



200.000 - Financial Policies

Version 76.0  
~~1102/029/20264~~

**AUTHORITY**

The Colorado Health Benefit Exchange (COHBE) was established by the State of Colorado under CRS §§10-22-101 et seq. (as amended). A Board of Directors provides oversight and ultimate governance for COHBE.

On May 6, 2013, COHBE became also known as Connect for Health Colorado (C4HCO) for business purposes of the healthcare marketplace.

**APPROVED**

Pending Board of Directors Approval

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Date \_\_\_\_\_



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# 1 Purpose

To provide general principles and guidelines for the financial management, governance and control of COHBE assets. The Financial Policies provide the guiding principles for the establishment of the financial procedures of the organization.

# 2 Scope

This policy applies to all financially related operations of COHBE and is in conjunction with other related policies that interface with the financial processes of the organization

# 3 References

Below are other policies, procedures, guidance or processes that are related to this policy and should be used in conjunction with policy. Please refer to the list below when using this policy.

Articles of Governance	400.001 Workforce Member Handbook
Bylaws	Procurement Policy
Conflict of Interest Policy	Procurement Procedures
912.03 Record Retention and Disposal Policy	<a href="#">200.004 Investment Policy</a>
Authorization Matrix	<a href="#">200.002 Payroll Processing Procedure</a>
Corporate Credit Card Procedures	<a href="#">200.005 Expense Reimbursement Procedure</a>
<a href="#">200.001 AR Billing and Deposit Procedure</a>	<a href="#">AP Cycle Procedures</a>

# 4 Policy

## 4.1 Financial Operations Guiding Policy

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Financial operations shall at all times be managed in such a way as to protect the financial solvency, promote professional management and reporting of income and expenses and maintain public confidence in COHBE’s financial integrity and ability to achieve its mission.

## 4.2 General Policies

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**Accounting Basis.** Accounting records are to be maintained on an accrual basis and in accordance with generally accepted accounting principles (GAAP).

**Accounting Year.** COHBE’s accounting year begins on July 1 and ends on June 30.

**Audits.** COHBE will conduct an annual independent financial audit and any other audits as required by state or federal regulations. The Chief Financial Officer (CFO) will annually select and recommend an independent audit firm to the Executive and Finance Committee. The Executive and Finance Committee will approve and recommend the audit firm to the Board of Directors (Board) for its approval. The Executive and Finance Committee will meet with the external Auditor to review the final audit results and report findings to the Board.

**Policy Changes.** The Executive and Finance Committee will review these policies at least annually and recommend any necessary changes to the Board for approval. All revisions to the Financial Policies, including exhibits, must be approved by the Board.

## 4.3 Financial Planning, Reporting and Management

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**Financial Management System.** COHBE will track income and expense through use of an automated, internally managed accounting system that has been approved by the Chief Executive Officers (CEO).

### Financial Reporting

- Reporting practices will provide financial transparency and inform stakeholders of the organizations financial condition and comply with all oversight requirements.
- Quarterly financial statements, including budget variances, are prepared by the Finance Department and presented to the Executive and Finance Committee for review. Quarterly financial statements reviewed by the Executive and Finance Committee are included in the corporate record.
- The Finance Department will report quarterly to the Executive and Finance Committee all financial commitments by vendor that, in aggregate, exceed the Board's expenditure approval threshold as defined in the Authorization Matrix (Exhibit 1).
- The Finance Department will provide specialized financial management and ad hoc financial analysis reports to the senior management team and the Executive and Finance Committee upon request
- The CEO may include other specific financial reports and analysis in the Board financial packet at his/her discretion

**Budgeting.** The annual budget is prepared by the CFO in coordination with the CEO. The budget will include projected revenue, expenses and cash balances for the budget period. The Executive and Finance Committee will review the budget for conformance with the financial policies of COHBE and prudent financial management. The budget is to be approved by the Board prior to the start of the fiscal year.

Circumstances during the fiscal year may necessitate an amended budget. Budget revisions that increase the overall budgeted expenditure total must receive approval of the Board upon recommendation of the Executive and Finance Committee.

**Tax Compliance.** All tax returns and related filings, required by state, local and federal government law, must be filed with the appropriate agency by the designated deadline.

### **Internal Controls**

- Financial duties are distributed among multiple people to help ensure protection from fraud and error. The distribution of duties aims for maximum protection of the organizations assets while considering efficiency of operations. When neither practical nor cost-effective to segregate financial duties, compensating controls should be used to reduce the risk of fraud and error.
- Write access to the internal accounting system is controlled through the use of standard network security procedures and is functionally restricted among authorized staff to segregate accounting duties.
- The organization maintains physical security of its assets to ensure that only people who are authorized have physical or indirect access to money, securities, inventories, real and personal property and equipment. Assets will be disposed of in compliance with applicable laws and regulations.
- All employees and members of the Board are expected to use good judgement, to adhere to high ethical standards, and act in such manner to comply with the organizations Conflict of Interest Policy.
- The CEO and any persons having access to the internal financial accounting system must take at least five consecutive business days of leave on an annual basis.
- The CEO shall receive monthly, an electronic copy of all bank statements and shall scrutinize all transactions to determine if they are appropriate.
- Quality control reviews will be periodically conducted to ensure organizational compliance with laws, regulations, and internal policies and procedures. All errors, overpayment and noncompliance issues discovered through the review process or by

other audit/monitoring activities will be investigated and appropriately resolved in a timely manner and policies and procedures revisions made if necessary. Results of the quality control reviews will be reported to the Board.

**Borrowings and Other Credit.** Authorization and delegation of users of credit accounts is established in the Authorization Matrix. Use and monitoring of corporate credit cards will be in compliance with the Corporate Credit Card Procedures.

**Investments.** Investments are maintained within the guidelines of a separate Investment Policy reviewed by the Executive and Finance Committee and approved by the Board.

## 4.4 General Accounting

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**Chart of Accounts.** The chart of accounts will contain a classification system for income and expenditures to identify the sources and uses of funds. The definition and organization of the accounts reflects the need to provide information to the Board concerning the financial management of COHBE and progress toward fulfilling its mission.

**Account Reconciliation.** Bank account statements are reconciled with internal financial records monthly by finance personnel that are independent from any cash authorization roles. Reconciliations are reviewed by the Controller. Other balance sheet accounts are reconciled periodically as necessary but no less than annually.

**Journal Entries.** All journal entries are recorded in the electronic accounting system with sufficient information to allow for review and audit of the entries.

**Capitalization.** Furniture, equipment, tenant improvements, purchased software and other intangible assets are capitalized if the value or cumulative value of like items is \$5,000 or greater and has a useful life of more than one (1) year. COHBE depreciates/amortizes these items using the straight-line method over the useful life of the assets acquired.

**Intercompany transactions.** Transactions with COHBE owned entities will be accounted for in accordance with GAAP.

## 4.5 Revenues, Cash Receipts and Accounts Receivable

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**Revenue Recognition.** Revenues are recognized based on accrual accounting in accordance with GAAP. Revenues are recognized when earned, regardless of the timing of cash receipts. Revenue is considered earned when COHBE has substantially met its obligation to be entitled to the benefits represented by the revenue. Deposits, advance payments and progress payments for programs or activities to be conducted primarily in a future period are classified as deferred revenues and are recognized as revenue only when the revenue producing event has occurred.

**Cash Receipts.** All funds received by the organization, whether currency, by check or by electronic transfer, will be deposited in a timely manner and directly into the appropriate bank account. No monies should be removed to make payments or for other purposes prior to depositing and recording the funds received in the accounting system.

**Billings/Receivables.** For fee/customer based revenues, properly designed accounting records and reports should be in place to ensure that total billings and individual customer accounts are accurately accounted for, collections are recorded timely, and delinquent accounts are readily identified and enforced. Periodic reconciliations of control accounts to individual customer accounts should be performed to ensure overall accuracy of accounting records.

## 4.6 Expenses, Cash Disbursements and Accounts Payable

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**Purchases & Procurement.** Approval of expenditures are to be in accordance with the Authorization Matrix. All procurements for goods and services are to comply with the Procurement Policy.

**Cash Disbursements.** Any checks/ACH's/wire transfers are authorized according to the Authorization Matrix. No payments will be made without appropriately documented approval of expenditure and supporting documentation.

**Contract Management.** A contract management process will be used to ensure appropriateness of payments and to monitor contract terms and expenditure levels. Contract expenditures materially exceeding contract limits are to be identified and reported to management to determine appropriate levels of approval needed prior to incurrence of additional contract expenditures. Periodic reporting of significant contracts and any relevant changes will be provided to the Executive and Finance Committee.

### Expense Processing

- Invoices are to be recorded as accounts payable in the accounting system in a timely manner.
- Expenditures are to be recorded consistent with budgeted line items and for the appropriate period. When applicable, expenditures should be recorded with the proper funding source and cost code.
- Invoices will be paid according to the invoice terms unless awaiting contract funding, in which case, invoices will be paid upon receipt of funds.
- Supporting expenditure documentation including invoices shall be retained in accordance with the 912.03 Record Retention and Disposal Policy v2.2.

**Employee Expense Reimbursement.** Expenses incurred in the normal course of COHBE business by the staff will be reimbursed in a timely manner and in compliance with the expense reimbursement policies and procedures established in the [Expense Reimbursement Procedure](#)~~Workforce Members Handbook~~.

**Board Expense Reimbursement.** Reasonable and necessary travel and related business expenses incurred by a Board member due to geographic location in Colorado are reimbursable.

**Small Purchases.** Purchases of low risk and low dollar administrative goods and services are to be processed in a controlled and expeditious manner. [For procurement purposes the classification of purchase levels are based on federal guidelines for non-federal entities.](#) Credit accounts may be established for purposes of funding small reoccurring purchases.

**Payroll & Related Activities.** COHBE may employ full time, part time, temporary, exempt, and non-exempt employees.

- All additions and changes to employee compensation for both new and existing employees must be approved and signed by the CEO.
- All employees, exempt and non-exempt, are required to [account for their time worked and record](#) ~~record time worked~~, holidays and leave taken in the time keeping system each pay period.
- Payroll processing and reporting will comply with the rules/laws set forth by state, local and federal regulations.
- Receipt of the Workforce Member Handbook by all employees should be documented. Any revisions to the Workforce Member Handbook will be communicated to staff and access to the revised document made readily available.

**Independent Contractors.** Contracting with consultants is to comply with the Procurement Policy and Procurement Procedures.

**Intercompany Expenses.** Expenses incurred for COHBE owned organizations will be identified in the accounting system.

## 4.7 Federal and State Awards

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**Preparation and Review of Proposals and Applications.** Individual departments are responsible for preparing proposals/applications for projects that the department intends to pursue. All proposals/applications shall be reviewed by the CFO prior to submission to

government agencies or other funding sources. Final proposals/application shall be reviewed and approved in writing by the CEO and the Board in accordance with the Authorization Matrix.

**Compliance with Laws, Regulations and Provisions of Awards.** As a recipient of federal and state funds, the organization is to be compliant with all applicable laws, regulations, and provisions of contracts and grants.

**Cash Drawdowns.** Cash drawdowns from federal or state agencies shall be made as deemed necessary and follow all requirements of the funding agency. All federal or state funds shall be deposited into an interest-bearing cash account.

**Procurement under Federal and State Awards.** Procurement of goods and services to be funded by federal or state funds will comply with the purchasing policies in the Procurement Policy and any additional restrictions specific to the funding source. Vendors will be appropriately screened when federal funds are utilized.

**Sub-recipients.** COHBE may make sub-awards of federal or state funds to other approved organizations. All sub-awards in excess of \$5,000 shall be subject to the same procurement policies described in the Procurement Policy or the policies of the funding source, whichever is more restrictive. All federally funded sub-recipients will be appropriately screened to receive funds.

**Sub-recipient Monitoring.** COHBE will comply in all material respects, with laws, regulations and award provisions for the monitoring of sub-recipient expenditures. Specific program policies and procedures will be developed as needed for monitoring compliance with sub-award contractual terms.

**Allowable vs Unallowable Costs.** It is the policy of COHBE that only costs that are reasonable, allowable and allocable to a federal or state award shall be charged to that award directly or indirectly. All unallowable costs shall be appropriately segregated from allowable costs in the general ledger in order to assure that unallowable costs are not charged to federal or state awards.

**Direct Costs.** Direct costs include those costs that are incurred specifically for an award or function. COHBE identifies and charges these costs exclusively to each award or program.

**Indirect Costs.** Indirect costs are those costs that either benefit more than one award (overhead costs) or non-federal function or that are necessary for the overall operation of COHBE (management and general costs). Allocation of indirect costs should comply with all state and federal regulations.

**Cost Sharing.** It is the policy of COHBE to value contributed services and property that are to be used to meet a cost sharing or matching requirement at their fair market values at the time of

contribution, unless award documents or federal or state agency regulations identify specific values to be used.

**Budget Revisions and Program Reporting.** It is the policy of COHBE to follow the requirements of federal or state awarding agencies for program budget revisions and any ongoing program financial reporting.

**Program Close Out.** COHBE shall follow the close out procedures described in 2 CFR 200.343, depending upon the Federal award date, and in the grant agreement as specified by the granting agency.

## 5 Roles and Responsibilities

### 5.1 Board of Directors

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The Board has the fiduciary responsibility to oversee the overall financial health of COHBE utilizing the guidelines established in the articles of governance, bylaws and organizational policies. Board members evaluate financial policies, approve annual budgets, and review periodic financial reports to ensure that the organization has the necessary resources to carry out its mission.

### 5.2 Chief Executive Officer

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The CEO is delegated the financial management authority from the Board, subject to the approved annual budget. The CEO is responsible for the execution of a budget that will facilitate the achievement of COHBE's policies and program goals.

### 5.3 Chief Financial Officer

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The CFO is responsible for preparing an annual budget, managing the execution of the budget, and submitting regular financial reports to the Executive and Finance Committee of the Board.

## 6 Policy Maintenance

The Executive and Finance Committee will review these policies at least annually and recommend any necessary changes to the Board for approval. All revisions to the Financial Policies, including exhibits, must be approved by the Board.

# 7 Authorization Matrix

Specific levels of authority are detailed in the Authorization Matrix (Exhibit 1 of these Financial Policies).