1. **Purpose**
To ensure accounting procedures follow sound business practices and internal controls, support the recording and reporting requirements of Generally Accepted Accounting Principles (GAAP), and provide assurance to all stakeholders that delegated authority and responsibility for financial transactions is effectively applied and monitored.

2. **Related Policy/Authority**
Policy B3011

3. **Faculty/Staff Responsibilities**
Vice President of Administration/CFO is responsible to ensure that an overall structure of sound internal controls is implemented, GAAP is followed in all accounting, and that all external regulations and requirements for routine business transactions are addressed in the control and reporting structure. The VP of Administration/CFO is responsible to periodically review the structure and implementation of internal controls, and to regularly review all financial reports presented to the BCOM Investment Partners Members, the Board of Trustees, the Debt Trustee, and any governmental agency or accrediting body.

The Controller is responsible for the implementation and oversight of these procedures.

4. **Definitions/Abbreviations**
None

5. **Procedural Steps**
1. New accounts are created by the Assistant Controller.
2. Cash receipts are processed by the Administrative Coordinator and Associate Controller. Application of financial aid is processed by the Enrollment Services Department in a separate student administration system; the Accounting Technician balances, and the Associate Controller reviews the balancing, of the Financial system records to the Student system records and Enrollment Services can validate the application of financial aid and creation of student disbursements.
3. Purchase requisitions and other requests for cash disbursements are initiated by Administrative Assistants (to include Executive Assistants) on behalf of Departmental requestors and approved by the requestor; the request after approval is processed by the Purchasing Technician; those disbursements requiring a three-way match of a requisition, a receiving report and an invoice have receiving verified by the Operations Coordinator and entered by the Purchasing
Technician. Depending upon the dollar value, multiple levels of requestor approvals are required, as addressed in policy B3011. Invoices are all forwarded to the Accounting Technician for processing.

4. Assistant Controller and Accountant prepare Bank Reconciliations for review by the Controller.

5. Journal entries are initiated by the Assistant Controller and Accountant and approved by the Controller, or initiated by the Controller and approved by the Vice President of Administration/CFO.

6. The CFO reviews and approves all external financial reports.

7. The CFO or the President signs all checks and all ACH disbursement authorizations.

8. The CFO and the President have no system access to the administrative financial system, and act as reviewers and approvers only. The other Finance positions have limited access based upon their functions. Requestors can only access requisition and financial reporting systems via established systems security approval which limits them to their departmental information.

6. Reports/Charts/Forms/Attachments/Cross References

N/A

7. Maintenance

Office of the Controller; updated whenever an external reporting requirement is added or changed.

8. Signature

Approved by VP Administration/CFO 4.28.2023

9. Distribution List

Internal/External

10. Revision History

<table>
<thead>
<tr>
<th>Revision Date</th>
<th>Subsection #</th>
<th>Summary of Changes</th>
<th>New/Replacement Procedure? (if applicable)</th>
<th>Approval Date</th>
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<tr>
<td>11.29.2021</td>
<td>5</td>
<td>Updated titles</td>
<td></td>
<td>11.30.2021</td>
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<tr>
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<td>5</td>
<td>Added information about the process.</td>
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<tr>
<td>4.28.23</td>
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