

10000 SERIES

FISCAL

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FEE SPLITTING

10050

POLICY:

Easterseals Central & Southeast Ohio, Inc. does not split fees in exchange for referrals.

Originated: 9/94

Reviewed: 8/2000, 4/03, 12/04, 8/05, 8/06, 8/07, 7/08, 8/09, 7/10, 8/11, 5/12, 11/15,
2/20, 7/21, 6/24

Revised:

POLICY:

Easterseals Central & Southeast Ohio, Inc. will maintain and manage the organization's allocation plan to be in compliance with the current 2 CFR 200.

The purpose of this cost allocation plan is to summarize in writing the methods and procedures that this organization will use to allocate costs to various programs, grants, contracts, and agreements.

2 CFR 200, "Cost Principles for Non-Profit Organizations," establishes the principles for determining costs of grants, contracts, and other agreements with the Federal Government. Easterseals Central & Southeast Ohio's Cost Allocation Plan is based on the Direct Allocation method described in 2 CFR 200. The Direct Allocation Method treats all costs as direct costs except general administration and general expenses.

PROCEDURE:

The general approach of ESCSO in allocating costs to particular grants and contracts is as follows:

1. All allowable direct costs are charged directly to programs, grants, activity, etc.
 - a. Expenses that can be identified specifically with a particular award, contract, or department will be fully allocated to the corresponding program.
 - b. Easterseals follows any requirements set forth by various grants. No awarded money will be spent on costs that are disallowed by said grant. (Ex. Government awards will not be used for lobbying, alcohol, sales tax, etc.)
2. Allowable direct costs that can be identified to more than one program are prorated individually as direct costs using a base most appropriate to the particular cost being prorated.
3. All other allowable general and administrative costs are allocated to programs, grants, etc. using a base that results in an equitable distribution.
4. Indirect Costs – Hilliard

- a. Shared administrative and facility expenses will be allocated using a simplified allocation. Based on an approximation of 50 persons housed in the Hilliard office, a 2% allocation per employee will apply to expenses directly related to the facility use.
- b. Easterseals does not utilize a set negotiated Indirect Cost Rate.
Easterseals is eligible for use of a De Minimis Rate where applicable and will comply with the terms and conditions of each contract/grant/award entered into. The terms of each Indirect Cost methodology will be reviewed against 2 CFR 200 rules and regulations to ensure compliance.

5. Administrative Salaries, Taxes, and Benefits

- a. At a meeting time and place approved by Easterseals Management, an estimate of time will be determined for each of the positions that support the programs funded by outside awards/contracts. Updates to allocations can occur as needed. This information will be provided to the Human Resources Manager for payroll purposes.
6. Fiscal year allocation information will be maintained by the Controller and Human Resources Manager.

Originated: 01/16

Reviewed: 02/18, 11/19, 12/19, 2/20, 7/21, 6/24

Revised: 11/19, 12/19, 2/20, 9/21

POLICY:

Easterseals Central & Southeast Ohio, Inc. funds will be administered by the administrative staff of the organization with the oversight of the Board of Directors and appropriate committees.

PROCEDURE:

1. Budget: Leadership of the organization will prepare a proposed budget for the ensuing year and present it to the Fiscal Committee for its approval prior to September.
 - a. Once approved, it will be presented to the Board of Directors for final approval.
2. Requisitions
 - a. Purchase requisition/check request forms will be completed and submitted to the employee's supervisor for his/her approval. The supervisor determines if the purchase is within the organizational guidelines.
 - b. After determining the validity of the request and approving the purchase requisition, the supervisor will submit the requisition to the Business Office.
3. Payment of Invoices
 - a. Upon receiving the invoice for the purchase, the Business Office will review the invoice for correctness and enter it into the Accounts Payable system for processing.
 - b. Checks will be signed as needed but at least bi-weekly by the Chief Executive Officer and/or the Chief Development Officer. The Board President and/or other appointed Board Officer are authorized to sign checks in the absence of the Chief Executive Officer or the Chief Development Officer.

- c. Checks for amounts in excess of \$1,000 will require two signatures from the list of signers designated in 3-b above.
 - d. The Business Office will record and distribute the checks per instructions on the purchase requisition.
 - e. Electronic payments are used for many transactions, especially utilities, mortgage payments, and other disbursements of a recurring nature. All electronic payments will be documented by the Controller on purchase requisition forms and reviewed and approved by a member of the Senior Leadership Team.
4. Petty Cash
- a. Petty cash funds are maintained on an imprest basis in order to facilitate and/or reimburse employees for approved small purchases.
 - b. Disbursements from petty cash are limited to \$20 per transaction. Larger purchases require a check.
 - c. A Petty Cash Request form will be completed documenting the department, amount, person requesting, description of need, and date. An original receipt must be attached to the form. The form is signed off by a manager and signed by the person receiving cash.
 - d. When cash is close to being depleted, the Controller or designee adds up the Petty Cash Request forms and ensures the forms plus the remaining cash equals the designated balance in the fund. The Controller or designee prepares a purchase requisition and forwards to the Chief Executive Officer with supporting documentation for approval. The Controller or designee produces a check made payable to a qualified professional staff member who cashes the check at the bank to replenish the petty cash funds. Checks made out to "CASH" are prohibited.
5. Credit Cards
- a. Credit Cards are issued to Senior Management and other managers/coordinators in the organization for the purpose of facilitating business transactions and business-related travel.

- b. A member of the Senior Leadership Team is responsible for issuing cards and determining appropriate credit limits. Senior Leadership may not approve their own cards (i.e. must be countersigned by a second member).
- c. Cardholders are responsible for safeguarding the cards, making sure that use is limited to business purposes, and immediately reporting theft or suspected fraudulent use of the card to the Business Office.
- d. Cardholders are responsible for turning in an expense report and all original receipts on a weekly basis, as per the instructions on the expense report form.
- e. Cardholders must sign a Credit Card Agreement upon receipt of card.

Originated: 9/86

Reviewed: 8/2000, 4/03, 12/04, 8/05, 8/06, 8/07, 7/08, 8/09, 7/10, 8/11, 5/12, 2/20, 7/21, 6/24

Revised 9/88, 9/94, 4/03, 12/04, 3/13, 11/15, 6/18, 3/19, 2/20, 9/21, 6/24

POLICY:

Easterseals Central & Southeast Ohio, Inc. will maintain and manage the organization's cash position to maximize investment earnings while meeting the organization's cash flow needs, in conjunction with the organization's Investment Policy.

PROCEDURE:

1. Deposits of checks are made remotely by the Controller via merchant capture software. These deposits are made as needed, no less often than weekly, depending on check receipts. Checks awaiting deposit are locked in the Fiscal Office. Cash deposits are prepared and taken to the bank by the Controller or designee.
2. Balance in checking accounts is monitored daily. The Chief Financial Officer or designee will monitor all balances and the Controller will record transactions affecting balances.
3. Excess funds will be transferred to a higher yielding investment. (See Investment Policy). The Controller and/or Chief Financial Officer designee monitors needs and balance accounts, seeks approval from the Chief Executive Officer and the Chief Executive Officer makes the transfer if required.
4. Investment funds needed for cash flow will be transferred to the operating checking account after approval from the Board of Directors is obtained. The Chief Executive Officer will activate the transfer.

Originated: 9/86

Reviewed: 9/88, 8/2000, 4/03, 12/04, 8/05, 8/06, 8/07, 7/08, 8/09, 7/10, 8/11, 5/12, 2/20, 7/21, 6/24

Revised 4/96, 4/03, 12/04, 7/08, 8/11, 5/12, 3/13, 2/20, 9/21

Introduction and Purpose

This statement of investment policy has been formulated in order to present a clear understanding of the intended investment policy and objectives of Easterseals Central & Southeast Ohio, Inc. (Easterseals). The purpose of this statement is to:

1. Clearly articulate the views on investment objectives and risk tolerance;
2. Establish specific guidelines and limitations for the investment manager(s) to ensure that assets are being managed in accordance with the policies and objectives;
3. Establish a target asset allocation and criteria to monitor and evaluate the level of risk, diversification and performance of the investment manager(s); and,
4. Comply with the prudence, due diligence, and other applicable fiduciary principles, including the prudent man rule (e.g., as outlined in the Prudent Investor Rule and the Employee Retirement Income Security Act).

These guidelines will be revised, updated, and modified as appropriate on a periodic basis to reflect such factors as changes in the investment environment, manager performance, and the Fiscal Committee's expectations and/or needs.

Investment Objectives

These objectives have been established after a comprehensive review of current and projected financial requirements, market returns and risks and any special requirements of Easterseals. The Fiscal Committee of the Board of Trustees (Fiscal Committee) will address these objectives in periodic reviews of the performance of Funds.

Two Investment Funds have been established by the Board of Directors. Each has specific investment objectives. These objectives are presented by Fund.

Aladdin Endowment Fund:

- Fund consists of principal amount of \$445,360, which is restricted per the terms of Endowment Agreement.
- Earnings objective is balanced growth, providing equal emphasis on reduction of year-to-year volatility and long-term capital growth.

- Proportion of debt vs. equity in the portfolio is left to the discretion of the investment manager(s) as deemed appropriate to achieve earning objective and will be reviewed and discussed in semi-annual performance reviews.
- The market value of the Fund in excess of the original corpus plus 10 percent (\$489,896) may be transferred to unrestricted funds on an annual basis subject to Board approval. Absent extenuating circumstances and Board approval, the value of the Fund shall not be drawn below this \$489,896 threshold. At no time shall the Fund's balance be drawn below the value of the original corpus (\$445,360).

Recessionary Reserves/Program Investment Fund:

- Overall purpose of this fund is to provide working capital for the organization during recessionary periods when net income may be insufficient, and to provide capital for investment in new programs or services.
- Earnings objective is to achieve current income and moderate appreciation of capital.
- Proportion of debt vs. equity in the portfolio is left to the discretion of the investment manager(s) as deemed appropriate to achieve earning objective and will be reviewed and discussed in semi-annual performance reviews
- Withdrawals from Fund are subject to Board approval.
- In order to optimize investment income, operating cash in excess of forecast needs plus \$250,000 for current fiscal year will be invested in Recessionary Reserves.

The investment guidelines for the Aladdin Endowment Fund and the Recessionary Reserves/Program Investment Fund are based upon a long-term investment horizon, and there is, therefore, an implicit instruction to match the maturity of the portfolio's assets with the long-term needs implied by the objectives. By definition, this means that under most conditions the emphasis will be on investment in long-term assets. However, the requirement to provide significant income to meet organizational goals will limit these Funds' exposure to equity securities, making preservation of capital an important investment objective as well. Thus, these Funds have earnings objectives of growth with reduced volatility (Aladdin Endowment) and defensive growth (Recessionary Reserves/Program Investment) in order to meet these needs.

In the case of the Recessionary Reserves/Program Investment Fund, it is understood that it may be necessary to draw on the return generated in prior years or to draw upon the original corpus of the portfolio to meet cash requirements or achieve strategic goals, which may cause a depletion of assets over time. Guarding against inflation will only be a concern when doing so does not conflict with the other objectives.

Asset Allocation

It is the investment philosophy of Easterseals that the type of investment assets utilized may vary from time to time in response to the changes in the economy and prospects for maximizing the return on these assets.

Approved investment managers are expected to be fully or near fully invested, unless extreme market conditions dictate otherwise, or explicit consent has been received from the Fiscal Committee.

Rebalancing

Given the volatility of the capital markets, strategic adjustments in various asset classes may be required to rebalance asset allocation back to its target policy. Such adjustments should be executed to minimize excessive turnover and transaction costs.

Securities Guidelines

The following securities and transactions are not permitted to be purchased for the Fund without prior Fiscal Committee approval:

1. Letter stock and other unregistered securities; commodities or other commodity contracts; short sales or margin transactions; uncovered and covered options.
2. Investments for the purpose of exercising control of management.
3. Investments in companies that have filed a petition for bankruptcy.
4. Investments in bonds below investment grade.
5. Futures
6. Real Estate
7. Warrants
8. Eurobonds

9. Securities Lending
10. Volatile derivatives such as those possessing elements of leverage, having risk characteristics beyond that of the underlying collateral, or with a potential duration greater than ten years, other than those needed for hedging purposes.

Within the above guidelines, Easterseals gives investment manager(s) full responsibility for security selection, diversification, turnover and allocation of holdings among selected securities and industry groups. The following are additional guidelines to be followed by investment manager(s):

Equities:

1. Individual equity securities in a portfolio must not exceed 5% of the market value of that portfolio at the time of purchase.
2. Individual equity securities in a portfolio must not exceed 10% of the market value of that portfolio.
3. No more than 20% of the total portfolio's assets market value shall be invested in any one industry.
4. Investments in any corporation shall not exceed 5% of the outstanding shares of the corporation.

Fixed Income:

1. Fixed Income securities are limited to United States Government and Agency obligations and corporate bonds rated "BAA/BBB. No limitations are placed on investments in U.S. Government guaranteed obligations (including any fully guaranteed Federal Agency obligations).
2. Investments in any fixed income issuer (excluding direct or indirect obligations of the U.S. Government) shall not exceed 10% of total portfolio assets.
3. Fixed income holdings by the portfolio should not represent more than 5% of a total particular issue.

Cash/Cash Equivalents:

1. Investment manager(s) may invest in commercial paper, bankers' acceptances, repurchase agreements, Treasury Bills, certificates of deposit, and money market funds to provide income, liquidity for expense payments, and preservation of the portfolio's principal value.

2. All such assets must represent maturities of one year or less at the time of purchase. Commercial paper must be rated A-1 or P-1 by Standard & Poor's and Moody's, respectively.
3. Bankers' acceptances and certificates of deposit should only be purchased from larger, well-capitalized domestic and foreign banks with a minimum of an A rating from one of the major rating agencies.
4. Any idle cash not invested by the investment managers shall be invested daily through an automatic sweep provided through the custodian.
5. The investment manager may not purchase short-term financial instruments considered to contain speculative characteristics (uncertainty of principal and/or interest).

Communications

Investment manager(s) must promptly provide to the Fiscal Committee information about changes in the manager's investment philosophy, management, ownership, and key personnel in a timely fashion, which is not to exceed one month from the change. Investment managers are required to give the Fiscal Committee, or any sub-committee delegated by the Fiscal Committee, a quarterly portfolio review detailing investment performance (time-weighted), strategy, and portfolio value.

Investment manager(s) shall be required to participate in meetings to discuss:

1. The manager's investment performance and risk levels in light of the stated policies and objectives.
2. The manager's views on important developments within the economy and securities markets, and their potential effect on the investment strategy, asset allocation, and portfolio performance.
3. The effects of changes within the manager's organization on investment philosophy, strategy, and performance.
4. Proposed amendments to the policies and objectives presented in this statement.

Performance Measurement

The Fiscal Committee hires and reviews investment managers based on an evaluation of their investment philosophies and long-term performance. Investment manager(s) must adhere to their stated investment philosophies and goals. Investment manager(s) shall be monitored and evaluated in accordance with the following:

1. The Fund's performance will be compared to the weighted performance of recognized indices invested in similar types of securities, for any given time period measured. The types of securities and benchmark indices are:
 - U.S. Stocks MSCI World Index
 - Barclay Intermediate Gov/Corp Bonds

In the case of Funds consisting of investments in specific mutual funds, performance will be measured by looking at the weighted return on those mutual funds over the corresponding time period.

2. Since full stock market participation at all times represents a level of risk and volatility not acceptable to the Fund, it will not be compared directly to the stock market, but market comparisons may be made on a risk-adjusted basis.

It is expected that, to the extent allowed by the restrictions listed above, the investment manager(s) will at all times manage the portfolios with the aim of meeting the above guidelines. The purpose of the investment management style is not to beat the market, but to use it when it suits the objectives of each portfolio.

Originated:

Reviewed: 12/04, 8/06, 8/07, 7/08, 5/11, 5/12, 1/15, 7/19, 7/21, 6/24

Revised: 5/02, 5/11, 1/15, 9/15, 7/19

POLICY:

Easterseals Central & Southeast Ohio, Inc. has procedures for the handling of receipts.

PROCEDURE:

1. All incoming mail is received by a Senior Manager or designee, who routes all receipts to a designated individual who is independent of accounting functions. This individual prepares a log of checks by day including description and amount.
2. Receipts are forwarded to the Controller. A daily deposit of checks is prepared and deposited remotely through a check scanner. Cash deposits are taken to the bank by the Controller or designee.
3. Any non-mail receipts are given to the Receptionist, who prepares receipt forms and forwards to the Controller.
4. Any funds received after the end of the banking day are secured at the Program site until the next day.

Originated:

Reviewed: 4/96, 8/2000, 4/03, 12/04, 8/05, 8/06, 8/07, 7/08, 08/09, 7/10, 8/11, 5/12, 9/15, 2/20, 7/21, 6/24

Revised: 4/96, 4/03, 8/07, 7/08, 3/13, 2/20, 9/21

POLICY:

Easterseals Central & Southeast Ohio, Inc. has charitable gift substantiation procedures, which comply with applicable standards/law.

PROCEDURE:

Beginning January 1, 1994, new Internal Revenue Code sections impose substantiation and reporting rules for the receipting of charitable gifts. These requirements also include a \$10 penalty for each contribution, which lacks the required disclosure up to \$5,000 per fund-raising event.

Two main categories of requirement apply:

ALL GIFTS OF \$250.00 OR MORE:

1. Donors will be allowed to claim an income tax deduction for gifts of \$250 or more only if they have a "written acknowledgement" (i.e., a receipt). A canceled check will no longer be accepted. All receipts must contain the following information:
 - a. The amount of cash given and a description (but not an estimate or appraisal of value) of any property other than cash contributed by the donor. Where the value of a contributed item is not clear, but it might exceed \$250, the donor must have this receipt. (Example: "Thank you for your gift of a fur coat.")
 - b. A statement specifying whether any goods or services were provided to the donor in exchange for making the gift. An example would be where the gift entitles the donor to attend a dinner or concert, or to participate in a golf outing. Where there are no such goods or services offered, the receipt must say so.
 - c. If such goods or services were offered to the donor, the receipt must meet the "quid pro quo" gift requirements. Quid pro quo is a payment to a charity (gift or contribution) in exchange for which the payer receives any goods or service. This is not deductible except to the extent that the payment exceeds the fair market value of the benefit received. (Example: You are invited to a dinner for \$100.00 per person. The dinner is the "quid pro quo." A similar dinner would cost \$22 in a restaurant. You can deduct only the amount by which \$100 exceeds \$22 or \$78.00.)

2. Where the amount of the donor's gift is \$75 or more and the donor becomes entitled to claim a quid pro quo for the gift, the receiving charity or volunteer group must provide the donor with a statement that includes the following:
 - a. Shows the date and amount of the gift.
 - b. Describes the goods/service that the donor received in exchange for the gift.
 - c. Includes a good faith estimate of the fair market value of the goods/service. (The value is what it would cost to buy the goods/service from a commercial establishment, not what they cost the charity.)
 - d. Inform the donor that the income tax deduction for the gift is limited to the excess of the payment over the value of the goods/service. (Example: A donor can participate in golf outing for a gift of \$125. The course would normally charge \$60 for a round of golf with a cart. The donor must be provided with a receipt that shows all the information listed above, making it clear that the deduction is limited to \$65.)

The only exception to the "quid pro quo" substantiation requirements are where the benefit received by the donor is essentially of spiritual rather than market value (e.g., a Christian communion service) or where that item is a trinket bearing the charity's logo worth less than 2% of the amount of the gift) e.g., a refrigerator magnet). The requirements do apply even if the charity did not have to pay for the item itself because it was contributed by another donor or sponsor.

PROCEDURE:

1. All gifts of \$75.00 or more:
 - a. Acknowledge the gift with a thank you letter. The letter should include:
 - i. The amount of the gift
 - ii. Date the gift was received
 - iii. Description of the gift
 - iv. Whether the donor received anything in return for the gift

- v. If the donor received something in return, you must include what it was and what the fair market value is
 - b. Once the acknowledgement is completed, one copy should be placed in the reader file and one copy should be given to the Development Assistant to be entered or updated on the Center's data base. This applies to ALL SITES.
- 2. Receipts related to events that have invitations/tickets
 - a. All invitations/tickets should have printed on them what portion of the event is tax deductible.

Example: Ticket cost is \$100 per person, the fair market value for the dinner which included a boat ride was \$40. Total tax deduction would be \$60.

As long as the ticket includes all of the information necessary to provide our donors (date, amount, etc.) you will not need to send a separate letter/receipt to the donors.

Originated: 1/94

Reviewed: 8/2000, 4/03, 12/04, 8/05, 8/06, 8/07, 7/10, 8/11, 5/12, 9/15, 2/20, 7/21, 6/24

Revised: 2/20

POLICY:

Easterseals Central & Southeast Ohio, Inc. has policies and procedures to minimize risks to employees, consumers and guests.

PROCEDURE:

1. The Senior Management team will review the Risk Management Plan of the agency, in conjunction with appropriate external resource persons at least annually, and make revisions to the plan as necessary.
2. Security policies and procedures will be reviewed on an annual basis as part of the review of the Operations and Personnel manuals.
3. The organization's Health and Safety committee will meet at least quarterly to review issues related to health and safety of employees, consumers, and guests.
4. The HIPAA Privacy and Security officers will review all Business Associate Agreements (BAA) annually.
5. An outside firm will conduct an audit of the organization's financial statement, including consideration of internal controls, annually.

PLAN:**Risk Management Philosophy**

Easterseals Central & Southeast Ohio, Inc. aspires to operate in a way that protects the health, safety, and security of clients, staff members, and volunteers while lifting up the organization's mission and safeguarding assets needed for mission-critical programs and activities.

Risk Management and General Safety Principals

The safety of personnel receiving or engaged in delivering services sponsored by Easterseals Central & Southeast Ohio, Inc. shall at all times be regarded as a top priority. This emphasis shall be communicated throughout the organization to ensure its understanding.

Easterseals Central & Southeast Ohio, Inc. seeks to involve appropriate personnel, whether Board or staff, at all levels of the organization to identify risks and create practical strategies in order to make certain that the organization's approach to risk management considers diverse perspectives and that staff understand their responsibility; to protect safety and security of our facilities, integrity our reputation, the preservation and future growth of assets as well as the fulfillment of our mission.

Responsibility for Risk Management

Board of Directors

1. Adopts annual capital budget with risk management in mind.
2. Reviews operational reports to determine compliance and future priorities.
3. Reviews the organization's insurance program periodically as part of the Governance Committee.
4. Reviews the organization's risk management plan annually as part of part of the Fiscal Committee.

CEO

1. Executes contracts for the organization.
2. Keeps the Board apprised of emerging threats and opportunities facing the organization.
3. Ensures compliance with policies and standards imposed by national organization or accrediting organization.
4. Sets risk management goals, adopts annual operating objectives and budget with risk management included.

Senior Leadership Team

1. Assigns staff to design and carry out safety and risk management activities.
2. Assigns staff to perform annual review of the safety and risk management activities.
3. Sets risk management goals, adopts annual operating objectives, and budget including risk management.

4. Champions organization-wide effort to protect the vital assets of Easterseals Central & Southeast Ohio, Inc. and engage key stakeholders in risk management activities.
5. Convenes periodically to review the agency's priority risks and corresponding risk management strategies.
6. Oversees the development, implementation, and monitoring of loss prevention programs.
7. Oversees the purchase of insurance for the organization and evaluates the insurance program annually.
8. Adopts and establishes policies and standards.

Articles of Incorporation

Easterseals Central & Southeast Ohio was incorporated in the State of Ohio on February 13th, 1945. The articles of incorporation are reviewed annually by the Governance Committee of the Board of Directors to ensure compliance with state laws. We have maintained our corporate status by filing with the state as required by law. The date of our last filing was December 04, 2014. The Board representatives annually review the articles for compliance with the current mission and purpose of the organization.

The original articles of incorporation are stored with the Ohio Secretary of State, located at Continental Plaza, 180 E Broad Street, Floor 16, Columbus, Ohio 43215. An authenticated copy of the articles is stored at the Easterseals Central & Southeast Ohio, Inc. Hilliard Office, 3830 Trueman court, Hilliard, Ohio 43026 in the office of the CEO.

Bylaws

The bylaws were originally filed and approved by the State of Ohio on February 13th, 1945. The Board last amended the bylaws in October 2009. The Board reviews the bylaws annually and proposes amendments as needed. Every member of the Board receives a current copy of the bylaws when they join the Board and annually when the bylaws are reviewed by the Governance Committee of the Board of Directors.

Indemnification

The indemnification provision is funded by a Directors' & Officers' liability insurance policy underwritten by Philadelphia Indemnity Insurance Coverage under PHSD913190 with an annual term of February 5, 2015 - February 4, 2016. The policy limit of liability is \$1,000,000.00 with no deductible.

Conflict of Interest Policy

Every year each Board member completes and signs a disclosure statement declaring any known conflicts and agreeing to comply with the policy. These annual statements are gathered in September of each year. The statement is reviewed annually by the Governance Committee of the Board, then by the Senior Leadership Team.

Board Operations

Easterseals Central & Southeast Ohio, Inc. has adopted a Board Manual containing the key policies and expectations of the Board. The Manual is reviewed annually by the Senior Leadership Team, and updates are made on an as-needed basis. The Board is then made aware of the changes.

Board Orientation

To ensure that the members of the Board of Easterseals Central & Southeast Ohio, Inc. are properly trained and prepared for their service, the organization conducts Board orientation training for all Board members on an annual basis. The experienced Board members will share their insights and coach the new members in fulfilling their Board duties.

Board Development

The Board of Easterseals Central & Southeast Ohio, Inc. is dedicated to improving the skill and knowledge of its members by continually educating the members on the legal, financial, and operational aspects of governing a nonprofit organization. The Board will allocate time during the year at Board meetings to increase its governance knowledge.

Board Assessment

To become a more effective Board, the Board members of Easterseals Central & Southeast Ohio, Inc. will conduct a Board self-assessment at least once every three years. The Board will use the self-assessment as a tool to improve its performance and energize the organization to achieve its mission.

Board Recruitment and Nomination

Easterseals Central & Southeast Ohio, Inc. strives to have a qualified Board with people who bring the skills, qualities, and expertise needed to lead and govern the organization in accomplishing its mission.

Board Minutes

Easterseals Central & Southeast Ohio, Inc. recognizes the importance of recording accurate and contemporaneous minutes of Board meetings and minutes of committees

that are authorized to act on the Board's behalf, and each Board member is aware of his/her responsibility for ensuring the accuracy of the minutes.

The minutes are maintained in a separate binder available to all Senior Leadership and Board members to preserve their integrity.

Easterseals Central & Southeast Ohio, Inc. has procedures for record maintenance, retention, storage, and destruction. Records maintenance, retention, storage, and destruction comply with all legal/licensing and/or certification requirements. Archive files are kept off site in secure damage resistant environmentally controlled building with Fireproof.

Risk Financing Strategy

To safeguard the assets and resources of Easterseals Central & Southeast Ohio, Inc., the organization will purchase insurance for those insurable risks of major importance to mission-critical operations and the financial health of the organization. It is the Senior Leadership Team's responsibility to oversee the organization's insurance program and provide an annual insurance report to the Board.

Human Resources

Easterseals Central & Southeast Ohio, Inc. believes that written Human Resource policies are an essential risk management tool. The organization has compiled its key employment policies in section #2000.

Safety

Easterseals Central & Southeast Ohio, Inc. believes that the safety of its employees and clients is of paramount importance. All consumer rights, safety, health & medical, facility, and service planning policies are found in sections #3000, 4000, 5000, 6000, and 7000.

Financial Management

Financial Responsibilities and Objectives

It is the responsibility of the Board of Directors to formulate financial policies and review the operations and activities of Easterseals Central & Southeast Ohio, Inc. on a periodic basis. The Board delegates this oversight responsibility to the Fiscal Committee, of which the Treasurer is the Chair. The CEO and CFO or designee of the organization act as the primary fiscal agents, with responsibility for implementing all financial management policies and procedures on a day-to-day basis. The CEO may delegate to qualified professional staff responsibility for managing various aspects of financial management.

All financial policies for Easterseals Central & Southeast Ohio, Inc. are found in section #10000.

Technology and Information Management

Easterseals Central & Southeast Ohio, Inc. policies pertaining to the use of computers and other technology by staff are found in section #2000.

Safeguarding Equipment and Systems

Easterseals Central & Southeast Ohio, Inc. is committed to protecting its office technology assets. The organization takes all reasonable steps to protect and safeguard systems and equipment from damage due to power fluctuations, water damage, dust, extreme temperature change, and other environmental factors. In addition, the organization guards against threats to due to viruses, worms, malicious software and hackers. The position in the organization responsible for overseeing the security of office systems is the Chief Development Officer.

All policies on records retention are found in section #9000. Policies on security of information system are found in section #11000.

Crisis Communications Policy

The Crisis Communications policy is found in section #1000.

Originated: 7/91

Reviewed: 8/2000, 4/03, 12/04, 4/05, 8/05, 8/06, 8/07, 7/08, 8/09, 7/10, 8/11, 5/12, 2/20, 7/21, 6/24

Revised: 4/05, 3/15, 9/15, 2/20

POLICY:

Easterseals Central & Southeast Ohio, Inc. will delineate authority within the organization for signing and otherwise binding the organization to contractual obligations.

PROCEDURE:

1. Significant financial obligations must be signed by the CEO. When seeking signatures of these obligations, a note should be attached explaining the nature of the request and recommendation of the sender.
2. Service agreements, without financial obligation, can be signed by members of the Senior Management Team.
3. Individual service or treatment plans for all programs may be signed by middle managers and therapists.

Originated: 1/08

Reviewed: 7/08, 8/09, 7/10, 8/11, 5/12, 2/20, 7/21, 6/24

Revised: 8/09, 9/15, 2/20

POLICY:

Easterseals Central & Southeast Ohio, Inc. will grant the CEO a spending limit of \$10,000.00 during a fiscal year without prior Board of Directors authorization as long as net income from operations shows positive income is available within the current fiscal year budget with normal accountability and security checks in place.

PROCEDURE:

1. Requests for non-budgeted expenditures such as fixed assets, repairs, engagement of professionals, etc. in excess of \$10,000 will be identified by management and presented to the Board for approval prior to commitment or disbursement of funds.
2. If emergent in nature necessary expenditures exceeding \$10,000 may be approved through Executive Committee, with follow up approval at the next scheduled Board meeting.

Originated: 06/14

Reviewed: 06/14, 2/20, 7/21, 6/24

POLICY:

In order to reserve bequests for future operations or projects, Easterseals Central & Southeast Ohio, Inc. will classify any bequests received as Board-designated funds.

PROCEDURE:

1. Easterseals Central & Southeast Ohio, Inc. solicits and accepts gifts that are consistent with its mission and that support its core programs, as well as special projects.
2. Bequests and other forms of support will generally be accepted from individuals, partnerships, corporations, foundations, government agencies, or other entities, subject to the following limitations:
 - a. All bequests will be considered Board-designated funds and disbursed at the discretion of the Board of Directors.
3. Gifts of real property or personal property will be accepted and liquidated.
4. Gifts of stocks or other securities will be accepted and deposited into a brokerage to be liquidated. Proceeds will be held and/or deposited in accordance with the Easterseals Central & Southeast Ohio, Inc. Investment policy.

Originated: 06/14

Reviewed: 06/14, 2/20, 7/21, 6/24