

UTAH COUNTIES INDEMNITY POOL INTERNAL ACCOUNTING CONTROLS POLICY

SECTION A EFFECTIVE DATE AND FREQUENCY OF REVIEW

1. The effective date of this Internal Accounting Controls Policy is August 17, 2017.
2. This policy should be reviewed annually, but not less than every three years by the Board of Directors.
3. This policy should also be reviewed at any time that changes to laws or rules governing the internal controls of Interlocal entities are amended or recommendations are made by the UCIP CEO or CFO, which would require review and update to this policy.
4. Failure to review this policy in the frequency stated shall not nullify, void, limit or waive this policy or any action taken under this policy.
5. This policy is considered to be amended at the time any new federal or state law becomes effective which conflicts with this policy, but only to the extent necessary to come into compliance with new law.

SECTION B PURPOSE

1. The purpose of these policies and procedures is to describe all accounting procedures currently in use at the Utah Counties Indemnity Pool (UCIP) and to ensure that the financial statements conform to generally accepted accounting principles; assets are safeguarded; and finances are managed with accuracy, efficiency, and transparency.

SECTION C AUTHORITY

1. All UCIP staff and Board of Directors, with a role in the management of fiscal and accounting operations, are expected to comply with these policies and procedures.

SECTION D APPLICABILITY AND SCOPE

1. These policies and procedures apply to all financial transactions and financial reporting conducted in the scope of business of UCIP.

SECTION E DEFINITIONS

1. ACH: Automated Clearing House, a United States electronic payment network.
2. Board: the UCIP Board of Directors.
3. CEO: the Chief Executive Officer of the Utah Counties Indemnity Pool.
4. CFO: the Chief Financial Officer of the Utah Counties Indemnity Pool.

5. FDIC: Federal Deposit Insurance Corporation.
6. GRAMA: the Government Records Access and Management Act.
7. I-9 form: the U.S. Citizenship and Immigration Services Department of Homeland Security Employment Eligibility Verification.
8. UCIP: the Utah Counties Indemnity Pool.
9. Unclaimed Property: an abandoned or lost check.
10. W-4: the Internal Revenue Service Employee Withholding Allowance Certificate.

SECTION F POLICY STATEMENTS

1. UCIP will comply with the Governmental Accounting Standards Board basis of accounting.
2. UCIP will utilize appropriate separation of duties to prevent fraud.
3. UCIP operates as a joint liability reserve fund of its members and reports as a single enterprise fund.
4. UCIP will map their operational chart of accounts to the uniform chart of accounts developed by the Office of the Utah State Auditor.
5. UCIP will safeguard all assets of the Pool.
6. UCIP will comply with the Interlocal Cooperation Act—Fiscal Procedures for Interlocal Entities.

SECTION G PROCEDURES AND RESPONSIBILITIES

1. **Board of Directors**
 - a. Elects a Treasurer in accordance with the Bylaws.
 - b. Appoints members of the Board to serve as the Audit Committee.
 - c. Appoints a Clerk.
 - d. Ensure a method for reporting fraud.
 - e. Annually review a fraud risk assessment.
 - f. Authorize signers on the bank accounts.
 - g. Authorize issuance of credit cards and limit of each card as recommended by the Treasurer.

- h. Reviews and adopts a preliminary budget for underwriting purposes in August of each year. Reviews and adopts a tentative budget in October of each year. Identifies the resources available to arrive at a final proposed budget. Holds a public hearing on the proposed budget in December of each year. Once the public hearing is complete, formally adopts the annual budget.
- i. Reviews and approves vendor contracts including ratification of contracts approved by the CEO and/or CFO.
- j. Reviews and approves all expenditures and credit card transactions.
- k. Reviews and approves periodic financial statements.
- l. Reviews and approves the annual independent audit of financial statements.
- m. Assures that net asset levels are within the Net Asset Management Policy.
- n. Reviews and approves actuarial analysis of member equity, reserve adequacy and rate adequacy.
- o. Develop and maintain policies and procedures relating to internal accounting controls including but not limited to those policies required under the Interlocal Cooperation Agreement, Bylaws, Federal and State law.

2. **Treasurer**

- a. Custodian of all cash, bank accounts, credit card accounts, bonds and securities.
- b. Manages the petty cash fund
- c. Determines cash requirements.
- d. Provides for the investment of all money by following the Money Management Act.
- e. Receives all money payable, keeps an accurate record of all money received and deposits money received no later than once every three banking days.
- f. Approves/signs transfers of funds between accounts.
- g. Approves/signs checks prepared by the Clerk after verifying that a sufficient amount is on deposit in the appropriate bank account in order to honor the check.
- h. Reviews and approves a reconciliation of all accounts on a monthly basis.
- i. May appoint one or more Deputies to perform any of the above responsibilities.

3. **Audit Committee**

- a. Oversees the engagement of a qualified, independent audit firm to conduct an annual independent audit of UCIP in compliance with this policy and all applicable state and federal laws.
- b. Reviews with the independent auditor the *Audit Plan* prior to the examination of UCIP's financial statements and adhere to the responsibilities and role of the Committee during the audit.
- c. Reviews the professional standards requirements with the independent auditor upon the completion and issuance of the draft audit.
- d. Reviews the draft audit with the Board of Directors for compliance and conformity.
- e. Reviews audit findings and management's responses with the Board of Directors.
- f. Maintains and adheres to the responsibilities outlined in the UCIP Investment Policy.
- g. Designs and implements programs and controls to prevent and detect fraud.

4. **Clerk**

- a. Prepares the annual tentative budget and presents it to the Board of Directors. Makes the final proposed budget available to the public and gives notice of a public hearing at least seven days prior to the adoption of the final budget. Files the final budget with the State Auditor within 30 days after the final budget adoption.
- b. Monitors budget.
- c. Processes payroll including payroll taxes.
- d. Manage accounting system and assure integrity of accounting system data.
- e. Protect the confidentiality and integrity of all payee banking information.
- f. Reviews all incoming invoices, and requests for reimbursement by Board and staff, to ensure the expense is proper and within budget.
- g. Request Treasurer authorization of inter-account transfers necessary to pay expenditures.
- h. Processes all inter-account transfers.
- i. Process all payment of expenditures.
- j. Prepares all outgoing invoices.
- k. Enters accounts receivable for deposit.
- l. Reconciles bank statements and investments financials for approval by the Treasurer.

- m. Files required budget, investments and financial reports to the Office of the Utah State Auditor.
- n. Files required quarterly revenues and expenses to the Utah Transparency website using the uniform chart of accounts for local governments developed by the Office of the Utah State Auditor.
- o. Files required annual compensation data to the Utah Transparency website.
- p. Prepares all interim financial reports.
- q. Prepares year-end financial reports, management discussion and analysis and notes to financials for independent audit review.
- r. Perform an annual fraud risk assessment.
- s. Reports unclaimed property to the Utah State Treasurer Unclaimed Property Division, pursuant to the Revised Uniform Unclaimed Property Act, for unclaimed property valued at \$50 or more.
- t. Designate a separate individual as the Receivables Clerk.

5. Receivables Clerk

- a. Receives, opens and date stamps all incoming mail.
- b. Logs in all received checks and stamps for deposit only to the operating account.

SECTION H REVISION HISTORY

- 1. Adopted: August 17, 2017
- 2. Revised: February 15, 2018
- 3. Revised: August 22, 2018
- 4. Revised: February 21, 2019
- 5. Revised: June 18, 2020

SECTION I APPENDICES

- 1. Listing of elected, appointed and designated individuals to ensure proper separation of duties.
- 2. Office of the Utah State Auditor Fraud Risk Assessment.

DIVISION OF FISCAL AND ACCOUNTING RESPONSIBILITIES

Separation of duties is a specific internal control implemented to limit the risk of financial fraud. Each officer, appointee and designee must act independently when performing the duties and responsibilities of the Internal Accounting Controls Policy.

The governing body is responsible for electing a Treasurer and appointing a clerk who shall be two separate individuals. In order for separation of duties to properly function, additional individuals are appointed or designated.

Elected, appointed and designated individuals to ensure proper separation of duties:

Board Elected Treasurer	Karla Johnson, Kane County Clerk/Auditor
Board Appointed Audit Committee	Karla Johnson, <i>Chair</i> , Kane County Clerk/Auditor Alma Adams, Iron County Commissioner William Cox, Rich County Commissioner Mike Wilkins, Uintah County Clerk/Auditor
Treasurer Appointed Deputy Treasurer	Johnnie Miller, Chief Executive Officer Mike Wilkins, Uintah County Clerk/Auditor
Board Appointed Clerk	Sonya White, Chief Financial Officer
Receivables Clerk	Marty Stevens, Operations Specialist



OFFICE OF THE
STATE AUDITOR

Questionnaire

Revised March 2020

Fraud Risk Assessment

INSTRUCTIONS:

- Reference the *Fraud Risk Assessment Implementation Guide* to determine which of the following recommended measures have been implemented.
- Indicate successful implementation by marking “Yes” on each of the questions below.
- Total the points of the questions marked “Yes” and put on the “Total Points Earned” line below.
- Using the points earned, circle the risk level on the “Risk Level” line below.

Total Points Earned: _____ Risk Level: Very Low Low Moderate High Very High
> 355 316-355 276-315 200-275 < 200

	Yes	Pts
1. Does the entity have adequate basic separation of duties or mitigating controls as outlined in the attached Basic Separation of Duties Questionnaire?		200
2. Does the entity have written policies in the following areas:		
a. Conflict of interest?		5
b. Procurement?		5
c. Ethical behavior?		5
d. Reporting fraud and abuse?		5
e. Travel?		5
f. Credit/Purchasing cards (where applicable)?		5
g. Personal use of entity assets?		5
h. IT and computer security?		5
i. Cash receipting and deposits?		5
3. Does the entity have a licensed or certified expert as part of its management team? (CPA, CGFM, CMA, CIA, CFE, CGAP, CPFO)		20
a. Do any members of the management team have at least a bachelor's degree in accounting?		10
4. Are employees and elected officials required to annually commit in writing to abide by a statement of ethical behavior?		20
5. Have all of the board members completed the State Auditor online training at least once in the last four years?		20
6. Regardless of license or formal education, does at least one member of the management team receive at least 40 hours of formal training related to accounting, budgeting, or other financial areas each year?		20
7. Does the entity have or promote a fraud hotline?		20
8. Does the entity have a formal internal audit function?		20
9. Does the entity have a formal audit committee?		20

Certified By: _____ Certified By: _____

* MC = Mitigating Control