# 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 withinstructions
  - 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

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### **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

- www.elca.org (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 Reimbursement Policies
  - 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)