

# **FISCAL OPERATIONS MANUAL**

Version 4.1

2017

---

This manual is to be used by the UW-Kenya Country Office as well as individual project offices supported by research from University of Washington Principle Investigators.

## Contents

1.0 INTRODUCTION .....	3
2.0 FISCAL TERMS, ACRONYMS, AND DEFINITIONS .....	4
3.0 ROLES AND RESPONSIBILITIES .....	5
4.0 FISCAL SAFEGUARDS .....	6
4.1 Code of Conduct.....	6
4.2 Delegation of Authority.....	6
4.3 Separation of Duties .....	6
4.4 Records Retention and Management .....	8
4.5 Fraud and Theft Reporting .....	8
4.6 Research Subject/Confidential Payment on Cash Advances.....	9
4.7 Internal and External Audit Schedules .....	9
4.8 QB Software Maintenance.....	9
5.0 FUNDS ADVANCES .....	10
5.1 Work Advance Set-up .....	11
5.2 Revolving fund roll in.....	11
5.3 Accounting for work advances .....	11
5.4 Expense validation and data capture in the Country Office .....	12
5.5 Travel Advances.....	12
5.6 eREVOLVER RECONCILIATION .....	14
5.6.1 Monthly eRevoler reconciliations.....	15
5.7 Foreign Exchange Gains/Loss Management .....	16
5.8 Cash Management and Reporting.....	16
6.0 PROCUREMENT .....	17
6.1 General Overview.....	17
6.2 Vendor Agreements.....	17
6.3 Competitive Bidding.....	18
6.4 Sole Source Buying .....	19
6.5 Vendor Invoicing & Payment.....	19
7.0 INVENTORY .....	20
7.1 Reporting Assets to Seattle Headquarters.....	20
7.2 Tracking Assets .....	20
7.3 Fixed Asset Policy .....	20
7.4 Disposition of Assets .....	20

8.0 BANKING.....	21
8.1 Local Checking Accounts.....	21
8.2 Signature Authority .....	22
8.3 Bank Statement Reconciliation .....	23
9.0 PAYROLL.....	24
10.0 FISCAL REPORTING .....	25
10.1 Revenue Recognition.....	25
10.2 Annual Returns Submitted To The NGO Coordination Board.....	25
10.3 Monthly Work Advance Reports To UW-Kenya.....	25
10.4 Local Taxes And Value Added Tax (Vat).....	25
10.5 Internal Management Reviews .....	25
10.6 External Audit .....	26

## 1.0 INTRODUCTION

UW-KENYA uses Accrual Accounting methods and follows GAAP for USG non-profit educational institutions as outlined in the OMB circular A-21.

UW-KENYA uses the most current version of QuickBooks Premier or Enterprise (aka QB) available. QB will be set up for at least 5 multi user licenses.

UW-KENYA will maintain a current set of operational accounting books that are posted daily, reviewed weekly for accuracy and submitted monthly as e-revolver reconciliations to the Field Advance Office. This should be submitted by the 15<sup>th</sup> of every month.

UW-KENYA's accounting practices are in full compliance with those practices and guidelines established by the Government of *Kenya* such that no practice or rule of the USG A-21 will supersede the *Kenya* Government regulations, but both government rules will be noted and adhered to.

All regulations of the *Kenya* Government regarding the operations and reporting of UW-KENYA as a registered NGO will be adhered to by the country office and all the project offices.

UW-KENYA maintains transparent accounting management and reporting procedures, and requires regulatory compliance and accountability of all employees in all sites where funds are managed and/or materials are purchased.

In accordance with *Kenya* Government regulations and the University of Washington's Equipment Inventory Management Office, all assets purchased by UW-KENYA will be added to a regularly maintained fixed assets register and will be physically inventoried by staff at project offices and at the country office in *Kenya* annually.

Decommissioned, destroyed or retired assets must be identified as such on the Inventory Schedule. This will be performed as a part of the close of books for the reporting year that ends June 30<sup>th</sup>. Any assets determined as missing from inventory will be reported to the Country Manager and Seattle Based Budget Managers for investigation. No assets will be retired or decommissioned without the express written permission of the University of Washington and Kenyan governing authority, where applicable.

## 2.0 FISCAL TERMS, ACRONYMS, AND DEFINITIONS

- **Activity codes:** Six character coding system for the development of program activity budgets.
- **Chart of accounts:** See “object codes.”
- **FAR:** The Field Advance Reconciliation (FAR) funding model is used to detail weekly country office expenses and tie them to receipt copies in support of ongoing operations.
- **GAAP:** Generally Accepted Accounting Practices (USA). The set of 12 rules that establish the boundaries for accounting.
- **IFRS:** International Finance Reporting Standards. (GAAP system used outside the US.)
- **Internal controls:** Finance, Accounting and Procurement procedures and policies designed to minimize the potential for fraud / misuse of funds, and the policy for reporting any fraud / misuse suspected or implied.
- **International Specialist:** Refers to the appropriate Seattle-based administrator (such as CFAR International Core International Procurement Specialist, IARTP Program Manager or Program Coordinator)
- **My Financial Desktop (MyFD):** The UW’s internal fiscal reporting program that tracks the allocation and expenditure of total country/award budgets.
- **NGA:** Notice of Grant Award
- **NGO:** Non-Governmental Organization
- **Object codes:** Expenditure codes defined by the UW and used to classify costs attributed to budgets. The standard accounting term for the listing of these codes is “chart of accounts.”
- **One Person Office:** a project office that has one administrator who is responsible for making purchases, approving the invoice, and reconciling transactions
- **PI: Principal Investigator**
- **Project Field Administrator:** the administrator of a research project based in Kenya
- **Revolving fund:** A revolving fund is a field advance account that has a set dollar limit but is replenished when reconciliations are submitted.
- **Seattle Project Budget Manager:** this person is the primary grant and budget manager for a PI in Seattle.
- **UW-Kenya Country Manager:** this person is part of the UW K Country Office staff and serves as the overall in charge of all accounting/ finance and human resource operations including any other overall administrative responsibility within the Country Office.

### 3.0 ROLES AND RESPONSIBILITIES

#### **UW-Kenya's role is to:**

- Assure adherence to guidance and regulations of the OMB Circular A-21 and all corresponding funder regulations.
- Communicate the terms, conditions and expectations of projects fiscal operations.
- Monitor and assure the implementation and training of each projects fiscal policies and procedures.
- Implement and train the administrators in the use of the accounting software for the projects where applicable.
- Provide technical support and problem solving for fiscal systems for the various projects.
- Acts as a liaison between field administrators and the UW accounting offices.
- Develop risk management policies and risk reduction procedures with and for projects.
- Assure compliance with procedures and policy at both UW-Kenya and within each project.
- Lead or Co-lead with a field Administrator the annual audit of each project.

#### **Project Field Administrator role is to:**

- Assure adherence to guidance and regulations of the OMB Circular A-21 and all corresponding funder regulations.
- Organize and implement the necessary infrastructure to ensure that all systems, policies, and procedures detailed in the UW-Kenya Fiscal Operations Manual and standard operating procedures are operationalized.
- Ensure that each projects fiscal operation is compliant with the fiscal operations of UW-Kenya and UW.
- Apprise UW-Kenya Treasurer of any contradiction between locally-required fiscal operations and the terms detailed in the UW-Kenya Fiscal Operations Manual.
- Adapt and implement risk management systems and proactively investigate control weaknesses.
- Assure monthly and annual close and all related reports and analysis for project operations.
- Operationalize work plans for correction of audit findings, systems improvements and compliance management.

## 4.0 FISCAL SAFEGUARDS

### 4.1 Code of Conduct

Field offices must follow the standards of conduct outlined in the Procurement Policy (Section 7.0) for employees engaged in the award and administration of contracts and any part of fiscal operations. Employees or consultants cannot participate in the selection, award, or administration of a contract if a real or apparent conflict of interest would be involved. A conflict would arise when an employee or any member of his/her immediate family, partner, or an organization that employs, or is about to employ any of these parties, has a financial or other interest in the organization considered or selected for an award. No UW employee or consultant shall either solicit or accept gratuities, favors, or anything of monetary value from contractors or parties to any sub-agreement. The standards of conduct provide for disciplinary action to be applied for violations of such standards by employees and consultants of University of Washington.

### 4.2 Delegation of Authority

While all UW staff members are responsible for the appropriate use of UW funds, resources, and assets as outlined in [\*OMB Circular A-21\*](#), the Principal Investigator is ultimately responsible for the sufficiency and security of field office fiscal operations, and is vested by the UW (the grantee) with fiduciary authority and responsibility.

To facilitate efficient administration of UW business, the PI for projects may delegate authority for certain aspects of fiscal oversight, such as the initiation and approval of the procurement of goods and services, or signature approval for banking activity. It is incumbent upon the PI to supervise those to whom authority has been delegated.

The PI may delegate decision-making and/or signature authority to a particular individual in the form of a memo, or to a specific position through the job description for that function. The PI may also rescind their delegation, or provide that it is limited to a specific period of time. Records of all delegations of authority are maintained by the Seattle Project Budget Manager as audit support documents. For delegation of authority forms, reference Section 14.1.

Minimum criteria in delegating fiscal authority:

- The party to whom authority is delegated must have direct knowledge of UW's needs, resources, and relevant policies to exercise the authority responsibly, i.e.
- The individual understands how and why a specific purchase is needed,
- That there are resources to cover the costs, and
- That the purchase is allowable by funder and UW guidelines.

### 4.3 Separation of Duties

'Separation of duties' is the practice of dividing fiscal functions and procurement functions between multiple employees to minimize the potential for conflict of interest or other abuse. The practice protects the employee as well as project assets by splitting the actions involved in a process between two or more individuals in the team.

Examples of duty separation include:

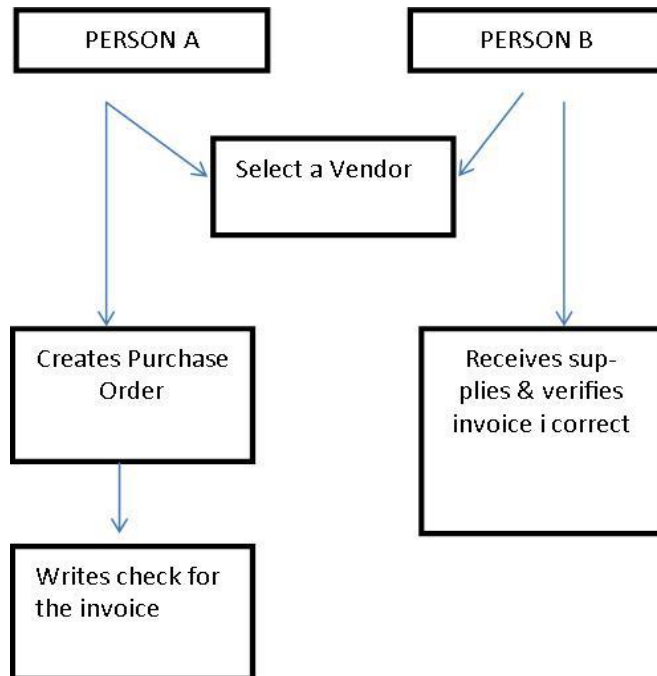
The employee who approves a bill/invoice for payment does not write the check or wire.

The employee who creates a request for a purchase does not ‘solely’ select the vendor who provides the materials / services

The employee who receives materials to the organization is not the same person who wrote the purchase order for the materials.

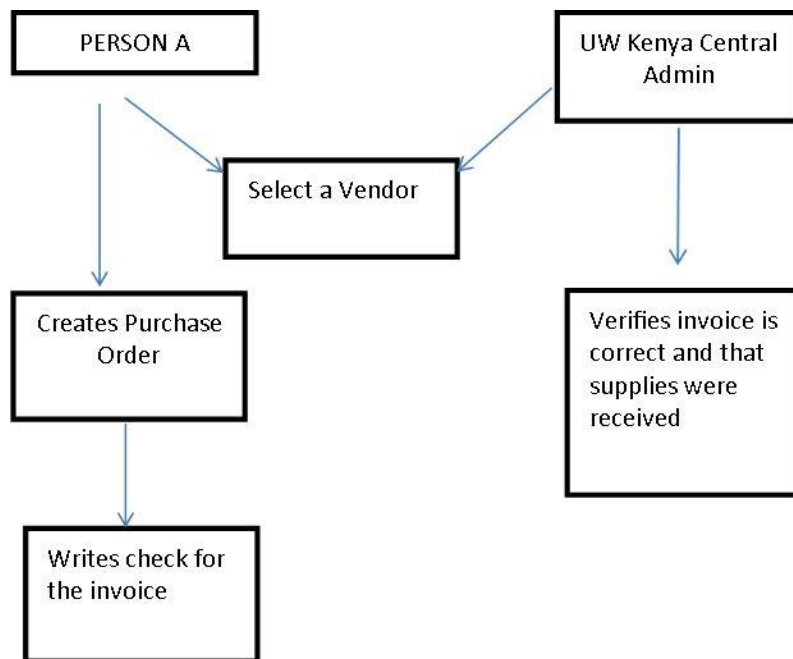
In the event that a project operates under a “One Person Office” the project office will be required to develop a system of oversight and management with another UW-Kenya project office (by sharing staff resources) or with the UW-Kenya Country Office to ensure that separation of duties are still performed.

Example of Separation of Duties in a 2 person office:





Example of Separation of Duties in a 1 person office:



#### 4.4 Records Retention and Management

Field offices must have a secure, lockable, filing cabinet system for fiscal record storage and preferably a fire proof safe secured to the floor. Documents, receipts, and invoices must be maintained in an alphabetical filing system based on Vendor Company Name or in a chronological order as per the FA closed out or eRev closed for any given period. All electronic fiscal records must be backed up on a daily basis and secured within the server's redundancy system or to a secure data storage device kept in the safe. Periodic tests of the backup files must be scheduled and performed to assure the system established in fact works. The Country Manager will make random checks to ensure that files are properly and securely backed up.

Records of all financial transactions, supporting documentation, statistics, reports, and all other records pertinent to the fiscal administration of the project and associated awards from funders shall be retained for a period of 7 years from the expiration of the award with which referenced fiscal activities are associated. Records shall not be destroyed without approval from the UW-Kenya Treasurer.

Field offices must conform to local and UW fiscal recordkeeping laws and regulations.

#### 4.5 Fraud and Theft Reporting

The Field Administrators provide a full incident report on the fraud or theft discovered to the UW-Kenya Country Manager.

The UW-Kenya Country Manager and the Field Administrator liaises with the local authorities or police to assure follow up per law and sends copies of any related reports to the PI and to the central UW administration.

The Project Field Administrator provides a detailed list of missing funds, equipment, repairs made if there was vandalism, and other costs related to the theft to the Project Manager Kenya (Local P.I) within 10 days of the event.

The country/field office replaces the equipment upon approval from the PI/ HQ from the field advance funds and requests cash replacement, if needed, on their field advance expense report. The Project Field Administrator works with the Seattle Budget Manager to assure all cash and materials are replaced and recouped.

#### **4.6 Research Subject/Confidential Payment on Cash Advances**

In order to protect patient privacy and to comply with all laws and regulations, receipts containing patient information should not be submitted for reconciliation. Instead administrators should follow the procedures detailed in Section 14.5 “*Cash Advance Policy for Research Subject Payments and Patient Travel Reimbursements*”

All documents containing confidential information should be securely retained by the Kenyan office for the retention period determined by the grant sponsor and/or University of Washington.

If a research subject is a United States citizen, it is required that we collect their tax payer identification number and report any payments that collectively total \$600 USD or more in a year. A report of payments to individuals for \$600 USD and over must be submitted to the UW Tax Desk by January 15 of the following year.

#### **4.7 Internal and External Audit Schedules**

An annual audit will be performed by outside auditing agency approved by the University of Washington and the Kenya Government within the first 90 days of the new fiscal year, and will cover the previous year’s accounting practices. The UW prefers the use of their audit company, KPMG, wherever possible.

Additional internal audits and reviews will be scheduled periodically by the UW Internal Audit Department and UW-KENYA for management reviews, Procurement Delegation of Authority and in support of major change management.

#### **4.8 QB Software Maintenance**

UW-KENYA HQ will renew and/or purchase user licenses annually or bi-annually for the country office software version. Installation and upgrade instructions will be sent from UW Seattle with the software upgrade discs.

Regular back-ups of the data files, at least monthly, must be stored in an external hard disk.

## 5.0 FUNDS ADVANCES

The UW-Kenya Country Office (CO) will set-up a money transfer system that will ensure timely transfer of funds to the Project office bank accounts or any other work advance accounts as shall be approved by UW-Kenya Treasurer.

Project Office PFA in liaison with SBM and the UW-Kenya Management will determine and maintain a reasonable amount of work advance in the Project Offices. The standard threshold ceiling will be based on activity budgets submitted on monthly basis as a reasonable amount of work advance to mitigate the risk of excess sums of cash in the Project Offices and to protect UW-Kenya assets.

Funds sent to the Project Offices will be treated as work advances rather than petty cash. This will therefore mean that the amounts advanced will have to be accounted for in full before more money can be advanced. Full accounting requirement doesn't necessarily mean using up all the money before getting a new advance. It requires that the amount used plus balance in hand be reported to enhance transparent system of advancing funds.

The *Monthly Work Advance Reconciliation form* will be used in reporting on a monthly basis or any time that a top-up on funds advanced would be needed. PFAs can scan receipts to the CO in order to avoid delays in topping up their work advance accounts. The original receipts MUST however be submitted to the CO within a week from the date of scanning the receipts.

The CO will have a team of accountants each assigned to handle reconciliations from specific projects. The PFAs will be informed of the accountants that will be handling their reconciliations for ease of communication and submission of receipts. In cases where an accountant is on leave the other accountants will fill in their duties as will be directed by the Project Accounting Coordinator in liaison with the Country Manager. Communication on such changes must be sent to the PFAs at least one week before any accountant proceeds on leave.

The main QB data file will be maintained on the Project Accounting Coordinator's computer that will also act as the database server.

UW-KENYA will allow the following forms funds advances:

1. Petty cash advances (Country Office Only)
2. Work Advances
3. Travel Advances

**The petty cash will only be maintained within the Country Office.** Any other petty cash set-ups must be approved by the Treasurer of the organization in writing.

All petty cash custodians must sign the *Petty Cash Custodian Responsibility form*. The same form has to be signed by all persons taking charge of the petty cash in case the regular custodian goes on leave.

Petty cash accounts will require the use of the following:

1. Pre-numbered receipt books for recording all funds received in the petty cash
2. Cash count form. There should be at least one regular monthly cash counts of the petty cash and at least one impromptu cash count every 6 months
3. Pre-numbered petty cash voucher books must be used for whenever funds are to be advanced from the petty cash box.
4. Petty cash float will require the use of imprest system of advance. Ceiling threshold will be no more than USD1000 unless approved in writing by the Seattle Based Budget Manager or the UW-Kenya Treasurer (for the Country Office).

5. Petty cash transactions are to be captured in QuickBooks on a day to day basis to ensure the most accurate balances within the Country Office books in cases of impromptu cash counts.
6. Petty cash will only be used for miscellaneous expenditure not exceeding Kshs 10,000 per advance through the petty cash vouchers. Any amount above Kshs 10,000 is to be paid in check.
7. Funds advanced through the vouchers will only be used for approved purpose and all expenditure receipted and filed together with the funds advance voucher.
8. Any balances on petty cash vouchers must be indicated as returned to the petty cash box on the voucher.
9. Calling cards will not be accepted as receipts but must be accounted for with stamped or printed receipts.

## 5.1 Work Advance Set-up

Rather maintain petty cash accounts, all the UW-Kenya **project offices will maintain work advance accounts**. The procedure for setting up these accounts will be as follows:

1. All project offices that are to transitioning to the centralized accounting system will be expected to close out all current FAs and provide a report to UW Field Advance office on the amounts used and balances of these FAs within 30 days of the date of the signed PI agreement (Attachment A).
2. A Work Advance Request Form must be filled out along with the Budget for Work Advance (Attachment B). This form must be signed by the Budget Manager and the Custodian. See Work Advance Process Flow (Attachment C).
3. For projects that have already been set-up for a revolving fund, see “Revolving Fund roll in’ below for guidance on the transition.
4. Work Advance funds transfer will be done within 72 hours of submission of fully completed work advance request documentation.

## 5.2 Revolving fund roll in

1. The funds in the existing revolving field advance will be spent down and Work Advances will be phased in as new funds are needed.
2. Such offices are requested to do activity budgets on a monthly basis for funds that they will require in the subsequent month.
3. The activity budget should detail the cost breakdown per expected expenditure. The total on the activity budget must be approved by the Seattle Based Budget Manager (for the at the set-up stage) and by the Local P.I before an advance can be made to the project office.
4. The activity budgets shouldn’t contain expenses that can be paid by check or anything that should be procured through centralized procurement.
5. Work advance should only be requested for by the Project Administrator or their designee (email communication of delegation must be provided).

## 5.3 Accounting for work advances

1. All work advances **MUST** be accounted for at least once per month. The full accounting for previous advance must reach the Country Office by the 10<sup>th</sup> of every month.
2. Funds request in within the above period can be done after ensuring scanned receipts have been emailed to the Country Office. However, by the 10<sup>th</sup>, all pending receipts must be sent to the Country Office.

3. Authorization to transfer more funds **MUST** be sought from the UW-Kenya Treasurer and CEO in cases where pending receipts add up to Kshs.10,000 and above yet the office needs a work advance.
4. Each project will be required to liaise with the respective Accountant within the Country Office in reconciling and requesting for work advances.
5. Turnaround time from submission of reconciliations to transfer should be maintained within 72 hours.
6. Project offices are encouraged to ensure that the funds request (reorder) level set for their work advances is able to sustain them for at least a week to avoid forestalling Project Office operations.

## 5.4 Expense validation and data capture in the Country Office

1. Country Office Accountant on receiving the *Work Advance Reconciliation Form* from the project office will confirm that the actual receipts have been received or scanned copies emailed.
  - a. In cases where the scanned receipt copies are emailed, the Accountant will be expected to go through the *Work Advance Reconciliation form* and check that every indicated expense has a scanned receipt and that the expenses with no receipt have a receipt status on them.
  - b. All expenses captured on the work advance reconciliation form must have a 'receipt status.' The receipt status column has a drop down arrow that only allows for 2 choices:
    - **Scanned:** Scanned copy of the receipt has been submitted to the country office.
    - **Missing:** Receipt has been misplaced by the project office. Perjury statement must be attached.
2. A file is then to be maintained for the finalized work advance form for every project office and a QuickBooks report of the balance on the work advance printed, signed by preparer and approved by Project Accounting Coordinator or the Country Manager in a case where the Project Accounting Coordinator is the preparer of the report. Check Payment Voucher should accompany these two.
3. All original receipts are to be sent to the Country Office within a week from the date of the work advance top-up request and any pending or missing ones no later than the 10<sup>th</sup> of the following month.
4. Any rejected receipts must be communicated to the project office in writing (email). Phone follow-ups are also allowed after sending the email. Issues causing these receipts to be unallowable should then be solved within 48 hours from the date when the email is sent to avoid delays in transferring work advance funds

## 5.5 Travel Advances

UW-Kenya recognizes the need to give advances to staff when working away from their duty stations for more than 24 hours. The following procedures are applicable in such situations

- Travel advances are valid up to 90 days
- Travel Advances may only be given to the employee or consultant 24 hours prior to their departure or project launch.
- Allowable travel advances expenses include meal per diem, lodging, transportation, gas/mileage, and training supplies.
- Travelers must clear outstanding travel advances before receiving subsequent ones.
- Travelers must submit a formal estimate of costs for their travel in order to receive a travel advance.
- Travelers assume full responsibility for the safety and appropriate use of the funds, and accept responsibility for lost/stolen funds and repayment for unallowable purchases.

- All advances must be requested in writing on the appropriate advance request form, at least 3 days prior to the need for funds.
- All approved advance requests forms and the corresponding bank supportive documents for payment of the advance must be kept on file and accessible to the Finance team and or the Country Manager
- Advances may not be used to replenish regional petty cash funds.
- All advances must be settled with the UW-Kenya Finance team within 72 hours of the completion of the trip or work project (activity budgets) for which the funds were drawn.
- Unsettled advances for any purpose will be deducted IN FULL from the staff member or consultant's pay at the immediate next payroll or billing date.
- Tax deducted must be remitted to the government agency no later than the 9<sup>th</sup> of the following month as required under Income tax law.
- No employees or consultants are exempt from the rules of settlement or the required time frames for any reason.
- M&IE (meals and incidental expenses) and lodging rate will be per location and posted on the UW-Kenya website. Any M&IE amount above Kshs.2000 will have to be taxed at the rate of 30% as required under Kenyan Income Tax law.

A cash advance, called a "living allowance," may be requested from the Country Office to cover meals for foreign nationals (non-UW-Kenya staff), traveling to the United States from an international location.

Whenever possible, UW-Kenya will book a room for the staff member and make payment to the facility directly rather than give lodging advances. Employees may opt for their preferred hotels. However, the rate for these hotels should never exceed the established rate for that area. In instances where it isn't possible for the Country Office to pay directly for the hotel and has to give lodging advances to staff then a written justification must be provided at least 48 hours before to the trip date.

**Travel advance settlements include:**

- Completed and signed Travel expense spread sheet form supported by all receipts for expenses
- Full set of *original receipts* for all expenses and lodging. No copies of receipts are acceptable unless accompanied by a signed and dated "Perjury Statements" that detail the reason why receipts or copies are missing or illegible and the purpose of the expense(s). Meals and Incidental Expenses (M&IE) need not be receipted
- Refund *in cash* of all balances due to UW-KENYA on unspent travel funds, (for which a receipt will be given the employee or consultant.)
- All foreign language receipts must be translated to English when before submission to the UW-Kenya Finance team
- No employee or consultant will be given a new advance for any purpose if *any* previous advances are left unsettled in their name
- Consultants are not allowed Per Diem advances if their contracts do not allow for the same
- Accounting staff will record to QuickBooks the full settlement of any advance within 24 hours upon receipt of expenditure summary from the staff member or consultant

All receipts must be taped to a single sheet of paper (8.5" x 11" preferred) if they are smaller than this size and can easily be lost. Please do not staple or highlight receipts as this makes it difficult to scan receipts for UW submission.

Note: Consultants are not allowed Per Diem/Travel Advances if their contracts stipulate that Per Diem, Travel, and Lodging must be billed to the UW-Kenya for reimbursement on their invoices.

## 5.6 eREVOLVER RECONCILIATION

UW-Kenya will maintain one e-revolver (eRevolver00002) that will be tracked in two separate bank accounts: UW-Kenya re Administration account (01080xxxxxx09) for payroll transactions and UW-Kenya re Operations (01080xxxxxx07) for centralized accounting transactions.

All funds payable or transferable from these two bank accounts MUST be accompanied by the following documentation.

Type of expense	Required Documentation
Purchases	<ul style="list-style-type: none"> <li>• If &lt;Kshs.10,000 <ul style="list-style-type: none"> <li>○ Check Payment Voucher</li> <li>○ Invoice and delivery note or receipt of payment</li> <li>○ Copy of payment check or online payment instructions dully approved</li> <li>○ This amount can be paid from the petty cash or work advance funds</li> </ul> </li> <li>• If &gt;=Kshs.10,000 but &lt;Kshs.85,000 <ul style="list-style-type: none"> <li>○ Check Payment Voucher</li> <li>○ Receipt of payment</li> <li>○ Copy of payment check or online payment instructions dully approved</li> <li>○ Invoice and delivery note-signed</li> <li>○ Purchase order</li> <li>○ Purchase requisition</li> </ul> </li> <li>• If &gt;=Kshs.85,000 <ul style="list-style-type: none"> <li>○ Check Payment Voucher</li> <li>○ Receipt of payment</li> <li>○ Copy of payment check or online payment instructions dully approved</li> <li>○ Invoice and delivery note-signed</li> <li>○ Purchase order</li> <li>○ Vendor selection matrix-duly filled or sole source justification</li> <li>○ 3 quotes or a price warranty for sole source justifications</li> <li>○ Purchase requisition</li> </ul> </li> </ul>
Work Advance replenishment	<ul style="list-style-type: none"> <li>• Check Payment Voucher- for replenishment of funds</li> <li>• Work Advance Summary-finalized and signed by reviewer to proceed with advance</li> <li>• QuickBooks report on work advance balance</li> </ul>
Petty Cash replenishment	<ul style="list-style-type: none"> <li>• Check payment voucher</li> <li>• Petty cash replenishment form</li> <li>• QuickBooks print out of petty cash for the period under reconciliation</li> <li>• Observed cash count form</li> </ul>

Payroll	<ul style="list-style-type: none"> <li>• Net salaries transfer <ul style="list-style-type: none"> <li>○ Payroll schedules dully checked and approved</li> <li>○ Net salaries S2B upload worksheet signed by preparer and checked by Project Accounting Coordinator</li> <li>○ Fully authorized S2B payroll batch</li> </ul> </li> <li>• Deductions transfer <ul style="list-style-type: none"> <li>○ Check payment voucher</li> <li>○ Respective deduction schedule</li> <li>○ Fully authorized S2B batch transfer</li> <li>○ Copy of signed check where a check has been written</li> </ul> </li> </ul>
Travel Advance	<ul style="list-style-type: none"> <li>• Pre-travel <ul style="list-style-type: none"> <li>○ Check Payment Voucher</li> <li>○ Travel Advance request form dully filled KES for Kenyan travels and USD for foreign travels.</li> <li>○ Copy of payment check or fully approved online payment batch print out</li> </ul> </li> <li>• Post travel <ul style="list-style-type: none"> <li>○ Travel Advance form filled in with actual costs incurred</li> <li>○ Receipts (for non M&amp;IE expenses)</li> <li>○ Bank deposit slip or petty cash deposit receipt for refunds</li> <li>○ Copy of payment check or fully approved online payment batch print out for over expenditures.</li> </ul> </li> </ul>

### 5.6.1 Monthly eRevolver reconciliations

UW-Kenya will provide to the UW Field Advance office a reconciliation spreadsheet and scanned copies of all expenses incurred on the eRevolver. The reconciliation will be two phased i.e. Centralized accounting funds (by 15<sup>th</sup> of every month) and payroll transactions funds (by 10<sup>th</sup> of every month) both of which are in two separate bank accounts.

Steps taken for reconciliation:

1. CO Accountant submits the following in Purchase Path:
  - a. A copy of each receipt or vendor invoice included in the request
  - b. Copies of each bank statement or bank voucher in support of claimed bank charges.
  - c. The eRevolver expense report exported to a spread sheet from QB that details the expenses as recorded to the books, including:
    - i. Numbering of the receipts enclosed
    - ii. Budget being charged for each receipt (QB: Class)
    - iii. Date of transaction
    - iv. Object Code (QB: Account)
    - v. KES amount
    - vi. USD amount
2. Purchase Path will route this packet to the appropriate UW Budget Manager.
3. Budget Managers will review the expenses associated with their budgets.
4. If there are questions, Budget Managers will send these questions to the CO Accountant and cc Global Health International Procurement Specialist (GH IPS) via email.
5. When all issues are resolved, GH IPS will send the PP order back to the CO Accountant for corrections to the QB file and resultant spreadsheet.
6. CO Accountant will resubmit corrected eRevolver expense report.
7. Budget Managers will approve expense report via PP.



8. GH IPS will review expense report for completeness, verify bank account, verify all budget managers have approved and submit a Reimbursement Request in KES to the B&A office.
9. B&A will send a wire to the appropriate bank account per instructions in the Reimbursement Request and send confirmation of receipt to the GH IPS once settled.
10. GH IPS will then insert the exchange rate received into the expense report spreadsheet and submit the files to B&A as backup documentation.
11. B&A then submits these charges via the UW Financial system to charge each budget appropriately.
12. GH IPS will send the wire confirmation and exchange rate to the CO Accountant who will insert the exchange rate into QB.

Upon determining the amount due for replenishment, an invoice is created in QB numbered to match the eRevolver expense report for the gross amount of the replenishment request. All revolving fund invoices must be created in USD, and must support the exchange rate used on the FAR expense report.

Funds received from the University of Washington (UW) for fund replenishment are posted against the open FA receivable, and the difference between the request and the receipt noted for follow up.

## **5.7 Foreign Exchange Gains/Loss Management**

Multi-currency option must be 'activated' in QuickBooks. Invoices for FAR reimbursements must be entered in QB in USD or the ERev Reimbursements in KES.

Foreign Exchange rates are based on the rates provided by the bank at the time funds are received.

Period adjustment to 'Home Currency' value and other asset or liability balances may be created per Auditor instructions during the annual close process.

Gains/Loss in FOREX are not billable to the funder, and must be resolved between UW-KENYA and the UW.

## **5.8 Cash Management and Reporting**

Cash management is a primary concern of the Fiscal office of UW-KENYA.

Active management of accounts payable, open purchase orders, accounts receivable, travel advances and petty cash accounts are the primary tools for successful planning of cash needs and large purchase timing.

Daily and weekly comparison of the data entered to the ledgers of QB and the on-line bank balance is required to assure that data entry timing, deposits, transfers and other compliance issues are managed in accordance with documented requests and GAAP.

At no time are the bank account ledgers allowed to be behind schedule in the posting of deposits, payments and Checks, transfers or other data transactions.

The Balance Sheet, Statement of Functional Expense (P&L) and Trial Balance Report(s) constitute a complete set of management reports and will be printed, approved and archived every month for the preceding period.

Prior to completing the monthly report set, a trial balance and balance sheet account reconciliation will be performed to assure the accuracy of the balance sheet accounts and match the cash/bank account ledgers to the bank statements. Any bank discrepancy found will be detailed in writing to the bank and monitored for correction.

Separate files for the bank statements will be kept on file for each year and will contain:

1. All bank correspondence
2. The bank account reconciliation printed from the QB software, with original review signatures from the Country Manager or their designee.

## 6.0 PROCUREMENT

### 6.1 General Overview

UW-Kenya procurement and purchasing of professional services (vendors and subcontractors), equipment, and supplies must conform to local, headquarters, and US government regulations. It is incumbent upon field administrators to observe all relevant laws, regulations, and standards, and to consult with headquarters staff when norms contradict UW-Kenya guidance.

UW-Kenya staff has a variety of options available to meet their procurement needs; however, the USD total for the order will determine the course of action and regulations regarding a purchase.

For purchases of \$1-\$5,000 USD a Field Project Administrator may purchase items without obtaining quotes or bids. Purchases should be paid for using a University of Washington procurement card, wire transfer, or cash advance funds. To procure items using a procurement card or wire transfer contact the International Specialist.

For purchases of \$5,001 USD or more a field administrator must contact the International Specialist for assistance. For these purchases, a competitive bidding or sole source process will occur and the International Specialist will help determine the best method of payment.

For a template to help with drafting a sole source statement, reference Section 14.8 “*UW Sole Source Justification*”.

### 6.2 Vendor Agreements

#### Background

A vendor is a company/organization that UW-Kenya contracts with to secure goods or services on an ongoing or one-time basis. Individuals are not vendors, individuals are consultants. Examples of vendors include: office supplies stores, auto dealerships, a meeting planning company, a printing firm, a human resources or payroll firm, or a media company. Potential vendors must meet ALL the following criteria to work with UW-Kenya:

- Provide the goods/services being sought by UW-Kenya within their normal business operations hours.
- Provide similar goods/services to other purchasers.
- Operate in a competitive environment.

Vendors should NOT start work or delivery goods until UW-Kenya has received approval from the UW Purchasing Office for orders over \$5,000 USD. Vendors that begin or ship items in advance of UW approval risk delays in receiving payment or refusal of payment.

#### Vendor Agreements

A vendor agreement is a contract between UW-Kenya and a vendor. Field administrators can identify the need for a vendor and select the best-equipped, most-reliable, and most cost-effective vendor based on the needed goods/services. If the purchase will total more than \$5,000USD, the vendor agreement will be processed through the International Specialist in Seattle and the UW. Project Field Administrators will be consulted to help create local agreements with vendors following UW approval.

The vendor agreement details must include:

- Scope of work (SOW)—what the vendor will do for UW-Kenya.

- UW-Kenya’s obligations to the vendor.
- List of deliverables (“products”) that are to be delivered to UW-Kenya.
- Timeline for delivery of goods and/or services.
- Budget/cost.
- Dispute resolution.
- Liability clause.

The vendor agreement timeline for delivery of goods/services can run up to 12 months and can continue beyond the end of a fiscal year, but not beyond the grant or budget period. If a vendor agreement timeline needs to be extended, field administrators should contact the International Specialist.

For purchases below \$5,000, field administrators may request that the International Specialist to help source items, draft vendor agreements, and pay invoices but it is not required.

#### Amending a Vendor Agreement

If new goods/services or deliverables are added to an existing vendor agreement, an addendum must be drafted detailing SOW and/or budget/cost changes. UW-Kenya cannot pay a vendor for work that was not reviewed and approved by the UW.

A vendor agreement budget can be increased via amendment. The field administrator needs to inform the International Specialist of the increase. This takes between 4–6 days for the UW to process. If the increase brings an agreement over the US \$25,000 threshold, the vendor must sign the “Certs and Reps” form.

NOTE: A budgetary increase MUST be processed at the UW at least 6 days before the vendor invoices UW-Kenya for those additional funds.

#### Terminating a Vendor Agreement

The termination process is detailed in the UW Terms & Conditions and Vendor Agreement/PO (See Section 14.9 for Terms and Conditions).

### **6.3 Competitive Bidding**

Washington’s state law states that, “Insofar as practicable, all purchases shall be made on competitive bids.” The following procedures must be applied by country offices:

- For purchases above US\$5,000 quotations/bids must be secured from at least three (3) vendors. Quotations are acceptable in writing, by fax, by email, or with written notes from a telephone conversation. The competitive bid process (see “Record of Competition Form”, Section 14.9) for all purchases of US\$5,000 or more must be kept with the selected vendor’s paid invoices for audit purposes.
- In cases where there is reason to select a vendor that did not provide the lowest quote, justification must be documented. Acceptable justifications include prior use of the vendor, quality of the work, availability to meet deadlines, etc.

## 6.4 Sole Source Buying

Justification for the selection of a vendor as a “Sole Source” can be made in a situation where there is only a single source of supply available to meet UW-Kenya’s requirements. If a country office determines the need to use a “Sole Source” vendor for goods/services without a competitive bid process, compelling written justification as to why only that particular vendor is able to do the work must be filed with the vendor agreement. A copy of the sole source justification must be sent to the International Specialist in Seattle. Acceptable justification includes, “[Vendor X] has a successful history with UW-Kenya and we know of no other vendors that are able to supply this service;” or “[Vendor X] is approved by the funder;” or “No other vendor supplies this good/service”. The country office must also document its effort to identify other existing qualified vendors (e.g., notes from three or more phone calls).

## 6.5 Vendor Invoicing & Payment

Payment for vendor work is initiated by invoice following completion of work, or some discrete portion thereof. The vendor can submit invoices via fax, email, or regular mail to the Field Project Administrator. The Field Project Administrator reviews the invoice, approves it with a signature, and forwards the invoice to the International Specialist for review, taxation, and confirmation that the payment information is accurate. The International Specialist will route the invoice for UW approvals and wire payment.

The International Specialist will process all invoices received within a five day period and the University of Washington can generally wire payment of invoices within one week of receiving the verified invoice from the department. Payments cannot be made to vendors in the absence of all required documentation. Required documentation includes a detailed invoice and a receipt of delivery (in the form of a packing slip, delivery note, or written statement from the field administrator).

## 7.0 INVENTORY

### 7.1 Reporting Assets to Seattle Headquarters

The procurement of any single item that has a cost above \$2,000 USD (after tax) must be reported to the University of Washington inventory office within 24 hours of invoice payment.

The Country Office will be provided with a roll of UW Inventory stickers that should be affixed to any asset that is recorded. To record the asset, Field administrators should complete an “*Inventory Report Form*” (Section 14.10) and email to the Country Manager and the Treasurer.

The Treasurer will enter the information into the UW Inventory System and will reply with a confirmation. This confirmation will be retained in UW-Kenya Inventory files.

### 7.2 Tracking Assets

The Treasurer will request updated project inventory lists on an annual basis. Field administrators should maintain a complete list of assets and be able to provide information regarding their condition and status **within 48 hours** upon request.

Lost or stolen assets should be reported to the International Specialist within 24 hours.

### 7.3 Fixed Asset Policy

UW-Kenya assets (value >USD2000) are to be expensed within the UW-Kenya books of account and a separate asset register maintained in excel for tracking purposes. Each asset is to be tracked by the budget number and Project office. The assets are not to be depreciated in-line with NIH policy on grant funded assets.

### 7.4 Disposition of Assets

Under no circumstance should a project dispose of an asset without prior approval from the International Specialist. To seek approval to dispose of an asset, send the “*Inventory Report Form*” (Section 14.10) for the asset with a statement regarding the reason for disposal to the International Specialist.

Information Technology (e.g., computers, servers) must be cleaned of all UW-Kenya data before transfer or disposal and useful supplies and equipment, no longer needed by UW-Kenya projects, cannot be transferred to individuals.

## 8.0 BANKING

### 8.1 Local Checking Accounts

#### Opening & Managing an Account

##### Structure

A main UW-Kenya Bank account in Kenya Shillings will be opened up and maintained with Standard Chartered Bank in Kenya. This will be the main UW-Kenya account where all the funds will be held before being transferred to the Standard Chartered Kenyan Bank accounts of each UW-Kenya Principal Investigator by the UW Kenya Treasurer.

These sub bank accounts in the name of the project /PI, namely UW-Kenya- McClelland, UW-Kenya-John Stewart, UW-Kenya-Farquhar, UW-Kenya-Chung, UW-Kenya-Walson, UW-Kenya-IARTP will be opened up with SCB in Kenya for efficient and risk reduced fund management, but must follow the guidance below for the opening and management of all local bank accounts. These sub accounts will be in KES.

##### Regulations

All projects/PI must have a commercial bank account with Standard Chartered Bank (SCB) in the name of UW-Kenya in order to receive Field Advance and work advance funds or Task Description Funds.

Bank accounts *should not* be interest bearing, however, if there is no alternative, interest earnings must be returned to the University through the Cash Advance reconciliation process.

The main UW-Kenya Bank accounts require at least 3 signatories, and must include the three Board Members, namely, the Chair, Secretary and the Treasurer as Custodians of the Funds.

##### Checks

All blank checks must be kept in a fire proof safe or locked file.

For offices using ‘hand checks’, the check books if possible should be ‘duplicate style’ so the written check copy remains in the check register.

- Check copies may not be removed from the check books.
- Check books must be maintained and reviewed by Project Field Administrator, and periodically reviewed by the Project Budget Manager against the bank statement and the QB records.
- Void Checks must be ‘stamped VOID’ at the payee and signature lines and kept in the safe with the other checks.

Under no circumstances can blank checks be signed and held in the vault, safe or issued to *anyone* to use for payments. Wire transmittal requests must be accompanied by the same approval documents required for checks.

Checks can only be made for across the counter cash withdrawals in the following circumstances:

- Petty cash account top-up in the UW-Kenya country office
- Site offices needing cash for patient reimbursements and other cash related operations

Check to cash withdrawals can however only be done by the bank account signatories in the stated circumstances per their signing mandates for each bank account. Check payment is encouraged in all circumstances for purchases from

vendors and especially for costs above Kshs.10,000. Cash should only be used where payment by checks or bank transfer would be impossible e.g. unbanked persons. Proper records must be maintained at the office for all cash withdrawals indicating payee, reason for the withdrawal and where the funds were channeled.

### **Closing a Bank Account**

Closing sub-bank accounts requires UW-K Board approval from Board meeting and from relevant UW PI approval. Bank accounts may be closed to establish new accounts with the recommended bank, to close down a project office, or to close the country office.

## **8.2 Signature Authority**

***A minimum of one authorized signatory for the UW-K-Sub Account bank account must be a UW employee.***

A minimum of two signatories are required per Project sub- account. No finance staff can be a signer on the operating bank account(s). Project Office Administrators/ Field PI's may elect to authorize more than two signatories, however, bank account signatories must be a Project PI, local Field PI or the Project Administrator with written delegated authority, and have sufficient understanding of the operations and regulations to understand check signing responsibility.

The following signatory requirements must be observed in authorizing procurements, petty cash draws and payments via check or wire transfer. The amounts listed refer to the total amount of a single invoice:

<b>Level</b>	<b>Authorization Needed</b>
Level 1: Equivalent of up to US\$5,000	A signature of the Field Advance custodian.
Level 2: >US\$5,001	UW Purchasing must approve through the International Specialist.

- All wire and ACH transactions require two person authorizations at the bank login, regardless of amount. One authorizer must have signature authority on the bank account.
- Stricter multi-signature requirements may be developed where deemed necessary by the project PI or field PI in conjunction with the Field Administrator.

***In the event that an authorized signatory is to be the beneficiary of a payment, s/he may not authorize (sign) that payment; authorized other(s) must provide the needed signature(s).***

In the event that the local banking customs prohibit signatory levels as described above, the same table is to be used to develop the bill/check payment voucher approval process to assure that purchases over certain levels have multiple approvals and reviewers.

Bank account signatories list must be updated regularly. All signatories who are no longer part of the organization are to be removed as signatories. In doing this, the Project P.I or the Project Administrator should have the UW-Kenya Country Manager know whenever signatories exit employment by the Project office. The Country Manager will then send out an approved mandate letter to the bank Relationship Manager requesting for the immediately deletion of the mentioned

signatory. The process of signatory deletion should be effected as soon as the signatory resigns as an employee. Copies of such communication are to be kept on the bank file.

### 8.3 Bank Statement Reconciliation

Bank Statement dates must start on the 1<sup>st</sup> of the month and end on the last day of the month. The bank statement must include the bank logo, name and address, website and phone numbers. The statement must also include the beginning and ending balance, the dates of the statement and cumulative fees and interest earnings.

Bank Statement Reconciliation must be performed by the Country Office Accounting team for all bank accounts managed by the Country Office. The PFAs will no longer be required to reconcile their bank accounts on a monthly basis for Projects that have transitioned to the work advance system. The bank accounts to be used in managing work advance funds for the Project Offices will not undergo a monthly reconciliation any more. The PFAs will be expected to be able to account for all work advance funds advanced from the Country Office and attached bank statement when accounting for bank charges. Expected bank reconciliations are to be undertaken by the 15<sup>th</sup> of each month, including those of projects yet to join the work advance system. For such projects, the Accounts Coordinator will require their updated QB files annually for consolidation with the Country Office books. Any bank account (s) not reconciled upon receipt of the QB files will undergo the same from the Country Office. This means that for Projects that transitioned into work advance system, the expectation is that their bank accounts be reconciled up to the date they joined the work advance system.

Reconciliation documents from the software must accompany the bank statements for review and sign off by the Country Manager. Bank Statements should include either the cancelled checks for the month or copies of the cancelled checks. All Project Office QB files are to be sent to the Accounts Coordinator from the point of transition into work advance. QB records maintained up to this point are to be reconciled by the Country Office and any balances transferred to the work advance schedule (maintained at the Country Office) for the specific project.

For the primary parent bank account in Kenya, the UW-Kenya Country Manager or Treasurer will be responsible for providing the monthly bank statement.

<p><b><i>Bank reconciliations must be completed in the accounting software for each bank and petty cash account holding UW issued funds on a monthly basis.</i></b></p>
---



## 9.0 PAYROLL

Payroll management at the Country Office should be done through a procured payroll software. Currently the office uses SAGE Premier HR service. Project Offices are required to manage time sheets and to report the time and benefits used and accrued for each employee to the UW-K Operations Analyst. The actual upload of ACH payments for staff salaries and payments to the employment tax authority must be done by the UW-K Operations Analyst.

The Project Field Administrator must maintain a ledger of current employees and use it to check the payroll report submitted to the UW-K Operations Analyst to assure only current, active employees are receiving paychecks. The preparation of the monthly payroll and the review against the staff ledger must be done by two different staff members within the Country Office. Project Field Administrators must review all payroll schedules on a monthly basis before payment of net salaries and other payroll deductions can be done.

Additionally,

- UW-K Operations Analyst must be timely in withhold tax and other government payments and reports
- Payroll liabilities for taxes and pension fund will be paid to the authority within 5 days of the pay period, or as required by law (whichever comes first).
- A detailed reconciliation of the amounts due to the tax authority and to the pension fund will be made in support of the payments, and kept on file in the UW-K office.

Payroll cannot be paid in advance. Federal funding regulations restrict payment in advance of work performed. Therefore, payroll may only be made for the exact number of days worked and leave taken prior to the date of the paycheck.

## 10.0 FISCAL REPORTING

### 10.1 Revenue Recognition

Revenue should be recognized in the organization once the Seattle based Budget Managers have approved a field advance expenditure report or a monthly eRev reconciliation report. It's expected that the total amount of expenses reported and approved will also be recognized as revenue upon matching credits available in QuickBooks with the customer invoice created therein. At the end of the financial year when preparing books of accounts, any prepaid expenses reported to Seattle Budget Managers and approved as allowable expenditure should be deducted from total revenue for the organization in coming up with net revenue for a given financial year. An adjustment (increase in revenue) needs to also be made for prepaid expenses that were deducted from total revenue in prior year's audited financial reports.

### 10.2 Annual Returns Submitted To the NGO Coordination Board

UW-Kenya is required to declare bank account details in its Annual Report and to report any changes in address or changes in officers to the UW-K Board. UW-K must also submit an Annual Return to the NGO Board at least two weeks before September 30 each year or as shall be guided under revised schedules in the concerned ACT. The NGO Coordination Board then analyzes annual returns submitted by UW-Kenya. Preparation of accounts should be made using International Finance Reporting Standards (IFRS).

### 10.3 Monthly Work Advance Reports to UW-Kenya

The Field Project Administrator is responsible for the preparation of Work Advance reconciliations Excel file within 5 business days of the month's end. After review of the work reconciliation by the CO Accountant, the Excel file will then be uploaded to the UW-Kenya QuickBooks file for reporting and consolidation into the parent UW-Kenya books of accounts.

### 10.4 Local Taxes and Value Added Tax (Vat)

Registration as an NGO, gives UW-K automatic exemption from Income Tax for their organization. However, individuals must pay taxes on their incomes as required by law. Income that is paid outside the country is not taxed in Kenya since it is taxed in the country of origin.

Exemption of tax on goods imported into the country is granted on a case by case basis. However, UW-K should work with line ministries within their specific intervention areas which will in turn recommend them to the treasury for exemption.

UW-Kenya should discuss local tax requirements with UW legal counsel and apply for VAT tax exemption if possible.

***Field Administrators/ Accounts Coordinator must ensure that fiscal systems are compliant with local VAT and other tax reporting laws and follow appropriate guidelines for filing and reporting VAT and related tax payments, withholding and reimbursement requests.***

### 10.5 Internal Management Reviews

Internal management reviews will be conducted by UW-Kenya fiscal staff up to two times a year. The review will examine finance and procurement policies and practices, country office fiscal structure, and the capacity of key finance and operations staff.

Internal audits may be performed by the UW's Internal Audit Department as required by the funder. The costs for these audits will be borne by the UW's General Accounting Office.

## 10.6 External Audit

UW-Kenya offices must follow external audit practices as outlined by the NGO Coordination Board and the Kenya government. KPMG is the contracted audit firm for annual external audits, audited financial report preparation and where possible, filing of related annual tax returns. However, according to the NGO Coordination Board, use of any authorized local auditors is permitted who are recognized by Institute of Certified Public Accountants Kenya (ICPAK) and as such other firms may be engaged based on the review process as outlined in the procurement policy.

Annual external audits are managed jointly by UW-Kenya's Project Administrators, The UW-Kenya Accounting Coordinator, UW-Kenya Country Manager and the Board Treasurer. As a flow down, an external audit of UW-Kenya may also lead to an audit of the individual projects, programs and Field Office financial records.

Management control findings (deficiencies) are reviewed by the UW-K Board prior to sign off. All control findings must be corrected within 6 months of the report, and are considered a top priority in the work plan of Board Treasurer and the CEO of UW-Kenya.

Audited financial statements (AFS) are required to be filed with the NGO Coordination Board within 3 months after the completion of the financial year of the organization as per UW-Kenya's constitution. A filing fee of KES 1,000 (USD\$12) should accompany these annual returns. Returns should be submitted on a duly filed form 14

UW-Kenya is a Not-For-Profit organization. Therefore, all Statements of Revenue and Expense (P&L) should 'net to zero' there being no auditor recommended accruals and prepayments. The only costs or income allowed in Retained Earnings each year are:

- FOREX gains/loss (under the review of the Board Treasurer)
- Accrued payroll benefit expenses
- Other accruals per the close of the year process deemed necessary by the audit firm

Upon approval of the draft audited financial statements and management letter, the audit firm will provide 3 bound copies to the CEO-UW-Kenya, and one bound copy and electronic copy to UW.