## **TOWN OF BOXFORD**

FINANCIAL POLICIES MANUAL

**APRIL 2025** 



**P**REPARED BY:

DLS | Financial Management Resource Bureau www.mass.gov/dls

Marcia Bohinc, Senior Project Manager Kasey Bik, Project Manager At the Select Board's request, the Division of Local Services (DLS) Financial Management Resource Bureau created a financial policy manual for the Town of Boxford. The policy topics in the first part of the manual are concerned with financial planning and in the second part with day-to-day financial operations.

This draft manual is provided as a Word document so that town officials can review and revise the policies as desired prior to formal adoption. The provisions in the policy drafts are based on best practice guidance tailored to the town's structure, goals, and financial conditions incorporating the town's existing financial practices and policies, both formal and informal, as well as current relevant bylaws. Local officials should analyze current financial operations to assess the appropriateness of the benchmarks and metrics that we have presented in several of the policies. To assist with this analysis, we include within the policies the Town's current financial positions against the recommended targets. To keep the policies relevant, this data should be updated annually.

As a default, all the policies have a prominent box to fill in the date when the policy was "Adopted by the Select Board." The town might want to consider joint adoption of certain policies, such as the select board jointly adopting the Annual Budget Process policy with the finance committee. We recommend that the town conduct reviews of the policies every few years to revise or otherwise expand upon them as changing circumstances may warrant and also to adopt new policy topics.

Please note that the Capital Planning, Debt Management, Financial Reserves, Reconciliations, and Year-End Closing policies begin with a table that summarizes budget targets and/or primary procedural details. In each case, this information is repeated and explained further within the policy's narrative section. When finalizing any revisions to these policies, the pertinent local officials must be careful to make sure that corresponding updates are done in both policy sections to avoid any possible confusion.

# **BOXFORD MASSACHUSETTS**

FINANCIAL POLICIES MANUAL



The Town of Boxford is committed to safeguarding public funds, protecting local assets, and complying with financial standards and regulations. In order to ensure the growing and continued financial health of the Town, provide the public with confidence that Town officials respect their responsibility for fiscal stewardship, and demonstrate to bond rating agencies that the Town has thoughtfully prepared for its future, the financial policies outlined below shall guide the Town.

This manual of financial policies provides guidance for local planning and decision making. The policies are intended to outline objectives, provide direction, and define authority to help ensure sound fiscal stewardship and management practices. These policies are a living tool and shall be reviewed by the Town Administrator, Assistant Town Administrator/Finance Director and designated staff on an annual basis and updated as necessary.

With these policies, the Town of Boxford, through its Select Board, Town Administrator, Assistant Town Administrator/Finance Director, Finance Committee, and employees, commits to the following objectives:

- Sustaining a consistent level of service and value for residents and businesses
- Providing fiscally sound management and maximize return on taxpayer dollars
- Safeguarding financial integrity and minimizing risk through a system of internal controls
- Ensuring the quality and maintenance of capital assets so that current and future capital needs are addressed in a comprehensive and financially sound manner
- Conforming to general law, uniform professional standards, and municipal best practices
- Protecting the Town's bond rating
- Promoting credible and sound financial management by providing accurate and timely information on the Town's financial condition to elected officials, staff, the public and external interests

### TABLE OF CONTENTS

FINANCIAL PLANNING	1
ANNUAL BUDGET PROCESS	3
CAPITAL PLANNING	8
DEBT MANAGEMENT	13
FINANCIAL RESERVES	18
Forecasting	22
INVESTMENTS	25
OTHER POSTEMPLOYMENT BENEFITS LIABILITY	31
OVERLAY	34
SPECIAL PURPOSE APPROPRIATIONS	36
FINANCIAL OPERATION	
ANTIFRAUD	41
DISBURSEMENTS	46
FINANCIAL MANAGEMENT TEAM	49
GIFTS OF FUNDS	51
GRANTS MANAGEMENT	54
PROCUREMENT CONFLICT OF INTEREST	58
RECONCILIATIONS	61
Revenue Turnover	66
TAX RECAPITULATION	70
TRAVEL/EMPLOYEE REIMBURSEMENT	74
YEAR-END CLOSING	78
POLICY LOG	83

## FINANCIAL PLANNING POLICIES

ANNUAL BUDGET PROCESS				
Applies to:	<ul> <li>Town Administrator, Select Board, Finance Committee, Permanent Building Committee, and Boxford School Committee budget decision-making roles</li> <li>Finance Director and Board of Assessors job duties</li> <li>All department heads and the boards and committees that have spending authority (all referred to here as "department heads") in their budget planning duties</li> </ul>			
<b>Scope:</b> Coordination, development, and adoption processes for the annual omnibus budget, encompassing the operating and capital budgets				
Effective:	Adopted by the Select Board on [Date]			

To promote transparency, procedural consistency, and fiscal sustainability, this policy establishes guidelines for developing, documenting, adopting, monitoring, and reporting the Town's annual budget. As the Town's central policy document, the budget prioritizes annual and longer-range objectives and is the means for turning strategic plans into fiscal reality. It constitutes a contract between the Town and its residents, explaining how funds are to be raised and allocated for the delivery of services.

#### POLICY

Town officials will work together to prepare a balanced budget for the approval of voters at annual town meeting. The creation of the budget will be guided by and reflect all the other financial planning policies adopted by the Town and contained in its policy manual. Town meeting has the sole authority to appropriate funds for the budget, except for specific instances where appropriation is not required by statute (such as grants and gifts). Further, only a subsequent annual or special town meeting vote can amend any previously approved appropriation.

The Town Administrator, with assistance from the Finance Director, is responsible for developing the annual budget and will do so according to the vision, goals, priorities, and strategic plans laid out by the Select Board. The Town Administrator will cultivate a strong, communicative relationship with the Boxford Elementary School Committee and Tri-Town School Union Administration to ensure early knowledge of its expenditure projections and smoothly integrate its budget. To create the omnibus annual budget also requires the Town Administrator to prepare the annual capital requests based on the Capital Improvement Program according to provisions set out in the <u>Capital Planning</u> policy. As the advisor for the interests of town meeting voters, the Finance Committee will make recommendations on all articles to be included in the annual town meeting warrant. It is the goal of all these parties to work in a cooperative manner beginning with a joint meeting of the Select Board, Finance Committee, and School personnel in the fall of each year through presenting voters with a consensus budget in the spring.

Because of the substantial budget appropriations that arise from obligations to certain regional shared service partners, most prominently, the Masconomet Regional School District, but also vocational school districts, the Finance Director will endeavor to stay timely apprised of their annual budget projections.

All parties applicable under this policy are expected to comply with the annual budget calendar's milestone deadlines when they are set each year. As part of this, department heads will timely provide the Finance Director with all information needed for the creation of an informative budget document, which will be made available to voters at least seven days prior to the date of town meeting.

#### A. Budget Goals

The goal of the Select Board is to create an efficient, effective, and fiscally responsible budget process that meets the planned needs and goals of Boxford, maintains reserves for emergencies, and is accountable to the taxpayer. At minimum each year, the Town's budget goals will include the following:

*General Fund* – The goals for the general fund budget include preserving core services, fulfilling required mandates, and maintaining or enhancing the local quality of life, while also ensuring reserve levels that will allow flexibility to respond to changes in the economy and other unanticipated issues that could potentially affect the Town's fiscal health.

*Capital Investment* — To pay for items in the capital plan, the town will strive to achieve and maintain the annual capital funding levels spelled out in the <u>Capital Planning</u> and <u>Debt Management</u> policies. Additionally, the Town will plan to regularly fund, within departmental operating budgets, the maintenance costs for equipment, facilities, infrastructure, and other capital assets to maximize their useful lifespans.

#### B. <u>Principles for Balanced, Sustainable Budgets</u>

The Town Administrator, with the Finance Director, will prepare an annual budget proposal for the approval of the Select Board and Finance Committee and eventual inclusion in the annual town meeting warrant.

Assuring the creation of a budget that is structurally balanced and sustainable for future years requires the Town to support the recurring expenditures of each annual operating budget using only recurring, or current, revenues. Current revenues are those revenues that the Town brings in during the budgeted fiscal year (e.g., taxes, excises, fees, charges, interest earnings, state aid), and they do not include free cash.

Additional principles that shall govern the creation of the annual budget include:

- 1. All departmental budgets will be prepared to reflect the full costs of providing the services and list the proposed and prior-year actual allocations of full-time-equivalent employees.
- 2. The Town will avoid using any one-time revenue source to fund ongoing services unless necessitated by exceptional circumstances, and any such usage will require the Town Administrator to document a plan to replace this source in future years.

- 3. Discretionary revenues <sup>1</sup> available for the operating will be allocated among General Government, Elementary School, and Regional Schools in approximately the same proportions as the appropriations from the previous fiscal year.
- 4. New major programs and non-school benefit-eligible positions will be presented as an override ballot question to determine taxpayer acceptance and permanent funding in the tax base.
- 5. The Town will endeavor to maintain a debt service appropriation at the target level defined in the Debt Management policy.
- 6. The Town will not underfund any fixed, recurring costs in the annual operating budget with the expectation that budget supplements will be available during the year but will instead fund them at the realistic amount necessary to complete the year.
- 7. The Town will not use budgetary procedures that balance the budget at the expense of future years, such as postponing or deferring payment of expenses already incurred, accruing future year revenues, or rolling over short-term debt to avoid making principal payments.
- 8. The proposed revenue sources for the annual budget shall reserve an excess levy capacity of 1.5% of the prior year's maximum tax levy.
- 9. Each officer, elected board, committee, and department authorized to charge a fee for service will review the fee schedules in relation to the cost of providing the service at a minimum of every two years and propose increases when necessary to ensure coverage of service costs.
- 10. The Town Administrator and Finance Director will evaluate all contractual obligations, requests, and strategic priorities to determine annual non-collectively bargained pay increases.
- 11. When a forecast predicts annual revenues to exceed annual expenditures, the following options should be considered for the excess revenue:
  - Building up reserve fund target levels
  - Advancing deferred capital expenditures
  - Funding the other postemployment benefits liability
  - Accelerating payments on other long-term obligations
  - Restoring services reduced from prior years
  - Funding new initiatives
  - Exploring tax relief
- 12. The Board of Assessors will vote to authorize a contribution to the overlay account to offset the Town's liability for unpaid property taxes caused by abatements and exemptions. This amount shall be based on:
  - Current balance in the overlay account
  - Three-year average of granted abatements and exemptions
  - Cases pending before, or on appeal from, the Appellate Tax Board
  - Timing of the next five-year certification review by the Division of Local Services

<sup>&</sup>lt;sup>1</sup> Boxford Town officials should define 'discretionary revenues' as it applies to this policy.

#### C. <u>Budget Calendar</u>

The Finance Director, under the Town Administrator's direction will coordinate an annual budget process that begins with the development of a calendar for approval by the Town Administrator, Select Board and Finance Committee. The calendar will frame the budget process with specific due dates for all milestones to enable early identification and review of major policy issues leading to annual town meeting. The calendar will include:

- Joint meetings of the Select Board, Finance Committee, and School personnel
- Revenue projections and financial forecast completion, distribution, and updates
- Departmental appropriation guidelines, submissions, and review
- Capital improvement plan guidelines, submission, and review
- Public hearings, reviews, and approvals at different levels
- Budget document compilation and distribution
- Town meeting warrant production and distribution

#### D. Budget Document

The Town Administrator and Finance Director will work together to prepare and present a transparent and reader-friendly budget document that presents all proposed expenditures for current operations and capital projects during the ensuing year, detailed by department, purpose, and project. It will contain a Town Administrator budget message detailing short- and long-term strategic objectives and explaining the Town's fiscal challenges. The outlook will include economic trends that will affect the Towns, as well as anticipated major capital investments. The budget message will also highlight important features of the budget, explain any major variations in current year revenue, expenditures, or policies, and summarize the town's debt position.

The model for the budget document will be based on standards established by the Government Finance Officers Association (GFOA) in its <u>Distinguished Budget Presentation</u> program. It will incorporate narrative information on Town departmental and organizational goals, the plans and resource allocations needed to meet those goals, graphical information about available finances, and summary of the Town's five-year capital plan.

#### E. Budget Monitoring

The Finance Director will continually monitor the budget and provide regular formal reports to the Town Administrator and Select Board. The Town will take immediate corrective actions if at any time during the fiscal year expenditure or revenue estimates indicate a projected operating deficit by yearend. Corrective actions can include, but are not limited to, hiring freezes, expenditure reductions, layoffs, or use of contingency funds.

#### **BOXFORD REFERENCES**

**Bylaw:** Part I, Chapter 19, Town Administrator, <u>Article XII, §19-26</u>, Chapter 11 Budget responsibilities of Director, <u>Article IV, §11-16</u>

**Policies:** Capital Planning, Debt Management, Financial Management Team, Financial Reserves, Forecasting, OPEC Liability, Overlay, Year-End Closing

#### **EXTERNAL REFERENCES**

M.G.L. c. 39, § 10	M.G.L. c. 41, § 60	M.G.L. c. 58, § 25A
M.G.L. c. 39, § 16	M.G.L. c. 44, § 31	M.G.L. c. 59, § 21C
M.G.L. c. 40 § 6	M.G.L. c. 44, § 33A	M.G.L. c. 70
M.G.L. c. 41, § 15A	M.G.L. c. 44, § 33B	M.G.L. c. 71, § 16B
M.G.L. c. 41, § 59	M.G.L. c. 58, § 25	M.G.L. c. 71, § 16B½

Division of Local Services (DLS) Informational Guideline Release 2017-23: Overlay and Overlay Surplus

DLS Best Practice: Annual Budget Process in Towns

Government Finance Officers Association Best Practices: <u>Achieving a Structurally Balanced Budget</u> and <u>Distinguished Budget Presentation Criteria</u>

CAPITAL PLANNING					
Applies to:	<ul> <li>Select Board, Finance Committee, Permanent Building Committee, Town Administrator, and Finance Director budget decision-making roles</li> <li>Town Administrator, Finance Director, and Town Accountant job duties</li> <li>All department heads in planning for and requesting capital projects</li> </ul>				
Scope:	<ul> <li>All current and proposed capital projects for assets owned by the Town</li> <li>Included are projects for which the Town may seek Community Preservation Act (CPA) financing. However, this policy does not govern the procedures and decision making of the CPA Committee, which has sole budget-making authority for CPA funds.</li> </ul>				
Effective:	Adopted by the Select Board on [Date]				

To assure the Town can cost-effectively acquire, expand, or enhance the capital assets necessary to achieve its service provision goals, this policy outlines guidance for planning, reviewing, and coordinating capital improvements.

#### POLICY

To acquire or extend the useful life of the equipment and infrastructure needed to achieve the highest possible levels of public services and quality of life affordable with available financial resources, the Town will maintain an annually updated, five-year Capital Improvement Program (CIP). Apart from the CIP, the Town will protect the value and service capacity of its capital assets by providing consistent funding in annual operating budgets for the maintenance expenditures necessary to realize their useful lifespans.

The Town Administrator assisted by the Finance Director is responsible for developing the Town's annual capital budget, which will derive from the multiyear CIP. This involves maintaining a capital asset inventory, prioritizing projects, analyzing funding, and creating a long-term financial plan achievable within the Town's budget limitations.

FULICE SUIVIIVIANE		
Capital Process Component	Policy Guidance	
Capital Project definition	<ul> <li>Costs \$25,000 or more, and</li> <li>Has (or extends) useful life of five years</li> </ul>	
Annual capital budget	<ul> <li>Derived from the CIP and developed by the Finance Director under the Town Administrator's direction</li> </ul>	
Multiyear capital improvement plan (CIP)	<ul> <li>First year is the capital budget proposed for the next fiscal year</li> <li>Four subsequent years of capital project projections</li> <li>Updated and maintained by the Town Administrator and Finance Director</li> </ul>	

#### **POLICY SUMMARY**

Capital Financing	Policy Guidance		
Funding targets <sup>2</sup>	<ul> <li>Overall capital spending: 4-8% of the total revenue</li> </ul>		
	<ul> <li>Non-debt, "cash capital" spending: 2-4% of GF revenue</li> </ul>		
	<ul> <li>Annual within levy capital debt service: 2-4% of GF revenue</li> </ul>		
Cash capital	Appropriate funding sources: levy, free cash, stabilization funds, revolving funds, overlay surplus, certain receipts reserved, state and federal grants		
Debt Usage	<ul> <li>Short-term debt: Useful life &lt; 10 years</li> </ul>		
	<ul> <li>Long-term debt: Useful life &gt; 10 years and cost &gt; \$100,000</li> </ul>		

#### A. Definition of a Capital Improvement

A capital improvement is a tangible asset or project estimated to cost over \$25,000 and to have or to extend five or more years of useful life. These include:

- Real property acquisitions, construction, and long-life capital equipment
- Major renovations of existing capital items that extend their useful lifespans, as distinguished from normal operating expenditures
- Major improvements to physical infrastructure, such as streets and stormwater drains
- Planning, feasibility studies, and designs for potential capital projects, such as new buildings or major additions to existing buildings, which would include equipment needs to furnish such building or addition
- Equipment acquisition, replacement, or refurbishment, including but not limited to vehicles, furnishings, technology hardware and software, or other items that, when combined together make it a capital project
- Items obtained under long-term capital leases
- Bulk purchases of similar items, like software, furniture, or radios with an expected useful life of five or more years that, when aggregated, have total costs exceeding \$25,000

#### B. Capital Asset Inventory

To support a systematic acquisition and replacement schedule, the Town Accountant, assisted by the Finance Director will annually update and maintain a detailed inventory of all capital assets. The inventory shall include dates built, acquired or last improved, original costs, current conditions, expected and remaining useful lifespans, depreciated values, extent of use, and any scheduled replacement or expansion dates.

The Finance Director will verify the assets identified in the inventory are properly reflected in the Town's annual property insurance policy.

#### C. Submitting and Evaluating Capital Project Proposals

Beginning in October each year, the Town Administrator and Finance Director will solicit capital project requests from department heads, which will include priority level, estimated project cost, and

<sup>&</sup>lt;sup>2</sup> Total revenue is defined as the fiscal year gross revenues, whereas the general fund revenue is the total gross revenues less Community Preservation Fund revenues.

useful life. In addition to responding with any new project requests, department heads will also assess their current and prior capital projects and requests and submit recommendations to add, withdraw, and/or adjust the projected costs of capital projects based on updated anticipated needs.

Department heads will assign priorities using the criteria below:

- Urgent/Legally Required Completing this project will address an imminent risk to the safety
  of the public or municipal personnel, and/or it will prevent the imminent destruction or
  collapse of public infrastructure and loss of assets. Alternatively, this project is required to
  bring the community into compliance with federal or state safety, environmental,
  accessibility, or other regulations and legal requirements.
- 2. Maintain Service Completing this project is necessary to ensure level service for the planned fiscal year. This priority type may include projects that replace old or worn-out equipment, dramatically rehabilitate aging facilities, or facilitate a department's ability to meet increased service demands.
- 3. Enhancement Completing this project will provide a benefit to the community over and above the existing service level, or it will result in cost savings or other efficiencies.

#### D. <u>Multiyear Capital Improvement Plan</u>

By February, the Town Administrator will annually update and propose to the Select Board and Finance Committee a five-year CIP while taking the following into consideration:.

- Relationship of project submittal to financial and governing policies, plans, and studies
- Input from major stakeholders and the general public
- Operating budget impacts resulting from capital projects
- Analytical evaluations of potential projects (e.g., net present value, payback period, costbenefit analysis, lifecycle costing, cash flow modeling)

Incorporated in the CIP shall be the proposed capital budget for the forthcoming fiscal year, a fouryear projections of capital needs and expenditures, and a long-term capital outlook for up to an additional 15-year period. It shall detail the projects' estimated costs, descriptions, and anticipated funding sources.

#### E. Capital Financing

Annually, the Town will strive to maintain 2-4% of the general fund revenue on capital investment with overall capital spending within 4-7% of the total revenue. Appropriate sources for cash capital funding include the tax levy, free cash, general stabilization fund, capital stabilization fund, overlay surplus, Community Preservation Fund, as well as certain receipts reserved funds and grants. This cash capital funding target is a complement to the debt service maintenance goal defined in the <u>Debt</u> <u>Management</u> policy.

- Short-term debt may be used to fully finance purchases with useful lifespans under 10 years.
- In accordance with the Debt Management policy, the Town will restrict long-term debt funding to projects with lifespans greater than 10 years and costs exceeding \$100,000.

- Before any long-term, bonded capital project is recommended, the project's annual operating costs and debt service costs shall be identified.
- Special revenue sources (e.g., grants, revolving funds) shall be evaluated as funding options whenever practical.
- The Finance Director will proactively work with the CPA Committee on strategies to finance projects that may be eligible for funding under the CPA statute.
- Infrastructure or facility maintenance budgets built into the general operating budget will not be reduced to fund other departmental budgets.
- Funding for any major capital project with a cost exceeding 10% of total revenues shall be proposed as a capital or debt exclusion.

Other capital financing considerations include:

- Scope and timing of projects
- Estimates of all major components required to implement a project, such as land acquisition, design, construction, contingency, and post-construction costs
- Identification of the most appropriate approaches, including outside assistance, when estimating project costs and potential revenues
- Adjustments of cost projections based on anticipated inflation
- Recognition of a project's nonfinancial (e.g., environmental) impacts on the community

Fiscal Year	FY2021	FY2022	FY2023	FY2024	FY2025
Current Year General Fund Revenue	37,638,288	37,957,358	39,771,976	41,667,196	43,988,395
GF Cash Capital Expenditure (Free Cash)	993,000	422,168	1,252,000	830,651	991,500
General Fund Capital Debt Service	845,257	722,861	1,115,809	914,926	1,365,748
Percentage Capital to GF Revenue	4.9%	3.0%	6.0%	4.2%	5.4%
Current Year Total Revenue	38,737,611	39,131,579	41,326,889	44,524,581	45,602,460
Total Capital Expenditure	2,052,116	1,355,882	2,640,448	2,009,003	2,610,471
Percentage Capital to Total Revenue	5.3%	3.5%	6.4%	4.5%	5.7%

Debt data sources: FY2021 – FY2024 Statement of Indebtedness and line items in the FY2025 Annual Budget, exclusive of debt service for land acquisitions.

#### F. <u>Betterment Assessment</u>

Betterments may be assessed to property owner(s) for water and sewer enhancements where real property within a limited and determinable area receives a special benefit or advantage. For any public improvement being proposed for betterment funding, the Town Administrator, Select Board, and board or commission responsible for the project (referred to as the "Assessing Board") will seek acceptance and authorization of the betterment or special assessment at the annual town meeting.

The Assessing Board shall issue the order and for those property owners opting to pay the betterment assessment in installments, establish a lien on the applicable property by recording at the Southern Essex District Registry of Deeds. The list of assessments will be certified to the Board of Assessors, who will then commit the assessments to the Treasurer/Collector for inclusion in the property tax bills. Apportioned amounts are committed with interest at a rate of 5% on the unpaid balance calculated from October 1 to October 1. Any installment payment remaining unpaid after the tax bill

due date will accrue additional interest at 14%. Property owner may seek an abatement of the assessment from the Assessing Board.

If the town borrows to pay for the improvement for which a betterment is imposed, revenue from the betterments shall be reserved for appropriation to pay a portion of the project's annual debt service.

#### **BOXFORD REFERENCES**

**Bylaw:** Part I, Chapter 19, Town Administrator, <u>Article XII, §19-26</u>, Chapter 11 Budget responsibilities of Director, <u>Article IV, §11-16</u>

**Policies:** Annual Budget Process, Debt Management, Financial Reserves, Forecasting, Special Purpose Appropriations

#### **EXTERNAL REFERENCES**

M.G.L. c. 41, § 106B	<u>M.G.L. c. 80</u>
<u>M.G.L. c. 44, § 53J</u>	<u>M.G.L c.83</u>

Division of Local Services (DLS) Best Practice: Presenting and Funding Major Capital Projects

DLS Guidance: <u>Capital Improvement Planning Manual</u> and <u>Capital Improvement Planning Guide</u>, and <u>Betterments & Special Assessments – Assessment and Collection Procedures</u>

DLS Information Guideline Release 2021-1: <u>Betterments and Special Assessment, Assessment, and</u> <u>Collection Procedures</u>

Government Finance Officers Association Best Practice: <u>Strategies for Establishing Capital Asset</u> <u>Renewal and Replacement Reserve Policies</u>

	DEBT MANAGEMENT
Applies to:	<ul> <li>Town Administrator, Select Board, Finance Committee, and Finance Director in their budget assessment and decision making</li> </ul>
	<ul> <li>Treasurer/Collector's debt-management responsibilities</li> </ul>
Scope:	All short- and long-term debt obligations as permitted to be issued under state law, including general obligation bonds, revenue bonds, bond anticipation notes (BANs), revenue anticipation notes (RANs), grant anticipation notes (GANs), and lease/purchase agreements
Effective:	Adopted by the Select Board on [Date]

To provide for the appropriate issuance and responsible use of debt, this policy defines the parameters and provisions governing debt management. Policy adherence will help the Town to responsibly address capital needs, provide flexibility in current and future operating budgets, control borrowing costs, and sustain capital investment capacity. It can also help the Town to maintain or enhance a favorable bond rating so as to achieve long-term interest savings.

#### POLICY

Under the requirements of federal and state laws, the Town may periodically issue debt obligations to finance the construction, reconstruction, or acquisition of infrastructure and other assets or to meet short-term cash flow needs. The Town may also refinance existing debt. For any given, highly expensive capital project, a debt issuance may present the most appropriate financing strategy. Not only does it provide funds not otherwise available upfront, but the amortizing of the debt over multiple years equitably distributes the project's cost among the taxpayers, who may settle in or move out of Town over time.

The Town will issue and manage debt obligations so as to obtain the best long-term financial advantage and will limit the amount of debt to minimize the impact on taxpayers. The Town will not issue debt obligations to construct, reconstruct, or purchase capital assets that can be acquired with current revenues.

The Town may issue short-term debt (by BAN, RAN or GAN) when needed to fund immediate cash requirements, as bridge financing in advance of receiving the anticipated funding. Short-term debt also makes sense when it allows the Town to take advantage of a lower interest rate, when savings are to be had from aggregating issuances, or when market conditions are such that postponing the issuance of long-term debt for the greater portion of a project's cost may be a prudent option.

### Long-term debt criteria Nonrecurring purposes with cost of \$100,000+ and useful life 10+ years Debt service targets • Total debt service: 5-8% of the total revenue, exclusive of debt exclusions for Masconomet Regional School District • Within levy: 2-4% of general fund revenue • Appropriation to either budget for debt service or to capital reserve

#### POLICY SUMMARY

Debt structure	<ul> <li>Retire at least 50% of the principal within 10 years</li> </ul>
	• Limit bond maturities to 10 years, except for major buildings, land, and
	other purposes detailed in the DLS guidelines for useful life borrowing limits
	<ul> <li>Long term debt payback will not exceed the expected useful life of the</li> </ul>
	project or equipment

#### A. <u>Debt Financing</u>

In financing with debt, the Town will:

- 1. Issue long-term debt only for purposes that are authorized by state law and qualify for taxexempt bonds and only when the financing sources have been clearly identified.
- 2. Use available funds to the greatest extent possible to reduce the amount of borrowing on all debt-financed projects.
- 3. Confine long-term borrowing to capital projects that cost at least \$100,000 and have at least 10 years of useful life or whose useful lifespans will be prolonged by at least 10 years.
- 4. Refrain from using debt to fund any recurring purpose, such as current operating and maintenance expenditures.
- 5. Consider using revenue bonds, betterments, or other types of self-supporting bonds instead of issuing general obligation bonds whenever possible.
- 6. Retire any debt obtained through a BAN no later than six months after the date that its associated capital project is completed. If there is a financial advantage to deferring the issuance of permanent debt, the Town will make annual reductions to the outstanding principal as if the permanent debt had been issued. This will prevent the Town from carrying any BAN beyond the period in which it is necessary, reduce the interest rate risk the Town will face, and help ensure the timely close out of capital projects.

#### B. Debt Limits

The Town will adhere to these debt parameters:

- 1. Total debt service, including debt exclusions and any self-supporting debt, shall be limited to 10 percent of total revenues, with a target balance of 5-8%.
- 2. To help assure consistent capital investment and debt-funding capacity, annual within-levy debt service (net of debt exclusions and any self-supporting debt) shall be maintained at 2-4% of general fund revenue. Pursuant to this goal, the Town will seek to replace maturing, non-excluded debt obligations with new issuances. If the Town does not replace the rolled-off debt service with a new issuance(s), the amount of the service on the matured debt should be appropriated to the capital stabilization fund annually until a new issuance with an equivalent amount of debt service occurs.

3. As dictated by M.G.L. c. 44, § 10, the Town's debt limit shall be 5% of its most recent equalized valuation<sup>3</sup>.

Fiscal Year	FY2021	FY2022	FY2023	FY2024	FY2025
Current Year General Fund Revenue	37,638,288	37,957,358	39,771,976	41,667,196	43,988,395
Annual Within Levy Debt Service Range:					
2%	752,766	759,147	795,440	833,344	879,768
4%	1,505,532	1,518,294	1,590,879	1,666,688	1,759,536
GF Within Levy Debt Service Budget	92,615	289,465	630,026	623,372	894,374
Percentage within Levy to GF Revenue	0.2%	0.8%	1.6%	1.5%	2.0%
Total Revenue	38,737,611	39,131,579	41,326,889	44,524,581	45,602,460
Excluded Debt Service	759,844	586,237	710,092	555,867	573,421
Total Budgeted Debt Service	1,353,218	1,356,841	1,879,833	1,559,165	1,833,393
Percentage Total Debt Service to Total Revenue	3.5%	3.5%	4.5%	3.5%	4.0%

#### C. Structure and Term of Debt

The following shall be the Town's guidelines on debt terms and structure:

- 1. The Town will attempt to maintain a long-term debt schedule such that at least 50 percent (50%) of outstanding principal will be paid within 10 years.
- 2. The term of any debt shall not exceed the expected useful life of the capital asset being financed and in no case shall it exceed the maximum allowed by law.
- 3. The Town will limit bond maturities to no more than 10 years, except for major buildings, land acquisitions, and other purposes in accordance with the useful life borrowing limit guidelines published by the Division of Local Services (DLS).
- 4. Any vote to authorize borrowing will include authorization to reduce the amount of the borrowing by the amount of the net premium (bonds) and accrued interest (notes).
- 5. For new long-term debt, the Town will pursue net direct debt service schedules with annual principal and interest payments (net of any reimbursements or dedicated revenue sources) that are sustainable using recurring revenues.
- 6. The Treasurer/Collector will work closely with the Town's financial advisor to follow federal regulations and set time frames for spending borrowed funds to avoid committing arbitrage, paying rebates, fines, and penalties to the federal government, and jeopardizing any debt issuance's tax-exempt status.
- 7. The Town will comply with the following required spending of borrowed funds time frames to avoid having to pay a rebate to the federal government on investment income earned on the funds.

<sup>&</sup>lt;sup>3</sup> Under the General Laws, this debt limit may be exceeded for: (1) projects to construct, reconstruct, equip, or furnish a school facility if the Town voted to exclude the debt from the limits of Proposition 2½ and will <u>not</u> receive any financial assistance from the Massachusetts School Building Authority or (2) issuances that meet criteria laid out in the 24 exceptions listed under M.G.L. c. 44, § 8.

	Construction Debt	Capital Debt for Non-Construction Projects	All Other Municipal Debt
First six months	10%	15%	100%
First year	45%	60%	
18 months	75%	100%	
Two years	100%		

#### D. Bond Refunding

To achieve potential debt service savings on long-term, tax-exempt debt through bond refunding, the Town will:

- 1. Issue debt with optional call dates no later than 10 years from issue.
- 2. Analyze potential refunding opportunities on outstanding debt as interest rates change.
- 3. Use any net premium and accrued interest to reduce the amount of the refunding.
- 4. Work with the Town's financial advisor to determine the optimal time and structure for bond refunding.

#### E. Disposition of Surplus Bond Proceeds

Whenever a completed or discontinued project has a surplus balance from bond proceeds, the Treasurer/Collector will make a report of the information to the Town Administrator and Select Board with a recommendation(s) on how the money should be repurposed based on the following options allowed under <u>M.G.L. c. 44, § 20:</u>

- For a completed project with a balance less than \$50,000, the Select Board will vote to apply it to any existing debt service obligation.
- For a completed project with a balance of \$50,000 or greater, town meeting will be presented with an article to appropriate the balance for another purpose.
- For a project that was discontinued regardless of the surplus amount, town meeting will be presented with an article to abandon the project, by a two-thirds vote, and to appropriate the balance for a new purpose.

In the latter two circumstances above, the expenditure being offset by the surplus must have a purpose for which the Town may authorize a loan for an equal or longer period of time than that for which the original loan was issued.

#### F. Protection of Bond Rating

To obtain and maintain a favorable bond rating, the Town will:

1. Maintain good communications with bond rating agencies, bond counsel, banks, financial advisors, and others involved in debt issuance and management.

2. Follow a policy of full disclosure on every financial report and bond prospectus, including data on total outstanding debt per capita, as a percentage of per capita personal income, and as a percentage of total assessed property value.

#### G. <u>Reporting</u>

- 1. The Treasurer/Collector will report to the Town Administrator and Select Board on the Town's debt status annually.
- 2. The Town Accountant will include an indebtedness summary as part of a report on receipts and expenditures in the Annual Town Report.
- 3. The Treasurer/Collector, with the Town's financial advisor, will file the annual audit and official disclosure statement within 270 days of the end of the fiscal year.

#### **BOXFORD REFERENCES**

Policies: Annual Budget Process, Capital Planning, Forecasting

#### **EXTERNAL REFERENCES**

M.G.L. c. 41, § 59	M.G.L. c. 44, § 8	M.G.L. c. 44, § 21C
M.G.L. c. 41, § 61	M.G.L. c. 44, § 17	M.G.L. c. 44, § 53J
M.G.L. c. 44, § 6	M.G.L. c. 44, § 19	26 USC § 148
		20 030 9 148
<u>M.G.L. c. 44, § 6A</u>	<u>M.G.L. c. 44, § 20</u>	
<u>M.G.L. c. 44, § 7</u>	<u>M.G.L. c. 44, § 21A</u>	

Division of Local Services (DLS) Best Practice: <u>Understanding Municipal Debt</u>

DLS Borrowing Guidelines: Asset Useful Life Schedules and Maximum Borrowing Terms

DLS Informational Guideline Releases 2022-01: <u>Premiums and Surplus Proceeds for Proposition 2½</u> <u>Excluded Debt</u> and 2022-02: <u>Borrowing</u>

Government Finance Officers Association Best Practice: Refunding Municipal Bonds

Internal Revenue Service Guidance: Arbitrage Guidance for Tax-Exempt Bonds

FINANCIAL RESERVES				
Applies to:	<ul> <li>Town Administrator, Finance Director, Select Board, Finance Committee, Boxford Elementary School Committee budget decision-making roles</li> <li>Town Accountant and Board of Assessors job duties</li> </ul>			
Scope:	Goals for and appropriate use of general fund reserves, including free cash, stabilization funds, and overlay surplus			
Effective:	Adopted by the Select Board on [Date]			

To help assure the Town's ability to stabilize finances during difficult economic periods so that operations can be maintained and to provide a cash funding source for capital plan items not suitable for bonding, this policy establishes prudent practices for appropriating to and expending reserve funds. With well-planned sustainability, the Town can use its reserves to finance emergencies and other unforeseen needs, to hold money for future purposes, or in limited instances, to serve as revenue sources for the annual budget. Reserve balances and policies can also positively impact the Town's credit rating and consequently its long-term borrowing costs.

#### POLICY

The Town is committed to building and maintaining its reserves so as to have budgetary flexibility for unexpected events and significant disruptions in revenue-expenditure patterns and to provide a source of available funds for future capital expenditures. Adherence to this policy will help the Town withstand periods of decreased revenues and control spending during periods of increased revenues. In total for the general fund reserves under this policy, the Town will strive to maintain a minimum funding level of 10-15% of its prior year general fund budget.<sup>4</sup>

#### **POLICY SUMMARY**

General Fund Reserve Name	Funding Target	Appropriate Usage
Free cash	5-7% Prior year general fund (GF) budget	<ul> <li>One-time costs only, including cash capital</li> <li>Build stabilization funds to achieve target levels</li> <li>Pay down the OPEB liability</li> </ul>
General Stabilization Fund	4-6% Current year GF budget	<ul><li>Emergencies and unexpected events</li><li>Nonrecurring expenditures</li></ul>
Capital Stabilization Fund	1-2% Current year GF budget	<ul><li>Cash capital expenditures</li><li>Funding source for debt service</li></ul>
Special Education Reserve Fund		<ul> <li>Fund unanticipated/unbudgeted special education costs, out of district tuition, transportation, and recovery high school programs</li> </ul>

<sup>&</sup>lt;sup>4</sup> General fund budget is defined as the fiscal year gross revenues less Community Preservation Fund revenues

Overlay	Based on annual analysis of levy shortfall risk and	<ul> <li>Any legal purpose</li> </ul>
	the cumulative balance	
	from prior years	

#### A. Free Cash

The Division of Local Services (DLS) defines free cash as "the remaining, unrestricted funds from operations of the previous fiscal year, including unexpended free cash from the prior year." DLS must certify free cash before the Town can appropriate it.

The Town will strive to realize year-to-year free cash certifications equal to 5 to 7% of the prior year's annual general fund budget. To achieve this, the Town Administrator with assistance from the Finance Director will propose budgets with conservative revenue projections, and department heads will carefully manage their appropriations to produce excess income and budget turn backs.

The Town will limit its use of free cash to building reserves, funding nonrecurring costs (i.e., one-time expenditures, such as capital projects, snow and ice deficits, and emergencies), and offsetting the Town's unfunded liabilities. Unless compelled by urgent circumstances, the Town will leave at least 25% of the certified free cash amount unappropriated to provide a starting balance for next year's free cash certification. The Town will appropriate the remaining free cash as follows:

- Apply at least 20% but no more than 30% to the cash capital budget.
- Use the lesser of 10% or \$250,000 for noncapital special articles (e.g., snow and ice deficit, building maintenance, etc.).
- Appropriate at least 15% to the capital stabilization fund and 20% to the Town's general stabilization to achieve this policy's target balances, with the total appropriations to the two stabilization funds capped at 10% of the previous year's tax levy.
- Appropriate up to 10% to the Town's other postemployment benefits (OPEB) trust fund as defined the <u>OPEB Liability</u> policy.

Fiscal Year	FY2021	FY2022	FY2023	FY2024	FY2025
Prior Year General Fund Budget	37,041,485	37,638,288	37,957,358	39,771,976	41,667,196
Free Cash Target Range:					
5%	1,852,074	1,881,914	1,897,868	1,988,599	2,083,360
7%	2,592,904	2,634,680	2,657,015	2,784,038	2,916,704
Certified Free Cash	2,654,126	3,699,386	3,451,805	3,758,382	3,959,180
Percentage to GF Budget	7.2%	9.8%	9.1%	9.4%	9.5%

#### B. Stabilization Funds

A stabilization fund is a reserve account allowed by state law to set aside monies to be available for future spending purposes, including emergencies or capital expenditures, although it may be appropriated for any lawful purpose. The Town has established three stabilization funds as detailed below.

**General Stabilization**: The Town will endeavor to achieve and maintain a minimum balance of 4-6% of current year budget in its general stabilization fund. Withdrawals from the fund should only be used to mitigate emergencies or other unanticipated events that cannot be supported by current general fund appropriations. When possible, withdrawals of funds should be limited to the amount available above the 4% minimum target. If any necessary withdrawal drives the balance below this minimum, the Town Administrator and Finance Director will develop a detailed plan to replenish the fund to the minimum level within the next two fiscal years.

Fiscal Year	FY2021	FY2022	FY2023	FY2024	
Current Year General Fund Budget	37,638,288	37,957,358	39,771,976	41,667,196	
General Stabilization Fund Target Range:	General Stabilization Fund Target Range:				
4%	1,505,532	1,518,294	1,590,879	1,666,688	
6%	2,258,297	2,277,441	2,386,319	2,500,032	
General Stabilization Fund Balance	930,029	906,653	943,727	995,826	
Percentage to GF Budget	2.5%	2.4%	2.4%	2.4%	

**Capital Stabilization**: By sustaining funding in this reserve, the Town can balance debt with pay-asyou-go practices and protect against unforeseen capital costs.<sup>5</sup> The fund's target level shall be 1 to 2% of the prior year general fund budget. Sources of income for this fund include appropriations or transfers from any general fund source, including taxation and free cash and transfers of unexpended funds from previously approved capital projects ('capital close outs') at the close of each project. By sustaining funding in this reserve, the Town can balance debt with pay-as-you-go and cash capital funding costs consistent with the <u>Capital Planning</u> policy.

Fiscal Year	FY2021	FY2022	FY2023	FY2024
Current Year General Fund Budget	37,638,288	37,957,358	39,771,976	41,667,196
Capital Stabilization Fund Target Range:				
1%	376,383	379,574	397,720	416,672
2%	752,766	759,147	795,440	833,344

**Special Education Reserve Fund**<sup>6</sup> The purpose of this fund is to support unanticipated or unbudgeted special-education-related costs, including out-of-district tuition or transportation costs, for Boxford Elementary School District pupils. Sources to fund this account include appropriation from the tax levy, transfer from the school operating budget, and transfer from other available accounts such as free cash. Per <u>M.G.L. c. 40, § 13E</u>, the fund's balance cannot exceed 2% of the district's annual net school spending amount as reported in the Annual End of Year Report. Funds can only be expended or transferred out with a majority vote of the School Committee and Select Board.

Fiscal Year	FY2021	FY2022	FY2023	FY2024
Budgeted Net School Spending	13,278,262	13,508,881	14,056,908	14,725,040
Special Education Reserve Fund	166,633	162,445	169,088	178,422
Percentage to Budgeted NSS	1.3%	1.2%	1.2%	1.2%

<sup>&</sup>lt;sup>5</sup> Boxford has not established this fund but should consider doing so to provide a prudent planning tool for financing the capital improvement program.

<sup>&</sup>lt;sup>6</sup> Town meeting voted to approve the creation of this fund on May 9, 2017, with an initial transfer of \$145,000 from the Elementary School budget appropriation.

#### C. Overlay Surplus

The purpose of the overlay reserve is to offset unrealized tax revenue resulting from abatements and exemptions. It can be used for other purposes only after it is determined to have a surplus. Therefore, unlike the other previous two categories of reserves, this policy does not set a funding target for it. Rather, each year as part of the budget process, the Board of Assessors will vote to raise an overlay amount on the annual tax recapitulation sheet based on the analytical factors outlined in the <u>Annual Budget Process</u> policy.

At the conclusion of each fiscal year, the Board of Assessors will submit to the Town Administrator and Finance Director an update of the overlay reserve with data that includes, but is not limited to, the gross balance, potential abatement liabilities, potential costs of current and future ATB cases, and any transfers to surplus. If the overlay balance exceeds the amount of potential liabilities, the Select Board may request that the Board of Assessors vote to declare it as surplus and available for use in the Town's capital improvement plan or for any other one-time expense.

#### **BOXFORD REFERENCES**

**Policies:** Annual Budget Process, Capital Planning, Debt Management, Forecasting, OPEB Liability, Overlay, Year-End Closing

#### **EXTERNAL REFERENCES**

<u>M.G.L. c. 40 § 5B</u>

<u>M.G.L. c. 40 § 13E</u>

<u>M.G.L. c. 59 § 25</u>

DLS Informational Guideline Releases 2024-12: <u>Stabilization Funds</u> and 2017-23: <u>Overlay and Overlay</u> <u>Surplus</u>

DLS Best Practice: Free Cash

Government Finance Officers Association (GFOA) Best Practices: <u>Strategies for Establishing Capital</u> <u>Asset Renewal and Replacement Reserve Policies</u>

	FORECASTING
Applies to:	<ul> <li>Town Administrator, Finance Director, and Director of Assessment job duties</li> </ul>
	<ul> <li>Select Board, Finance Committee, and Boxford Elementary School Committee in their</li> </ul>
	budget analysis and decision-making responsibilities
Scope:	<ul> <li>Creation, revision, and year-to-year conversion of a multiyear forecast of revenues and expenditures as part of the annual budget process</li> <li>Guidelines for formulating the assumptions that form the basis for forecast projections</li> </ul>
Effective:	Adopted by the Select Board on [Date]

To assess the range of choices available to budget decision makers when determining how to allocate resources, this policy establishes guidelines for creating projections of revenues and expenditures as part of the annual budget process and multiyear fiscal planning. By presenting the future implications of current budget scenarios, forecasting helps local officials to make strategic plans for lasting fiscal sustainability and future investment.

#### POLICY

To determine the Town's operating capacity for future fiscal years, the Finance Director under the Town Administrator's direction, will annually create a detailed forecast with five-year projections of revenues and expenditures. The Town Administrator, Select Board, Finance Committee, and Boxford Elementary School Committee will use the forecast to support their decision making for the upcoming year's operating and capital budgets and for the Town's multiyear capital improvement program.

To guard against potential deficits, as a general rule, the Finance Director will create conservative forecasts. In basic terms, this entails reviewing historical revenue and expenditure trends, anticipating factors that may impact those trends going forward, analytically developing assumptions, and then formulating reasonable revenue and realistic expenditure projections. Overly optimistic estimates can increase the risk of a revenue deficit, which would necessitate a reduction to the subsequent year's revenue to offset it. Conversely, underestimated projections may result in excess revenue that is unavailable to benefit the public in the same year as accrued and can be perceived as over taxation.

Early in the annual budget process, the Town Administrator will present the initial forecast to a joint meeting of the Select Board, Finance Committee, and Boxford Elementary School Committee. Throughout the budget development, the Finance Director will update the forecast whenever there are changes in circumstances that would materially impact forecast projections and provide revised forecast to the Town Administrator, who will subsequently share them with the Select Board and Finance Committee.

With each new budget year, the Finance Director and Town Administrator will review the performance accuracy of prior-year forecasts and any evolving factors related to the underlying assumptions to consider how projections in the new forecast may need to be adjusted. Factors to consider include changes in laws, regulations, inflation rate, interest rate, Town goals, and policy decisions.

#### A. <u>Guidelines for Revenue Assumptions</u>

The following principles shall guide the formulation of revenue assumptions:

- Projections of the property tax levy will be confined by the limits of Proposition 2½ (absent any overrides) and take into consideration consensus decisions regarding the Town's level of excess levy capacity.
- New growth projections will consider the Town's three-, five- and 10-year averages by property class and advice from the Director of Assessment.
- The levy limit's relationship to the levy ceiling (2.5 percent of the Town's real and personal property total value) will be annually assessed to identify potential override capacity and guard against the levy limit approaching or hitting the ceiling, which would impact future levy growth.
- Local aid projections will correspond with economic cycles, while Chapter 70 educational aid will reflect trends in school choice, enrollments, tuition, and charter assessments.
- Estimates for local receipts (e.g., motor vehicle excise, inspection fees, etc.) will not exceed 90% of the prior year's actual collections without firm evidence that higher revenues are achievable.
- No one-time revenues will be applied in the projections to support recurring operating expenditures. This means that projections of funds available to support operating budget expenditures in future years will be constrained to those revenues anticipated to be brought in within the given years, as opposed to any usage of residual funds available from the prior year(s), such as free cash or overlay.
- Revenues from grant programs will be reviewed annually to determine their sustainability.
- The Town will build and maintain reserves in compliance with its <u>Financial Reserves</u> policy.

#### B. <u>Guidelines for Expenditure Assumptions</u>

Annually, the Town Administrator and Finance Director will determine a particular approach for forecasting expenditures, either maintenance (level service), level funded, or one that adjusts expenditures by specified increase or decrease percentages (either across the board or by department). A maintenance budget projects the costs needed to maintain the current staffing level and mix of services into the future. A level-funded budget appropriates the same amount of money to each municipal department as in the prior year and is tantamount to a budget cut because inflation in mandated costs and other fixed expenses still must be covered.

The following principles shall guide the formulation of expenditure assumptions:

- The Town's current level of services will provide the baseline for projections.
- Historical trends in the growth of operating expenses and employee benefits will prevail.
- The Town will cultivate a strong relationship with the Masconomet Regional School District's School Committee to receive timely, long-term estimates of district assessments (Grades 7 – 12).
- The Town will annually meet or exceed the state's net school spending requirements (Grades PK 6).

- Trends in enrollment, including vocational and technical schools, and school choice, tuition, and charter assessments will be factored.
- Only currently known increases in employee compensation plans will be factored into the projections, leaving any potential, future cost-of-living adjustments to be calculated independently of the forecast.
- The Town will pay its annual pension contributions and make appropriations to amortize its other postemployment benefits (OPEB) liability.
- The forecast will integrate projected capital expenditure data contained in the Town's multiyear capital improvement program.
- The Town will pay all existing debt service obligations and adhere to its <u>Capital Planning</u> and <u>Debt Management</u> policies.

#### BOXFORD REFERENCES

**Bylaw:** Part I, Chapter 19, Town Administrator, <u>Article XII, §19-26</u>, Chapter 11 Budget responsibilities of Director, <u>Article IV, §11-16</u>

**Policies:** Annual Budget Process, Capital Planning, Debt Management, Financial Reserves, Grants Management, OPEB Liability

#### EXTERNAL REFERENCES

M.G.L. c. 44, § 20	<u>M.G.L. c. 44, § 53A½</u>	<u>M.G.L. c. 44, § 63A</u>
<u>M.G.L. c. 44, § 53A</u>	<u>M.G.L. c. 44, § 63</u>	

DLS Best Practice: Revenue and Expenditure Forecasting

Government Finance Officers Association article: <u>Financial Forecasting in the Budget Preparation</u> <u>Process</u>

Investments				
Applies to:	<ul> <li>Treasurer/Collector's statutory duty to invest Town funds</li> </ul>			
	<ul> <li>Any investment advisor(s) with whom the Town contracts</li> </ul>			
Scope:	<ul> <li>Goals, objectives, and allowable practices related to all of the Town's short-term operating funds and its long-term reserve, investment, and trust funds</li> <li>Excluded are Town funds invested by the Essex Regional Retirement Board</li> </ul>			
Effective:	Adopted by the Select Board on [Date]			

To ensure the Town's public funds achieve the highest possible rates of return that are reasonably available while following prudent standards associated with safety, liquidity and yield, this policy establishes investment guidelines and responsibilities. In addition, the policy has been designed to comply with the Governmental Accounting Standards Board's requirement that every community define and disclose its investment risk management strategy.

#### POLICY

The Treasurer/Collector will invest funds in a manner that meets the Town's daily operating cash flow requirements and conforms to state statutes governing public funds while also adhering to prudent investment standards. The Treasurer/Collector will manage all investments so as to achieve a fair market average rate of return within the context of all relevant statutory, safety, and liquidity constraints.

#### A. Investment Objectives

In priority order, the Treasurer/Collector's investment objectives shall be:

- **Safety:** Safety of principal is foremost, and the Treasurer/Collector will adhere to this policy's risk mitigation strategies for the purpose of preserving capital in the overall portfolio.
- Liquidity: The investment portfolio must remain sufficiently liquid to enable it to meet all reasonably anticipated operating requirements.
- **Yield:** The investment portfolio will be designed with the objective of attaining a fair market average rate of return throughout budgetary and economic cycles, in accordance with the Town's investment risk constraints and the portfolio's cash flow characteristics.

The Treasurer/Collector will ensure that all **short-term operating funds**, such as general funds, special revenue funds, bond proceeds, and capital project funds remain sufficiently liquid to pay all reasonably anticipated operating requirements and debt service.

For **trusts and other long-term funds** (e.g., stabilization funds, cemetery perpetual care, and any similar funds set aside for long-term use), liquidity is less important than growth. The Treasurer/Collector will pool any individual funds that are invested in the same institution while also maintaining each fund in its own account to allow for the proper proportioning of interest and any

realized and unrealized gains or losses. All trust funds are under the Treasurer/Collector's control unless otherwise directed by their particular donor(s).

#### B. Standards of Care

If the Town accepts <u>M.G.L. c. 44, § 54</u> subsection (b)(1), the Treasurer/Collector is authorized to pool and invest trust funds (and only trust funds) in accordance with the standards of care outlined in the Prudent Investor Act (<u>M.G.L. c. 203C</u>). If the (b)(1) subsection is not locally accepted, all investments by the Treasurer/Collector must comply with the more restrictive provisions found in <u>M.G.L. c. 44, § 54</u>, <u>55</u>, <u>55A</u> and <u>55B</u> and outlined in the table in Section D below.

The Treasurer/Collector shall be relieved of personal responsibility for any individual security's credit risk or market price changes, provided that its purchase and sale agreement had been executed in accordance with the applicable statutes and the provisions of this policy

#### C. Conflict of Interest

The Treasurer/Collector is prohibited from making a deposit in any bank, trust company, or banking company for which he or she is or has been an officer or employee at any time in the last three years. The Treasurer/Collector will refrain from any personal activity that may conflict with the proper execution of the investment program or that could impair or appear to impair the ability to make impartial investment decisions. The Treasurer/Collector will disclose to the Town Administrator any large personal financial investment positions or loans that could be related to the performance of the Town's investments. Further, when contracting for any investment services, the Treasurer/Collector will adhere to requirements under M.G.L. c. 30B and the Town's Procurement Conflict of Interest policy.

#### D. Investment Instruments

Unless the Town has accepted M.G.L. c. 44, § 54's subsection (b)(1) for the investment of trust funds, all short- and long-term investments by the Treasurer/Collector must adhere to the guidelines and allowable investment instruments outlined below.

Instrument Type	Short-Term Funds	Long-Term Funds
Depository accounts in Massachusetts state-chartered banks, including savings, checking and NOW accounts, and money market deposit accounts	No limitations	No limitations
Certificates of deposit (CDs) in Massachusetts state-chartered banks only	Unlimited amounts and maturity up to three years	No limits on amounts or maturity dates

Instrument Type	Short-Term Funds	Long-Term Funds
The <u>Massachusetts Municipal</u> <u>Depository Trust</u> (MMDT), the State Treasurer's investment pool for public entities	No limitations and the pool is liquid	No limitations
U.S. Treasury or other U.S. government agency obligations	Unlimited amounts and up to one year from date of maturity	No limitations
Bank-issued repurchase agreements ("repos") secured by U.S. Treasury or other U.S. government agency	Maximum maturity of 90 days	Repos are by their nature short- term and therefore not appropriate for the growth objective of long-term funds.
Money market mutual funds	<ul> <li>Must be registered with the Securities and Exchange Commission (SEC)</li> <li>Must have the highest possible rating from at least one rating organization</li> <li>These are liquid investments, so maturity term is not applicable</li> </ul>	<ul> <li>Must be registered with the SEC</li> <li>Must have the highest possible rating from at least one rating organization</li> </ul>
Common and preferred stock, investment funds, and any other type of investment instrument specified in the List of Legal Investments	Not allowed	<ul> <li>The Town's aggregate amount of long-term funds must exceed \$250,000 to invest in these.</li> <li>Investment in mortgages, collateral loans, and international obligations is prohibited.</li> <li>Cannot invest more than 1.5% of a particular fund in the stock of any single banking or insurance company</li> <li>Cannot invest more than 15% of total aggregated funds in banking or insurance company stocks</li> </ul>

**Note**: This policy confines the allowed depository accounts only to those offered by Massachusetts state-charted banks, a provision that is more restrictive than state statutes and the Massachusetts Collectors & Treasurers Association's sample investment policy statement. The reason is that the MA-chartered banks' depository accounts are fully insured through a combination of the Federal Deposit Insurance Corporation and the state's Depositors Insurance Fund. However, funds placed in these banks' mutual funds or annuity products are not covered by either insurance, and the Treasurer must manage those and any other type of investments in accordance with other applicable provisions of this policy.

# E. <u>Risk Tolerance Guidelines</u>

The Treasurer/Collector will employ the following strategies to mitigate the range of investment risks:

Type of Risk	Mitigation Strategy
<b>Credit risk</b> is the risk that an issuer or other counterparty to an investment will not fulfill its obligations.	<ul> <li>Investments in any of the following are safe from credit risk: state-chartered banks' depository accounts (including CDs), obligations backed by the U.S. Treasury or other U.S. government agency, and the MMDT.</li> <li>For any other investments, the Treasurer/Collector will only purchase investment grade securities highly concentrated in those rated A or better.</li> </ul>
<b>Concentration of credit risk</b> is the risk arising from all funds being invested in a single issuer.	The Treasurer/Collector will diversify the portfolio among multiple issuers/institutions (see Section F).
<b>Custodial risk for deposits</b> is the risk that, in the event of the failure of a depository financial institution, the Town would not be able to recover deposits or to recover collateral securities in the possession of an outside party.	The Treasurer/Collector will negate this risk by only making deposits at MA-chartered banks.
<b>Custodial risk for investments</b> is the risk that, in the event of a failure of the counterparty to a transaction, the Town would not be able to recover the value of an investment or to recover collateral securities in the possession of an outside party.	<ul> <li>The Treasurer/Collector will review the financial institution's financial statements and its advisor's background to ensure it has proven financial strength, capital adequacy, and an overall positive reputation in the municipal investment industry (see Section G).</li> <li>If a security is to be held by a third-party custodian, the Treasurer/Collector must approve that party and verify that the security is held in the Town's name and tax ID number, as evidenced by its CUSIP (Committee on Uniform Security Identification Procedures) code.</li> </ul>
<b>Interest rate risk</b> is the risk that interest rate changes will adversely affect an investment's fair market value.	The Treasurer/Collector will negotiate for competitive interest rates that are locked in for long terms.
<b>Foreign currency risk</b> is the risk that an investment will lose value as the result of an unfavorable exchange rate.	The Treasurer/Collector will negate this risk by not investing in any instruments with foreign currency exposures.

# F. Diversification

The Treasurer/Collector will invest in a diverse portfolio to prevent overconcentration in any institution, issuer, or maturity type. Apart from money placed in the <u>MMDT</u> or obligations backed by U.S. government agencies, the Treasurer/Collector will invest no more than 25 percent (25%) the Town's long-term funds with a single financial institution.

## G. <u>Selection of and Relationship with Financial Institutions</u>

When selecting from among MA-chartered banks to hold short-term funds, the Treasurer/Collector will consider their fee structure, service efficiencies, and account management control features. For investing long-term funds, the Treasurer/Collector will also assess the soundness, stability and reputation of prospective financial institutions and dealers/brokers. Brokers must be recognized, reputable dealers and members of the Financial Industry Regulatory Authority. The Treasurer/Collector will require any brokerage houses and brokers/dealers wishing to do business with the Town to provide the following:

- Audited financial statements
- Form ADV Part 2 showing the broker/dealer to be actively registered with both the SEC and Massachusetts Secretary of State's Office and providing information on the types of services offered, fee schedule, disciplinary information, conflicts of interest, and the educational and business background of management and key advisory personnel
- Statement that the broker/dealer has read and will comply with this policy

The Treasurer/Collector will also consult the <u>Veribanc</u> rating service to select and monitor financial institutions. The Treasurer/Collector may invest in institutions rated green by Veribanc and will continue to review their ratings quarterly. If a bank's rating turns yellow, the Treasurer/Collector will request the bank provide a written explanation with an expected timetable for changing back to green. If the rating remains yellow for a second quarter, the Treasurer/Collector will consider liquidating all funds that are uninsured or uncollateralized. If any rating becomes red, the Treasurer/Collector will remove the money from the banking institution.

The Treasurer/Collector will review all banking and financial services at least annually to ensure their quality and the competitiveness of their fee structure and interest rates. On an annual basis, the Treasurer/Collector will also send letters to banks in the local region requesting them to report all usage of the Town's tax identification number as a means to ensure the number is used only by the Treasurer/Collector and no outside entities.

To ensure that any investment advisor contracted by the Town complies with this policy, the Treasurer/Collector will do the following:

- Meet with the investment manager at least semiannually to monitor the performance of the investment fund and compliance with the Town's policies.
- Monitor fund performance by comparing the investment manager's results to a blended benchmark to be determined in conjunction with the investment manager.
- Rebalance the portfolios at least annually or more frequently if appropriate.

## H. <u>Reporting Requirements</u>

The Treasurer/Collector will assess investment activity and keep the Town Administrator and Select Board apprised of any major changes by providing a report of investment activity annually or more often as needed. The investment activity report shall incorporate all of the Town's investment funds and include the following information at minimum:

- List of all the individual accounts and securities held at the end of the period
- List of short-term investment portfolios by security type and maturity to ensure compliance with the diversification and maturity guidelines
- Summary of income earned on monthly and year-to-date bases
- Disclosure of the fees associated with managing each fund
- Brief statement of general market and economic conditions and other factors that may affect the Town's cash position
- Statements on the degree of compliance with the provisions of this policy

## **BOXFORD REFERENCES**

Policies: Antifraud, OPEB Liability, Procurement Conflict of Interest

#### REFERENCES

M.G.L. c. 30B	<u>M.G.L. c. 44, § 55</u>	<u>M.G.L. c. 110A, § 201</u>
<u>M.G.L. c. 29, § 38A</u>	<u>M.G.L. c. 44, § 55A</u>	<u>M.G.L. c. 167, § 15A</u>
<u>M.G.L. c. 44, § 54</u>	<u>M.G.L. c. 44, § 55B</u>	<u>M.G.L. c. 203C</u>

Massachusetts Collectors & Treasurers Association: Treasurer's Manual

MA Division of Banks List of Legal Investments and database of MA-chartered banks

Massachusetts Depositors Insurance Fund FAQs

MA Secretary of State webpage, Massachusetts Securities Division

Governmental Accounting Standards Board Statement 40: Deposit and Investment Risk Disclosures

SEC webpage Form ADV Information

OTHER POSTEMPLOYMENT BENEFITS LIABILITY			
Applies to:	<ul> <li>Select Board, Finance Committee, Town Administrator, and Finance Director budget</li> </ul>		
	decision-making duties		
	<ul> <li>Town Accountant and Treasurer/Collector job duties</li> </ul>		
Scope:	<ul> <li>Budget decisions related to the Town's OPEB liability</li> </ul>		
	<ul> <li>Liability mitigation</li> </ul>		
Effective:	Adopted by the Select Board on [Date]		

To ensure fiscal sustainability, this policy sets guidelines for a responsible plan to meet the Town's obligation to provide other postemployment benefits (OPEB) for eligible current and future retirees. It is designed to achieve generational equity among those called upon to fund this liability and thereby avoid transferring costs into the future.

## BACKGROUND

In addition to salaries, the Town compensates employees with benefits earned during years of service to be received upon retirement. One such benefit is a pension, and another is a set of retirement insurance plans for health, dental, and life, which are collectively referred to as other postemployment benefits, or OPEBs. OPEBs represent a significant liability for the Town that must be properly measured, reported, and planned for financially.

## POLICY

The Town is committed to funding the long-term cost of the benefits promised its employees, with the goal to reach a fully funded status by 2047<sup>7</sup> To do so, the Town will accumulate resources for future benefit payments in a disciplined, methodical manner during the active service life of employees. After achieving fully funded status, the Town will continue to supplement the OPEB Trust Fund after any annual OPEB payments to maintain a fully funded status as actuarially determined.

The Town will also periodically assess strategies to mitigate its OPEB liability. This involves evaluating the structure of offered benefits and their cost drivers, as well as conducting periodic audits of the Town's insurance rolls.

## A. <u>Accounting for and Reporting the OPEB Liability</u>

The Finance Director will obtain actuarial analyses of the Town's OPEB liability every two years and will annually report the Town's OPEB obligations in the financial statements that comply with the current guidelines of the Governmental Accounting Standards Board. The Town Administrator will ensure that the Town's independent audit firm reviews compliance with the accounting and reporting provisions of this policy as part of its annual audit and reports on these to the Select Board.

<sup>&</sup>lt;sup>7</sup> Funding date based on actuarial valuation as of June 30, 2022 provided by Odyssey Advisors

# B. <u>Trust Management and Investment</u>

The Town established an OPEB Trust Fund pursuant to M.G.L. c. 32B, § 20 and designated the Treasurer/Collector as its custodian and trustee. The OPEB Trust Fund is fully invested in the <u>State</u> <u>Retiree Benefits Trust Fund</u> (SRBTF)<sup>8</sup>.

To ensure the Town's investment in the SRBTF conforms with its adopted Investments policy, the Finance Director and Treasurer/Collector will do the following:

- Meet with a member of the SRBTF client service group at least semiannually to monitor the performance of the fund and its compliance with Town policy.
- Monitor the fund's performance by analyzing PRIM performance reports against the relevant industry and policy benchmarks.
- Review the OPEB policy every year to ensure it remains in compliance with governing regulations.

# C. <u>Mitigation</u>

On an ongoing basis, the Town will assess healthcare cost containment measures and evaluate strategies to mitigate its OPEB liability. The Finance Director will monitor proposed laws affecting OPEBs and Medicare and analyze their impacts. The Treasurer/Collector will regularly audit the group insurance and retiree rolls and terminate any participants found to be ineligible based on work hours, active Medicare status, or other factors.

## D. <u>OPEB Funding Strategies</u>

To address the OPEB liability, decision makers will analyze a variety of funding strategies and subsequently implement them as appropriate with the intention of fully funding the obligation. The Town will derive funding for the OPEB Trust Fund from taxation, free cash, and any other legal form.

Achieving full funding of the liability requires the Town to commit to funding its actuarially determined contribution (ADC) each year. Among strategies to consider for funding the ADC:

- Appropriate annually increasing dollar amounts or percentages of yearly revenues toward the OPEB liability.
- Determine and commit to appropriating an annual portion of free cash.
- Transfer unexpended funds from insurance line items to the OPEB Trust Fund.
- Once the pension system is fully funded, on a subsequent annual basis, appropriate to the OPEB Trust Fund the amount equivalent to the former pension-funding payment or the ADC, whichever is less.

<sup>&</sup>lt;sup>8</sup> The SRBTF invests funds earmarked for retiree health insurance costs with the Massachusetts Pension Reserves Investment Management Board (PRIM).

Fiscal Year	FY2020	FY2021	FY2022	FY2023	FY2024	FY2025
Tax Levy	30,610,700	31,025,505	31,971,752	32,980,232	35,215,352	36,815,747
Free Cash	3,632,461	2,654,126	3,699,386	3,451,805	3,758,382	3,959,180
Annual OPEB Target:						
0.75% of Levy	229,580	232,691	239,788	247,352	264,115	276,118
7.5% of Free Cash	272,435	199,059	277,454	258,885	281,879	296,939
Annual Appropriation	300,000	300,000	300,000	300,000	250,000	250,000
Year-End OPEB Balance	3,034,544	4,292,645	4,417,839	4,986,330	5,730,306	

#### **BOXFORD REFERENCES**

Policies: Financial Reserves, Investments

#### **EXTERNAL REFERENCES**

M.G.L. c. 32B, § 20	<u>M.G.L. c. 44, § 54</u>	M.G.L. c. 203C
<u>M.G.L. c. 32B, § 20A</u>	<u>M.G.L. c. 44, § 55</u>	

Division of Local Services (DLS) Information Guideline Release 2019-10 <u>Other Postemployment</u> <u>Benefits Liability Trust Fund</u>

DLS FAQS: OPEB Trust Fund FAQs

Massachusetts Pension Reserves Investment Management

Government Finance Officers Association Best Practice: <u>Ensuring Other Postemployment Benefits</u> (OPEB) Sustainability

GASB Statements 75: <u>Accounting and Financial Reporting for Postemployment Benefits Other Than</u> <u>Pensions</u> and 74: <u>Financial Reporting for Postemployment Benefit Plans Other Than Pension Plans</u>

OVERLAY		
Applies to:	<ul> <li>Board of Assessors, Director of Assessment, and Town Accountant job duties</li> <li>Town Administrator, Finance Director, and Finance Committee in budget analysis and decision-making responsibilities</li> </ul>	
Scope:	Funding and maintaining the account for abatements and exemptions (overlay)	
Effective:	Adopted by the Select Board on [Date]	

To ensure the Town can adequately offset all unrealized tax levy revenues, this policy sets guidelines for determining the annual overlay amount in the Town's budget and for deciding whether any overlay balance can be certified as surplus.

# BACKGROUND

The allowance for abatements and exemptions, commonly referred to as the overlay, is an account to offset anticipated abatements and exemptions of committed real and personal property taxes, as well as any tax receivables deemed to be uncollectable. State statute allows overlay to be maintained in a single account, so that any levy deficit for a particular year need not be subsequently raised on the tax recapitulation sheet, provided that the total overlay account balance is greater than zero.

# POLICY

The Board of Assessors is responsible for proposing an annual overlay amount for the Town budget sufficient to offset potentially unrealized revenue from that year's tax levy. The Town Administrator may propose for appropriation by the legislative body any overlay surplus subsequently determined by the Board of Assessors, for purposes consistent with the Town's <u>Financial Reserves</u> policy.

Although <u>Sections A - C</u> below refer to the overlay as a single account, to better record historical information and facilitate reconciliations, the Town Accountant will maintain overlay balances by levy year in subsidiary ledgers of the general ledger.

## A. <u>Annual Overlay</u>

Each year, the Board of Assessors will vote in an open meeting to authorize a contribution to the overlay account as part of the budget process and to raise it without appropriation on the Town's tax recapitulation sheet. The Director of Assessment will determine and propose to the Board the amount to be added to the overlay account based on the following:

- Current balance in the overlay account
- Three-year average of granted abatements and exemptions
- Potential abatement liability in cases pending before, or on appeal from, the Appellate Tax Board (ATB)
- Timing of the next certification review by the Division of Local Services (scheduled every five years)

The Board of Assessors shall notify the Town Administrator and Finance Director of the amount of overlay voted.

## B. Excess Overlay

Annually, the Director of Assessment and Town Accountant will conduct an analysis to see if there is any excess in the overlay account balance by factoring the following:

- Current balance in the overlay account after reconciling with the Town Accountant's records
- Balance of the property tax receivables, which represents the total real and personal property taxes still outstanding for all levy years
- Estimated total of potential abatements, including any cases subject to ATB hearings or other litigation

Upon determining any excess in the overlay account, the Director of Assessment will present the analysis to the Board of Assessors for its review and notify the Town Accountant.

## C. Overlay Surplus

If there is an excess balance in the overlay account, the Board of Assessors will formally vote in an open meeting to certify an amount to transfer to overlay surplus and notify the Town Administrator and Finance Director in writing of its vote. If the Select Board makes a written request for a determination of overlay surplus, the Board of Assessors will vote on the matter within the next 10 days and notify the Select Board, Town Administrator, and Finance Director of the result in writing.

After being certified, town meeting may appropriate overlay surplus for any lawful purpose until the end of the fiscal year. The appropriation should be as prescribed in the <u>Financial Reserves</u> policy. Overlay surplus not appropriated by year-end will close to the general fund's undesignated fund balance.

#### **BOXFORD REFERENCES**

Policies: Annual Budget Process, Financial Reserves, Forecasting, Tax Enforcement

#### EXTERNAL REFERENCES

<u>M.G.L. c. 59, §25</u>

Division of Local Services Informational Guideline Release 2017-23: Overlay and Overlay Surplus

SPECIAL PURPOSE APPROPRIATIONS			
Applies to:	<ul> <li>Town Administrator, Finance Director, Select Board, and Finance Committee in their budget decision making</li> <li>Town Accountant job duties</li> <li>Job duties of all department heads, boards, and committees with expenditure authority for special articles (all referred to here as department heads)</li> </ul>		
Scope:	Monitoring, reporting, continuing, and closing special purpose appropriations		
Effective:	Adopted by the Select Board on [Date]		

To maximize the Town's resources through the efficient identification of unused appropriated funds, this policy lays out protocols for continuing, reporting on, and closing special purpose appropriations.

## BACKGROUND AND DEFINITIONS

*Special purpose appropriation* – A budget appropriation having a spending purpose whose time of completion may extend beyond a single fiscal year. In most but not necessarily all cases, special purpose appropriations are for capital projects and are presented to town meeting in warrant articles separate from the town-wide budget article.

*Continued appropriation account* – A separate general ledger account created for special purpose appropriations, either by fund or segment, that allows the balance to carry over to the next fiscal year.

Because the time frame for expending a special article is open-ended, the Town must be proactive in monitoring the expenditure status of each special purpose appropriation account and promptly close it when called for so that any unexpended balance may then be made available for other purposes or potentially become available to augment the Town's free cash certification.

There are two types of special appropriation closures, based on the purchase or project status:

- 1. <u>Completed</u>: The money was spent for the approved purpose, or the project is completed. There may be a remaining account balance.
- 2. <u>Canceled</u>: A determination has been made that the spending purpose is no longer necessary, and not all of the appropriation has been spent.

## POLICY

As a general rule, the Town will administratively manage the continuation or closure of special purpose appropriations in accordance with the provisions of this policy without the need for further legislative action by town meeting. In addition to the review of special appropriation funds at yearend, this policy calls for ongoing, monthly reviews of these appropriations so that any residual or otherwise static balances may receive timely consideration as a potential funding source for a new purpose in the next town meeting or to cover any year-end deficit by line-item transfer.

A. <u>Reporting Appropriation Status Updates</u>

Each month, the Town Accountant will send updated expenditure reports to all department heads. Department heads will notify the Town Accountant if any special appropriation account's purpose under their responsibility was either accomplished or cancelled during the month.

If the completed or canceled appropriation reported by the department head has an account balance of less than \$5,000, the Town Accountant will close it in the general ledger, as described in Section C below. For an appropriation with a balance above \$5,000, the Town Accountant will take no further immediate action but will report it in a running list of all special purpose appropriation accounts with residual balances accompanying the next monthly expenditure report sent to the Town Administrator.

Department heads will also respond to the Town Accountant's year-end closing memo with a detailed status report of any special appropriation(s) that require continuing appropriation(s) for the forthcoming year. The report will include a project update indicating funding position and expected completion date.

# B. <u>Repurposing Unexpended Funds</u>

The Town Accountant will maintain a detailed spreadsheet of the completed and canceled special purpose appropriations. The Town Administrator and Finance Director will use it to provide prioritized funding sources when developing budgets for annual or special town meetings and when reviewing the status of the town-wide budget at year-end for potentially necessary line-item transfers.

When proposing a new use for the surplus funds of a special purpose appropriation, the Town Administrator, Select Board, and Finance Committee will be guided by provisions in the Town's adopted financial planning policies. However, the first priority for the Select Board and Finance Committee in their year-end transfer actions will be the prevention of budget deficits. Note also that the Community Preservation Committee has sole authority for making decisions about any proposed new uses of community preservation funds. Any new use of surplus funds that derived from a restricted reserve must conform to the restrictions of said reserve.

In the event that the Town's budget framers desire to reappropriate a surplus balance in a special purpose appropriation account to a new purpose, town meeting approval is required, with two exceptions. One is the exercise of the Select Board's and Finance Committee's combined authority to authorize year-end transfers. The other relates to surplus proceeds of bond-funded projects (see Section E of the <u>Debt Management</u> policy).

As part of the year-end closing each year, the Town Administrator along with the Finance Director will determine which account balances will not be appropriated for new purposes and will close to their originating funding sources.

# C. Accounting Guidelines for Administrative Closeouts

When closing out an account, the Town Accountant's transfers of surplus funds will comply with the following guidelines based on their funding sources:

- Tax levy or free cash: Transfer to general fund undesignated fund balance.
- Restricted reserve (e.g., stabilization, community preservation funds, etc.): Transfer back to the reserve of origin.
- Bond-funded projects: See Section E of the <u>Debt Management</u> policy.

## **BOXFORD REFERENCES**

**Policies:** Annual Budget Process, Capital Planning, Debt Management, Forecasting, Reconciliation, Year-End Closing

## **EXTERNAL REFERENCES**

<u>M.G.L. c. 44, § 33B</u>

Division of Local Services Informational Guideline Release 2017-13: <u>Appropriation Transfers</u>

# FINANCIAL OPERATION POLICIES

ANTIFRAUD			
Applies to:	<ul> <li>All elected and appointed Town officials and employees</li> </ul>		
	<ul> <li>All other persons acting on behalf of the Town, such as vendors, contractors, volunteers, casual employees, and grant subrecipients</li> </ul>		
Scope:	Any suspected fraud, abuse, or similar irregularity against the Town		
Effective:	Adopted by the Select Board on [Date]		

To protect the Town's assets and reputation from misappropriation and abuse, this policy provides guidelines to safeguard against fraudulent activities and any appearances thereof. The policy's objectives include:

- To create an environment in which employees and citizens can report any suspicion of fraud
- To communicate the Town's intent to prevent, report, investigate, and disclose to proper authorities suspected fraud, abuse, and similar irregularities
- To provide management with guidelines and responsibilities regarding appropriate actions in conducting investigations of alleged fraud and similar improprieties

## POLICY

The Town is committed to protecting its revenue, property, information, and other assets from any attempt, either by members of the public, contractors, consultants, vendors, agents, or its own employees, to gain by deceit, financial or other benefits at the expense of taxpayers. Town officials, employees and other persons acting on behalf of the Town must, always comply with all applicable policies, laws, and regulations. A "Person acting on behalf of the Town" refers to any individual responsible for or to Boxford's government placed in that position by some official relationship with the Town.

The Town will not condone any violation of law or ethical business practices and will not permit any activity that fails to withstand the closest possible public scrutiny. The Town intends to fully, objectively, and impartially investigate any suspected acts of fraud or other similar irregularities regardless of the position, title, length of service, or relationship with the government of any party who may be the subject to such investigation.

#### A. Actions Constituting Fraud or Abuse

Fraud and abuse can take many forms, all of which are covered by this policy and described in examples below.

Abuse of authority can occur in financial or nonfinancial settings and refers to, but is not limited to:

- Improper use or misuse of authority
- Improper use or misuse of Town property, equipment, materials, records, or other resources
- Waste of public funds

Fraudulent activity includes, but is not limited to, the following:

- Any dishonest or fraudulent act
- Forgery or alteration of any document or account
- Forgery or alteration of a check, bank draft, or any other financial document
- Misappropriation of funds, securities, supplies, or other assets
- Impropriety in the handling or reporting of money or financial transactions
- Profiteering because of insider knowledge of Town activities
- Disclosing confidential or proprietary information to outside parties
- Accepting or seeking anything of material value from consultants, contractors, vendors, or persons providing services or materials to the Town
- Destruction, removal or inappropriate use of records, furniture, fixtures, and equipment
- Any claim for reimbursement of expenses not made for the exclusive benefit of the Town
- Any computer-related activity involving the alteration, destruction, forgery, or manipulation of data for fraudulent purposes
- Any omissions and misrepresentations made in bond offering documents, presentations to rating agencies, and annual financial reports

# B. Antifraud Responsibilities

Every employee has a duty to report any suspected fraudulent activity. Department heads are responsible for instituting and maintaining a system of internal controls to reasonably ensure the prevention and detection of fraud. All Town officials, department heads, and supervisory staff must familiarize themselves with the types of fraud that could occur within their areas of responsibility and be alert for any indications of such conduct. The Town Administrator has primary responsibility for coordinating all fraud investigations.

## C. <u>Reporting Suspicion of Fraud</u>

Any Town employee or official who suspects fraud or abuse has occurred will promptly report it to the Town Administrator, who will duly post the matter for discussion in an executive session of the Select Board. If the suspected fraud involves the Town Administrator, the employee/official will report it to the Chair of the Select Board or to a different member of the Board if the Chair is suspected to be involved. Whoever receives the initial report will document it in writing and include sufficient details to ensure a clear understanding of the issues raised.

The Town Administrator is accountable for maintaining the confidentiality of all information related to a report of potential fraud, and the person making the report is protected from retaliation under the provisions of Section H below. The Town therefore strongly encourages individuals to put their names to reports; however, an anonymous report can be delivered to the Town Administrator.

# D. Security of Evidence

Upon receipt of a report of suspected fraud, the Town Administrator will take immediate action to prevent the alteration, theft, or destruction of relevant records and assets. Such actions may include, but are not limited to:

- Limiting access to the location where the records and assets exist
- Preventing access by the individual or individuals suspected of committing fraud
- Relocating the records and assets to a secure location

## E. <u>Confidentiality and Media Relations</u>

All participants involved in a fraud investigation will keep its details and results confidential so as not to violate any individual's expectation of privacy, and the Town Administrator will ensure that all related documents are securely stored. No investigation-related verbal information or documents may be shared with anyone not formally assigned to the investigation. No person employed by or otherwise acting on behalf of the Town may make any comment to the media or any other party without explicit authorization from the Town Administrator or Select Board.

## F. Investigation

As soon as possible after receipt of a report of potential fraud or abuse, the Town Administrator will schedule a Select Board executive session to consider the following:

- Is a formal investigation necessary, and if so, who will lead it?
- Is there an immediate need for legal assistance or advice?
- Is police involvement immediately necessary?
- Is there a need for any external support (e.g., forensic accountants, technology professionals)?
- Should the Select Board and Town Administrator devise a media strategy on the issue?
- Is there a need to report the issue to any external parties?

The Town will investigate every non-anonymous report of suspected fraud. For any anonymous report, the Select Board will decide whether a formal investigation is justified based on the following:

- Credibility of the concern
- Seriousness of the issue (i.e., magnitude of negative impact to the Town)
- Sufficiency of details provided to enable an investigation

To begin the formal investigation, the Town Administrator will consult with the Town Counsel to obtain guidance on next steps. From there, the Town Administrator may also seek the involvement of the Finance Director, Police Chief, and/or other personnel as needed. The Town Administrator may also recommend to the Select Board the employment of an outside consultant to lead the investigation, such as an independent auditor.

## G. Conclusion of Investigation, Corrective Actions, and Disclosures

At the investigation's conclusion, the Town Administrator or other assigned investigator will provide a written report of findings to the Select Board. If it supports a finding of fraud, the Town will pursue disciplinary action against any individual(s) involved and make every reasonable effort to recover any lost assets. On the advice of Town Counsel, the Select Board may also report the violation(s) to the Essex County district attorney's office to pursue appropriate legal actions. Additionally, the Town Administrator, in consultation with the assigned investigator if any, will determine the corrective actions needed to implement new or enhanced internal controls, in the subject department and potentially Town-wide, to mitigate the risk of future fraudulent activity. The subject department head(s) will subsequently provide the Town Administrator with updates on the status of the corrective action(s) monthly or upon request.

If the Town's investigation concludes that there was a violation of any federal criminal law involving fraud, bribery or gratuity potentially affecting a federal award, the Town Administrator will disclose such in writing to the federal awarding agency in compliance with the Office of Management and Budget's Omni Circular. Similarly, if there are findings of bond offering information falsification, the Town Administrator will disclose this in writing to the bondholders.

# H. <u>Whistleblower Protection</u>

Regardless of an investigation's outcome, no employee who makes a good faith report pursuant to this policy shall be subject to retaliatory actions by Town management, such as:

- Dismissal or threat of dismissal
- Discipline, suspension, or threat of these actions
- Intimidation or coercion
- Any other form of penalization or retaliation

Any party found to have retaliated against an employee for making a report pursuant to this policy will be subject to disciplinary action, up to and including termination.

If an allegation is made in good faith but not confirmed after the investigation concludes, no action will be taken against the originator. Any employee who knowingly makes a false report, provides evidence they know to be false, or provides information without a reasonable belief in its truth and accuracy may be subject to disciplinary action. Evidence of false allegations made with malicious intent will result in disciplinary action, up to and including termination.

# I. <u>Ethics Training and Annual Acknowledgments</u>

In July every year, the Town Administrator will distribute this policy to all employees and officials along with a copy of the state's conflict of interest law, and each recipient is required to acknowledge receipt. In addition, every two years, all Town employees must complete the state's conflict of interest training. Further, any Town employee responsible for managing a vendor contract will ensure the vendor receives a copy of this policy and returns a signed acknowledgment. The Town Clerk or designee will maintain a database to track the status of all acknowledgments and employee trainings and will follow up with those who are noncompliant with either requirement.

## **BOXFORD REFERENCES**

**Policies:** Disbursements, Gifts of Funds, Grant Management, Procurement Conflict of Interest, Reconciliations, Revenue Turnover

## **EXTERNAL REFERENCES**

M.G.L. c. 12, § 5A	M.G.L. c. 12, § 5D	M.G.L. c. 12, § 5J
<u>M.G.L. c. 12, § 5B</u>	<u>M.G.L. c. 12, § 5E</u>	<u>M.G.L. c. 149 § 185</u>
<u>M.G.L. c. 12, § 5C</u>	<u>M.G.L. c. 12, § 5F</u>	<u>M.G.L. c. 268A</u>

MA Office of the Inspector General webpage: What is Fraud? and Fraud Reporting FAQ: What to Know

MA Ethics Commission webpage <u>Summary of the Conflict of Interest Law for Municipal Employees</u>

U.S. Office of Management and Budget, December 2013: Omni Circular

DISBURSEMENTS			
Applies to:	<ul> <li>Finance Director's oversight responsibilities</li> <li>Town Accountant, Treasurer/Collector, Assistant Treasurer, Human Resource Coordinator, and Tri-Town School Union (TTU) Central Office Staff job duties</li> <li>Select Board's warrant approval responsibilities</li> <li>All department heads and the elected or appointed officials with spending authority (all referred to here as "department heads") in submitting their requests for expense and payroll disbursements</li> </ul>		
Scope:	Guidelines for managing requests for and disbursements of Town funds to pay accounts payable liabilities and to compensate employees through payroll.		
Effective:	Adopted by the Select Board on [Date]		

To mitigate the risk of fraud and ensure the Town disburses cash only for legally valid liabilities, this policy establishes guidelines for the expenditure of Town funds.

## POLICY

No disbursement for any payroll or accounts payable (AP) expense shall occur without the prior review of the Town Accountant and approval by the Select Board. Accordingly, the Town Accountant is responsible for finalizing every AP and payroll warrant and the Select Board for approving each by majority signatures.

Every AP disbursement must be based on an original invoice (may be electronic) and valid form W-9 for the payee. As a tax-exempt organization, the Town will not pay sales tax on any expense. All invoices must be charged to the proper fiscal year. Payment for any bills payable for a prior fiscal year must be approved by vote of town meeting in accordance with M.G.L. c. 44, § 64.

All payroll expenditures must be based on approved time and attendance (T&A) reports and be consistent with personal service contracts, classification schedules, or Boxford personnel bylaws. No employee may submit overtime hours (i.e., hours exceeding 40 hours in a week) or hours for any special detail work without the supervisor's advanced approval.

To allow for the expedited processing of any checks that may go unclaimed (as permitted under <u>M.G.L. c. 200A, § 9A</u>), printed on the face of every disbursed check will be: "Void if not cashed within one year of issuance." The Treasurer/Collector will secure all checks in a safe until distributed.

All disbursement activity is subject to audit by Boxford's independent auditor.

#### A. Ongoing Maintenance of Payroll and Leave Time Data

The Assistant Treasurer, in coordination with the Town Accountant, is responsible for maintaining the Harpers PayrollForward database of all active town employees, including their salaries, pay rates, stipends, weekly work hours, benefit options, and withholdings. Any change to an employee's employment status, work hours, or pay rate can only be made through the Human Resource Coordinator's Office based on a Personnel Action Form (PAF) and supported by a collective bargaining

agreement, classification schedule, or personal services contract. The PAF must be signed by the appropriate department head, Town Accountant and Town Administrator.

TTU Payroll Administration is responsible for the maintaining all school employee payroll information within Harpers PayrollForward.

# B. <u>Responsibilities Related to Disbursement Processing</u>

Every **employee** is responsible for:

- Documenting on a biweekly time sheet the hours worked or leave time used by specific date
- Reviewing each paycheck to ensure that it accurately reflects all time worked and monitoring time accrual balances Harpers Payroll EmployeeForward

Each **department head** is responsible for:

- Assuring that all purchases of goods and services conform to the state's procurement laws
- Monitoring the department's online account purchasing activity and invoice processing
- Verifying that adequate funds exist in the department's budget for every AP and payroll submission, attesting to the accuracy of each AP submission via signature on the coversheet of the invoice(s) and for payroll submissions by electronic or hardcopy signature
- Timely submitting of AP disbursement requests and T&A updates to the Town Accountant

## The **Town Accountant** is responsible for:

- Reviewing T&A approvals and AP submissions and including each requested expense on the AP/payroll warrant only after validating:
  - Procurement laws were adhered to
  - The submission is legal
  - No fraud is evident
  - Adequate funds exist
- Reviewing payroll data in the Harpers' database based on departmental time sheet submissions
- Preparing the AP and payroll warrants and submitting it to the Select Board for approval
- Notifying the Treasurer/Collector to initiate bank transactions to disburse the payroll
- Monitoring and maintaining employee accrual balances in the on both pay period and annual basis
- Updating the general ledger with all AP and payroll warrant expenditures
- Printing vendor checks
- Importing TTU AP and payroll files into MUNIS

The **Treasurer/Collector** is responsible for:

- Reviewing the AP warrant and withholding from disbursement any amounts owed to the town by listed payees
- Upon receipt of payroll and AP warrants signed by the Select Board, funding the gross payroll warrant, the Town's portion of Medicare tax, and the gross AP warrant in the associated bank accounts
- Disbursing payroll by the mandatory direct deposit or by live checks in the case of direct deposit exemption
- Disbursing all AP checks to the vendors and initiating ACH wire transfers
  - The Treasurer/Collector will not give any vendor checks to department heads or other employees to mail
- Updating the cashbook to document the disbursement activity

The **Select Board** is responsible for:

- Reviewing each warrant for appropriateness by examining the invoices, back-up documents, and payroll detail, and directing any inquiries to the Town Accountant
- Approving the warrants by a majority of the Board signing them

## C. Off-Cycle Disbursements in Exceptional Circumstances

An emergency or other imperative circumstance may compel an allowable exception to the usual disbursement process. In such rare cases, the Town Accountant will process an off-cycle AP warrant for the Treasurer/Collector to fund and issue a check. Under no circumstances will the Treasurer/Collector issue a manual AP check outside the MUNIS system. Select Board signature is required for any disbursement not previously approved.

Additionally, due to error or omission, the Town Accountant may authorize a payroll disbursement outside of the normal payroll process. This supplemental process shall follow the same procedure and approval process as a regular payroll process.

#### **BOXFORD REFERENCES**

Bylaw: Chapter 23 – Personnel

Policies: Antifraud

#### EXTERNAL REFERENCES

M.G.L. c. 30B	M.G.L. c. 41, § 41C	M.G.L. c. 44, § 58
M.G.L. c 40 § 5	M.G.L. c. 41, § 42	M.G.L. c. 44, § 64
<u>M.G.L. c. 41, § 41</u>	<u>M.G.L. c. 41, § 43</u>	<u>M.G.L. c. 200A, § 9A</u>
<u>M.G.L. c. 41, § 41A</u>	<u>M.G.L. c. 41, § 52</u>	
<u>M.G.L. c. 41, § 41B</u>	<u>M.G.L. c. 41, § 56</u>	

Massachusetts Municipal Auditor's and Accountants' Association: <u>Accounting Manual</u> Massachusetts Collectors & Treasurers Association: <u>Treasurer's Manual</u>

FINANCIAL MANAGEMENT TEAM			
Applies to:	<ul> <li>Town Administrator, Finance Director, Town Accountant, Treasurer/Collector, and Director of Assessment</li> <li>Town School Union (TTU) Central Office Staff, Human Resources Coordinator, and Town Clerk as auxiliary members</li> <li>Department staff as necessary</li> </ul>		
Scope:	Coordination of ongoing financial operations through regular meetings of a financial management team		
Effective:	Adopted by the Select Board on [Date]		

To maximize the effectiveness of financial practices by optimizing the coordination of interdepartmental activities and long-range plans, this policy establishes a financial management team that will meet regularly to discuss common goals and objectives. A financial management team also fosters institutional continuity during times of turnover in financial offices.

# POLICY

The Town establishes a financial management team consisting of the Town Administrator, Finance Director, Town Accountant, Treasurer/Collector, and Director of Assessment. The Town Administrator, or designee, will schedule meetings of the financial management team at a consistent time each month and more frequently when necessary, and act as meeting chair. A member of the Tri-Town School Union Central Office staff, Human Resources Coordinator, Town Clerk and other responsible department staff may also be called upon to participate in certain meetings during the year when appropriate for the agenda.

The intent of the meetings will be to help the Town's finance officers maintain open lines of communication and reinforce awareness of their interdependence. In this forum, team members can identify critical junctures, consider strategies to deal with anticipated areas of concern, and establish agreement about goals, deadlines, and each individual's role in meeting common objectives.

Appropriate agenda topics include:

- Updating the status of assigned responsibilities and due dates related to cyclical procedures
- Reviewing budget preparation, including financial forecasting and capital funding analysis
- Monitoring monthly revenue and expenditure reports and analyzing cash flow
- Coordinating financial system updates and software enhancements
- Proposing internal audits
- Reviewing the effectiveness of internal controls, including the status of monthly reconciliations
- Developing corrective action plans for citations in the external auditor's management letters
- Coordinating submissions to the Division of Local Services
- Review and updating the status of special projects assigned by the Town Administrator or others
- Pursuing professional development and training opportunities
- Coordinating activities to improve internal collaboration and engaging with the public

# **BOXFORD REFERENCES**

**Policies:** Annual Budget Process, Capital Planning, Forecasting, Reconciliations, Tax Recapitulation, and Year-End Closing

#### **EXTERNAL REFERENCES**

Division of Local Services Best Practice: *Financial Management Team* 

GIFTS OF FUNDS				
Applies to:	<ul> <li>Select Board, Town Administrator, and Boxford Elementary School Committee (School Committee) in their responsibilities related to approving the expenditure of gift funds</li> <li>Department heads<sup>9</sup> in their responsibilities related to accepting and expending gift funds</li> <li>Town Accountant and Traccurer (Collector in their ich duties related to monoping</li> </ul>			
	<ul> <li>Town Accountant and Treasurer/Collector in their job duties related to managing, accounting for, and reporting on gift funds</li> </ul>			
Scope:	<ul> <li>All receipts of monetary gifts to the Town</li> <li>Managing, expending, and accounting of gift funds</li> <li><u>Not in the scope of this policy</u>:         <ul> <li>Monetary gifts to trust funds governed by specific statutes, such as scholarship or cemetery perpetual care funds</li> <li>Donations of tangible property</li> <li>Federal, state, or private grants<sup>10</sup></li> </ul> </li> </ul>			
Effective:	Adopted by the Select Board on [Date]			

The guidance and directives presented in this policy are intended to:

- Enable the receipt of monetary gifts that align with the Town's goals
- Ensure that no gift funds are comingled with any other monies and that they are only expended for the purposes intended by donors
- Mitigate against the potential for any violations of the state's Ethics Code in relation to gift donations and fundraising

# BACKGROUND

<u>M.G.L. c. 44, § 53A</u> allows any department head or Town official to accept monetary gifts for the benefit of municipal services, which funds may be spent without appropriation. However, the statute also requires the expenditure of the gift's funds be approved by the Select Board (or the School Committee for school gifts). This approval process allows the Select Board (or School Committee) to ensure that the circumstances of the donation do not compromise the Town/School in some way and to assess whether or not the particular purpose of the gift aligns with Town/School goals without also creating any substantially offsetting financial or administrative burdens. Thus, for practical reasons, this policy calls for departments to obtain the approvals of the Select Board (or School Committee) before the gift may be formally accepted, deposited, and expended.

# POLICY

Gifts of donated funds make valuable contributions the Town's goals and fiscal well-being, and the offers of such are greatly appreciated by Town officials. Gifts to the Town must be voluntary and not received from any party in lieu of payments, fees, or services otherwise due the Town. In addition,

<sup>&</sup>lt;sup>9</sup> In this policy, department head refers to any Town employee or official with spending authority.

<sup>&</sup>lt;sup>10</sup> Although gifts and grants are governed by the same statute (44:53A), grants are addressed in a separate Grants Management policy.

the Town's acceptance of a gift does not constitute or imply its recommendation or endorsement of any service, product, or business of the donor.

All gift funds shall be treated as one-time revenues, even those that may be offered to the Town on a repetitive basis (e.g., from a "Friends" organization). As such, the Town shall in no way rely on any gift revenues to support ongoing operational costs.

Whenever a department receives a monetary gift, the department head must submit it for the approval of the Select Board (or School Committee) before the funds may be spent. If a department receives multiple gifts donated for the same purpose (such as from a private fundraising event), they shall be accumulated and submitted as a single amount.

All decisions regarding gift approval shall be based on the gift's compatibility with Town/School Department policies and goals, as well as an assessment of any risks the gift may pose to the Town in maintaining its reputation, mission, or values.

Without appropriation, departments may expend the funds from an accepted donation according to the purpose specified by the donor and only after the gift has been approved by the Select Board (or School Committee).

# A. Accepting a Gift

Upon receiving a gift or set of related gifts, regardless of the total amount, the department head will turn over the receipt(s) to the Treasurer/Collector consistent with the Revenue Turnover policy and include a document from the donor stating the purpose of the gift. The Treasurer/Collector will secure the funds in a safe pending the completion of the appropriate approval(s).

The Town Accountant will coordinate with the Town Administrator's office (or Chair of the Boxford Elementary School Committee) to present the Select Board (or School Committee) with the offered gift. Once the gift is approved or rejected, the Town Accountant will notify the originating department and Treasurer/Collector. If a gift is not approved for expenditure, the Treasurer/Collector will return the funds to the donor. Approved gifts will be processed in accordance with Section B below.

## B. Managing and Expending Gift Funds

Once any gift has been approved for expenditure, the Treasurer/Collector will deposit it in Town's depository account. The Town Accountant will maintain a separate general ledger account for each gift purpose and a paper or electronic file containing all donor documentation. All interest on gift accounts shall be deposited to the general fund.

Through the Town's standard payroll and vendor warrant procedures, a department head may, without appropriation, expend the funds of a gift for its designated purpose. Gifts donated without a specific purpose shall be expended in accordance with the overall intent (i.e., for the general operation of the gifted department). The Town Accountant shall approve a gift expenditure for inclusion in a warrant in accordance with the Disbursements policy and after verifying the legality of a gift expenditure. The Town Accountant must assure that:

- 1. The gift had received the appropriate approval;
- 2. The expenditure's purpose is consistent with the intent of the donor; and
- 3. Any applicable procurement laws were adhered to.

When the purpose of the gift no longer exists or if the revenue is not expended by a time specified by the donor, the department head will request to refund the balance of the account to the donor through the accounts payable process. The Town Accountant shall follow the procedures in the <u>Year-End Closing</u> policy for closing expended and inactive accounts.

## C. <u>Prohibitions on Fundraising</u>

This policy prohibits any fundraising activities by Town employees and officials. An example of prohibited activity would be a department selling items, such as t-shirts or calendars, to raise money. In addition, the Massachusetts Constitution's Anti-aid Amendment prohibits the use of public funds to assist a private organization's fundraising, even when it would directly benefit the municipality. To further assure compliance with the Amendment, there shall be no Town co-sponsorships with any private organizations of any community events or fundraisers.

The Town may accept as gifts the funds raised and offered by private entities, including "Friends" organizations. All such entities are entirely separate from the Town and therefore not subject to Town policies or any form of municipal oversight. Furthermore, the State Conflict of Interest Law bars the use of municipal resources, including staff time, to assist any private sector initiatives. Therefore, no Town personnel may participate in the activities of "Friends" and other similar organizations during their work hours.

#### **BOXFORD REFERENCES**

Policies: Antifraud, Disbursements, Year-End Closing

#### **EXTERNAL REFERENCES**

<u>M.G.L. c. 44, § 53A</u>

<u>M.G.L. c. 71, § 37A</u>

M.G.L. c. 268A

Division of Local Services City & Town article, Ask DLS: Public Purpose Expenditures

State Ethics Commission's Advisory Opinion on gift solicitation, EC-COI-12-1

MA Constitution Anti-Aid Amendment: Article XVIII, as amended by Articles XLVI and CIII

GRANTS MANAGEMENT				
Applies to:	<ul> <li>Grant Managers within Town and Elementary School departments</li> <li>Select Board, Boxford Public School Committee, Town Administrator, Tri-Town School Union (TTU) Superintendent, Finance Director, Town Accountant, and Treasurer/Collector in their grant-related responsibilities</li> <li>Department heads and Town officials that accept the grants obtained for their departments, in their budget management and operational oversight roles</li> </ul>			
Scope:	<ul> <li>Evaluating the grant opportunities</li> <li>Tracking grant activity</li> <li>Processing revenues and expenditures</li> </ul>			
Effective:	Adopted by the Select Board on [Date]			

To help the Town take advantage of external funding sources, ensure all grant applications align with the Town's best interests, optimize cash flow from reimbursements, and deter year-end account deficits, this policy sets guidelines for pursuing and managing grants.

## BACKGROUND

M.G.L. c. 44, § 53A allows any department head or Town official to accept a grant from a state, federal or other grantor, which funds may then be spent without appropriation. However, the statute also requires that the expenditure of the grant funds be approved by the Select Board (or the Boxford Elementary School Committee for school grants). This approval process allows the Select Board (or the School Committee) to assess whether or not the particulars of the grant program align with Town/School goals without also creating any substantially offsetting financial or administrative burdens. Thus, for practical reasons, this policy calls for departments to obtain preapproval(s) before applying for any grants and then obtain expenditure approval once a grant is awarded.

As a legal contract, every grant agreement must be fulfilled in accordance with its prescribed terms and conditions, and all applicable federal, state, and local regulations. Failure in this regard exposes the Town to legal and financial liabilities and compromises future grant funding.

## POLICY

All departments are encouraged to solicit grant funding for projects and programs consistent with the Town's goals. All municipal grant applications must receive preapproval by the Town Administrator and all educational applications by the Boxford Elementary School Committee. To be eligible for preapproval, there must be sufficient staff available to effectively administer the grant program and perform its required work scope, along with adequate matching requirements (both cash and in-kind).

No department shall expend grant funds until a fully executed grant agreement has been accepted and approved for expenditure by the Select Board or the School Committee when applicable. Further, no grant funds shall be used to supplant an existing expense for the purpose of diverting current funds to another use. Operating departments through their designated grant administrator(s) have primary responsibility for seeking grant opportunities, preparing applications, and managing awarded programs. The Town Administrator and Town Accountant are responsible for consulting with grant administrators on grant budgetary matters. The Town Accountant will monitor grant expenditures for consistency with award requirements, track the timeliness of reimbursement requests, distribute monthly reports of grant expenditures to departments, and maintain a database of all grants and grant activity from inception to closure.

# A. Grant Opportunity Assessment

Well in advance of a grant application's due date, the departmental grant administrator will assess the opportunity in consultation with the Town Administrator and Town Accountant or with the School Superintendent. Below are the factors to be considered, at minimum.

Programmatic:

- Alignment of the grant's purpose with the Town's and department's strategic priorities
- Department's capacity to administer the grant through to closeout
- Office space, facilities, supplies, or equipment required
- Ongoing impact of the grant program after it is completed
- Compliance and audit requirements, particularly as they may differ from the Town's

Financial:

- Total anticipated project cost
- Expenditure requirements and anticipated cash flow schedule
- Required cost matching shares and sources, including cash and in-kind
- Staffing requirements, including salary and benefit increases for multiyear grants
- Administration and indirect recapture amounts
- Program income potential

In this stage, the grant administrator will also develop a continuation plan to address the potential future loss of grant funding, which may include alternative funding proposals or plans for reducing or terminating program positions or components after grant closeout.

# B. Grant Application and Award Acceptance

Prior to filing any grant application, the grant administrator will submit a meeting agenda item requesting preapproval from the Town Administrator (or the School Committee) with a report summarizing the grant and how it complies with this policy. The Town Administrator will then decide as to whether any preapproved application should be submitted to the Town Counsel for legal review. Following this, the grant administrator will submit the grant application to the grantor and forward a copy to the Town Accountant.

When a grant administrator receives notice of any grant award, he or she will submit it as a meeting agenda item for the Select Board (or the School Committee) to formally accept by signatures and thereby approve the expenditure of grant funds. The grant administrator will then send copies of

the signed agreement to the grantor. The grant administrator will also send copies of the documents to the Town Accountant. Upon receiving the grant documents, the Town Accountant will create the appropriate general ledger account to record the grant activity separately from regular expenses. Federal grants will be identified by including Assistance Listings (AL) title and number, Federal award identification number and year, federal agency, and pass-through entity, if any. When notified of any amendment or adjustment by the grantor, the grant administrator will immediately forward the information to the Town Accountant, who will make adjustment(s) to the grant's budget in the general ledger.

# C. Grant Financial Management

At the start of a new grant, the Town Accountant and grant administrator will discuss its requirements and the timing of reimbursement requests (e.g., at the time of expenditure, monthly or quarterly), when applicable.

The grant administrator will ensure all expenditures made are allowable and consistent with each grant award's requirements. The grant administrator will submit project invoices to the Accounting Office consistent with the Town's Disbursements policy. The grant administrator will ensure the proper payroll account codes for grant-funded employees are reported on the department's submission as part of the regular payroll process.

Because required retirement system remittances and/or general fund benefit reimbursements vary by grant, the Town Accountant will calculate these for each grant and notify grant administrator of the resulting amounts to include on the accounts payable submissions.

To minimize the use of advanced Town funds, every grant administrator will request reimbursements as often as the grant's guidelines allow and always no later than June 15. In doing so, the administrator will prepare all required reports and requests as detailed in the agreement and submit these to the grantor. Immediately following each submittal, the grant administrator will send an email notification of the reimbursement request to the Town Accountant and Treasurer/Collector. The Treasurer/Collector will match reimbursements received electronically or by check with the requests and credit the proper revenue accounts. The Town Accountant will respond to the email confirming receipt and recording to the general ledger.

The Town Accountant will monitor each grant's deficit balance to assure it is temporary and receives reimbursement within the grant's allowable timeline and always prior to year-end.

## D. Grant Closeout

Upon completion of the project work or grant period, whichever comes first, the grant administrator will verify that all grant requirements have been met and will send to the Town Accountant a grant closeout package. This package will include a final report and either a final reimbursement request or notification of the amount to be refunded to the grantor. The report will outline the planned outcomes with the documented actual results.

Upon receipt of the closeout package, the Town Accountant will reconcile the grant administrator's report with the general ledger's record of grant activity. The grant administrator will subsequently submit the final reimbursement request to the grantor or, if a refund is due, the Town Accountant will add the refund amount to the accounts payable warrant. Additionally, the Town Accountant will determine if the grant account has been over expended and will either apply the expense to the operating budget or propose an appropriation from other available funds. After all transactions are completed, the Town Accountant will put the general ledger's grant account into inactive status.

E. <u>Audit</u>

All grant activities are subject to audit by the grantors, the Town Accountant, and Boxford's independent auditor. The Town Accountant will maintain all grant documents and financial records for seven years after their closeouts or for the lengths of time specified by the grantors, whichever period is longer.

## **BOXFORD REFERENCES**

**Policies:** Antifraud, Disbursements, Reconciliations. Special Purpose Appropriations

# EXTERNAL REFERENCES

M.G.L. c. 40, § 5D

<u>M.G.L. c. 41, § 57</u>

M.G.L. c. 44, § 53A

Public Employee Retirement Administration Commission: Memo #12/2003

Mass.gov webpage: Community Grant Finder

US grant search website: grants.gov

Federal programs Assistance Listings: <u>SAM.gov</u>

PROCUREMENT CONFLICT OF INTEREST			
Applies to:	<ul> <li>Town Administrator's role as chief procurement officer and any official designated to assist in this function</li> <li>All other Town employees, officials, and others working on the Town's behalf who are involved with any procurement and contract process</li> </ul>		
	<ul> <li>Prospective contractors</li> </ul>		
Scope:	Guidelines for vetting conflicts of interest related to all procurements of the Town		
Effective:	Adopted by the Select Board on [Date]		

To ensure integrity in the procurement process, this policy sets guidelines for vetting potential conflicts of interest.

# POLICY

The Town is committed to ethical business practices, professional integrity, and compliance with all procurement laws and regulations. Boxford will provide fair opportunities to participants in competitive processes for the award of Town contracts. Process integrity will be reinforced by the practices outlined here to ensure confidentiality during the bid evaluation process and to assess and address conflicts of interest in all competitive solicitations. The Town will investigate all allegations of conflict of interest or procurement misconduct brought to the attention of Town staff. Parties subject to this policy shall comply with M.G.L. c. 268A.

# A. <u>Confidentiality during the Bid Evaluation Process</u>

Town staff, consultants, and outside evaluators who are participants in a bid evaluation process are required to sign confidentiality agreements, which bind them not to share any information about responses received and the evaluation process until the Town issues a Notice of Intended Award.

The departmental purchasing employee will:

- 1. Identify all participants of a bid evaluation process who receive proposals or other documents used in the process, including any non-evaluating observers.
- 2. Ensure that these participants sign confidentiality agreements.
- 3. Submit the confidentiality agreements to the Town Administrator.

The Town Administrator will:

- 1. Verify that signed confidentiality agreements for all participants in the evaluation process, including non-evaluating observers, are submitted.
- 2. Maintain signed confidentiality agreements on file.

## B. Conflict of Interest in Procurement

To ensure decisions are made independently and impartially, Town employees and officials are expected to avoid any conflicts of interest and also avoid the appearance of conflicts of interest. A

conflict of interest, or the appearance of one, must be disclosed whenever a vendor, employee, or officer has, or can reasonably anticipate having, an ownership interest, a significant executive position, or other remunerative relationship with a prospective supplier of goods or services to the Town or knows that a family member or other person with whom they have a personal or financial relationship has such an interest.

According to the federal Office of Management and Budget's Omni Circular, a conflict of interest arises when: "the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract."

And it states that: "The officers, employees, and agents of the non-federal entity must neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts."

The Omni Circular further requires that for any federal grant involving a parent, affiliate, or subsidiary organization that is not a state or local government, the Town must also maintain written standards of conduct covering organizational conflicts of interest. An organizational conflict of interest means that due to a relationship with a parent company, affiliate, or subsidiary organization, the Town is unable or appears to be unable to be impartial in conducting a procurement action involving the related organization.

Any person with a conflict as described above shall not participate in the preparing of specifications, qualifying vendors, selecting successful bidders on products or services in which they have an interest, or approving payment to those interests. The only exception to this arises if the person makes full disclosure of a potential conflict and receives an advance, written determination from the <u>State Ethics Commission</u> that the interest is not so substantial as to be deemed likely to affect the integrity of the services the Town may expect from that individual.

## C. Conflict Disclosure and Review

Department heads and other officials are required to ascertain and disclose to the Town Administrator any potential conflict of interest affecting procurement transactions before a contract is signed, a commitment made, or an order placed.

The following measures will be taken to ensure the Town avoids any conflicts of interest in procuring Town contracts:

- 1. Employees, officials, and others who regularly participate in contract activities on behalf of the Town must disclose relevant financial interests as required by state and federal laws and to annually review those statements in conjunction with this policy and other ethical standards.
- 2. Other persons involved in procurements must review this policy and other ethical standards and provide information to determine if there is a conflict of interest. Such persons shall

include, but are not limited to, authors of specifications; paid and unpaid evaluators; and paid and unpaid consultants who assist in the procurement process.

3. If a possible conflict of interest is identified, it must be documented and reviewed with Town Counsel.

The departmental purchasing employee will:

- 1. Identify employees, consultants, outside uncompensated parties, and any other persons who will be involved in a procurement or contract activity, such as specification development, preparation and issuance of solicitations, evaluation of solicitations or submissions, or other evaluations, that will lead to an award of contract.
- 2. Provide conflict of interest forms to the identified participants.
- 3. Submit the completed forms to the Town Administrator prior to commencing any procurement or contract activity.

The Town Administrator or designee will:

- 1. Review the submitted forms for potential conflicts of interest.
- 2. Discuss any potential conflicts of interest with the Town Counsel and document the resulting determinations.
- 3. Provide the Select Board with the documented result.
- 4. If a conflict or the appearance of one exists, take appropriate actions, including but not limited to, removal of the employee, consultant, or outside uncompensated party from the procurement activity or cancelation of the solicitation.
- D. <u>Compliance Reviews</u>

The Town Accountant will conduct random reviews of compliance with this policy. All procurement activities are also subject to audit by Boxford's independent auditor.

#### **BOXFORD REFERENCES**

**Bylaw:** Part I, Chapter 19, Town Administrator, <u>Article XII, §19-26</u>, Chapter 7, Permanent Building Committee, <u>Article XI, §7-19</u> Chapter 32, Select Board, <u>§ 32-10</u>

## Policies: Antifraud

#### EXTERNAL REFERENCES

<u>M.G.L. c. 30B</u>

M.G.L. c. 41, § 57

M.G.L. c. 268A

State Ethics Commission's webpage <u>Disclosure Forms for Municipal Employees</u>

Inspector General's webpage <u>Procurement Assistance</u>

U.S. Office of Management and Budget, December 2013 Omni Circular

RECONCILIATIONS			
Applies to:	<ul> <li>Finance Director's oversight responsibilities</li> <li>Town Accountant in keeping the general ledger up to date</li> <li>Treasurer/Collector in maintaining a cashbook and managing accounts receivable</li> <li>Town Accountant managing payroll and associated withholdings</li> <li>All personnel within the Town with responsibility for managing either a receivable account and/or special revenue fund</li> </ul>		
Scope:	Periodic reconciliations of departmental cash, receivables, payroll, and special revenue fund records and of those departmental records with the general ledger		
Effective:	Adopted by the Select Board on [Date]		

To ensure transactions are in balance, mitigate fraud, safeguard general ledger accuracy, and maximize certifications of free cash and retained earnings, financial officers must conduct regular reconciliations of their accounting records, and these must be reconciled to the general ledger. Although each financial officer is responsible for maintaining independent records of his or her office's transactions, they are also collectively accountable for the overall accuracy of Boxford's financial records.

## POLICY

The Treasurer/Collector and every department head responsible for managing a receivable account and/or special revenue fund will internally reconcile their respective accounting records and subsequently reconcile them with the Town Accountant according to the guidelines and periodic time frames outlined in this policy. Although each financial officer is responsible for maintaining independent records of his or her office's transactions, they are also collectively accountable for the overall accuracy of the Town's financial records. All reconciliation activities are subject to audit by the Town's independent auditor.

Records of Account to be Reconciled	Record Keeper	Reconciliation Time Frames
Cashbook	Treasurer/Collector	<ul> <li>With online bank data daily</li> <li>Month-end close by the 10<sup>th</sup> of the following month</li> <li>To the general ledger by 15<sup>th</sup> of each month</li> </ul>
Payroll withholdings	Town Accountant, Treasurer/Collector	<ul> <li>Internally, by the 10<sup>th</sup> of the following month</li> <li>To the general ledger by 15<sup>th</sup> of each month</li> </ul>
Collector's receivables	Treasurer/Collector	<ul> <li>Month-end close by the 10<sup>th</sup> of the following month</li> <li>To the general ledger by 15<sup>th</sup> of each month</li> </ul>
Other departments' committed receivables	Departmental record-keepers	<ul> <li>Internally, within 10 days of the end of each fiscal year quarter</li> <li>To the general ledger by the end of the month following each quarter-end</li> </ul>

#### **POLICY SUMMARY**

Records of Account to be Reconciled	Record Keeper	Reconciliation Time Frames
Special revenue funds	Departmental record-keepers	<ul> <li>Internally, within 10 days of the end of each fiscal year quarter</li> <li>To the general ledger by the end of the month following each quarter-end</li> </ul>

## A. <u>Cashbook Reconciliation</u>

To ensure an accurate accounting of all revenue activity, the Treasurer/Collector will maintain a cashbook that reflects up-to-date and accurate information for all cash and assets. To do so, the Treasurer/Collector will make certain that every cash receipt, disbursement, transfer, and interest accrual is recorded in the cashbook within two business days of each transaction. The Treasurer/Collector will reconcile cashbook accounts to their corresponding bank accounts daily and finalize the monthly reconciliation within 10 days after month-end. These will include zero-balance vendor and payroll bank accounts, whose balances must equal the outstanding checks at the end of any month.

The Treasurer/Collector will identify all reconciling items, including deposits in transit, bounced and voided checks, and discrepancies between the cashbook and financial institutions, and will document the reason for the discrepancy or correct them when appropriate. The Treasurer/Collector will then forward a cash activity summary report with the cashbook balances to the Town Accountant.

# B. <u>Payroll Withholdings Reconciliation</u>

Payroll withholdings include federal and state taxes, child support and other wage assignments for legal obligations, deferred compensation, optional insurances, association dues, and other employer-sponsored options.

At the conclusion of each pay cycle, the Town Accountant will record withholdings subject to vendor invoices (i.e., insurances) in separate general ledger agency accounts to be disbursed through the accounts payable process. Further, to reduce the risk to the Town for liabilities in excess of withholdings, the Town Accountant will conduct monthly reconciliations of these payroll withholdings to their corresponding accounts payable, identify any discrepancies, document the results of these activities, and make any necessary payroll changes or adjustments. The Assistant Treasurer, under the direction of the Town Accountant, will verify and reconcile payments for all other withholdings and deductions that are automatically issued through the payroll system via electronic fund transfers or check to the actual disbursements.

## C. Accounts Receivable Reconciliation

Accounts receivable are outstanding monies owed to the Town, whether from committed bills (e.g., taxes, excises, liens, water charges) or from uncommitted department invoices (e.g., police details, recreation programs, etc.). To ensure these assets are accounted for and balanced, the Treasurer/Collector and any department head with accounts receivable duties (each referred to here

as "record-keeper") will ensure that all cash receipts are recorded timely, maintain a control record for each receivable type and levy year (if applicable), and verify the detail balance agrees with the receivable control.

The receivable control is a record of original entry in which a record-keeper reduces a commitment according to processed collections, abatements, and exemptions and increases it by issued refunds. To maintain accuracy, the record-keeper must review the detailed list of receivables, identify credit balances as prepaid amounts, or investigate them for possible correction, and reconcile the control balance to the detail.

Whenever these records do not agree, the record-keeper must determine the discrepancy by:

- Verifying the various transactions (commitments, abatements, refunds, chargebacks) against their supporting documents
- Comparing the total amount of posted payments to the turnovers accepted by the Treasurer/Collector
- Determining whether any revenues were incorrectly recorded as payments to the commitment, such as interest and fees

Within 10 days after every month-end, the Treasurer/Collector will provide a create a summarized MUNIS accounts receivable report by bill type and levy year and forward the summary to the Town Accountant as the Schedule of Outstanding Receivables showing the internally reconciled accounts receivable balances. All other record-keepers will provide a list of outstanding balances to the Town Accountant.

# D. Special Revenue Reconciliation

In accordance with various state statutes, certain revenues that are earmarked for specific purposes are segregated from the general fund. These special revenue funds include gifts and grants from governmental entities, individuals, and organizations; revolving funds; and receipts reserved for appropriation. To ensure these funds are balanced, department heads with responsibility for special revenue funds will verify that all revenues turned over to the Treasurer/Collector, expenditures authorized for payment by the Town Accountant, and properly authorized transfers are recorded monthly. These department heads will subsequently provide the Town Accountant with quarterly reconciliation reports on the funds.

# E. <u>General Ledger Reconciliation</u>

To achieve the core objective of maintaining the general ledger's integrity, the Town Accountant must regularly reconcile it with the separately maintained accounting records outlined in <u>Sections A – D</u> above. In addition, it is the Town Accountant's responsibility to review all accounts analytically from time to time for reasonableness and to identify unusual activity.

The general ledger's cash accounts should reflect only those transactions reported to the Town Accountant by the Treasurer/Collector, so that in theory, the general ledger should be in balance with the cashbook. However, errors may occur due to omitting transfers or transactions or applying them

in the wrong amounts or to the wrong accounts. Whenever the Town Accountant identifies a discrepancy between the general ledger and the cashbook, the following steps must be taken in conjunction with the Treasurer/Collector to determine the cause:

- If the total amount of revenue reported in the cashbook does not agree with the amount recorded in the ledger for that month, the Treasurer/Collector must verify that the monthly total Treasurer's Schedule of Receipts revenue reports agree by detailed amount and classification with the cashbook and correct any errors.
- Compare the total amount of warrants paid during the month as recorded in the cashbook with the total recorded in the ledger for the same period. The last warrant paid must be the last one recorded; otherwise, a timing problem will create a discrepancy.
- If the records still do not agree, the Treasurer/Collector and Town Accountant must trace each entry to the ledger until the variance is determined.

All receivable records must also be reconciled to the Town Accountant's general ledger. If a given receivable control has been internally reconciled, any discrepancy must be in the general ledger, so the Town Accountant must:

- Review the commitments, charges, payments, abatements, refunds, reclassifications, and adjustments in the general ledger, as appropriate for each control.
- Verify whether receipts are recorded to the correct type and levy year.
- Verify the dates that activities were recorded.

The Town Accountant's receivable accounts in the general ledger should reflect the transactions provided by the Treasurer/Collector or other departmental record-keeper. Therefore, the above steps must resolve any discrepancies between the receivable control and the ledger. If they do not, the particular record-keeper and Town Accountant must trace each ledger entry until they determine the reason for variance.

The Town Accountant will verify that all special revenue fund reconciliations match the general ledger. The responsible department head and Town Accountant must research any discrepancy and correct the record(s) as appropriate.

# F. <u>Time frames and Documentation</u>

Employees subject to this policy will complete reconciliations of their internal accounting records early each month so that subsequent reconciliations to the general ledger take place no later than the 15<sup>th</sup> of the month following the one being reconciled. At each quarter-ending month Town Accountant will extend the cash reconciliation process to individually reconcile every general ledger account that directly corresponds to a specific bank account (e.g., stabilization funds, trust funds, guarantee bond deposits).

Each general ledger reconciliation will be documented and cosigned by the two parties. If, at that time, any variance has not yet been fully resolved, this must be noted, along with a work plan and

timetable for resolution. The Town Accountant will report the documented reconciliation status to the Town Administrator and Finance Director at each month's end.

#### **BOXFORD REFERENCES**

**Policies:** Antifraud, Credit Card Usage, Disbursements, Grants Management, Revenue Turnover, Special Purpose Appropriations

#### **EXTERNAL REFERENCES**

DLS Best Practice: <u>Reconciling Cash and Receivables</u>

Massachusetts Municipal Auditor's and Accountants' Association: Accounting Manual

Massachusetts Collectors & Treasurers Association: Treasurer's Manual and Collector's Manual

<b>Revenue Turnover</b>				
Applies to:	<ul> <li>Finance Director's oversight responsibilities</li> </ul>			
	<ul> <li>Treasurer/Collector, as the custodian of Town funds, and Treasurer/Collector</li> </ul>			
	Department staff in their cash management duties			
	<ul> <li>All individuals and department heads with responsibility for handling payments</li> </ul>			
	<ul> <li>Town Accountant in the duty to keep the general ledger up to date</li> </ul>			
Scope:	Guidelines for managing cash, check, credit card, and other forms of payment received			
	by all Town departments for taxes, excises, fees, charges, and intergovernmental			
	receipts, from the departmental level through Treasury and Accounting duties			
Effective:	Adopted by the Select Board on [Date]			

To safeguard Town assets and maximize cash flow, this policy provides guidelines for departments to turn over receipts to the Treasurer/Collector. Included are details of internal controls designed to provide reasonable assurance that the Town's revenues are properly and timely secured, recorded, and deposited in Town bank accounts.

#### POLICY

By <u>M.G.L. c. 41, § 35</u>, the Treasurer is given charge of all revenue receipts of the Town. To minimize the risk of any revenue lags or losses, every department that receives payments must accurately account for the funds and turn them over to the Treasurer/Collector's Office according to the timing and protocols outlined in this policy. As called for here, the departmental staff and Treasurer/Collector will separately notify the Town Accountant of the money turned over and accepted, respectively. This check-and-balance control enables the Town Accountant to effectively track receipts within the general ledger per <u>M.G.L. c. 41, § 54</u>, while also maintaining complete separation from any cash handling functions.

The head of each department that receives payments is responsible for instituting and employing internal controls designed to ensure that all receipts are recorded accurately, kept secure from loss or theft, and turned over timely to the Treasurer/Collector. This includes online payment accounts, credit card transactions, and cash payments. Town departments are expected to turn over their receipts at least on a weekly basis and must do so by the end of the day when cash receipts total \$300 or more. At each month-end, departmental staff will turn over all revenues no later than 11:00 am on the last business day of the month.

To indemnify the Town from potential loss or theft of receipts, the Town Administrator will ensure that surety bonds are maintained for all individuals responsible for handling payments.

## A. <u>Receiving Payments</u>

Using prenumbered receipt books, assigned departmental staff must issue a receipt for every payment received, even when the payer attempts to refuse it. These employees must identify the forms of payment (check, cash, or credit card) in the receipt books. As the exception, employees in the Treasurer/Collector's office receiving taxes and other collections from the public need only issue receipts for cash payments. Every Town employee who receives a check will immediately stamp it

"For Deposit Only." Every department shall secure their received payments in a locked cashbox or safe until completing a turnover to the Treasurer/Collector. In coordination with the Treasurer/Collector, School Department personnel deposit certain receipts directly into a designated Town bank account.

Each department head is responsible for overseeing the processing, recording, record retention, and turning over of receipts to the Treasurer/Collector. To the extent practicable, separate individuals should be tasked with 1) receiving and endorsing payments, 2) recording payments in the departmental log, 3) depositing receipts in the bank (if applicable for the department), and 4) turning receipts over to the Treasurer/Collector.

## B. <u>Turning Over Revenues</u>

Departmental staff will complete a Schedule of Departmental Payments to the Treasurer (i.e., the turnover form) in Excel, print it, and obtain the department head's signature. Every listed receipt should tie back to a receipt book entry and to the receipt logs maintained by the department head and contain the charge code, account description, and receipt details. Departmental staff will deliver the turnover form with documentation (e.g., online accounts, credit card settlement) in person. Departments with access to online bank accounts will include a reconciliation of the revenue amount to the bank deposit activity with the turnover. At no time may departmental staff leave any unattended turnovers in the Treasurer/Collector's office or elsewhere in Town Hall.

No less than weekly and at month-end, the Treasurer/Collector will complete an internal turnover of all the revenues received directly by the Treasurer/Collector's office during that period (e.g., collections processed during that period for taxes and other committed receivables, interest, state aid, grant funds, etc.). The turnover form will report all the revenues summarized by receipt type, which must reconcile to the bank deposits for the same period.

When a Treasurer/Collector employee has accepted the turnover, the departmental employee will receive two signed copies back. The departmental employee will deliver one copy to the Finance Office and retain the other on file. The Town Accountant will refuse to accept any turnover form that is not signed by a Treasurer/Collector employee.

The Town Accountant shall issue revenue reports monthly to the head of every department that receives payments. The department head will verify that all turned over receipts have been recorded in the appropriate general ledger accounts and either affirm accuracy or report any discrepancies to the Town Accountant within five business days of receipt.

# C. <u>Receiving Turnovers</u>

When presented with the turnover, Treasurer/Collector staff will count the receipts in the presence of the departmental employee submitting the turnover. Any inaccuracies on the turnover forms will be corrected on them at that time and initialed by both parties. The Treasurer/Collector staff member will then sign the form, make two copies, and return two copies to the departmental employee. Within 24 hours of receiving the turnover, Treasurer/Collector staff will record the receipt data in the MUNIS General Revenues – Payment Entry module. As possible, a different staff member will deposit checks received via remote scanner. The Treasurer/Collector or Assistant Treasurer/Collector will take any received cash to the bank for deposit daily. Until the deposit is completed, the Treasurer/Collector will ensure that all receipts are secured, either in a cash drawer or, if being held overnight, in a safe.

At the close of business each day, the Treasurer/Collector will review the MUNIS Payment Proof against all submitted documentation (from remote entry, cash deposit slips, credit card, and online payment settlement). When all the activity ties out, the Treasurer/Collector will update the cashbook with all deposit data, then release and approve the MUNIS payment batches for the Town Accountant's review.

# D. Insufficient Funds

Upon notification from the bank of an insufficient check or an invalid or otherwise unpaid electronic funds transfer (EFT), the Treasurer/Collector will create a reversal entry in the MUNIS Payment Entry module to enter a negative deposit to the original revenue account, document the reason for the reversal, and notify the department responsible for the turnover. The Treasurer/Collector will also make a reversal entry in the cashbook, assigning it to the appropriate bank account. The Treasurer/Collector will notify the department responsible for the turnover and the Town Accountant.

The department head will prepare and send a non-sufficient funds notice to the issuer of the bounced check or rejected EFT. Payment of the original amount plus a \$25.00 penalty is due in 10 days and must be in the form of cash, money order, or certified check. The department will not accept repayment funds without the applicable penalty fee. The repayment plus fee will always be entered into a new payment batch as an original receipt.

It is the department head's (or designee's) responsibility to follow up on collecting the amounts owed. If the payment was for a license or permit, the department will suspend the license or permit until the original amount and penalty have been paid. If it was for a committed receipt (e.g., tax bill), the committed amount will be reinstated by the appropriate official and the usual collection procedures followed.

# E. Updating the General Ledger

The Town Accountant will select the payment batch or batches to post to the general ledger. The Town Accountant will compare the data entered in the MUNIS Payment Entry module to the turnover reports received from departments and investigate any discrepancies with the Treasurer/Collector and originating department. When the MUNIS batches reconcile with the turnover reports, the Town Accountant will post the data to the MUNIS general ledger.

# F. Cash Drawers

On a limited basis, the Town Accountant may authorize funds for a department cash drawer for the exclusive purpose of making change. The Town Accountant will maintain records of cash drawer balances in the general ledger as cash accounts.

Use of these cash drawers shall be restricted only to departmental staff whose job duty assignments specify cashier functions. The department head is responsible for ensuring that each cash drawer is counted daily and will immediately investigate and correct any discrepancies. Cash drawers shall be stored in locked cabinets or safes.

## G. <u>Audit</u>

All cash management activity is subject to review by the Town's independent auditor. Further, the Town Accountant will conduct periodic, random audits of the receipt management done by the Town's various departments to ensure adherence to this policy.

#### **BOXFORD REFERENCES**

Policies: Reconciliations

#### EXTERNAL REFERENCES

M.G.L. c. 41, §35	M.G.L. c. 44, § 53	M.G.L. c. 60, § 57A
<u>M.G.L. c. 41, § 54</u>	<u>M.G.L. c. 44, § 69</u>	
<u>M.G.L. c. 41, § 57</u>	<u>M.G.L. c. 60, § 2</u>	

Massachusetts Municipal Auditor's and Accountants' Association: Accounting Manual

Massachusetts Collectors & Treasurers Association's Treasurer's Manual and Collector's Manual

TAX RECAPITULATION			
Applies to:	<ul> <li>Select Board and Town Administrator policymaking and management responsibilities</li> <li>Board of Assessors as principal overseer of the tax recap process</li> </ul>		
	<ul> <li>Finance Director, Town Accountant, Director of Assessment, Treasurer/Collector, and Town Clerk job duties</li> </ul>		
Scope:	<ul> <li>Guidelines and responsibilities involved with setting an annual property tax rate and reporting it to the Division of Local Services (DLS)</li> </ul>		
Effective:	<ul> <li>Adopted by the Select Board on [Date]</li> </ul>		

To ensure the Town timely and appropriately charges taxes to property owners in support of the annual budget, this policy sets forth the roles, responsibilities, and deadlines associated with the tax recapitulation ("tax recap") process. A timely and accurate annual tax recap helps ensure the Town complies with state statutes, prevents workflow disruptions in its financial offices, and avoids any temporary borrowing costs associated with cash shortfalls.

#### BACKGROUND

The property tax levy is Boxford's largest source of revenue, which therefore makes the tax recap a vital component of the Town's fiscal operations. The Assessing Department oversees two core phases: property valuation and tax rate setting. However, the full process begins with town meeting, involves many other local officials, and requires careful management, teamwork, and cooperation.

The tax recap forms and schedules present the Town's annual budget plan for the fiscal year. They summarize all appropriations made by town meeting since the previous year's tax rate was set and identify all non-property-tax revenue sources, such as state aid, local receipts, available funds, and reserves. The difference between these sources and the total budgeted appropriations must be raised through the property tax levy.

By completing the tax recap and submitting it to the DLS for approval, the Town establishes its property tax levy and sets the tax rate for the fiscal year. The Town may issue actual tax bills only after DLS reviews the recap and approves the tax rate.

#### POLICY

At the Finance Director's direction, Boxford's financial team will annually complete the tax recap process no later than November 30. The Finance Director will develop a realistic plan and timetable to meet this date with the goal of timely production and distribution of actual tax bills. The Town Administrator will be kept apprised of progress by the Finance Director. If the schedule is delayed, the Finance Director will develop a detailed plan to achieve the original deadline.

#### A. Preparation and Town Meeting

A successful tax recap process starts with a balanced annual budget, valid funding sources, and proper town meeting actions, which will be accomplished as follows:

- The Select Board, through the Town Administrator and Town Counsel, will assure the production of a properly written town meeting warrant that will allow town meeting voters, under the Town Moderator's oversight, to properly authorize annual budget appropriations funded by specific revenue sources (e.g., raise and appropriate, free cash, stabilization, etc.).
- The Finance Director will ensure that any annual increase in the tax levy does not exceed the maximum allowed under Proposition 2½.
- The Finance Director and Town Accountant will verify that the proposed budget is balanced.
- The Town Accountant will prepare a schedule of sources and uses to monitor the impact of funds available for appropriation by town meeting.
- The Finance Director, Treasurer/Collector, and Town Counsel will ensure any debt issuance authorizations are proper.
- The Town Administrator will ensure that any proposal for a general override, debt exclusion, or capital exclusion is properly presented in the town meeting warrant and, if passed, put to a town-wide referendum.

Whereas the budget is typically adopted at the spring town meeting, all appropriations and borrowings approved at this, and any other town meetings not recorded in the previous tax rate, must be included in the current tax recap process.

# B. <u>Recording Legislative Actions</u>

To allow time for any required corrective measures, the following tasks will be completed within two weeks after town meeting:

- The Town Clerk will record and certify the voting minutes of all town meetings held since the last tax rate was set.
- The Town Accountant will review the Town Clerk's certified town meeting minutes to ascertain all the voter-authorized appropriation amounts for the tax recap period.
- When the Town Clerk and Town Accountant agree on the individual appropriations by revenue category, the Town Clerk will enter the amounts into the DLS Gateway system (by article on page 4 of the tax recap).
- From the certified town meeting authorizations, the Town Accountant will complete the following Gateway forms:
  - Community Preservation Fund revenues and expenditures (Form A-4)
  - Free cash used (Form B-1)
  - Available funds used (Form B-2)
- The Treasurer/Collector and Town Accountant will prepare the debt exclusion report, including any use of reserved bond premiums (Form DE-1), and report any reserved bond premium amounts used as funding sources (Form B-2).

# C. <u>Tax Recap Entries done after the Fiscal Year-end Closing</u>

Within two weeks of closing the books for the fiscal year, the Town Accountant will do the following to complete the tax recap:

- Document and report all deficits or other expenditures that must be funded, including debt and snow and ice (page 2 of the tax recap)
- Record the actual amounts received for each type of local receipt (page 3, column (a) of the tax recap)
- Enter estimated local receipts using the revenue projections from the final budget approved at town meeting (page 3, column (b) of the recap)
- Record the actual amounts received for the community preservation fund (A-4, column a)

# D. <u>Property Value Certification</u>

Assessors must value all taxable real and personal properties and classify them into one of four classes (residential, open space, commercial/industrial, or personal) based on their use as of January 1. To do this, the Director of Assessment will:

- Update any prior-year omitted and revised assessments that included growth (Form LA-13A, which is transferred to the Levy Limit Worksheet) no later than June 20
- Complete the property sales report (Form LA-3) for all sales over \$1,000 and submit it to DLS for approval.
- Analyze market conditions and set final property values in compliance with DLS certification standards.
- Report the total assessed valuation for real and personal property by class (Form LA-4, which
  is transferred to page 1 of the tax recap).
- Report fiscal year tax base growth used to determine the levy limit under Proposition 2½ (Form LA-13, which is transferred to the Levy Limit Worksheet).

The Director of Assessment will submit the above forms to DLS for review and certification.

## E. <u>Tax Rate Setting</u>

After DLS has certified property values, the Select Board will hold a public hearing for the Board of Assessors to present its analysis of valuation trends and for the Select Board to determine the Town's tax policy. At this classification hearing, the Select Board may vote for a single tax rate, which thereby allocates the tax levy proportionately across all property classes, or for a shift of the tax burden between the four classes. Leading up to and during this hearing, the following must be done:

- The Director of Assessment and Town Accountant prepare an overlay analysis (Form OL-1).
- The Board of Assessors estimates and votes the amount of overlay to raise.
- The Board of Assessors prepares a financial analysis of the various tax alternatives.
- The Town Clerk publishes an advance notice of the hearing and reports this on Form LA-5.
- The Select Board votes on residential, small commercial, and open space exemptions.
- The Select Board acknowledges excess levy capacity (Form LA-5).

# F. <u>Review and Submittal to DLS</u>

The Board of Assessors, working with the Director of Assessment and Finance Director, is responsible for submitting all forms and supporting documents to DLS for tax rate approval. To do this:

- The Director of Assessment and Finance Director will review all schedules, verify signatures, and confirm that all proper documents are uploaded.
- The Finance Director will ensure that all budget authorizations are represented and clearly reconcile to the amounts reported in the tax recap schedules.

## **EXTERNAL REFERENCES**

M.G.L. c. 40, § 56	<u>M.G.L. c. 41, § 54A</u>	<u>M.G.L. c. 59 § 25</u>
<u>M.G.L. c. 40A, § 11</u>	<u>M.G.L. c. 59 § 5C</u>	
<u>M.G.L. c. 41, § 15A</u>	<u>M.G.L. c. 59, § 21C</u>	

DLS Informational Guideline Release 2024-8: *Fiscal Year 2025 Tax Bills Quarterly Payment System* (updated annually)

DLS Training Publications: Assessors Course 101 Handbook Chapter 5: Setting the Tax Rate

Massachusetts Municipal Auditor's and Accountants' Association: Accounting Manual

TRAVEL/EMPLOYEE REIMBURSEMENT		
Applies to:	<ul> <li>Town Administrator and Town Accountant job duties</li> </ul>	
	<ul> <li>All Town employees and elected or appointed officials (all referred to here as</li> </ul>	
	"employees")	
Scope:	<ul> <li>Guidelines for determining reasonable travel-related expenses</li> </ul>	
	<ul> <li>Procedures, forms, and documentation required for reimbursement</li> </ul>	
Effective:	Adopted by the Select Board on [Date]	

To mitigate opportunities for fraud, waste, and abuse, the Town must properly monitor and control travel costs and reimbursements to employees. This policy establishes rules governing reimbursements for legitimate business-related expenses, including necessary travel expenses incurred in performing official duties. It also provides guidelines for determining reimbursable expenses and details the procedures, forms, and documents required to receive reimbursement.

#### POLICY

The Town will reimburse employees for reasonable expenses incurred for travel on the Town's behalf as authorized by their department heads or the Town Administrator. With the department head's preapproval, also reimbursable are non-travel-related, employee out-of-pocket expenses. When this policy is not followed, there is no guarantee that all employee expenditures will be reimbursed.

Employee travel shall be restricted to necessary activities that provide a public benefit, such as training, professional conferences, and other municipal-related activities. All travel on Town business shall be planned for using the most economical mode and class of transportation reasonably available and the most direct and time-efficient route. Employees should determine estimates for their travel costs, discuss any extraordinary travel circumstances and expenses with their department heads, and obtain their authorizations in advance of travel. Employees will travel using government and group rates when available.

The Town will not reimburse any sales taxes but will, however, pay meals and room excise taxes.

Categories	Rules & Criteria	Required Documents
Professional development	<ul> <li>Applicable only for training, workshop, or conference</li> <li>May request advance payment through the AP process to meet deadlines and/or discounts</li> </ul>	<ul> <li>Brochure (or if online info only: detailed screenshots with dates, hours, included expenses)</li> <li>Proof of attendance: certificate, name badge, screenshots of virtual sessions</li> </ul>
Personal car transport	<ul> <li>Destination must be outside the Town of Boxford</li> <li>Mileage calculated from employee's residence or work location, whichever is closer to the destination</li> <li>Mileage reimbursed at IRS rate</li> </ul>	

# POLICY SUMMARY

Categories	Rules & Criteria	Required Documents
	<ul> <li>May submit for parking and tolls; no receipt needed for cash parking meters</li> </ul>	
Other transport	<ul> <li>Airplanes, trains, buses, ferries</li> <li>Taxis fares only between home and airport/station and between airport/station and lodging</li> <li>Town-owned vehicle: fuel is reimbursable</li> </ul>	<ul> <li>Proof of travel: boarding pass or ticket</li> </ul>
Lodging	<ul> <li>Travel is longer than 24 hours</li> <li>One night before the event is reimbursable</li> <li>Must book at govt/group rate or most comparable when not available</li> </ul>	
Meals	<ul> <li>\$20 max for lunch if gone for 6 hours, unless the meal is included in the fee</li> <li>\$50 max for each 24-hour period</li> <li>20% tip max</li> </ul>	<ul> <li>Write each employee's name with their charges on any receipt with multiple employees</li> </ul>
Supplies	<ul> <li>Out-of-pocket only allowed as a last resort and with the department head's approval</li> </ul>	<ul> <li>Department head attestation that the supplies were received by the department</li> </ul>
Time frames		

- All requests for reimbursement should be submitted within 15 days of incurring the expense and no later than 30 days. Submissions received by the Town Accountant beyond 30 days may not be reimbursed.
- Once the request is received the estimated time to reimbursement is two weeks.

## A. <u>Unauthorized Expenses</u>

The following expenditures will not be reimbursed:

- Alcoholic beverages and tobacco
- Costs associated with any political or charitable event
- Expenses incurred for the sole benefit of the traveler, such as internet access, gym fees, valet service, entertainment, laundry services, etc.
- Expenses incurred by or on behalf of any person who is not a Town employee who accompanies the employee on official business
- Theft, loss, or damage to personal property while on Town business
- Non-mileage-related personal automobile expenses, including repairs, insurance, gasoline, and traffic citations

The Town Accountant may refuse to approve for payment any claim deemed to be fraudulent, unlawful, or excessive. In that instance, the Town Accountant will file a written statement of the reason for refusal with the Treasurer and forward copies to the Town Administrator and the originating department head. Resolution of all disputes shall reside with the Town Administrator.

## B. <u>Reimbursable Expense Categories</u>

# Registrations

- Registration fees for any conference or workshop should be submitted through the Accounts Payable process. If necessary, the employee may pay the training/conference fees out-ofpocket and then submit for reimbursement.
- The employee must document attendance at the training/conference, such as a certificate of completion, name badge, or screenshot of virtual trainings.

## Personal Car and Other Transportation

- Employees authorized to travel using their personal vehicle will be reimbursed at the Internal Revenue Service (IRS) mileage reimbursement rate in effect on the dates the travel occurred.
- Mileage will be calculated starting from the employee's office location or residence to the destination point, whichever distance is shorter.
- Transportation costs between the employee's residence and any office or meeting location furnished within the Town are not reimbursable.
- Employees must present receipts to be reimbursed for parking, tolls, airfares, taxi fares, and, when using a Town owned vehicle, fuel charges.
- Taxi fares may only be for routes between the employee's home and the airport/station and between the airport/station and place of lodging.
- If not traveling by car, the employee must include proof of travel, such as a train ticket or boarding pass.

## Lodging

- If travel requires an employee to be away from home for more than 24 hours, he or she will be reimbursed for reasonable charges for lodging expenses.
- Lodging expenses must not exceed the group rate published by the conference or activity sponsor. If the sponsor's group rate is not available when booking, the Town will reimburse for lodging costs comparable in location and quality and reserved at the lodging's government or group rate, whenever that is available.
- The Town will reimburse for the overnights between the days of a multiday professional development event. One night before any single or multiday day event is also reimbursable.

## Meals

- If travel requires an employee to be away from their work location for more than six hours, he or she will be reimbursed up to \$20.00 for lunch, unless lunch was included in the cost of the professional event. If longer than a 12-hour period, the per diem meals limit is \$50.00.
- Meals included in registration costs cannot be claimed for reimbursement or advance.
- Meal costs, including tips and taxes, incurred during the course of approved travel will be reimbursed only upon presentation of original itemized receipts. The Town will not reimburse tips larger than 20 percent. If any receipt is for multiple employees, they should be listed on the receipt.

## **Business and Office Supplies**

 Employees must obtain department head approval prior to incurring expenses for any business or office supplies, and all purchases made on behalf of the Town must be necessary, reasonable, and appropriate.

- The department head must verify that the department received the supplies for which an employee requests reimbursement before approving the Reimbursement Request Form.
- Business-related special postal services or delivery services that are not available through the Town will be reimbursed.

## C. <u>Reimbursement Submission</u>

Every claim for reimbursement must be documented using a Reimbursement Request Form signed by the employee and their department head. Required information includes (as applicable): travel or purchase date(s), purpose, amount(s), and total business-related mileage. Except for mileage and cash parking meter expenses, the employee must attach to the form a receipt or other valid proof of payment for each reimbursement claim.

Employees should submit for reimbursement as soon as the travel concludes, and at maximum, no later than 30 days after the expenses being incurred. If an employee does not submit the Travel Reimbursement Form with the related receipts or other documentation within that time, he or she may be personally responsible for the expenses.

## D. Violations

Employees who violate this policy will be held directly responsible for their actions. Consequences may include revocation of travel privileges, reparatory payments, suspension, or termination. Improper documentation of otherwise valid travel expenditures creates the appearance of fraud, waste, or abuse and may result in similar consequences. Moreover, misrepresenting expenses and intentionally submitting false claims are fraudulent and could result in criminal penalties.

## E. <u>Audit</u>

All expenses are subject to verification that they comply with this policy and to audit by the Town's independent auditor.

#### **BOXFORD REFERENCES**

Policies: Antifraud, Disbursements

#### **EXTERNAL REFERENCES**

M.G.L. c. 41, § 52
M.G.L. c. 44, § 58

<u>M. G. L c. 44 § 66</u> M.G.L. c. 64H § 6(d)

IRS webpage, <u>Standard Mileage Rates</u>

YEAR-END CLOSING			
Applies to:	<ul> <li>Select Board and Finance Committee in their budget transfer authority</li> </ul>		
	<ul> <li>Town Administrator, Finance Director, Town Accountant, and Treasurer/Collector job duties</li> </ul>		
	<ul> <li>All department heads in managing and reporting on their budgets and assets</li> </ul>		
Scope:	<ul> <li>Tasks necessary to close the fiscal year's books and complete required annual reports</li> <li>Protocol for year-end appropriation transfers</li> </ul>		
Effective:	Adopted by the Select Board on [Date]		

To ensure local officials have accurate financial data in adequate time to make necessary budgetary decisions, the Town must properly close its books promptly after the fiscal year ends. Failure to adhere to a timely schedule delays the completion of closing entries, trial balances, reconciliations, account analyses, and financial reporting. Furthermore, the completion of these tasks must take place before the Town can submit the combined balance sheet to the Division of Local Services (DLS) for the annual certification of free cash.

#### POLICY

The Town Administrator will hold all department heads accountable for timely and accurately completing the year-end tasks applicable to them as outlined in this policy. All facets of the year-end closing will be accomplished no later than September 30.

Annually no later than May 15, the Town Accountant will transmit year-end instruction memo to department heads and provide them with the following submission deadlines:

- June 1: Status reports or updates on capital projects, capital assets, and borrowings
- June 10: Requests for fiscal year budget transfers requiring Select Board and Finance Committee approval
- June 15: Status reports on grants, special appropriations, and special revenue accounts
- June 30: Submission of current year account payable invoices and documentation
- June 30: Requisitions for all outstanding current year invoices not processed to be encumbered
- July 5: Submission of first next fiscal year accounts payable invoices and documentation
- July 10: Submission of remaining invoices related to the fiscal year just ended for payment

Along with the year-end memo, the Town Accountant will distribute year-to-date reports of all grant, special appropriation, and special revenue funds to the responsible department heads.

## A. <u>Year-end Encumbrances</u>

The Town Accountant will encumber funds when proper documentation confirms the funds have been committed to specific purchases (by purchase orders), services (by service agreements), or projects (by contracts). All remaining encumbrances from the prior fiscal year will be closed on June 30.

# B. <u>Review of Grant Balances, Other Special Appropriations, and Special Revenue Accounts</u>

By June 15, every department head with responsibility for a grant, special revenue fund, and/or special appropriation will send the Town Accountant a spreadsheet providing status update(s) on the account(s). In the spreadsheet, the department head will report whether or not the grant/project has been completed or discontinued. Additionally, if an account has a deficit balance, the department head will state whether revenue is anticipated to be received sufficient to cover the deficit by September 30 and include relevant back-up documentation. If the deficit will not be covered by September 30, the department head will complete a Year-End Transfer Request Form and include it with the status package.

Depending on the status reported and documents received from the department head, the Town Accountant will:

- Review the Year-End Transfer Request Form and coordinate with the Town Administrator to place the transfer request on the required meeting agendas to cover the deficit (see section D below).
- Close each account that has been verified as completed, transferring any residual balance to general fund balance or to the original special revenue source when applicable.
- Carry forward into the new fiscal year's accounts the verified balances for each grant, special revenue fund, and special appropriation that has been confirmed to be ongoing.

Further, the Town Accountant will carefully review any special appropriation account remaining open but inactive in the general ledger for more than two fiscal years to ensure it does not serve as an unauthorized special revenue funding source.

## C. Capital Project Reviews, Capital Asset Updates, and Borrowings

As of March 1, the Town Accountant and Finance Director will review all capital project accounts to ensure that any internal borrowings done in anticipation of short- or long-term debt issuances have been covered. For any identified deficits:

- If debt had been authorized, the Finance Director will notify the Treasurer/Collector to initiate
  a short-term borrowing in an amount sufficient to cover the deficit no later than June 30.
- If debt had not been authorized, the Finance Director will refer the shortfall to the Town Administrator to either submit it for a debt authorization or an appropriation from available funds by town meeting, or a line-item transfer by the Select Board and Finance Committee (see section D below).

By June 15, the Town Accountant will distribute via email a capital asset list to department heads along with next-step instructions. By no later than August 1, each department head with capital assets will respond by forwarding to the Town Accountant an asset update report with notes confirming the existing data, making additions, and/or noting appropriate deletions, along with narrative explanations. The Town Accountant will update the Town's capital asset inventory based on the returned information.

## D. <u>Year-end Transfers</u>

The Town Accountant and department heads will pay close attention to any pending appropriation deficits that may be rectified through line-item transfers and notify the Town Administrator. No earlier than May 1 and no later than July 15, the Town Administrator will put any necessary transfer request on the Finance Committee's meeting agenda, followed by the Select Board's meeting agenda, for their authorizations. The Town Accountant will notify any department head whose budget is affected by the transfer.

# E. <u>Closing the Books</u>

No later than August 31, the Town Accountant will do the following to close the books:

- Conduct a reconciliation of each fund type in turn (including transfers between funds) and, when completed, close each fund in the general ledger.
- Confirm that all encumbrances from the prior fiscal year have been closed.
- Verify the new opening balances of all carried forward accounts in the special revenue funds.
- Calculate the general fund's unreserved fund balance.

# F. <u>Submissions to the Division of Local Services (DLS)</u>

Finance Official	Schedule/Report	Date
Town Accountant	Snow and ice data sheet	<ul> <li>September 15</li> </ul>
	<ul> <li>Community preservation surcharge report</li> </ul>	<ul> <li>September 15</li> </ul>
	(CP-1) (with the Director of Assessment)	
	<ul> <li>Balance sheet checklist</li> </ul>	<ul> <li>September 30</li> </ul>
	<ul> <li>Combined balance sheet and supporting</li> </ul>	<ul> <li>September 30</li> </ul>
	documents	
	<ul> <li>Community preservation fund report (CP-2)</li> </ul>	<ul> <li>September 30</li> </ul>
	<ul> <li>Schedule A</li> </ul>	<ul> <li>November 30</li> </ul>
Town Accountant,	<ul> <li>Statement of indebtedness</li> </ul>	<ul> <li>September 30</li> </ul>
Treasurer/Collector	<ul> <li>Treasurer's year-end cash report</li> </ul>	<ul> <li>September 30</li> </ul>
	<ul> <li>Cash reconciliation</li> </ul>	<ul> <li>September 30</li> </ul>
	<ul> <li>Schedule of outstanding receivables</li> </ul>	<ul> <li>September 30</li> </ul>

#### **BOXFORD REFERENCES**

**Policies:** Antifraud, Capital Planning, Grants Management, Reconciliations, Special Purpose Appropriations

#### EXTERNAL REFERENCES

<u>M.G.L. c. 44, § 33B</u>

<u>M.G.L. c. 59, § 5</u>

<u>M.G.L. c. 64, § 64</u>

Division of Local Services Informational Guideline Release 2017-13: <u>Appropriation Transfers</u> and other guidance: <u>Annual Year-End Letters</u> and <u>Municipal Calendar</u>

Massachusetts Municipal Auditor's and Accountants' Association: <u>Accounting Manual</u> Governmental Accounting Standards Board Statement 1: <u>Objectives of Financial Reporting</u> Government Finance Officers Association Guidance: <u>Timely Financial Reporting</u>

# **POLICY LOG**

# FINANCIAL PLANNING

Policy	Adopted	Last Reviewed	Amended
Annual Budget Process			
Capital Planning			
Debt Management			
Financial Reserves			
Forecasting			
Investments			
OPEB Liability			
Overlay			
Special Purpose Appropriations			

# FINANCIAL OPERATIONS

Policy	Adopted	Last Reviewed	Amended
Antifraud			
Disbursements			
Financial Management Team			
Gifts of Funds			
Grants Management			
Procurement Conflict of Interest			
Reconciliations			
Revenue Turnover			
Tax Recapitulation			
Travel/Employee Reimbursement			
Year-End Closing			