**NABHO Policies and Procedures**

# Welcome and Introduction to the Policies and Procedures Handbook

Welcome to the Nebraska Association of Behavioral Health Organizations (NABHO)! You are joining an organization that has a reputation for outstanding leadership, innovation, and expertise.

Please take time to read the policies contained in this handbook. Before doing so, it may be helpful to familiarize yourself with the NABHO Bylaws. If you have questions, feel free to ask the Executive Director, the President of the Association, or any member of the Executive Committee, who will be happy to answer your questions or find someone who can.

## NABHO Bylaws

The Bylaws contain Articles that present the Organization’s Name; Purpose and Responsibilities, including Mission, Vision, and Core Values; Membership, speaking specifically to eligibility, joining process, dues, and voting; Officers of the Association, including the Executive Director and Executive Committee, and their roles, election procedures, and terms of office; Meetings; Committees; Parliamentary Authority and Standing Rules; and Method of Amending the Bylaws. A digital copy is available to all Members on the website.

## NABHO History

Since 1983, NABHO has grown into an organization that responds to the ever-changing needs of the behavioral health community and its consumers. We strive to educate the public and policy makers in order to remove the stigma associated with mental illness and substance use disorders.

# General Membership Duties & Responsibilities

## Meetings

Regular, Annual, and Special Meetings are outlined in the bylaws. Quorum and Voting procedures are also described in the bylaws.

Member attendance of meetings is important because the Association cannot conduct business without a sufficient number of member representatives present. We encourage all member organizations to designate at least one representative to attend all scheduled meetings, but our meetings are open to anyone who works for a member organization.

The Association meets regularly each month on the third Friday of each month, except in July, when we do not hold a meeting. Meetings typically start at 10 a.m. Members receive, via email, the meeting agenda, a copy of the last month’s minutes, a monthly finance report, and other supporting documents, including a Zoom etiquette sheet for members joining the meeting remotely and a full list of members in good standing.

The Annual Meeting is typically held during the regular meeting time on the third Friday in June, which is the last month of our fiscal year. During the Annual Meeting, per the bylaws, we elect Executive Committee members and approve the annual budget. We also review membership in any non-elected committees and take care of additional business as necessary.

## Membership Application and New Member Orientation

Any new member organization must meet the eligibility standards and follow the processes identified in the Association Bylaws. New members will receive access to NABHO documents including the Articles of Incorporation, Bylaws, and Policies and Procedures. Information from the National Council for Mental Wellbeing will also be made readily available.

Any and all documents related to NABHO business are stored and maintained by the association and available to members upon request. Each member organization must designate at least one individual to act as a representative. Each organization can designate other individuals to serve as representatives and/or receive communications from NABHO. Individuals designated as representatives are entered into our database and are added to our email contact list, which is shared with both National Council for Mental Wellbeing and our lobbyist, American Communications Group. Representatives receive meeting invitations, weekly reports, and other communications, including surveys to gather information when needed for our advocacy work.

## Member Expulsion

A process for member expulsion is outlined in the Bylaws.

# NABHO Committees

## Executive Committee

The Executive Committee’s makeup, election, terms, direction, and primary duties are outlined in our Bylaws. Its 9 members are the Officers of the Association, also described in the bylaws.

### Executive Committee Additional Duties

Though the general responsibilities of the Executive Committee are outlined in the Bylaws, additional details regarding the work of the Executive Committee are bulleted below:

* Conduct regular meetings
* Appoint, support and monitor executive staff
* Evaluate Executive Director
* In conjunction with Executive Director, conduct the lobbyist evaluation
* Clarify the mission of the organization
* Approve long-term plans
* Identify NABHO priorities
* Review NABHO policies and procedures
* Oversee operations
* Ensure financial stability
* Oversee the administration and monitoring of grants
* Fulfill fiduciary duties as specified in the “Finance Policies and Procedures” section of this manual (pp. 12-13)

### Executive Committee Performance Evaluation Responsibilities

The Executive Committee shall evaluate the performance of the Executive Director annually in April and shall meet with the Executive Director to share and discuss the evaluation. Upon completion of the performance evaluation, the Executive Committee shall discuss and agree upon any identified increase to the rate of compensation received by the Executive Director. The President of the Executive Committee shall then produce, in writing, the effective date of the pay increase and the amount of the increase to be received. This document shall be attached to the contract and retained by NABHO for a minimum of seven years. The Executive Committee shall provide feedback on the Contract Lobbyist’s performance to the Executive Director who shall meet with and evaluate the performance of the Contract Lobbyist annually in April. The Executive Director shall report the results of the discussion with the Contract Lobbyist to the Exec committee. The Executive Committee shall approve any changes to the contract including compensation.

## Executive Committee Meetings

The Executive Committee meets regularly on the third Friday of each month. The Executive Committee schedules an Annual Workday with the Executive Director on the third Friday of July to review the policy manual and association priorities and directions. The Executive Committee works with the Executive Director and Lobbyist to identify key issues that should inform advocacy efforts during the Session. A majority of elected officers shall constitute quorum.

### Attendance of Executive Committee Meetings

Executive Committee members are expected to attend or participate in all scheduled calls or meetings. If a member has unexcused absences to two consecutive monthly executive committee and membership meetings, the President of the Association may contact the member to discuss their attendance. The President may recommend removal of an officer for nonattendance. The process for filling vacancies on the Executive Committee is outlined in the bylaws.

### Voting at Executive Committee Meetings

Votes taken by the Executive Committee will be recorded in the meeting minutes. A motion requires a majority of elected officers to pass.

### Distribution of Executive Committee Materials

The meeting agenda and any supporting documents will be made available for each Executive Committee member prior to any meeting.

## Executive Committee Officers

Executive Committee Officers are defined in the Bylaws, as is the process for their election. Official roles for each Officer’s position are likewise defined in the Bylaws. Additionally, the following duties have been added to each role:

*President* – The President works with the Executive Director to set Association meeting agendas and organize other meetings, as with governmental agencies, stakeholders, or prospective members.

*Treasurer* – The Treasurer reviews the monthly Finance Reports and bookkeeping notes and presents the Finance Report to the membership at monthly meetings. The Treasurer also serves as a member of the Finance Committee (see below).

*Secretary* – The Secretary helps to take notes at all NABHO meetings. When possible, the Executive Director and/or Executive Assistant document the proceedings of the Association and its Committees; the Secretary’s notes serve to verify the accuracy of this documentation. Tracking motions and action items is particularly important.

The following positions are expected to bring their specific expertise related to their title to all discussions conducted by the Executive Committee.

 Vice President for Acute Care

 Vice President for Adult Behavioral Health Services

 Vice President for Children’s Behavioral Health Services

 Vice President for Consumer Affairs

 Past President

## Orientation checklist

Each new Executive Committee member shall be provided access to these Policies and Procedures and are expected to review them. New committee members will receive calendar invitations and information regarding regular meetings.

## Executive Committee Member Representative Removal

A member representative of the Executive Committee is removed by action of the membership at large. Prior to removal, the President, President-Elect, and Chair of the Nominating Committee shall conduct a timely investigation with the assistance of the Executive Director and make a recommendation. The Executive Director and President shall notify the member representative and the member organization of impending action by the general membership with a certified letter. The representative shall have up to five days to respond in writing. If immediate action is needed, the membership shall call a special meeting, otherwise action may be taken at the next membership meeting.

## Connie Barnes Memorial Mentor Program

Connie Barnes was the President of NABHO from 2014 through 2016. While serving in that role, she saw a need to build our leadership team and bring new voices to the table. Under her guidance, we created a mentor program that invites two individuals per year onto the Executive Committee to help member representatives to better understand its roles and responsibilities.

The program fosters leadership and creates a pipeline for moving new individual representatives into roles on the Association’s Executive Committee members. Many past program participants have gone on to become full members of the Executive Committee.

We accept self-nominations or nominations from member organizations for two positions annually. These are staggered to have a new mentee join in January and another in July, with each position to last for 1 year. The expectations for the participants are outlined in the application letter. An example of the letter is posted for members on our website, and the Executive Director sends it out when calling for applicants prior to the start of each mentee period. It is also included as part of the online Nomination or Application form, which is accessible to all members through the website.

## Finance Committee

The Finance Committee makeup and general responsibilities are described in the bylaws. Though, per the Bylaws, it only needs three members, it typically includes the current Treasurer, the immediate past Treasurer, the current President as an ex-officio member, and other members as appointed by the Association President.

### Finance Committee Meetings

The Finance Committee meets at the invitation of the Executive Director. Meetings to evaluate the current budget, make suggestions for modifications, and begin planning for the next fiscal year’s budget usually begin in January and carry on through the spring, until the budget it presented to the membership in May and approved at the Annual Meeting in June. The Finance Committee may also meet at other times of the year to address financial issues identified by the Executive Director or President. A majority of committee members shall constitute quorum.

### Attendance of Finance Committee Meetings

Attendance of meetings is strongly encouraged due to the time-sensitive nature of committee work. The President may recommend removal of a committee member for nonattendance.

### Voting at Finance Committee Meetings

A motion requires a majority of committee members to pass.

### Distribution of Materials for Finance Committee Meetings

The meeting agenda and supporting documents will be made available for each Finance Committee member prior to any meeting.

## Nominating Committee

The Nominating Committee’s membership and responsibilities are described in the bylaws.

### Nominating Committee General Responsibilities

Since the Nominating Committee is required to submit nominations for consideration at the annual meeting, it typically meets in March or April to draft a slate of candidates.

### Nominating Committee Meetings

Meetings are scheduled at the discretion of the Executive Director. A majority of committee members shall constitute quorum.

### Voting at Nominating Committee Meetings

A motion requires a majority of committee members to pass.

### Distribution of Materials for Nominating Committee Meetings

The meeting agenda and supporting documents will be made available for each Nominating Committee member prior to any meeting.

## Legislative and Regulatory Committee

The Legislative and Regulatory Committee is not described in the bylaws, except as an Ad Hoc Committee; however, it plays an integral role in the Association’s advocacy efforts, and its function has been refined as described below.

### Legislative and Regulatory Committee Members and Terms

Co-Chairs of the Legislative and Regulatory Committee shall be appointed by the President and serve for one year, with successive terms permitted. A minimum of 6 individuals from NABHO member agencies in good standing, representing a cross section of the membership, shall be selected by the President, Executive Director and Chairpersons to serve on the committee. At least one member of the Executive Committee may be appointed to serve on the Legislative and Regulatory Committee to act as a liaison, reporting on the work of the Legislative and Regulatory Committee to the Executive Committee.

### Legislative and Regulatory Committee General Responsibilities

The Committee shall provide advice and support to the Executive Committee and General Membership regarding Legislative and Regulatory issues. They will work with the Association’s lobbyist and Executive Director to review draft legislation, analyze proposed regulatory changes, suggest new or amended legislation or regulations and make recommendations to the Executive Committee and General Membership related to these responsibilities.

### Legislative and Regulatory Committee Meetings

The Committee shall meet at a minimum quarterly with additional meetings as determined by the Chairperson and Executive Director. The Committee meets as often as necessary at the beginning of the Legislative Session in January to ensure NABHO is actively involved in Legislative matters. A majority of committee members shall constitute quorum. The Chair shall regularly schedule meetings. The Executive Committee may invite the Chairperson to attend their meeting and report. Committee meeting records shall be retained and made available to all NABHO members upon request.

### Attendance of Legislative and Regulatory Committee Meetings

Committee members are expected to participate in at least three quarters of all committee meetings.

### Voting at Legislative and Regulatory Committee Meetings

A motion requires a majority of committee members to pass.

### Distribution of Materials for Legislative and Regulatory Meetings

The meeting agenda and supporting documents will be made available for each Legislative and Regulatory Committee member prior to any meeting.

## Managed Care Committee

The Managed Care Committee is an Ad Hoc Committee.

### Managed Care Committee Members and Terms

The Chairperson of the Committee shall be appointed by the President and serve for a term of one year with successive terms permitted. A minimum of 6 individuals from NABHO member agencies in good standing, representing a cross section of the membership, shall be selected by the President, Executive Director, and Chairperson to serve on the committee. At least one member of the Executive Committee shall be appointed to serve on the Managed Care Committee to act as a liaison, reporting to the Executive Committee.

### Managed Care Committee General Responsibilities

The Committee shall be responsible for providing advice to the Executive Committee and General Membership regarding any areas and concerns related to Heritage Health and Medicaid Managed Care. They shall seek input from member agencies regarding challenges and concerns, act as a liaison between other member agencies regarding recent issues and resolutions, identify and monitor issues that affect legislation and regulatory issues and communicate with the Legislative and Regulatory Committee, support the Executive Committee in areas of Medicaid Expansion and Value Based Contracting.

### Managed Care Committee Meetings

Committee meetings shall be held at a minimum quarterly. Additional meetings shall be determined by the Chair and the Executive Director as needed. The Chair shall set regularly scheduled meetings. A majority of committee members shall constitute quorum. A Secretary, appointed by the Chair, shall be responsible for keeping and reporting adequate records of all meetings. Committee meeting records shall be retained and made available to NABHO members upon request.

### Attendance of Managed Care Committee Meetings

Committee members are expected to participate in at least three quarters of all committee meetings.

### Voting at Managed Care Committee Meetings

A motion requires a majority of committee members to pass.

### Distribution of Materials for Managed Care Committee Meeting

The meeting agenda and supporting documents will be made available for each Managed Care Committee member prior to any meeting.

# NABHO Contractors and Employees

Role documents for NABHO Contractors and Employees are retained by the Association, stored online in a portion of the website reserved for Administrative Documents. They are available to members upon request.

## Executive Director

The Executive Director is selected by the Executive Committee and approved by a vote of General Membership. The Executive Director is an employee of the Association. The Executive Director serves as an Ex Officio member of the Executive Committee and has no voting authority.

## Executive Assistant

The Executive Assistant is an employee of NABHO and supports the work of the Executive Director, Committees, and Membership.

## Independent Contracted Lobbyist

The Lobbyist is an independent contractor who represents the organization at the direction of the Executive Director and the Membership.

## Interns or Volunteers

Interns or volunteers will be under the direction of the Executive Director with input from the Executive Assistant.

# Conflicts of Interest and Confidentiality

## Conflicts of Interest

NABHO expects all employees, contractors, and board members to conduct themselves and organization business in a manner that reflects the highest standards of ethical conduct, and in accordance with all federal, state, and local laws and regulations. This includes avoiding real and potential conflicts of interests.

Exactly what constitutes a conflict of interest or an unethical business practice is both a moral and a legal question. NABHO recognizes and respects the individual’s right to engage in activities outside of association with NABHO which are private in nature and do not in any way conflict with or reflect poorly on the organization.

It is not possible to define all the circumstances and relationships that might create a conflict of interest. If a situation arises where there is a potential conflict of interest, the employee should discuss this with the Executive Director and/or President of the Executive Committee for advice and guidance on how to proceed. The list below suggests some of the types of activity that indicate improper behavior, unacceptable personal integrity, or unacceptable ethics:

1. Simultaneous employment by another firm that is a competitor of or supplier to NABHO.
2. Carrying on company business with a firm in which the employee, or a close relative of the employee, has a substantial ownership or interest.
3. Holding a substantial interest in, or participating in the management of, a firm to which the company makes sales or from which it makes purchases.
4. Borrowing money from customers or firms, other than recognized loan institutions, from which our company buys services, materials, equipment, or supplies.
5. Accepting substantial gifts or excessive entertainment from an outside organization or agency.
6. Speculating or dealing in materials, equipment, supplies, services, or property purchased by the company.
7. Participating in civic or professional organization activities in a manner that divulges confidential company information.
8. Misusing privileged information or revealing confidential data to outsiders.
9. Using one’s position in the company or knowledge of its affairs for personal gains.
10. Engaging in practices or procedures that violate antitrust laws, commercial bribery laws, copyright laws, discrimination laws, campaign contribution laws, or other laws regulating the conduct of the organization’s business.

Members of the board will be expected to review and complete the Annual Acknowledgement and Disclosure Form at least once per calendar year, and at any time that a conflict of interest may arise. Note that all actual and potential conflicts should be disclosed, even if they appear to be immaterial. Materiality is for the organization’s management and for the Executive Committee of the Board to determine.

When a conflict of interest is identified, the board member shall abstain from any votes or other activities of the board related to the conflict of interest.

## Confidential Information

The protection of confidential business information and trade secrets is vital to the interests and success of NABHO. Confidential information is any and all information disclosed to or known by you because of employment with the company that is not generally known to people outside the company about its business.

An employee or representative who improperly uses or discloses trade secrets or confidential business information will be subject to disciplinary action up to and including termination of employment and legal action, even if they do not actually benefit from the disclosed information.

All inquiries from the media must be referred to the Executive Director of the organization.

This provision is not intended to, and should not be interpreted to, prohibit employees from discussing wages and other terms and conditions of employment if they so choose.

# Disaster Planning

The Executive Director will store key Association documents on the website secure portal and a back up solution. Hard copies may be kept in safety deposit box or fireproof storage. These documents include list of all technology support programs, physical assets, insurance policies, lease agreements, contracts, association charter, bylaws, recent 990s, 501 c4 determination letter, audits and bank account information.

As emergencies arise, the Executive Director in cooperation with the Executive Committee will develop both an internal and external communication plan to execute in time of emergency.

# Equal Opportunity and Commitment to Inclusion

## Equal Opportunity

NABHO provides equal employment opportunities to all employees and applicants for employment without regard to race, ethnicity, color, ancestry, national origin, gender, sexual orientation, marital status, religion, age, disability, gender identity, results of genetic testing, or service in the military. Equal employment opportunity applies to all terms and conditions of employment, including hiring, placement, promotion, termination, layoff, recall, transfer, leave of absence, compensation, and training.

NABHO expressly prohibits any form of unlawful employee harassment or discrimination based on any of the characteristics mentioned above. Improper interference with the ability of other employees to perform their expected job duties is absolutely not tolerated.

Any employees with questions or concerns about equal employment opportunities in the workplace are encouraged to bring these issues to the attention of an Executive Committee Member or the Executive Director of the organization. NABHO will not allow any form of retaliation against individuals who raise issues of equal employment opportunity. If an employee feels they have been subjected to any such retaliation, they should bring it to the attention of an Executive Committee Member or the Executive Director.

Retaliation means adverse conduct taken because an individual reported an actual or perceived violation of this policy, opposed practices prohibited by this policy, or participated in the reporting and investigation process described below. “Adverse conduct” includes but is not limited to:

1. shunning and avoiding an individual who reports harassment, discrimination or retaliation;
2. express or implied threats or intimidation intended to prevent an individual from reporting harassment, discrimination or retaliation; or
3. denying employment benefits because an applicant or employee reported harassment, discrimination or retaliation or participated in the reporting and investigation process.

Complaints of discrimination should be filed according to the procedures described in the Harassment and Complaint Procedure.

## Commitment to Inclusion

NABHO is committed to creating and maintaining a workplace in which all employees, contractors, and associated parties have an opportunity to participate and contribute to the success of the association and are valued for their skills, experience, and unique perspectives. This commitment is embodied in organization policy and the way we do business at NABHO and is an important principle of sound business management.

# Harassment and Complaint Procedure

Sexual and other unlawful harassment is a violation of Title VII of the Civil Rights Act of 1964 (Title VII), as amended, as well as many state laws. Harassment based on a characteristic protected by law, such as race, ethnicity, color, ancestry, national origin, gender, sex, sexual orientation, gender identity, marital status, religion, age, disability, veteran status, or other characteristic protected by state or federal law, is prohibited.

Harassment is not tolerated by members or employees. Any retaliation against an individual who has complained about sexual or other harassment or retaliation against individuals for cooperating with an investigation of a harassment complaint is similarly unlawful and will not be tolerated. NABHO will take all steps necessary to prevent and eliminate unlawful harassment.

## Definition of Unlawful Harassment

“Unlawful harassment” is conduct that has the purpose or effect of creating an intimidating, hostile, or offensive work environment; has the purpose or effect of substantially and unreasonably interfering with an individual’s work performance; or otherwise adversely affects an individual’s employment opportunities because of the individual’s membership in a protected class.

Unlawful harassment includes, but is not limited to, epithets; slurs; jokes; pranks; innuendo; comments; written or graphic material; stereotyping; or other threatening, hostile, or intimidating acts based on race, ethnicity, color, ancestry, national origin, gender, sex, sexual orientation, marital status, religion, age, disability, veteran status, or other characteristic protected by state or federal law.

## Definition of Sexual Harassment

While all forms of harassment are prohibited, special attention should be paid to sexual harassment. “Sexual harassment” is generally defined under both state and federal law as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature where:

* + Submission to or rejection of such conduct is made either explicitly or implicitly a term or condition of any individual’s employment or as a basis for employment decisions; or
	+ Such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile, or offensive work environment.

Other sexually oriented conduct, whether intended or not, that is unwelcome and has the effect of creating a work environment that is hostile, offensive, intimidating, or humiliating to workers may also constitute sexual harassment.

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct that, if unwelcome, may constitute sexual harassment depending on the totality of the circumstances, including the severity of the conduct and its pervasiveness:

* + Unwanted sexual advances, whether they involve physical touching or not
	+ Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one’s sex life, comments about an individual’s body, comments about an individual’s sexual activity, deficiencies, or prowess
	+ Displaying sexually suggestive objects, pictures, or cartoons
	+ Unwelcome leering, whistling, brushing up against the body, sexual gestures, or suggestive or insulting comments
	+ Inquiries into one’s sexual experiences
	+ Discussion of one’s sexual activities

All parties associated with NABHO should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment and retaliation against individuals for cooperating with an investigation of sexual harassment complaint is unlawful and will not be tolerated at NABHO.

## Complaint Procedure

Any individual who believes they have been subject to or witnessed illegal discrimination, including sexual or other forms of unlawful harassment, is requested and encouraged to make a complaint. You may complain directly to the Executive Director, President of the Board, or any member of the Executive Committee with whom you feel comfortable bringing such a complaint. Similarly, if you observe acts of discrimination toward or harassment of another individual, you are encouraged and expected to report this to one of the individuals listed above.

No reprisal, retaliation, or other adverse action will be taken against an individual for making a complaint or report of discrimination or harassment or for assisting in the investigation of any such complaint or report. Any suspected retaliation or intimidation should be reported immediately to one of the persons identified above.

The Executive Director, President or Executive Committee will promptly investigate all complaints to the extent possible, with regard for confidentiality.

If the investigation confirms conduct contrary to this policy has occurred, NABHO will take immediate, appropriate, corrective action.

# Whistleblower Protection

NABHO will use its best efforts to protect whistleblowers against retaliation. Whistleblowing complaints will be handled with sensitivity, discretion, and confidentiality to the extent allowed by the circumstances and the law. Generally, this means that whistleblower complaints will only be shared with those who have a need to know so that NABHO can conduct an effective investigation, determine what action to take based on the results of any such investigation, and in necessary situations, with law enforcement personnel. (Should disciplinary or legal action be taken against a person or persons as a result of a whistleblower complaint, such persons may also have a right to know the identity of the whistleblower.)

Any parties associated with NABHO may not retaliate against a whistleblower for informing management about an activity which that person believes to be fraudulent or dishonest by adversely affecting the terms or conditions of the whistleblower’s employment, including but not limited to: threats of physical harm, loss of job, punitive work assignments, or impact on salary or fees.

Whistleblowers who believe that they have been retaliated against may file a written complaint with the Executive Director, President of the Executive Committee, and/or the Executive Committee. Any complaint of retaliation will be promptly investigated, and appropriate corrective measures taken if allegations of retaliation are substantiated. This protection for retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

Whistleblowers must be cautious to avoid baseless allegations.

# Financial Policies and Procedures

## Responsibilities

The following is a list of personnel who have fiscal and accounting responsibilities:

### Executive Committee

The Executive Committee:

* Reviews and recommends adoption of the annual budget to full membership
* Reviews annual and monthly financial statements and information
* Reviews the Executive Director and Lobby Firm performance annually and establishes the salary
* Reviews and approves all contracts over $25,000
* Reviews and approves all non-budgeted expenditures over $5,000
* Reviews and approve any proposed expenditures which are 10% or more over the budgeted line item, unless the expenditure would cause a deficit budget
* Reviews and advises staff on internal controls and accounting policies and procedures
* Reviews annual 990 prepared by CPA firm
* Reviews the audit of financial records at a minimum of every 5 years by CPA firm
* Approves any movement or opening of new financial accounts or investments and report to the membership

The Executive Director and Treasurer:

* + Review of monthly bank reconciliations and credit card statements
	+ Review the monthly finance reports

The President and Treasurer:

* Will be authorized signers on the bank accounts

The President:

* Review Executive Director’s expense reimbursement

### Executive Director

* + Oversees annual budget development
	+ Approves all program expenditures
	+ Reviews and signs all issued checks and/or approves check signing procedures
	+ Reviews and approves all contracts under $25,000
	+ Reviews and approves all grant submissions
	+ Approves inter-account bank transfers
	+ Is on-site signatory for all bank accounts
	+ Reviews all online bank statements for any irregularities
	+ Makes access to all online financial information available to the Treasurer
	+ Reviews completed monthly bank reconciliations
	+ Oversees the adherence to all internal controls
	+ Authorizes stipends and reimbursements for staff
	+ Reviews and approves all reimbursements and fund requests
	+ Makes bank deposits
	+ Initiates processing of payroll
	+ Oversight of general ledger, monthly and year-end financial reports, reconciliation of all bank accounts, and accounts receivable
	+ Mails vendor checks
	+ Coordinates annual audit including single audit reporting requirements as necessary
	+ Coordinates finance meetings

### Finance Committee

The makeup and responsibilities of Finance Committee are described above under NABHO Committees.

### General Ledger

The accounting functions consist of processes to maintain NABHO’s General Ledgers, preparation of reports from these ledgers and other accounting records, and safeguarding NABHO’s assets. The General Ledger is the financial record of NABHO. The Executive Director is responsible for overseeing day-to-day operations of the accounting function, including the processing of transactions through the General Ledger system.

### Chart of Accounts

The Chart of Accounts is designed to capture the data needed to track NABHO’s financial information.

### Cash Disbursements

The Cash Disbursement Journal is a record of checks that are written.

### Cash Receipts

The Cash Receipts Journal is a record of all deposits that are made.

### Assets

A list of assets shall be kept.

### Cash Accounts

In order to properly safeguard and account for cash and cash equivalents, the following policies will be followed:

The Executive Committee shall approve of any new cash or checking accounts prior to such accounts being established. Conversely, the Committee shall also approve closing any such accounts.

All cash and checking accounts shall be held solely in the name of NABHO and shall be limited to authorized signers. The Executive Director, Association President and Treasurer, shall each be authorized to sign checks. All checks over $25,000 must have either a second signature or prior approval of the Executive Committee. A monthly record of checks will be distributed to the Executive Committee.

Any transfer of funds to other accounts must be reported to the Executive Committee.

### Bank Deposits

To maintain proper internal control over funds mailed to NABHO, the following policies shall be followed:

A receipt will be prepared by a staff member, all checks will be stamped immediately "for deposit only" with the NABHO account information. A deposit slip(s) shall be created by the Executive Director to ensure proper entry into the accounting system.

### Bank Reconciliations and Credit Card Statements

Each month, a formal reconciliation of every cash and cash equivalent account shall be performed. All credit card statements must be supported with appropriate receipts. Reconciliations will be completed within fourteen days of receipt of all bank statements. Treasurer has access to all online banking information.

### Asset Disposal

The decision to dispose of an item with an original value over $5,000 lies with the Executive Committee. Disposal of items with an original value of under $5,000 is left to the discretion of the Executive Director.

The Executive Committee will make every effort to sell NABHO assets at their fair market value through reasonable means and valuation methodologies. NABHO will make due notification to the Nebraska Attorney General as required under current statutes and regulations with respect to any sales of all or substantially all of its assets as part of the dissolution process. In the event that the item cannot be sold it can be: (1) donated to another non-profit organization with a similar tax-exempt purpose, if office equipment or furniture; or (2) sold for scrap value or traded in, subject to applicable law. Disposed property will be adjusted accordingly on the books.

## Billing and Accounts Receivable

### Revenue

Revenue will be recognized on the cash basis of accounting. Grant revenue will be recognized to the extent of grant expenditures. Grants calling for billings in advance of service provision shall be billed accordingly, with offsetting entries to deferred revenue. The balance of accounts receivable in the general ledger may be reconciled as needed, to coincide with dues payment periods.

### Grant and Contract Billing

Where a funding entity is to be billed for services rendered through NABHO activities related to a grant or contract, the accounting system shall be utilized to originate an invoice. The Executive Director shall determine, through the review of source documentation, to whom and for what amounts the accounts receivable will be billed. Accounts receivable shall be billed per grant or contract specifications.

### Credit and Collections

The Executive Director is to monitor amounts owed to NABHO. Accounts receivable balances which remain unpaid after 90 days will be brought to the attention of the Executive Committee.

### Federal Grants and Other Revenue Sources

NABHO Executive Committee may direct the Director to apply for any appropriate Federal Grants and to comply with all regulations stipulated within that grant. The Executive Committee will manage the drawdown of the funds.

### Administration

All NABHO Federal award funds will be administered in accordance with the HRSA Notice of Award, grant agreement, applicable provisions of current statutes and regulations, and applicable policy guidelines and statements (individually and collectively, the “grant requirements”). To be allowable under federal awards, costs must be reasonable, allocable and adequately documented. A cost is considered reasonable if it does not exceed what a prudent person would incur under similar circumstances. Costs will be allocable to a federal award only to the extent the goods or services benefit the program and only if such costs are adequately documented.

All HHS grant funds must be recorded by NABHO in accounting records separate from the records of all other funds, including funds derived from other grant awards. With respect to each approved HHS grant project, NABHO must account for the sum total of all amounts paid as well as other funds and in-kind contributions by keeping satisfactory records of expenditure for direct and indirect costs meeting the grant requirements.

All revenue and expenditures will be reported separately by federal or non-federal funding source. The Executive Director is responsible for the completion and submission of quarterly and annual reports required by the awarding agencies. With respect to HHS grants, the Executive Director will, with respect to each approved project, provide a full account as of the date of termination of grant support in accordance current statutes and regulations.

### State or Other Federal Grant Opportunities

State or other federal grant funds shall only be used to pay for expenditures of the nature specified by the awarding foundation or grant agreement.

## Liabilities

### Accounts Payable

Vendor invoices are to be paid upon receipt. Vendor invoices will be entered into the accounting system on a monthly basis. The Executive Director will be responsible for mailing the checks to vendors, or otherwise making electronic funds transfers. A filing system shall be used to maintain check stubs and copies of paid invoices. All unsigned checks are to be kept in a secured locked location.

### Expense

Cash Disbursements & Expense Allocations Cash disbursements are generally made for:

* Payments to vendors for goods and services ;
* Taxes/license fees;
* Staff training and development;
* Memberships and subscriptions;
* Meeting expenses/travel;
* Employee reimbursements;
* Marketing/promotional materials;
* Salary/fringe;
* Other expenses as approved by the Executive Committee

Any non-budgeted expenses exceeding $5,000.00 must be reviewed by the Executive Committee and approved by the full membership.

### Expense Reimbursement

Expense reimbursement form submitted with receipts, nature of business, before approving for reimbursement as follows:

*Lodging*: an itemized receipt from the hotel must be provided detailing all charges, the person(s) for whom the lodging was provided, and the specific business purpose. NABHO only pays for necessary nights of travel.

*Meals and Entertainment*: a receipt must be provided showing the cost of food, beverage, and gratuities, including the names of every person for whom food or beverage was provided, and the specific business purpose. GSA per diem rates can be used for meal reimbursement. No alcohol will be reimbursed with Federal funds.

*Other Expenditures*: a receipt from the vendor detailing all goods or services purchased (including the class of service for transportation) and the specific business purpose.

### Requests for Payment

The Executive Director reviews all requests for payment and:

* Verifies expenditure and amount;
* Approves for payment if in accordance with budget;
* Provides or verifies appropriate allocation information;
* Provides date of payment taking into account cash flow projections;
* Reviews and approves the processing of payments via Electronic Funds Transfer, when appropriate;
* Processes payment.

### Payment Processing

The Executive Director oversees the processing of all payments. NABHO staff:

* Mails checks, retaining appropriate backup documentation;
* Files all backup documentation in the appropriate file;
* Updates appropriate budgets for expenditure tracking.

### Payroll Administration

All personnel files contain the following documents: an application and/or resume, date of employment, position and pay rate, authorization of payroll deductions, W4 withholding authorization, termination data where applicable, a signed confidentiality agreement, and other forms as deemed appropriate by the Executive Director.

All employees will fill out an I-9 form and submit the allowable forms of identification to the Executive Director. The completed I-9 forms will be kept in a secure location separate from the personnel files. All personnel files are to be kept in a secure, locked file cabinet and accessed only by authorized personnel.

### Payroll

NABHO uses a payroll processing firm. Salary determination is set by the Executive Committee. All evaluations are documented and kept in employees’ personnel file. Employees are paid monthly. Timesheets are submitted on the last day of the month to the Executive Director and then sent to the Payroll Processor. Payroll is performed using direct deposit.

## Purchasing

### Administration

The nature and scope of services that may be outsourced may include the following functions: legal, accounting, auditing, design, construction, information technology, and payroll. The process for selection of contractors and consultants is done by the Executive Director in conjunction with the Executive Committee. All unbudgeted purchases over $5,000 must be reviewed by the Executive Committee and approved by the membership.

### Credit and Credit Cards

Executive Committee approves issuance of corporate credit cards. Balance shall be paid in full monthly and shall not carry a balance forward. The credit limit of the corporate credit cards shall not exceed $15,000. All staff usage of the corporate credit card shall be for NABHO business purposes only. Personal use is strictly prohibited. Staff usage of the corporate credit card shall occur only with prior approval of the Executive Director. Authorized cardholders are responsible for the safe keeping of corporate credit cards. The credit card will be used in situations where obtaining a check for payment is not practicable. Each receipt shall be documented with the business purpose of the charge and funding source to charge. NABHO staff shall reconcile receipts to the credit card statement each month. Credit card statements are accessible online.

## Budget and Planning

### Process

The Finance Committee is responsible for the preparation of the annual NABHO budget. The Finance Committee shall coordinate with the Executive Director to negotiate and establish budgetary line items and staffing patterns for the upcoming fiscal year. Preliminary review of current budget to determine any potential modifications will take place in January. This will also begin the planning for the upcoming fiscal year’s budget. The Finance Committee shall present the budget to the Executive Committee to refine the proposed budget and compare the proposed budget to the strategic goals of the agency. A draft budget will be presented to the membership at the meeting one month prior to the annual meeting. The Executive Committee shall present the budget for the NABHO Membership for final consideration and adoption at the annual meeting.

### Executive Committee Approvals

The Executive Committee, along with the Executive Director, is responsible for implementing and monitoring the NABHO budget once approved.

### End of Month and Fiscal Year-End Close

NABHO staff prepare month-end and year-end finance reports that shall be electronically stored for audit trail purposes.

At the end of the fiscal year, an outside CPA will prepare the annual Return for Organization Exempt from Income Tax (IRS Form 990). The return will be presented to the Executive Director, Executive Committee and Finance Committee for their review and approval. The CPA firm will then file the return with the Internal Revenue Service by the annual deadline. All other appropriate government filings will be completed and filed with the appropriate agency.

### Review of Monthly Financial Statements

Financial statements are reviewed by the Executive Committee and NABHO membership monthly. The monthly report is kept on file for members’ review.

### Cash Management

In order to maintain adequate operating capital, NABHO will maintain cash on hand of at least a 3-month operating reserve.

### Investment Policy

The Finance Committee will review all accounts annually and make any recommendations to the Executive Committee.

### Insurance

NABHO will purchase needed policies to insure the organization against risk. These policies will cover, at a minimum, Director and Officer Liability, Employment Practice Liability, General Liability, Business and Property Liability, Work Comp, and Cyber Liability. These policies will be reviewed annually. All independent contractors will carry their own liability insurance and worker’s compensation.

# Document Retention Policy

Documents shall be retained as follows:

|  |  |
| --- | --- |
| **Type of Document** | **Period of Retention** |
| Bank Reconciliations | 2 years |
| Customer and Vender Correspondence | 2 years |
| General Correspondence | 2 years |
| Bank Statements | 3 years |
| Employment Applications | 3 years |
| Expired Insurance Policies | 3 years |
| Internal Audit Reports | 3 years |
| Inventories | 7 years |
| Personnel Files (terminated) | 7 years |
| Time Sheets | 7 years |
| Duplicate Deposit Slips | Current year + 2 years |
| Audit Supporting Documents | Current year + 7 years |
| Contracts, Mortgages, Notes, and Leases | Current year + 7 years |
| Payroll Records | Current year + 7 years |
| Audit Reports | Permanently |
| Checks (for payments and purchases) | Permanently |
| Contracts (still in effect) | Permanently |
| Deeds, Mortgages, Bills of Sale | Permanently |
| Depreciation Schedules | Permanently |
| Insurance Records and Policies | Permanently |
| Legal and Important Matter Correspondence | Permanently |
| Minute Books, Bylaws, and Charters | Permanently |
| Retirement and Pension Records | Permanently |
| Tax Returns, 990s | Permanently |
| W-2s | Permanently |
| Year End Financial Statements | Permanently |

Documents may be stored in hard copy and/or scanned to be retained electronically. At the end of the retention periods, the records should be destroyed. The Executive Director is responsible for ensuring documents are retained for the correct amount of time and indicating where such documents are stored. Periodic assessments should be conducted to carry out the retention policies. The Executive Director will establish a retention period for any records not listed on the schedule by checking compliance with appropriate laws.

Records should not be kept if they are no longer needed for the operation of the organization or required by law. Records will be destroyed in a manner that ensures such information will not fall into unauthorized hands and be prevented from being reconstructed. Records will be kept regarding when such records were destroyed and by what means.

Notwithstanding the retention periods set in this policy, no record which is eligible for destruction shall be destroyed if the Association becomes aware that the record may be needed for litigation or other special circumstances. In the event of pending or threatened litigation, government or regulatory agency investigation, pending tax matters, subpoenas, other legal action, or other special situations, relevant records should not be altered or destroyed under any circumstances, even if this policy would otherwise direct destruction. The Executive Director will put a hold on records of interest.

# Member Benefits

## NABHO and ACG Reports

NABHO members receive reports from the Executive Director that highlight legislative activities, National Council for Mental Wellbeing news, NABHO news and other important news impacting behavioral health. Members also receive a weekly report from our Lobbyist during the Legislative Session. To be included on or removed from the mailing lists, member representatives must contact NABHO staff.

## NABHO Meetings

Members are invited to attend monthly meetings. Invitations are sent in a repeating Outlook calendar invite. They are also sent monthly, along with a meeting agenda, supporting documents for the meeting (usually at least the previous month’s minutes and finance report, and a list of members in good standing.

## NABHO Special Events

NABHO organizes special events like conferences, trainings, and webinars. Members are invited to attend for free or at a reduced-rate. These events provide opportunities to meet other people in the behavioral health field. When possible they can also be attended for continuing education credit. Special events may be held in person or online.

## National Council for Mental Wellbeing

Membership in the National Council for Mental Wellbeing which advocates on the federal level, offers discounted rates for their annual conference, and other trainings, sends regular communications and offers a “members only” listserv.

# Communication, Social Media, Media, and Website Policies and Procedures

Social Media is a powerful tool. As a member of NABHO, we suggest the Guidelines below.

## Social Media Guidelines for Members

Purpose***:*** These Guidelines help ensure that social media communications of NABHO members reflect and respect the fundamental principles of NABHO.

NABHO respects the right of its members to use social media. However, to protect NABHO’s interests as well as those of its member agencies, we ask members to keep these guidelines in mind when posting on social media.

Definitions***:*** “Social media” is technology that enables online users to interact and share information publicly or privately, including video, audio, photographs, and text. Social Media is understood to include blogs, wikis, microblogs, message boards, chat rooms, electronic newsletters, online forums, social networking sites, and other sites and services that permit users to share information with others in a contemporaneous manner.

“NABHO members” is understood to include the agencies that pay dues to NABHO as well as employees of those agencies.

Policy***:*** When NABHO members clearly identify themselves with NABHO or discusses their work or topics related to their work with NABHO, they are, whether intentionally or not, seen as a representative of NABHO and are therefore encouraged to represent NABHO in a manner consistent with the association’s policies and priorities.

If you, as a member, choose to identify yourself as part of NABHO or discuss matters related to NABHO on social media, readers may assume you speak on behalf of NABHO. To protect the reputation of NABHO, your communication should strive to be transparent, ethical, and accurate, in accordance with the guidelines presented below.

* Appropriate Use – Social media should never be used to conduct or solicit inappropriate or unlawful activities.
* Use Disclaimers – If you indicate your professional affiliation with NABHO on a social media website, make it clear that you express your views, not necessarily those of NABHO by using a disclaimer such as: “The views expressed here are solely the author’s and do not necessarily represent the opinions of NABHO.” This precaution should be adhered to when communicating directly about NABHO and in instances when the communication may be associated with or create the appearance of being on behalf of NABHO, such as using a NABHO hashtag on Twitter or Facebook, referencing NABHO directly, or using your actual name if you are publicly associated with NABHO.
* Be Transparent – If you discuss NABHO, disclose your role in the organization.
* Be Accurate – Do your research; avoid posting inaccurate content.
* Be Considerate and Respectful – Be mindful in your use social media. We ask that members frame their posts carefully, taking into consideration their potential repercussions for NABHO, NABHO member organizations (including member organization employees), and NABHO employees, contractors, and interns.
* Respect Copyright Laws – Give credit for non-original materials and content.
* Maintain Confidentiality – Do not reveal confidential NABHO information. Respect the privacy and confidentiality of NABHO members and staff.
* No Branding – Use of NABHO Logo or branding elements is not allowed on personal accounts.

# Strategic Plan Policy

The Executive Committee will review the Association’s Strategic Plan annually and make annual reports on progress to the Membership.

# Amending Policies and Procedures

The Policies and Procedures manual should be reviewed annually. Recommended changes will be presented to the General Membership and adopted by a majority vote of the membership.

# Acknowledgement and Disclosure Form (Conflict of Interest Policy)

I have received and read the Nebraska Association of Behavioral Health Organizations’ Conflict of Interest and Confidentiality Policy, understand the contents thereof, and agree to comply fully with its terms and conditions at all times during my service as: a member of the NAHBO Board of Directors; or as an officer; an executive employee; and/or a member of a Selection Committee or other appointed committee of NAHBO. I understand that NAHBO is charitable and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes. If I become aware of any actual or possible conflict of interest at any time following the submission of this form, or if the information set forth below becomes inaccurate or incomplete, I will promptly notify the NAHBO Executive Committee or the Board Chair of NAHBO in writing.

Please describe on an attached sheet any relationships, positions or circumstances in which you are currently involved, or will be involved in the next twelve (12) months, that you believe could be considered an actual or possible Financial Interest, as defined in the Conflict of Interest and Confidentiality Policy.

Do you or does any family member of yours have an ownership or investment interest in any entity with which NAHBO has a transaction or arrangement?

[ ]  Yes [ ]  No

Do you or does any family member of yours have a compensation arrangement with NAHBO or with any entity or individual with which NAHBO has a transaction or arrangement?

[ ]  Yes [ ]  No

Do you or does any family member of yours have a potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which NAHBO is negotiating a transaction or arrangement?

[ ]  Yes [ ]  No

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Board Member’s Name in Print

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature of Board Member

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Date Signed