Financial Best Practices for Congregations



Separation of Financial Duties

- Keep written policies and procedures for key responsibilities (not person-specific, but duty-specific)
- Avoid conflicts of interest
- Responsibilities for handling/recording church income should be separated from handling disbursements
- An individual not otherwise directly involved in banking activities should **reconcile the bank account**
- Suggested responsibilities for a person other than the treasurer:
 - Overseeing counting and recording offerings
 - Depositing receipts
 - Reporting income/gifts from individuals



Safeguarding offerings

- Dual custody at all times
- Rotating basis for counters
- Cash deposited immediately after counting
- Log of cash and check activity, including purpose (signed by two persons)
- Copies of deposit slips given to treasurer and financial secretary
- Regular **reporting** of offerings to members (quarterly)
- Maintain **confidentiality** (pastor, financial secretary and stewardship committee as have need to know)



Designated and restricted gifts

- Acknowledge gift purpose on gift receipt
- Separate accounting and/or tracking in the accounting system from undesignated gifts
- Maintain a **sufficient bank balance** to cover designated/restricted funds
- Honor donor intent
 - Congregation has the right to refuse any gift, including if it believes donor intent cannot be honored
 - Create and communicate a general policy for circumstances when purpose can't be fulfilled
- **Grant** accountability and reporting; unused or misused funds might be subject to return of funds to grantor



Charitable Deductions

- Meeting IRS requirements for charitable contributions
 - Cannot deduct
 - Contributions to individuals
 - Contributions from which donor benefits
 - Services, but can deduct unreimbursed, out of pocket expenses directly connected with the services (not living expenses)
- Substantiation
 - Cash: written acknowledgment (over \$250, no goods or services provided in exchange for the gift)
 - Non-cash gifts:
 - Fair market value
 - Form 8283 to be completed by charity for more than \$500
 - Generally, qualified appraisals for gifts of more than \$5,000



Handling expenditures

- Avoid sales tax by requiring use of exemption letter
- Use standard **vouchers** or expense forms
- Require **written approval/support** for payment (including original invoices, receipts, etc.)
- Checks should be prepared by someone other than those with authority to approve expenditures
- Keep **authorized check signatures** on file at the bank; dual signatures recommended
- Secure blank checks at the church
- **Consider electronic billing and payments** if have appropriate security and access
- **Credit cards** might be appropriate for a limited number of individuals
- Petty cash should be safeguarded and counted regularly



Accountable Reimbursement

- Decide when to **reimburse** business expenses on an actualcost basis **rather than** providing an **expense allowance**
- Establish a **budget and create a timing cutoff** (e.g. 90 days) to submit expenses for reimbursement
- Require **documentation** of business purpose and original receipts
- If providing **cash advance**, require reconciliation and substantiation of each payment
- Under account reimbursement, **no reporting of W-2** income is required
- Congregation retains ownership of all purchases



Employee vs. self-employed

- Twenty factors as developed by IRS, including:
 - Individual must comply with instructions
 - Individual must provide services personally (no substitutes)
 - Services are integral part of organization's operation
 - Continuing relationship between individual and organization
 - Set hours of work
 - Full-time required
 - Working on organization's premises
 - Paid by hour, week or month (as opposed to by the job)
 - Payment of business expenses, benefits
 - Working for only one organization at a time
 - Right to terminate
- Clergy have dual tax status treatment- employee for income tax and self-employed for social security



Housing Allowance

- Excluded from federal income
- Established annually before beginning of tax year
- Approved by congregation council
- Applies to ordained, commissioned or licensed; administers sacraments and conducts worship
- Allowable expenses:
 - Mortgage/rent/real estate taxes/property insurance
 - Utilities
 - Furnishings and appliances (purchase and repair)
 - Remodeling and repairs
 - Yard maintenance and improvements
- Amount fair market value, actual expenses (as long as less than amount previously designated)
- Housing equity allowance



Payroll (IRS Pub. 15, Circular E)

- Upon hiring, contracting Form W-4, W-9
- Taxable wages (includes cash gifts, spouse's travel, personal use of church-owned vehicle, nonaccountable reimbursements; imputed interest on loans from employer; social security offsets
- Quarterly Form 941 (to report Social Security, Medicare and income taxes withheld and paid); Form 8109 (federal tax deposit form)
- Annually Form W-2 or 1099-MISC (to employee) and coordinating forms to IRS
- Housing allowance included on W-2 (box 14)
- No Form 990 required for churches (unless unrelated business income over \$1,000 requires Form 990-T)



Accounting System/ Financial Reporting

- Choose the **basis for accounting**: cash basis, accrual basis, modified accrual
- Utilize accounting software whenever possible
 - Dual entry bookkeeping
 - Fund accounting
- Provide regular reporting to church council
 - Balance Sheet
 - Statement of Revenue and Expenses
 - Statement of Cash Flows (sometimes excluded)
 - Other Management Reports, as requested
- Establish a **records retention** policy and process
- Conduct internal audits annually and external audits, if desired



Data Security

- People are the best security
- Ensure adequate **IT security** for internet, e-mail and network (including virus scans and firewalls)
- Provide security for **portable media devices** (flash drives, CD, laptops, cellular phones, etc.)
- Ensure **confidential paper files** are kept in a locked, limited access location
- Be aware of Personal Identity Information (PII):
 - Names and addresses
 - Social security numbers
 - Credit card information
 - Documents with any financial information
- Ensure access to data is commensurate with duties; review user access regularly



Resources

- <u>www.elca.org</u> (found in Resources/Financial/Congregations tab)
 - Congregational Treasurers' and Bookkeepers' Financial and Accounting Guide
 - Internal Control Best Practices
 - Program Budget Presentations
 - Congregational Audit Guide
 - Accountable ReimbursementPolicies
 - Data Security Education
 - Contingency Planning
- Administration Matters e-newsletter and blog (subscribe under https://blogs.elca.org/adminmatters/)
- <u>www.irs.gov</u> (Publication 1828 Tax Guide for Churches and Religious Organizations)

