

INTERNAL CONTROLS, AUDITS & IRS 990s: WHAT EVERY BOARD MEMBER NEEDS TO KNOW



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BOARD DUTIES



1. **Ensure Legal & Ethical Integrity**
2. **Build a Competent Board**
3. **Determine Mission & Purpose; Ensure Effective Planning; Monitor & Strengthen Programs & Services**
4. **Protect Assets & Provide Financial Oversight**
5. **Ensure Adequate Financial Resources**
6. **Enhance the Organization's Public Standing**
7. **Select, Support & Evaluate the Chief Executive**

BoardSource, <https://boardsource.org/> Washington DC

KEY INTERNAL FINANCIAL CONTROLS



What checks and balances will prevent unauthorized spending and fraud?
 Evaluate checks and balances by testing whether procedures are followed.

	Met	Exception	Notes
SPENDING LIMITS			
Checks ≥ \$xx,000 have double signatures			
EFT/ACH transactions signed by authorized signers			
ACH transfer matches bank routing number and account number. Crosscheck originating documents to ensure accounts and amount debited match partner agency accounts			
SEPARATION OF DUTIES			
Check Signer/EFT initiator cannot be Payee			
PROPER DOCUMENTATION			
Investigate unusual transactions			
Choose five invoices - trace & verify			
Available supporting documents attached			
Invoice/payment reasonable and accurate			
Goods/services have been received			
Approved and initialed/signed by authorized bank signer(s)			
Payment appropriate if no invoice/receipt exists			
Items posted to proper expense account			
Challenge alterations/white-out			
Reconciliation and recordkeeping consistent			
Bank accounts reconciled monthly, irrespective of absence of transactions			
Bank statements signed by opener			
Any checks outstanding > three months			
Voided checks kept on file			
Pre-numbered checks used in sequence and location known			
Account balances reconcile with financial reports			
PHYSICAL PROTECTION OF ASSETS			
Storage of checks and credit card information secure			
TAX FILING/FINANCIAL REPORTING			
Payroll tax filing timely: local, state & federal agencies			



AUDIT CHECKLIST



Consider: How engaged is the board? How is diligence demonstrated?

IRS view of “presumption of reasonableness” re: compensation policy

Minutes for all committees kept on file

YEARLY ESSENTIAL

	Met	Needs Work
FEDERAL REQUIREMENTS		
Compliance with IRS requirements to maintain exempt status		
No private inurement		
No political lobbying/campaigning		
Provide disclosure of financial information upon request (IRS 990 & tax exemption letter)		
Provide substantiation for charitable contributions with federal tax disclosure		
File IRS Form 990 by due date: 15 th day of fifth month after close of fiscal year; may file extension		
Ø Expenses properly allocated between management & general, fundraising & program		
Ø Form 990 signed before filing (common filing error)		
Ø Persons employed as contractors meet federal requirements. Form W-9 filed		
1099s issued as required		
Ø Compliance with USA PATRIOT Act of 2001		
Documentation kept on file		
Ø Compliance with payroll withholding tax laws		
Ø Written Policies for: Code of Ethics & Conflict of Interest Disclosures for board and personnel		
Whistleblower Protection for personnel		
PENNSYLVANIA REQUIREMENTS		
Compliance with Pennsylvania’s requirements for charitable organizations		
Ø Bureau of Charitable Organizations registration filed yearly by deadline		
Ø On every printed solicitation, written confirmation, receipt and reminder of contribution, the following statement must be conspicuously printed verbatim: “The official registration and financial information of <u> NPO </u> may be obtained from the PA Department of State by calling toll free, within PA, 1 (800) 732-0999. Registration does not imply endorsement.”		
Ø Includes the following disclosures at point of solicitation:		
Legal name as registered and location		
Full, fair description of charitable purpose(s) & source of available written information		

AUDIT CHECKLIST, p.2



OPERATIONS	Met	Needs Work
Ø Follows accounting practices which conform to accepted standards, including use of accrual basis		
Ø Annual operating budget including income and expenditure developed		
Budget reviewed and approved by board		
Budget adjusted to changes during year		
Income & expenditures compared against budget at regular, frequent intervals		
Ø Suitable insurance coverage to ensure appropriate levels and types in place		
Coverage periodically reviewed		
Employees, board, volunteers handling funds bonded to help assure safeguarding of assets		
Ø Safeguards for computerized data and software		
Credit card account (donors) storage		
Where are backups?		
INCOME/EXPENDITURES	Met	Needs Work
Ø Funds deposited promptly into organization's bank account		
Ø Regular reconciliations against receivables		
Ø Written policy regarding write-off of receivables		
Ø Monies used for express purpose received		
Ø Expenditures tracked in open and transparent manner		
Ø Monies deposited in bank in secure manner		
AUDITOR	Met	Needs Work
Ø Board responsible to solicit bids, interview auditors, and hire an auditor		
Ø Annual, independent audit of financial statements by certified public accountant		
Ø Conflict of interest between audit firm and organization: any non-audit services?		
Ø Audit-firm lead partners rotated when deemed necessary		
Ø Auditor meet with board without a member of management present		
Ø Auditor submits management letter with recommendations to improve financial operations		
Ø Board reviews and approves IRS 990, audit, and management letter		
Ø Board & staff institute any necessary changes		
Ø Audit or annual report with financial statements available to anyone interested		

AUDIT CHECKLIST, p.3



YEARLY RECOMMENDED, con't

OPERATIONS	Met	Needs Work
Ø All donations acknowledged by written receipt		
Ø Mail opened at earliest opportunity and donation receipt recorded immediately		
Ø Cash payments kept to a minimum or nonexistent		
Ø Record keeping sufficient to show receipt and cost accurately		
Ø Is there a register for all bank accounts?		
Ø Bank accounts in the name of organization and not individuals		
Ø Are credit cards held? What are limits and who is authorized to use them?		
Ø Donations for restricted funds properly recorded and held for intended purpose		
Ø Adequate system of internal control; monitored effectively?		
RECORDS	Met	Needs Work
Ø Donor records kept as basis for donor acknowledgments for contributions		
Ø If goods or services provided, receipt informs donor of federal tax implication		
BUDGET	Met	Needs Work
Ø Cash flow forecasts prepared for year and updated at regular, frequent intervals		
Ø Document staff time to allocate management/general, fundraising & program expenses		
POLICY	Met	Needs Work
Ø Written investment policy		
Ø Written fiscal policy and procedures manual		
Is policy followed?		
Includes never signing blank checks		
Authority levels to place orders over a certain amount		
Ø Written document-retention policy		
Includes electronic files and voicemail		
Ø Established plan identifying actions in event of funding reduction/loss		
Ø Documented internal controls, ie: handling cash & deposits, approval of spending & disbursements		
Ø Reserve to cover at least three months of operating expenses policy agreement?		

AUDIT CHECKLIST, p.4



YEARLY RECOMMENDED, con't

FIXED ASSETS

	Met	Needs Work
Ø Review of fixed assets schedule and depreciation		
Ø Detailed records of property and equipment		
Includes date acquired, description, cost or FMV at date of acquisition		
Ø Physical inventory taken year-end		
Ø Has property/equipment been reconciled to insurance coverage?		
Ø Are capital needs are reviewed at least annually and priorities established?		

EMPLOYEES/PERSONNEL

	Met	Needs Work
Ø Staff has current contracts, if applicable, and written job description		
Ø Staff policies/procedures, including grievance procedure, in place & up-to-date		
Ø Personnel files maintained; kept separately from wage records and secured		
W-4, performance appraisals, Immigration I-9 form		
Ø Staff paid by check or funds transfer		
Ø Wage/salary increases properly authorized and documented in employee file/folder		

ADDITIONAL TO STRENGTHEN ORGANIZATIONAL ACTIVITIES

Training for board and staff on relevant topics; all encouraged to participate		
Organizations with cash handling, petty cash account, or debt (mortgages or notes) require further audit checks		



WHY IS THE IRS FORM 990 IMPORTANT TO THE BOARD?



1. **What** is an IRS 990?
2. What is the **Board's responsibility** for the 990?
3. What **information** is contained in the 990?
4. What **changes** can the nonprofit organization make as a result of the information contained in the 990?
5. **Where** is our nonprofit organization's 990?
6. **Who uses** the 990? For what?

The importance of GuideStar.org



1. How does **GuideStar** by Candid obtain our 990?
Why does GuideStar **post** our 990 online?
Can **anyone** see our 990 online at GuideStar?
2. How can we monitor, correct & improve our nonprofit's **GuideStar data** online?
<https://www.GuideStar.org/>



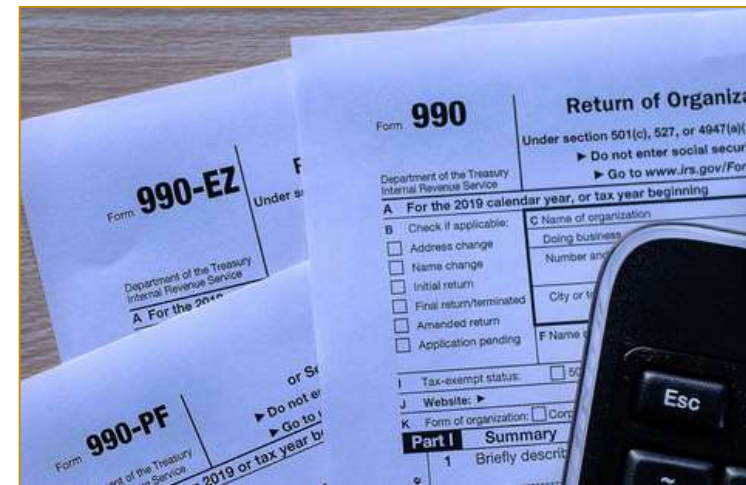
How does it relate to the audit?

IRS FORM 990 AREAS What is the IRS 990 used for?

What is the Board's responsibility for 990 contents & filing?



- **Program Service Accomplishments**
 - Defines the mission of the nonprofit organization and its impact
- **Reporting on Key Managers and Compensation**
 - Allows for comparison of similar npos' salary and compensation levels
- **Governance Reporting and Policies**
 - Defines what policies are required, and how they should be documented.
Answers the IRS definition of **good governance**
- **Disclosures – 990 Schedules**
 - Sch A – Describes how the npo is **tax exempt** and verifies **public support %** over time
 - Sch B - List of contributors (names blocked out) indicates diverse community support
 - Sch D - Detail of financial information, reconciling between the 990 and financial statements
 - Other schedules - Grants, non-cash contributions
- **Financial Information**
 - Overall: use historical information to identify trends & plan for future operations
 - Revenue Sources
 - Functional Expenses
 - Balance Sheet





IRS Form 990: Nonprofit Primer

IRS Form 990 is designed to enhance transparency of an exempt organization's mission and activities, and promote compliance with applicable tax law requirements. The 990 helps board members affirm their fiduciary responsibilities, and provides donors with information. This checklist highlights certain sections and schedules of importance, intended for those who are not tax experts.

Summary

A snapshot of the nonprofit's mission & governance.

Key financial, compensation & operational information.

- Is the brief description of the mission candid and clear?
- Does the current year summary of financial information compare favorably or unfavorably with the prior year?



Part III—Statement of Program Service Accomplishments

Provides the nonprofit an opportunity to increase awareness about itself by fully describing its program services and all related expenditures.

- Does the information explain why the nonprofit exists? Who it serves? Activities it undertakes to accomplish its mission?
- Are program services described in sufficient detail to present a comprehensive portrayal of the nonprofit?

•Part IV—Checklist of Required Schedules

Asks questions to determine whether particular schedules must be completed. The schedules provide detailed info that enables the IRS to evaluate the likelihood of violations to the rules.

- The nonprofit consider changes in its policies and procedures, especially if there is a Yes response to questions 25, 26 or 27.

•Part V—Statements Regarding Other IRS Filings and Tax Compliance

A checklist of other IRS compliance that might be required by the nonprofit, not necessarily related to the Form 990.

- Have paid personnel been properly classified as employees rather than independent contractors, to avoid payroll tax problems?
- If the nonprofit received more than \$250 from a donor, was a receipt furnished to enable the donor to substantiate their charitable deduction?
- Is the nonprofit potentially subject to unrecorded penalties and interest (if line 3b, 5c, 6b, 7b, 7g or 7h is answered "No," or if line 5a, 5b, 8, 9a or 9b is answered "Yes")?



Part VI—Governance, Management and Disclosure

Key governing body & management policies; and whether/how the nonprofit promotes transparency and accountability to its donors.

- If the nonprofit does not have written policies indicated by lines 12a, 13, 14 and 16b, should the board consider adopting any of these?
- If line 15a or 15b is answered "No," should the board consider a change in the procedures for setting compensation to minimize the future risk of challenge by the IRS on excess benefits?
- If the nonprofit conducts activities in multiple states, is it properly registered in those states and satisfying their filing requirements?

Part VII—Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees and Independent Contractors

Transparency on compensation, to disclose the degree to which salaries and benefits are in line with comparable community standards.

- Does the compensation of those listed in Part VII appear justifiable in view of the organization's activities, their responsibilities, and a review of comparable organizations? (Note: Revisit Part VI, lines 15a and 15b, especially if there is a "No" response.)

Part VIII—Statement of Revenue

Nonprofit's sources of support, including potentially taxable unrelated business income.

- Does the revenue data indicate too much reliance on a source that could be jeopardized by a weak economy, declining stock market or other external factor (i.e., should alternative revenue sources be considered or emphasized)?
- Too much reliance on unrelated business income [as reported in column (C)] could risk a nonprofit's exempt status. Is column (C) insignificant as compared to totals in column (A)?

Part IX—Statement of Functional Expenses

Is an appropriate amount of expenditure being directed to activities that further the nonprofit's exempt purpose?

- Are compensation and benefits (lines 5 through 9) an appropriate portion of the nonprofit's revenue?
- Are certain expenses justifiable (e.g., lines 11a -11g, 12, 17, 18 and 19)?
- Do column (C) management and general expenses and column (D) fundraising expenses totals appear reasonable relative to total program service expenses in column (B)?



IRS Form 990: Nonprofit Primer



Part X—Balance Sheet

How financially stable is the nonprofit?

- Is an adequate (or excessive?) proportion of cash (line 1) being kept in non-interest bearing accounts?
- Are resources being diverted from program service activities to related party loans (lines 5 and 6)?
- Is oversight being exercised over related party loans to ensure adequate collateral, interest, timely repayment, etc.?
- Are notes and loans receivable (line 7) adequately collateralized and monitored for timely repayment?
- Does an increase, if any, in accounts payable or accrued expenses (line 17) during the year suggest potential cash flow problems?

Part XII—Financial Statements and Reporting

Explains the level of involvement by an independent accountant.

Explains the reporting required for any audits required for nonprofits that receive federal grants under the Single Audit Act and OMB Circular A-133.

- If the nonprofit does not have an independent audit (line 2b), are its financial resources sufficiently large to make an independent audit prudent?
- If audited, do the auditors report to the group responsible for overseeing the financial reporting process (such as an audit or finance committee or a governing board)?

Schedule A—Public Charity Status and Public Support

Indicates a nonprofit’s reason for public charity status (i.e., why it is not a private foundation) and to provide the IRS with detailed information about its sources of financial support.

- Does the data (Part II Section C or Part III Sections C and D) indicate that the organization is in danger of being tipped into private foundation status, rather than remaining a public charity?



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Schedule C—Political Campaign and Lobbying Activities

501(c)(3) nonprofits are prohibited from participating in a political campaign & are subject to limitations on their lobbying activities. They can, however, advocate.

- If exempt under Section 501(c)(3), are policies followed to prevent participation in a political campaign that could jeopardize tax-exempt status?
- If the nonprofit is a Section 501(c)(3) entity that is eligible to make the lobbying expenditure election but has not, should it do so to minimize the likelihood that exempt status will be lost because of excessive lobbying (see Part II-A)?

Schedule J—Compensation Information

The compensation information required in Schedule J is much more detailed than that required in Form 990 Part VII. Review Schedule J to discern evidence of waste, extravagance and financial abuse.

- If any box on line 1a is checked, is the economic benefit warranted or should it be re-examined?
- Does the nonprofit require strict accountability for expense reimbursements to prevent abuse (lines 1b and 2)?
- Is the nonprofit setting compensation based on one or more methods indicated by the box descriptions for line 3? (Note: The more boxes, the better.)
- If any of the questions on lines 4 through 8 are answered “Yes,” do the indicated transactions suggest that changes should be made in non-fixed compensation arrangements to avoid windfall payouts?


Schedule L—Transactions with Interested Persons

Financial arrangements between the nonprofit and disqualified persons or other interested persons.

- Did the organization consider all direct or indirect transactions or relationships that may require disclosure? (See Part IV questions 25 through 28.)
- Are business transactions with interested persons fully disclosed, including the amount, nature of the transaction, and relationship with the nonprofit, management and board?

Schedule O—Supplemental Information

Is the 990 review process fully described?

- Does the nonprofit describe how public documents (Forms 990, 990-T, if applicable, and 1023) are made available for public inspection (website, office, GuideStar, etc.)? 



NPO IRS 990s are online.
 Look up your own npo at GuideStar & compare to others
<https://www.GuideStar.org/> info@chescofcf.org [Lincoln28\\$](#)



Candid at a glance

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GuideStar

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What people are saying

Candid profiles help the sector take a leap forward from data and information about charities to **powerful knowledge and insight to help us make informed decisions.**

—Victoria Vrana
 Senior Program Officer, The Bill & Melinda Gates Foundation

My experience being a board member at Village Enterprise, where **we have a Platinum Seal, is that it's made fundraising easier. The Platinum Seal helps us stand out** since there are so many nonprofits for donors to choose from.

—Jamie Austin
 Board Member, Village Enterprise Fund

Our Candid profile probably saves us 40 hours a week. We're constantly asked for our financials, details about our mission, and reviews. Sending people to our Nonprofit Profile frees us up to focus on our mission.

—Janet Wenholz
 Grant Writer, Operation Freedom Paws

Update your Candid profile in three easy steps



Step 1
Claim your profile
Request access to your organization's profile



Step 2
Get approved
We verify your affiliation and approve your access



Step 3
Tell your story
Showcase your programs and your impact to help make your funding

[View the Candid profile best practices guide for a simple step-by-step walkthrough.](#)



Financials

Audubon Society of Western Pennsylvania
 Fiscal year: Jul 01 - Jun 30



Financial documents

Download audited financials *

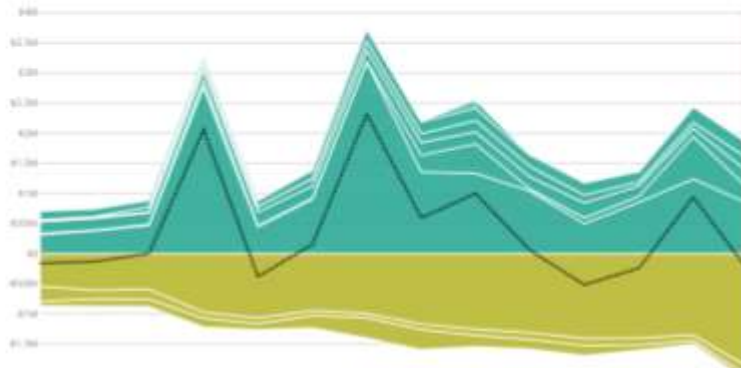
* Yes, financials were audited by an independent accountant.

Revenue vs. expenses: 2022 breakdown

SOURCE: IRS Form 990

NET GAIN/LOSS: **-\$163,870** in 2022

Total revenue:	\$1,840,052
Contributions:	\$838,811
Gov't grants:	\$255,390
Program services:	\$267,913
Investments:	\$223,486
Special events:	\$0
Sales:	\$248,877
Other:	\$3,775
Total expenses: \$2,103,922	
Program services:	\$1,877,498
Administration:	\$147,792
Fundraising:	\$78,632



Note: When component data are not available, the graph displays the total Revenue and/or Expense values.



Liquidity in 2022

SOURCE: IRS Form 990

6.26

Average of 13.10 over 10 years



Months of cash in 2022

SOURCE: IRS Form 990

1

Average of 7.1 over 10 years



Fringe rate in 2022

SOURCE: IRS Form 990

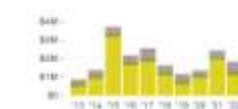
18%

Average of 20% over 10 years



Funding sources

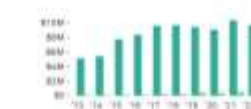
SOURCE: IRS Form 990



Contributions, Gifts, Grants
 Program Service Revenue
 Other Investments, Gifts, Fundraising
 Miscellaneous

Assets & liabilities

SOURCE: IRS Form 990



2021: \$3,000,000
 2022: \$1,966,130