestry, citizenship, medical condition, physical disability, marital status, or military service, or any other basis protected by any federal, state or local law which impairs an employee's ability to perform their job is illegal and is strictly prohibited.

Sexual harassment is an unlawful employment practice under Title VII of the Civil Rights Act of 1964 and various state laws. The regulations of the Equal Employment Opportunity Commission define "sexual harassment" as follows:

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

- (1) submission to such conduct is made either explicitly or implicitly a term or a condition of an individual's employment;
- (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Some examples of sexual harassment include, but are not limited to, the following:

- a. Unwelcome requests for sexual favors or dates.
- b. Unwelcome physical touching.
- c. Jokes or gestures that have a sexual content or sexual connotation.
- d. Posters or cartoons that have a sexual content or sexual connotation.
- e. Sending or forwarding written or electronic correspondence of a sexually explicit nature.
- f. Creating an otherwise offensive working environment or unreasonably interfering with another's ability to perform his or her job.

OBCDC does not condone sexual relationships between supervisors and their staff. A relationship of this type can easily be considered sexual harassment. If such a relationship develops, one of the individuals must transfer to another position in the organization.

Both as a matter of law and common decency, each employee of OBCDC is entitled to pursue his or her employment, free of harassment or discrimination on any of the prohibited bases enumerated above. Accordingly, unlawful harassment or discrimination against any employee of OBCDC will not be tolerated. Violation of this policy may subject an employee to discipline, up to and including immediate termination.

Any employee who believes that he or she (or another employee) is the object of harassment or discrimination on any of the above-enumerated bases is strongly encouraged to follow the complaint procedure outlined below.

Any employee may initiate the complaint procedure, without fear of reprisal, by immediately reporting such complaints to:

- the employee's immediate supervisor.
- the Executive Director, if the employee feels that he or she is unable to report a complaint to his or her immediate supervisor.
- an officer of OBCDC, if the employee feels that he or she is unable to report a complaint to the Executive Director.

OBCDC takes all complaints of harassment or discrimination seriously. All complaints will be investigated immediately by an impartial designee to be determined by senior management of OBCDC.

Any employee who believes that the actions or words of a supervisor or fellow employee or some other person(s) encountered in the workplace constitute unwelcome harassment has a responsibility to report such incident as soon as possible to the appropriate supervisor, manager or officer of OBCDC. Employees are encouraged to utilize the foregoing complaint procedure. No employee will be retaliated against for having opposed unlawful harassment or discrimination, or for having filed a complaint or otherwise participating in an investigation concerning a complaint.

Employees are also notified that there are governmental agencies that handle claims of unlawful discrimination and harassment. These agencies include the Equal Employment Opportunity Commission and parallel state agencies.

Each employee will be required to sign an acknowledgment of the Policy Prohibiting Unlawful Harassment, Including Sexual Harassment contained at the back of this manual.

Drug and Alcohol Policy

OBCDC believes that it has an obligation and right to have an alert, drug/alcohol free work force and it should ensure employees a safe work environment.

This means that all employees are expected to be free from any substance, whether illegal or legal, that can negatively affect job performance or risk the health and safety of employees. The use of intoxicants and drugs, excluding legally prescribed medications, unless the prescription would affect work safety or job performance, is considered a major violation of OBCDC policy. The sale and/or possession of these substances are also a major violation of OBCDC policy. In the event that any of these activities occur, OBCDC will take appropriate disciplinary action up to and including dismissal from employment. The OBCDC Board of Trustees may implement a pre-employment drug-screening program at its discretion.

Recruitment and Hiring

The Board has the responsibility of hiring the Executive Director. The OBCDC Board of Trustees delegates to the Executive Director the responsibility for hiring staff personnel required to conduct the business of the OBCDC.

Probationary Period

A six-month probationary period is required for all new employees. This probationary period provides an opportunity for new employees to evaluate their work situation and in turn, provides the Executive Director an opportunity to judge their performance and suitability for continued employment. This probationary period does not represent a guarantee or contract for employment for the full six months or any other period of time, and does not affect the eligibility requirements for benefits. A sixty-day written evaluation will be provided by the Executive Director to inform the employee of progress. The Executive Committee of the Board of Trustees will provide the written evaluation for the Executive Director. If time restraints prevail, the new employee is under probation until the evaluation has taken place.

At the end of the probationary period, the Executive Director, (for Executive Director's evaluation the Executive Committee), shall prepare a written evaluation of the employee's performance, and review the evaluation with the employee. The evaluation shall take into consideration the employee's ability to form sound relationships with the membership, volunteers, staff, Executive Director and Board of Trustees; progress on the job; and professional community relationships.

Employment Records

Correct and accurate employment records are important. Information concerning address, phone number, person to contact in case of accident, change in name, marital status, and number of dependents must be kept up to date. The Executive Director or a designee maintains these records in a confidential manner.

Personnel Files and Employment Information

All staff members have a right of access to their personnel file, with the exception of access to reference checks that were obtained in confidence. The staff member may review the folder in the presence of their immediate supervisor. It is the responsibility of the staff member to provide information to their supervisor to keep personnel folders up-to-date (e.g., current resumes, change in marital status, name, address, telephone numbers, number of dependents, designated beneficiaries, education and training skills).

The employee's immediate supervisor is authorized to verify the following information for a prospective creditor of an employee: 1) dates of employment, 2) title, and 3) salary. Neither the Executive Director nor any employee is authorized to provide a prospective employer of a present or former employee of the organization with any information other than dates of employment and title.

Sick & Disability Leave

When employees expect to miss work because of illness or accident they should notify OBCDC by 9:00 a.m., explaining the reason for absence and expected day of return. Employees shall be entitled to 10 Sick Leave days per year. Sick Leave days will not be carried over from year to year. Sick Leave days not used during the year will not be paid to the employees at the end of the calendar year or at termination of employment.

The Executive Director or designee shall maintain a record of Sick Leave time taken by each employee. If an employee utilizes more than four consecutive Sick Leave days, a written note from the doctor is required to accompany that month's time sheet. Excessive use of undocumented Sick Leave time would be two or more occurrences in one year. In the case of sickness or accident, if an extended period of time is needed for an employee, accrued Sick Leave time must be utilized first, followed by accrued vacation time. Upon notice and with a doctor's recommendation and approval of the Executive Director, non-paid disability leave may be taken for six months, less accumulated sick leave.

Personal Leave Time - Serious Illness of a Relative or Funeral Leave

The employee shall be entitled up to three days Personal Leave Time with full pay in the case of a serious illness of employee's parent, spouse or spouse equivalent, child, brother, sister, or step child. Employees may opt to use any combination of compensatory and or sick time for additional leave in relation to the above circumstances.

The employee shall be entitled up to an additional three days Personal Leave Time with full pay in the case of death of the employee's parent, spouse or spouse equivalent, child, mother-in-law, father-in-law, brother, sister, brother-in-law, sister-in-law, grandparent, or step child.

Personal Leave Time days not used during the year will not be paid to the employees at the end of the calendar year or at termination of employment

Although OBCDC is not subject to the Family Medical Leave Act of 1993 due to having less than fifty employees, the organization provides a similar benefit for eligible employees. A full-time employee who has worked for at least one year and has performed a minimum of 1,250 hours of employment is eligible for up to twelve weeks of unpaid leave. Accrued sick leave time must be utilized first, followed by

accrued vacation time.

Jury Duty

When an employee is called for jury duty, he/she shall be granted time off until discharged by the court. During the jury duty period, an employee shall receive full pay minus the amount he/she is paid for jury duty.

Absence Without Pay

On occasion, an employee is unavoidably away from work. Employees with no sick or vacation leave are granted reasonable leave, up to five (5) working days without pay upon approval of the Executive Director. Leave of absence for longer periods of time is granted at the discretion of the Executive Director and/or Board of Trustees. Personal leaves of absence will be granted in one-month increments and upon the employee's return to work, efforts will be used to place the employee in a similar position if available. This organization will attempt to use its best efforts to place an individual upon return from leave; however, this is no guarantee of any type of employment.

Work-Related Accidents

Should an employee receive injuries during the performance of his or her duties, he/she should report said injuries immediately to the Executive Director in order to receive Worker's Compensation coverage. Failure to report such injuries may result in a delay in receiving Worker's Compensation benefits, if applicable.

Lunch Periods

A half-hour paid is allowed for lunch, between the hours of 11:00 am and 3:00 pm. Employees should coordinate lunch hours so that the office is adequately covered.

Salary and Performance Reviews

On an annual basis the Executive Director will do performance reviews with each of the staff. This date establishes the anniversary date regarding salary evaluations.

The evaluation shall be based on the job description prescribed for the employee and shall be concerned with both quality of service given and the growth of the employee. The employee shall be entitled to receive a complete copy of the written evaluation and to discuss it with the Executive Director.

An employee may prepare and submit a written disagreement with any points in the evaluation. Such statements must be filed with the employee's personnel record. The employee may receive a copy of the evaluation to keep, along with a copy of his/her rebuttal, if he/she requests.

Salary increases at OBCDC are not automatic and must be earned. An employee in good standing will be considered for a salary increase once a year at his/her anniversary date, based on the salary range of that position with other comparative organizations, overall performance, attendance record, cost of living considerations, OBCDC planned budget and recommendations of the Executive Director and Executive Committee.

Flex Time

If an employee is required to work outside of the normal work-week hours, weekends or holidays, and the employee has worked more than 40 hours in a seven day period, then the employee may receive a like number of hours of flex time off. Accumulation and use of flex time hours must be pre-approved by the Executive Director. An employee may also add such accumulated time to paid vacation leave. All flex time must be utilized within that calendar year in which it accrued. Employees are allowed to accrue

no more than 40 hours of flex time per month.

Flex Time accrued and not used during the year will not be paid to the employees at the end of the calendar year or at termination of employment.

Retirement

Each full-time employee who reaches the age of 70 while in the employment of OBCDC may retire from full-time employment within the calendar year in which he/she attains such age. The Executive Director retains the prerogative to hire or retain the employee who is older than age 70 on a part-time basis.

Informal Complaint Process

Each employee who believes he/she has a complaint against another employee and/or the Executive Director should submit the complaint in writing to the Executive Director for his/her consideration. The Executive Director will furnish the employee with a written response to the complaint within 10 business days. If the employee is dissatisfied with the response, the employee may submit the written complaint and the Executive Director's response to the Board of Trustees for their consideration. The Board of Trustees may, within its discretion establish a Personnel Review Committee and conduct an informal meeting on the complaint. If so, the employee will be furnished with sufficient written notice of the date, time and place of the meeting to allow the employee to attend and present information. The Board/Personnel Review Committee will submit a written report to the employee and the Executive Director explaining its action on the complaint. The decision of the Board/Personnel Review Committee, rendered with or without a meeting, is final. This informal complaint procedure in no way creates any express or implied contract of employment or in any manner alters the employment at will status of any employee.

Dismissal

Employment is terminable by either party for any reason at any time, except as otherwise prohibited by state or federal law.

Resignation

Employees who wish to resign from their positions will give appropriate written notice to their immediate supervisor with the reasons stated therein. If appropriate notice as defined below is not given before resignation, the employee may lose any accumulated vacation time or other benefits.

When any employee decides to resign, he or she should give the following notice:

- 2 weeks notice from clerical staff
- 4 weeks notice from management staff

It is at the discretion of the Executive Director (Board of Trustees in the case of the Executive Director) as to whether the employee would be required to serve out the weeks of notice.

Disciplinary Action

Action may be required by the Executive Director in cases of non-adherence to the provisions set in this Policy, unacceptable job performance, inappropriate behavior/language, or any other area the Executive Director deems appropriate. However, employment is terminable at any time by either party for any reason and these disciplinary steps in no way prohibit termination of employment for any reason.

First Disciplinary notice may be a verbal or written notice, at the discretion of the Executive Director depending upon the severity of the problem. If verbal, a brief note will be entered into the employee's file and initialed by the employee and the Executive Director. This notation shall include date of verbal warning, and a brief description of problem discussed. If the warning is written, it shall include the date and description of situation requiring action.

Second Disciplinary notice shall be written notice including date of second notice served, description of problem requiring it, including reference to first notice, and an outline of expected improvements in behavior, time-line, and dates. Probation may be invoked if deemed appropriate by the Executive Director. All written disciplinary notices shall be signed by both the employee and Executive Director, with copies entered into the employee file. If time-line, dates, and probation are used, a follow up date is mandatory and must be included within the second notice and inserted into the employee's file. If, at the follow up date, improvement has occurred, it must be duly noted and signed by both the employee and Executive Director.

In the event that the employee disagrees with the written disciplinary notice, he/she shall sign the notice, noting the disagreement next to their signature and stating that a written addendum will follow. Refusal to sign a disciplinary notice will be construed as insubordination.

Third notice shall be a written notice including the date of notice, description of problem requiring disciplinary action, past notice references, outline of expected improvements in behavior utilizing time-lines, dates, probation (not to exceed ninety (90) days).

At this point, suspension without pay, up to three working days with option of only a twenty-four hour notice, as the Executive Director deems appropriate. Compensation, vacation, sick leave or Holiday time may not be used for the suspended hours. If suspension is used, it must be included in the above written notice.

At any time during disciplinary actions, the employee may initiate the informal complaint process or may add written addendums to respond to any disciplinary notice. These addendums must be dated the day presented to the Executive Director. These addendums must be presented no later than ten (10) days after the date of the disciplinary action, and copies will be placed in the employee's file signed by both the employee and the Executive Director. Copies of written warnings/disciplinary actions will be made available to the employee involved.

III. Employee Benefits

Vacation

Employees may take vacations at any time during the year. They must, however, prearrange such vacations with the Executive Director to avoid conflict with scheduled and other work of OBCDC that may require their presence. Employees may accumulate up to 15 days of vacation time. Employees will be paid for accumulated vacation time at termination of employment.

The Executive Director or designee shall maintain a record of vacation days taken by each employee.

Full-time Employee Vacation Schedule (40 hour/week employees)

- 1 year to 3 years 10 vacations days
- 4 years to 7 years 15 vacation days
- 8 years to 10 years 20 vacation days
- 10 years to 14 years 25 vacation days
- 15 years and more 30 vacation days

Part-time Employee Vacation Schedule (defined as an employee working less than 40 hours per week), shall be entitled to vacation based on the following formula:

- $10 \times \text{number of hours worked per week} / 40 = \text{Number of Annual Vacation Days}$

Paid Holidays

The Holidays regularly observed by OBCDC are:

1. New Year's Day
2. Martin Luther King Day
3. President's Day
4. Memorial Day
5. Fourth of July
6. Labor Day
7. Columbus Day
8. Thanksgiving Day
9. Christmas Day

In addition, two floating holidays may be used per calendar year as approved by the Executive Director. If a Holiday falls on a Saturday, the OBCDC office will be closed that preceding Friday. If a Holiday, falls on a Sunday, the office will be closed that following Monday.

Health and Retirement Benefits

OBCDC is committed to providing benefits that will help employees enjoy and maintain good health, protect employees against catastrophic medical expenses, and establish financial security for the future. To meet this commitment, OBCDC's benefit program provides a benefit package to all full-time employees which includes:

- 1. Health insurance**
 - a. Provider – Anthem Blue Cross (includes vision plan)
- 2. Dental insurance**
 - a. Provider - Humana
- 3. Prescription drug program**
 - a. Provider – Anthem Blue Cross Care
- 4. Life Insurance**
 - a. Provider – Anthem Blue Cross Care
- 5. Retirement plan (simple IRA)**
 - a. OBCDC matches up to a maximum of 3% of the employee’s annual salary

Full-time employees are eligible for all benefits 30 days after the date of their hire. The Executive Director or designee will provide summary plan descriptions (SPDs), which will explain the requirements and provisions of these benefit plans. If there is a conflict between the language in the handbook and the SPDs then the SPDs will control.

Additional salary compensation is not available to those declining healthcare or other benefits.

All health and retirement plans are subject to change at any time at the discretion of OBCDC.

IV. Office Procedures

Employees are expected to answer all inquires or requests within two working days. If they anticipate a delay in order to gather information they should immediately acknowledge the request. Neatness and accuracy are essential.

No letter should leave the office until a duplicate is filed (electronically or hard copy). When the same letter is sent to several people, retain one copy along with a list of people receiving the letter. All addresses on the front of envelopes or packages should be typed. Whenever an employee writes a letter over the name of an officer or committee chairperson, he or she should send a copy to the person whose name is used. Obtain prior permission unless the letter is standard or routine. When sending a letter over another person's name determine whether the addressee is known on a first-name basis.

It is easy to forget to enclose materials. Always double check mail to avoid this common error.

Mail

First class mail should be used. Bulk Rate, Third Class Book and Second Class Mailings require special handling and training. All mail must be placed within the basket for mailing prior to 4:30 p.m. OBCDC’s postage stamps are not to be utilized for personal use.

Filing

OBCDC maintains an adequate and systematic set of files. All filing is in accordance with this standard procedure in order to make records readily available. All employees are responsible for their own filing and the replacement of any files. All of these files, papers, documents, floppy disks, and records are the sole property of OBCDC and may not be removed from OBCDC.

Leaving the Office

When an employee is carrying out assigned duties outside the office, he or she must make certain that a member of the staff knows of the absence, the destination and the approximate time of return for safety related reasons. Failure to notify office staff of any business absences will subject the employee to disciplinary action.

Smoking

It is the policy of OBCDC to provide a healthy working environment. Therefore, the office and community room will be designated as a non-smoking facility. All customers and visitors are expected to comply with the smoking rules.

Confidentiality

From day-to-day you will deal with a number of confidential matters. These will more than likely be identified by your Executive Director. There will be times when questions may arise concerning the confidentiality of a project, activity, statement, etc. If an employee is not sure something is confidential, please clarify the confidentiality with the Executive Director. You are entrusted to keep such confidential information to yourself, even after your employment ends with OBCDC.

Conflicts of Interest

If an employee has a financial or other personal beneficial interest, direct or indirect, in any proposed or existing program, contract or other agreement involving OBCDC, that is considered a conflict of interest. The person shall, immediately upon learning about such program, contract or other arrangement, disclose his or her potential conflict of interest to OBCDC's Executive Director. Should the conflict involve the Executive Director, the report shall be made to the OBCDC Board of Trustees. Material conflict of interest may result in termination of employment or other appropriate actions. Employees and members of the Board of Trustees are required to sign a Conflict of Interest Policy (see attached policy).

Noise

Noise adds to confusion and decreases work and efficiency. Please avoid unnecessary noise or loud talking, as the office space is extremely limited in size.

Neatness

Keep offices neat and orderly at all times. Keep tops of desks, files and bookcases clear of unnecessary items. Because OBCDC's offices are open to the public, please keep all confidential papers out of sight.

Appropriate Dress

Appropriate attire is expected at all times to enhance the professionalism of the staff. Business attire is expected of all staff unless visiting off-premise sites. Midriiffs, shorts, and other abbreviated garments are inappropriate at any time.

Use of Telephones

When calling on the telephone, employees should remember that they represent OBCDC, its members, and staff.

Answer all telephone calls promptly. The proper greeting for all incoming calls is "Thank you for calling OBCDC, this is (*name, e.g. Mary*) speaking. How may I help you?"

Long distance calls add to the cost of doing business, so keep them to a minimum. Charge all personal long distance calls to your home number.

Purchasing of Supplies and Equipment

The Operations Manager with approval of the Executive Director orders all office supplies and equipment. Whenever possible, these items are purchased from an approved vendor. No purchase is made for any item that is not authorized in the budget unless prior approval is obtained from the Executive Director.

General Office Purchase Procedures

All general office purchases in excess of \$50.00 must be approved by the Executive Director prior to purchase. This includes, but is not limited to office supplies, printing orders, advertising, computer supplies, etc. All requests for payments must be submitted with a completed requisition, signed by the requesting individual and the Executive Director. No check should be processed without proper invoicing or payment documentation attached to the requisition. Two officers of OBCDC Board of Trustees must sign all checks for payments in excess of \$500.00. Check larger than \$500.00 must be signed by two officers of the OBCDC Board of Trustees. One signing officer must sign-off on the requisition or the payment cannot be released.

If an employee fails to obtain approval as discussed above, the employee will be personally liable for any purchases made by the employee. Only the Executive Director has authority to authorize and/or deviate from the above-described procedures.

Reimbursement of Funds

The Executive Director must approve all travel in advance. OBCDC will reimburse the employee in full for all direct expenses relating to the trip. The employee must complete a statement listing in detail, all expenses to be reimbursed. He or she must attach receipts for air travel, car rental and hotels to the statement of expenses within thirty (30) days of the date that the expenses were incurred. [The current per diem maximum allowance for meals purchased during out of town trips shall be \\$35.00. A higher per diem may be paid at the discretion of the Executive Director for out of town travel to cities with significantly higher average meal costs.](#)

Financial Control Policy

All contracts and agreements, which bind OBCDC to financial terms or performance measures, must be reviewed by the appropriate OBCDC committee and voted upon by the OBCDC Board of Trustees. The Executive Director can enter into said agreements if granted authorization by the OBCDC Board of Trustees. No other employees of OBCDC can enter into any contracts or agreements.

Local Travel

For local travel, OBCDC will pay the current average mileage allowance set annually by the OBCDC Finance Committee, based on mileage logged in a personal vehicle and any other transportation charges, including bus, rapid transit, or parking. No personal traffic violations (i.e., parking tickets, traffic tickets, etc.) will be paid by OBCDC.

Paying of Invoices

OBCDC seeks to maintain its credit standing at the very highest level at all times. This is accomplished by the prompt paying of bills. Staff members should see that all bills, properly approved by the Executive Director, are delivered promptly to the Operations Manager.

Cooperation of Employees

OBCDC, by its nature, is an example of teamwork. A high degree of teamwork is necessary at the staff level. Employees in a slack period are expected to offer their assistance to others when needed. In turn,

any employee confronted with an emergency assignment can expect cooperation from all other employees.

Suggestions

Constructive criticism and suggestions from employees are encouraged and welcomed. Staff members will make every effort to give credit and recognition for suggestions and ideas that are implemented to better serve the clients and the staff.

V. Administrative Policies

Affiliation with Other Organizations

OBCDC staff members should consult with the Executive Director before accepting any offices or making any public statements that might have an adverse effect on OBCDC.

OBCDC will pay membership dues in certain business organizations as provided for in the OBCDC budget and approved in advance by the Executive Director. The employee pays all other organization dues.

Appointments

Appointments of an employee to community (non-OBCDC) Boards, Commissions, Committees, etc. require prior written approval of the Executive Director if such appointments require time commitments during regular working hours. All written approvals must be maintained in the employee's personnel file. If an employee is requested to serve as an official representative of OBCDC, the Executive Director must also approve this. In the case of the Executive Director, the Board of Trustees must approve the appointment.

Personal Conduct

OBCDC staff should conduct themselves in an orderly manner in relationships with the public and fellow workers. Since OBCDC is judged to a great extent by its personnel, it is most important that employees maintain conduct above reproach at all times. Please remember, that no matter how friendly or familiar you are with a client, your relationship when representing OBCDC must always remain professional.

Confidential Matters

Since OBCDC is entrusted with many confidential matters, employees must keep such matters handled by OBCDC in strictest confidence especially when discussing OBCDC with members of the public or media.

Recommendations/Endorsements

Since OBCDC utilizes many vendors that are in competition with each other, it does not make recommendations or endorsements of products, services, companies and the like. When someone inquires about a product or service, give the names of all vendors that are concerned with the particular product or service.

Participation in Fund-Raising Campaigns

It is OBCDC's policy neither to participate in fund-raising campaigns nor officially endorse any particular drive among the many local worthy causes. Nor will it otherwise require employees or Board members to participate in or endorse any fundraising activities by outside organizations.

Budget Control

OBCDC operations are geared to anticipated annual receipts and expenditures. Income estimates are made at the beginning of each fiscal year. Expense estimates for the operation of programs are made at the same time. From these estimates an annual budget is prepared and ultimately adopted by the Board of Directors.

In order to stay within budgetary limitations, all OBCDC expenditures must have advance approval before any commitment is made.

Publicity

The OBCDC Executive Director will approve all publicity referring to the organization, its officers, directors and personnel. Staff should release no information about the OBCDC to the media without prior clearance.

Committee Management

Standing committees, as a matter of general practice, arrange for regular meetings at least once a month. The committee chairperson calls for more meetings whenever necessary. The staff member responsible for the committee or committees will:

1. Confer with the chairperson before meetings are scheduled to set up meeting dates, procedures and agendas.
2. Send out meeting notices to all members of the committee.
3. Reserve meeting facilities.
4. Offer advice and counsel when needed and/or requested.
5. Write reports on committee activity when committee action is warranted and if the employee is requested to do so.
6. Handle publicity for committee activities.
7. Submit committee resolutions for the Board of Directors' approval to the Executive Director before Board meetings.

All members of the staff will participate in a weekly staff meeting scheduled by the Executive Director or designee. The purpose of these meetings is to permit staff members to recommend improvements, discuss problems, exchange ideas and make a brief report on current projects.

Contact with the Public

"What is OBCDC's position in regard to non-clients," people often ask. Requests for services which are not currently provided under the current scope of service and contract obligations must be subjected to analysis and approved by the Executive Director, and depending on the scope of service requested approved by the Board of Directors before a commitment to providing the service can be made.

VI. Accounting, Audit & Financial Management Policies

I. Accounting Policies

It shall be the policy of OBCDC to create and maintain accounting, billing, and cash control policies, procedures and records which are consistent with Generally Accepted Accounting Principles (GAAP) and which meet the requirements of state and federal statutes and regulations.

OBCDC accounting, audit, and financial management policies are designed to:

1. Protect and secure the assets of OBCDC.
2. Ensure the maintenance of accurate records of the OBCDC's financial activities.
3. Ensure compliance with governmental and private grant reporting requirements.

a. Cash

- i. Bank accounts are established as required by donors and funding requirements.
- ii. All checks written on OBCDC accounts require two signatures.
- iii. Individuals generally authorized to sign checks include the President, Vice-President, and Treasurer of the Board along with the Executive Director of OBCDC. All persons approved to sign checks will be formally approved by the OBCDC's Board of Directors.
- iv. The Finance Committee recommends and the Board of Directors authorizes all bank accounts and approves all check signers. The approval of signers shall be reflected in the Board of Director's meeting minutes.
- v. Banks are promptly notified of all changes of authorized check signers.
- vi. All checks are to be pre-numbered and accounted for by a check custodian (used, voided, not used).
- vii. Voided checks are to be properly defaced and maintained.
- viii. Bank reconciliations to the general ledger are to be done monthly and provided to the Executive Director.

b. Petty Cash

- i. Receipts or itemized slips are required for every disbursement. The Executive Director or his/her designee will be responsible for verification of receipts and cash.
- ii. Petty cash should be used for such things as small and odd jobs, local travel and sundry items. It is not intended for purchases that can be made with designated suppliers. Activities or needs should be planned ahead so necessary funds will be available in the petty cash account.
- iii. Whenever petty cash is used, a pre-numbered "Receipt of Petty Cash" slip must be filled out. A completed slip will include date, the amount taken and returned, the cash category and the total spent. When a staff person receives cash, he/she will sign on the "Received By" line of the petty cash log. Items purchased should also be listed on the log, unless the receipt that must always be clipped to the log lists items purchased. The Executive Director or his/her designee will sign on the "Approved By" line of the petty cash log.
- iv. The Operations Manager will be responsible for the reconciliation and replenishment of the petty cash account.

c. Cash Receipts

- i. Someone other than the person making deposits is responsible for opening the daily mail, making a log of cash receipts, restrictively endorsing the payment, making note of any restrictions on the log entry, and account coding the receipt by receivable or revenue account.
- ii. The Executive Director prepares bank deposit slip, listing each item.
- iii. Receipts are deposited daily. The bank's stamped duplicate deposit slip is attached to the remittance documentation.
- iv. The daily deposit log and duplicate deposit slip is forwarded to the Operations Manager for verification and data entry.
- v. Cash is deposited in the appropriate bank account based on funding restrictions.

d. Cash Disbursements

- i. Cash disbursements are made by check (with the exception of petty cash).
- ii. The Executive Director approves all invoices for payment.
- iii. Vendor invoices are recalculated on site to ensure accuracy. This recalculation must occur prior to the preparation of a check to pay the invoice. After the recalculation is complete, the employee who performed the recalculation must initial the vendor invoice, indicating that the amount is correct and the invoice can be paid.
- iv. Checks for payment are signed only when supported by approved invoices (checks will not be processed and signed in advance of proper invoicing approval procedures).
- v. Check signers compare data on supporting documents to checks presented for their signature.
- vi. Bank transfers are scheduled and investigated to ascertain that both sides of the transaction are recorded.
- vii. The employee responsible for mailing checks will not be responsible for recording cash disbursements. These two functions must be handled by different employees to ensure that the appropriate checks and balances are in place.
- viii. Supporting documentation is noted as paid, check number, date paid, and general ledger account code. Supporting documentation is noted as approved for payment.
- ix. Account codes for each payment are reviewed for accuracy.
- x. OBCDC finance and accounting staff will ensure that all costs paid through the utilization of external funding sources are recognized as ordinary, necessary, within the budget, are arms length transactions, and do not deviate from established practices of the organization.

A cost will be considered reasonable if, in its nature or amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the costs.

e. General Ledger Account Coding

- i. All cash receipts and disbursements are account coded and reviewed by the Executive Director.
- ii. Funding from multiple sources may be kept in an account with other funding; however, it must be tracked independently.

f. Revenue

- i. Revenue is earned using the accrual basis of accounting.
- ii. Cost reimbursement grants or contracts earn revenue when the expenses are incurred (not committed).

g. Expenses

- i. Expenses are charged directly to programs when specific identification is available.
- ii. Expenses are charged to programs based upon a shared cost rationale when the direct charge can not be established.
- iii. Expenses may not be used for any purpose that is ineligible under a funding award.
- iv. Expenditures for each grant, loan, or contract are to be recorded according to the budget categories for that particular funding source. For each funding award, OBCDC will maintain records that allow for a comparison of outlays with approved budget amounts.
- v. When there are government funds involved, OBCDC will follow OMB A-122 cost principles.
- vi. When there are government funds involved, programs and grants will not be charged for OMB A-122 un-reimbursable items such as, but not limited to: entertainment, fundraising expenses, bad debts, fines or penalties or interest on debt.
- vii. Before OBCDC seeks reimbursement from a funding source, it will ensure that the costs for which it is seeking reimbursement are allocable to that source. A cost will be considered allocable to an external funding source (unless otherwise prohibited) if it is treated consistently with other costs incurred for the same purpose in like circumstances and if:
 1. The cost is incurred specifically for the award.
 2. The cost benefits both the award and other work and can be distributed in reasonable proportion to the benefits received, or
 3. Is necessary to the overall operation of the organization, although a direct relationship to any particular cost objective cannot be shown.
- viii. Any cost allocable to a particular award or other cost objective may not be shifted to other awards to overcome funding deficiencies, or to avoid restrictions imposed by law or by the terms of any award of funds.

h. Collection of Delinquent Accounts

- i. OBCDC will begin collections actions once an accounts payable item is older than 45 days. Collections activities include mail, phone contact and visiting an account representative. If the outstanding payable is older than 90 days, a certified letter shall be sent to the account holder. The Executive Director shall review the account, and at the Director's discretion services may be cancelled or withheld until proper payment is received.
- ii. OBCDC may utilize outside collection agencies if all past efforts to collect money due have been exhausted.
- iii. The Executive Director has discretionary authority to submit delinquent debts (over 90 days) to an outside collection agency.

i. Write-off of Delinquent Debts/Charges

- i. Records must indicate that all efforts to obtain payment have been exhausted before the decision is made to write off any debt.
- ii. The request for approval of a write-off must include a short narrative of actions taken to collect and the rationale for the debt being considered uncollectable.
- iii. The Executive Director of OBCDC has the discretion to approve debt write-offs of a board-authorized amount. The Finance Committee of the Board of Directors must approve any amount above the board-authorized amount that is requested to be considered a write-off. Reference to this action will be included in the board packet for the next regularly scheduled Board of Directors Meeting.
- iv. The budget line item for fees and collections must be updated by means of a budget revision to reflect uncollectable fees/debts.

If collection is made of a debt previously written-off as uncollectable, it will be recognized as revenue in the current period.

II. Financial Reporting Procedures

- A. The Executive Director or his/her designee will be responsible for compiling monthly and year-to-date reports on all cost centers by revenue source, expense code, and asset and liability account balances.
- B. Financial reports are reconciled to the general ledger and accounting records prior to submission to the funding source.
- C. If an expense is different from an external funding source's approved budget, prior approval must be obtained from the funding source prior to the submission of the financial report.
- D. Monthly financial reports, which analyze OBCDC's financial position and the effectiveness of its management and programs will be presented to the Executive Committee of the Board of Directors and also reported within the board packets.
- E. Periodic reports will be provided to all funding sources as requested or required by contract.
- F. OBCDC's finance and accounting staff will maintain records that adequately identify the source and application of funds for all activities. These records shall contain information pertaining to awards, authorizations, obligations, assets, outlays, income and interest. Records to be maintained include copies of contracts, invoices, proof of payments and allocation tracking when costs are distributed among several funding sources.

III. Investment/Banking Policies

The OBCDC Board of Directors will approve the placement of assets not needed for immediate operations assuring compliance with all contractual requirements and using the principles identified below.

A. Principles:

- 1. **Minimize Risk:** The Board will define a minimum risk strategy that will be reviewed annually to ensure appropriate discharge of responsibilities to donors, lenders, and contractual relationships.
- 2. **Maximize Investment Return:** Within the parameters defined as "minimum risk", funds will be invested at the highest area interest/return available at the time of decision.
- 3. **Support local banks and institutions if economically feasible:** "local" is defined as having a physical presence for customer service within OBCDC's service area.

B. Procedures:

- 1. Each quarter, the Executive Director or his/her designee will review with the Finance Committee the projected cash needs of the corporation and the assets available for investment.
- 2. Each quarter, the Finance Committee will provide the Executive Director or his/her designee with guidance regarding investment and institutions.
- 3. The Finance Committee will designate a representative to consult with the Executive Director or his/her designee between meetings on such matters as investment period timeliness and institutional issues.
- 4. The Executive Director or his/her designee will contact local institutions as needed to determine the best rate of return for investments.

C. Banking Policy

1. OBCDC will keep all funds not already invested available in a federally insured bank.
2. Support local banks if economically feasible: All assets kept in bank accounts will be in banks defined as local. "Local" is defined as having a physical presence for customer service within OBCDC's service area.

IV. Budget Principles/Procedure

Structure of the budgetary process shall evolve from the mission and by-laws of OBCDC with consideration given to the requirements of any of the organization's funding partners.

A. Budget Principles

1. The budgetary process shall comply with the organization's funding partners and in accordance with applicable state and federal laws.
2. The budgetary process shall comply with the guidelines and principles set forth by the Board of Directors.
3. Annually, each program area shall identify and develop a plan for its operation. Appropriate personnel shall develop the budgets needed to execute the plan, with concurrence from the Executive Director.

B. Procedures:

1. The organization's Executive Director will prepare and submit an operating budget to the Board of Directors 30-60 days prior to the beginning of the new fiscal year and prior to submission to funding sources.
2. If budget submission is due to funding sources prior to 60 days before the beginning of the fiscal year, the Board of Directors will review a preliminary budget and adopt it if necessary.
3. The approved preliminary or final operating budget will become the blueprint for the budget submission to all outside funding sources.
4. Differences in budget line items between the organization's operating budget and a funding source's approved budgets will be resolved in negotiations between the Executive Director and the funding agency.

C. Adjustments in Budget/Spending Plans

1. Any adjustments or changes in spending policies/budget plans which vary by more than 10% from the original approved budget will be initiated by the Executive Director and submitted for approval to the Board of Directors.
2. These changes will be communicated in writing to funding sources as required by contractual agreements.
3. If proposed changes are unsatisfactory to the funding source, the Executive Director will communicate this response to the Board of Directors, who may authorize:
 - a. Changing the budget/plan to one which is satisfactory to the funding source, or
 - b. Entering into negotiations to develop a compromise satisfactory to the funding source and the Board of Directors.
4. After approval of the changes by all parties, the changes will be communicated in writing to all affected management staff.

V. Audit Procedure

- A. OBCDC will contract for an independent audit to be performed by a Certified Public Accountant (CPA) at the conclusion of each fiscal year.
- B. The auditor(s) will complete the audit within four months of the conclusion of the fiscal year.
- C. The auditor(s) will test accounting mechanisms in accordance with generally accepted auditing standards for not-for-profit organizations and as contractually required by funding sources.
- D. If during its established fiscal year, OBCDC expends over \$500,000 in federal funding, it will contract for an audit that meets the requirements of OMB A-122 and A-133.
- E. A formal written report of the audit will be presented to OBCDC's Board of Directors.

VII. Changes in the Handbook

Since this Employee Handbook is based on OBCDC operations policies and procedures, and the policies and procedures required by federal and state law, all of which are subject to change, this handbook is subject to change also.

The management of OBCDC reserves the right to revise by addition, reduction, correction, or updating of any or all parts of the materials in this handbook.

Your Executive Director and/or the Board of Directors will bring any changes made in the materials now covered or in those that may be covered in the future to your immediate attention.

VIII. Acknowledgement Statement

I, _____, have received a copy of the Employee Handbook and have read and understand its contents. I understand that the Handbook is not intended to be a complete statement of employees' rights and responsibilities or a contract of employment, but instead is a summary of OBCDC Policies as of the date of the publication. Policies are subject to change, as OBCDC deems necessary.

I further recognize that the contents of the Handbook supersedes all oral or written promises and further understand that nothing in the Handbook is intended to constitute a guarantee of employment

I acknowledge that I have read the Policy Prohibiting Unlawful Harassment, Including Sexual Harassment, which is contained in Section VI., page 6 of this Sample CDC Policies and Procedures Manual, and I agree to the terms and provisions contained in such policy.

Name (signature)

Name (print)

Date Signed

Witness (signature)

Witness (print)

IX. POLICY ON POTENTIAL CONFLICTS OF INTEREST

INTRODUCTION

The Board of Directors of old Brooklyn Community Development Corporation (OBCDC) has adopted the following policy designed to avoid any possible conflict between personal interests of Board members or staff and the interests of OBCDC.

The purpose of this policy is to ensure the integrity of decisions regarding OBCDC operations and the use or disposition of OBCDC assets. Fiduciary responsibilities require staff and members of the Board of Directors to consider only the best interest of OBCDC when making such decisions. Any private profit or other personal benefit should not influence decision-makers. In addition to actual conflicts of interest, board members and staff are also obliged to avoid actions that could be perceived or interpreted in conflict with OBCDC's interest.

Conflicts of interest may occur when OBCDC enters into transactions with not-for-profit organizations as well as those that are undertaken with profit-making entities. The best way to deal with this problem is to make known one's connection with organizations doing business with OBCDC and to refrain from participation in decisions affecting transactions between the OBCDC and other organizations. Such relationships do not necessarily restrict transactions so long as the relationship is clearly divulged and the conflicted individual(s) within OBCDC recuses him/herself from the deliberations.

POLICY

1. Directors

Any member of the Board of Directors who may be involved in an OBCDC business transaction in which there is a possible conflict of interest shall promptly notify the Chair of the Board. The Director shall refrain from voting on any such transaction, participating in deliberations concerning it, or using personal influence in any way in the matter. The Director's presence may not be counted in determining the quorum for any vote with respect to an OBCDC business transaction in which he or she has a possible conflict of interest. Furthermore, the Director, or the Chair in the Director's absence, shall disclose a potential conflict of interest to the other members of the Board before any vote on an OBCDC business transaction and such disclosure shall be recorded in the Board minutes of the meeting at which it is made.

Any OBCDC business transaction that involves a potential conflict of interest with a member of the Board of Directors shall have terms that are at least as fair and reasonable to OBCDC as those which would otherwise be available to OBCDC if it were dealing with an unrelated party.

2. Staff

Any staff member who may be involved in an OBCDC business transaction in which there is a possible conflict of interest shall promptly report the possible conflict to the chief executive officer. If the possible conflict involves the chief executive, the possible conflict shall then be reported to the Chair of the Board.

The executive, or where applicable, the Chair, after receiving information about a possible conflict of interest, shall take such action as is necessary to assure that the transaction is completed in the best interest of OBCDC without the substantive involvement of the person who has the possible conflict of interest. (This does not mean that the purchase or other transaction must necessarily be diverted, but simply that someone other than the one with the possible conflict shall make the judgments involved and shall control the transaction.)

Each board member and senior staff member shall complete the attached questionnaire on an annual basis.

The executive director shall keep a written record of any report of possible conflict and of any adjustments made to avoid possible conflicts of interest, or, where applicable, the Board Chair.

3. Definitions

- a. “Involved in OBCDC business transaction” means initiating, making the principal recommendation for, or approving a purchase or contract; recommending or selecting a vendor or contractor; drafting or negotiating the terms of such a transaction; or authorizing or making payments from OBCDC accounts. That language is intended to include not only transactions for OBCDC ’s procurement of goods and services, but also for the disposition of OBCDC property, and the provision of services or space by the organization..
 - b. A “possible conflict of interest” is deemed to exist when either a board or staff member, or a business associate, relative, or member of that person’s household is an owner, officer, employee, partner, or director of, or, when aggregated with close relatives and members of that person’s household, holds 5% or more of the ownership interest in the organization seeking to do business with OBCDC . A possible conflict of interest is also considered to exist where a person related by business or family to a board or staff members is (or expects to be) retained as a paid consultant or contractor by an organization which seeks to do business with OBCDC.
4. This policy statement shall be made available to each Director and each person appointed to a position which regularly involves initiation, review or approval of significant OBCDC contracts or other business commitments. Such people will be asked to sign the attached acknowledgment concerning reporting of potential conflicts of interest.

I have read and understand OBCDC ’s policy on **Potential Conflicts of Interest**. I agree to report promptly any such interest which arises in my conduct of OBCDC business and, in other respects, to comply with the policy and its procedures.

_____ (Signed)

Print Name

_____ (Date)

CONFLICT OF INTEREST QUESTIONNAIRE

NAME

OFFICE OR POSITION HELD

In responding to these questions, please note that a “yes” answer does not imply that the relationship or transaction was necessarily inappropriate.

1. Did you, or any related party receive during the past twelve months any gifts or loans from any source from which OBCDC buys goods or services or with which it has engaged in any business transaction?

Yes _____ No _____

If the answer to the foregoing question is “yes,” list such gifts or loans as follows:

Nature of Source	Item	Approximate Value
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. Were you involved in any other activity during the past year that might be interpreted as a possible conflict of interest?

Yes _____ No _____

Describe: _____

3. Are you an owner, officer, director or employee of any business entity, whether nonprofit or otherwise, with which the [Your Corporate Name Goes Here] has business dealings?

Yes _____ No _____

If the answer to the foregoing question is “yes,” please list the names of such businesses or corporations, the office held and the approximate dollar-amount of business involved within the last year.

4. Do you, or does any related party as defined below*, have a financial interest in, or receive any remuneration or income from, any business organization with which [Your Corporate Name Goes Here] has business dealings?

Yes_____ No_____

If the answer to the foregoing question is “yes,” please supply the following information:

a. Names of the business organizations in which such interest is held and the person(s) by whom such interest is held:

b. Nature and amount of each such financial interest, remuneration or income:

I certify that the foregoing information is true and complete to the best of my knowledge.

Signature

Date

* “Related party” is defined as members of your family, which includes your spouse, minor children, parents, siblings, in-laws and all other dependents; estates, trusts, and partnerships in which you or your immediate family has a present or vested future beneficial interest; and any corporation or entity in which you or a family member is a beneficial owner of more than five percent of the business.

Old Brooklyn Community Development Corporation Corporate Policy on Political Activities

Whereas: the U.S. Internal Revenue Code prohibits tax exempt organizations from participation in political elections; and

Whereas: there are additional limitations and prohibitions imposed by the City's CDBG contract on political activities of employees; and

Acting in the best interest of the Corporation to ensure that political activities of governors and staff members do not conflict with the best interests of the corporation, the Directors of Old Brooklyn Community Development Corporation hereby adopt the following CORPORATE POLICY ON POLITICAL ACTIVITIES:

1. No assets, facilities or resources of the Corporation, whether financial or otherwise, may be used by any person to engage in, or to support or oppose any political party of the election of any candidate for public office. Directors, Officers and Staff Members of the Corporation who support or oppose the election of candidates for public office, or in any way engage in political activity, shall do so only on their own time, with their own resources and without identifying or associating the Corporation with their political activity.
2. No person shall be a candidate for election to a public office in a partisan election or serve in an elective public office while serving as a Director, Officer or Staff Member of the Corporation. Nor shall a person serve as a member of a campaign committee to elect a person to public office while serving as a Director, Officer or Staff Member of the Corporation.
3. Nothing in this Policy shall prohibit a Director, Officer or any employee from the exercise of the right to vote or the right to support or oppose candidates for office in a time, place and manner consistent with federal and state law and with the Corporations' regulations and policies. No Director, Officer, Staff Member or beneficiary of any service or activity of the Corporation shall be sanctioned or denied any program benefit for which he or she is entitled because of political preferences expressed in accordance with this Policy.
4. Nothing in this Policy shall prohibit the Corporation from nonpartisan activities of an educational nature during elections, including participation in or sponsorship of public events open to all candidates for one or more public offices. Such nonpartisan activity may not directly or indirectly favor one party or candidate over an opposing one.
5. Any person who is a Director, Officer or Staff Member of the Corporation shall inform the Executive Director, who shall inform the Board of Directors in writing of any and all participation in political activity on behalf of any candidate for election to a public office prior to engaging in such activity. The Directors shall determine whether the political activity, including activity permitted by law or contract, is in conflict with this Policy and the best interests of the corporation, its mission and its reputation. The Directors may require the resignation of any Director or the termination of employment of any staff member or employee whose political activities interfere with the purpose and mission of the Corporation or are detrimental to its best interests.