

## **Policies and Procedures**

(rev. 1/24/2024)

#### **Table of Contents**

#### I. PURPOSE/ADOPTION OF POLICIES & PROCEDURES

#### II. STATEMENT OF NONPARTISANSHIP

- Dos and Don'ts for Officers, Board Members, Lobbyists, Web Editors and The VOTER
- Link to LWVUS National Board Non-Partisan Policy
- Link to LWVUS Guidelines on Nonpartisanship on Social Media

### III. DIVERSITY, EQUITY AND INCLUSION (DEI)

- DEI Statement
- Non-Harassment Policy

### IV. LWVDE BOARD COMPOSITION AND MEMBER RESPONSIBILITIES

- Executive Board Defined
- Job Descriptions
- LWVDE President, ex officio member of all committees, except Nominating
- Program Chair Evaluation

## V. BOARD MEETING REQUIREMENTS AND PROCEDURES

- Board Meeting Scheduling and Notifications
- Board Attendance
- Board Meeting Preparation
- Uploading and reviewing Pre-board Meeting reports to LWVDE Google Drive
- Virtual Meetings
- Robert's Rules of Order
- Board Etiquette

## VI. CRITERIA AND PROCEDURES FOR THE BOARD USING ELECTRONIC VOTES TO MAKE EMERGENCY DECISIONS

- Criteria for using electronic vote to make emergency decisions
- Procedures for conducting board meetings

### VII. COMMUNICATIONS FROM LOCAL LEAGUES MANDATED BY LWVDE

- Local Leagues' Responsibilities to keep LWVDE Updated
- Contact Information for Local Leagues' board members
- Whistleblower Complaints
- Local Leagues' Board Agenda, Minutes with Committee Reports
- Local Leagues' Bylaw Updates
- Identification and Dating of Records: Templates on website under "Members Only"
- Publicly Distributed Material (also refer to XXIII. POLICIES FOR ONLINE COMMUNICATIONS)



#### VIII. FINANCIAL ADMINISTRATION

- LWVDE, a 501(c)3 non-profit organization
- Defining the Treasurer's Role, Succession Planning, and Board Responsibilities
- Bookkeeper or Accounting Firm Management
- Finance Committee & Responsibilities
- Administrator's Contract
- Biennial Budget Preparation and Approval
- Scheduling Biennial Financial Review
- Annual Review of Service Contracts
- Monitoring Grant Funding
- Per Member Payment (PMP)
- Submission of Proposed Biennial Budget to Local Leagues
- LWVDE & LWVNCC Office Sharing Agreement
- Mail
- Receipts
- Cash
- Expenditures/Checks
- Expenses: Routine, new purchases reimbursable, In-Kind
- Use of Debit Card
- Review and Reconciliation
- Data Security and Safeguards for Accounting Computer & Records
- Record Maintenance and Reporting
- Annual Obligations: State Franchise Tax & 990-N Electronic Notice filing

#### IX. REVIEWS/DEADLINES FOR CHANGES TO BYLAWS

- Review of the Bylaws
- Changes to the Bylaws
- Bylaws on LWVDE website under "Member's Only"
- Quorums

#### X. REVIEWS/DEADLINES FOR CHANGES TO POLICIES & PROCEDURES

- Biennial Review Procedure (even number years)
- Approval to adopt or amend the P&P
- Nominating Committee Chair responsibilities regarding P&P
- P&P on LWVDE website under "Member's Only"

#### XI. CONCURRENCE

- Definition of Concurrence
- Guidelines for using Concurrence as a basis for State/Local League action

#### XII. STATE-LEVEL STUDIES

Procedures for Study and Adoption

#### XIII. STATE LEVEL ADVOCACY CORPS

- Introduction: How the Advocacy Corps Works
- Advocacy Corps Membership
- Exclusion of Committed Partisans



- How the LWVDE Board and Advocacy Corps Coordinate
- Registration and Authorization of Advocacy Corps Lobbyists
- Lobbying at the LWVDE level
- Do's & Don'ts for League Lobbyists

## XIV. CONVENTION MEETING, NOMINATIONS, ELECTIONS and BUDGET

- Place, Date, and Call of Convention Meeting
- Nominations for Board of Directors, Chairs, and Nominating Committee Chair, plus one
- LWVDE President to appoint Election Committee
- Election of Board of Directors, Chairs, and Nominating Committee Chair, plus one
- Budget Preparation
- Submitting Program Recommendations
- Mandated Notifications to Local Leagues
- Convention Attendance & Voting

### XV. LWVUS COUNCIL MEETINGS AND LWVDE COUNCIL MEETINGS/ACTION

- Purpose and Scheduling of Councils
- LWVUS National Council
- LWVDE Statewide Council
- LWVDE Council Action
- Mandated Notifications to Local Leagues

#### XVI. NEW CITIZEN NATURALIZATION COMMITTEE

#### XVII. VOTER SERVICES & POLICIES

- Introduction: Non-partisanship Statement
- IRS (501(c)3), FEC, & FCC requirements for all Voter Services activities
- Review of Voter Services Policies in Election Years
- Voter Registration Drives
- VOTE 411 Online Voter Guides and Support
- Non-partisan Voter Education
- Providing Written Updates to LWVDE Board on Voter Services Events
- Voter Services Chairperson's Responsibilities

#### XVIII. LWVDE PUBLIC CANDIDATE FORUMS

- Policies for Public Candidate Forums
- Three Standardized forms for Candidate Forums on the website under "Members Only"
- Review of Public Candidate Forum Policies in Election Years
- Clarifying the number and qualifications of candidates invited to Candidate Forums based on compliance with Delaware Board of Election Laws
- Requirements for Candidates to sign Photograph, Video Release and Related Forms
- Policies Regarding Co-Sponsored Candidate Forums
- Policies when LWVDE is asked by a separate organization to moderate their forum
- Providing Written Updates to LWVDE Board on Candidate Forums



## XIX. CRITERIA FOR APPROVING REQUESTS FOR ACTION AT THE FEDERAL LEVEL BY STATE AND/OR LOCAL BOARDS AS ADOPTED BY LWVUS (01/26/2002)

- Requests from State/Local Leagues for Permission to Act at the Federal Level
- Requests from State/Local Leagues for LWVUS Action on Non-Priority Issues
- Requests for Permission to urge other Leagues/members to act on a National Issue
- Requests for Endorsement of Initiatives Sponsored by Other Organizations

#### XX. INTER-LEAGUE ACTION/ COORDINATION/FUNDRAISING

- LWVUS Action Alerts
- Protocol for communicating with elected officials:
  - LWVUS All Federal officials
  - LWVDE All state-wide officials
  - Local Leagues Local officials
- Letters to The Editor
- Fundraising Coordination among Local Leagues and the LWVDE

#### XXI. CRITERIA FOR JOINING COALITIONS AND PARTNERSHIPS

- Criteria specified, including nonpartisanship
- LWVDE President(s) appoints League representative
- Annual review of Coalitions and Partnerships

### XXII. PASSWORD STORAGE, PROTECTION, PROTOCOL AND REGULATION

• Implementation of the 1Password storage system.

### XXIII. POLICIES FOR ONLINE COMMUNICATIONS (Adapted from the LWVUS)

- Policies for Printed Publications
- Policies for Websites as "publications"
- Copyrights
- RE: Photographs & Videos Consents; Delaware, an "All-Party Consent" State
- Hypertext Links
- Protection of Members' Personal and Contact information
- Guidelines for Online Meetings under the Shared LWVDE ZOOM Account
- Planning Calendar Guidelines to Minimize Event Scheduling Conflicts

## XXIV. WHISTLEBLOWER POLICY (Required by IRS)

- How to report violations of LWVDE Bylaws, Policies and Procedures, Business and Personal Ethics
- Responsibilities of the Finance Committee in resolving allegations of misconduct
- Confidentiality and "Good Faith" Reporting

### **XXV. DOCUMENT RETENTION POLICY** (Required by IRS)

- Guidelines for LWVDE Office and President(s), Secretary and Treasurer of state and local Leagues
- Documents of historical significance retained in cooperation with the University of DE Library
- Schedule of documents that should be retained and for how long



## XXVI. CONFLICT OF INTEREST POLICY (501(c)3 IRS Requirement)

- Responsibilities of Board members to avoid actual or appearance of Conflict of Interest
- Dos and Don'ts regarding participation by Board members or LWVDE employees in decision-making positions which might result in their own or family's financial gain
- Annual requirement for Board members and employees to digitally sign a certificate of compliance with the Conflict-of-Interest Policy



#### I. PURPOSE/ADOPTION OF POLICIES & PROCEDURES

Policies & Procedures (P&P) are written rules made by the Board of Directors that serve as the operational supplement to the LWVDE Bylaws. (Refer to P&P Chapter X. Reviews/Deadlines for Changes to P&P)

#### II. NON-PARTISANSHIP

- A. The League of Women Voters of Delaware, Inc., (LWVDE) a 501(c)3, non-partisan organization, encourages informed and active participation in government and influences public policy through education and advocacy. We take action on public policy positions established through member consensus. This standard of non-partisanship was established in the 1920 League of Women Voters (LWV) Founding Document. We do not support or oppose any political party or candidate. Although the general LWVDE membership is encouraged to be active in party politics, Board members and those specifically designated to represent the League (e.g. lobbyists in Advocacy Corps) are expected to conduct themselves in such a way as to preserve the League's nonpartisan policy.
- B. LWVDE board members and lobbyists (except the President(s) and the Voter Services chair) may:
  - 1. Sign nominating petitions;
  - 2. Attend functions of political parties or candidates;
  - 3. Serve as an election official, a clerical position;
  - 4. Contribute to the campaigns of candidates of their choice.
  - 5. Run for a non-partisan office.
- C. LWVDE board members and lobbyists may NOT:
  - 1. Serve as a committee person for a political party;
  - 2. Serve in partisan elective office;
  - 3. Run for a partisan office;
  - 4. Work in any identifiable way, paid or volunteer, for the election of any partisan federal, state, or local candidate.
- D. Non-partisanship does not mean that the League does not take a position. The League has taken positions on issues, based on member consensus since the LWV was formed. Refer to the LWVUS National Board Non-Partisan Policy.
- E. A board member or lobbyist who decides to run for public office or takes a policy-making or advisory position on an officeholder's staff must resign their League position immediately and will clarify, if needed, in a public statement that this has occurred. After considering how widely the person has been known as a League spokesperson, the Board may issue a press release to make the resignation public. This policy applies whether or not the office in question is considered "nonpartisan" (e.g., some city or town councils).



- F. Potential conflicts of interest will be weighed in considering portfolio and/or project assignments.
- G. No political ads may be included in The VOTER, on the LWVDE website, or any LWVDE social media sites. Refer to LWVUS Guidelines on Nonpartisanship on Social Media.

### III. DIVERSITY, EQUITY AND INCLUSION (Per LWVUS)

- A. Commitment to Diversity
  - The LWVDE is an organization fully committed to Diversity, Equity, and Inclusion (DEI) in principle and practice. Diversity, equity, and inclusion are central to the organization's current and future success in engaging all individuals, households, communities, and policymakers in creating a more perfect democracy.
- B. The LWVDE is committed to an environment in which all individuals are treated with respect and dignity. Each individual has the right to work in an atmosphere that promotes equal opportunities and prohibits discriminatory practices, including harassment. Therefore, LWVDE expects that all relationships among persons in the organization will be free of bias, prejudice, discrimination, and harassment. Any person who believes they have been harassed by a coworker, supervisor, or by non-employee should promptly report the facts of the incident or incidents and the name(s) of the individual(s) involved to an officer on the LWVDE Board. Upon receipt of a complaint, the LWVDE officer will undertake a prompt, thorough, objective, and good-faith investigation of the harassment allegations. League members who violate this policy are subject to discipline up to and including the possibility of losing their membership.
- C. Participation in the League
  - 1. There shall be no barriers to full participation by members in this organization based on gender, gender identity, ethnicity, race, native or indigenous origin, age, generation, sexual orientation, culture, religion, belief system, marital status, parental status, socioeconomic status, language, accent, ability status, mental health, educational level or background, geography, nationality, work style, work experience, job role function, thinking style, personality type, physical appearance, political perspective or affiliation and/or any other characteristic that can be identified as recognizing or illustrating diversity.

#### IV. LWVDE BOARD COMPOSITION AND MEMBER RESPONSIBILITIES

- A. Each board member, regardless of office or portfolio, shares in the cooperative effort of making policy, planning, and carrying out League activities. Basic functions performed by every board member include:
  - 1. Advancing League goals;
  - 2. Involving members in League activities and developing leaders;
  - 3. Helping the organization to run smoothly, including specific responsibilities for membership growth, adequate financing, and quality programs.
- B. The Executive Committee of the Board is composed of elected officers, i.e. President, Vice President, Secretary, and Treasurer.
- C. Board Members and Committee chairpersons, working in conjunction with the LWVDE President, are responsible for creating, reviewing, and updating their job descriptions on a biennial basis in December (even number of years). These job descriptions are then posted on the LWVDE website under "Members Only".



- D. The LWVDE President as ex officio member of all committees (except the Nominating Committee), should be informed of all meetings and sent copies of all official correspondence.
- E. LWVDE Program Chair Evaluation should be completed no later than one week after any public forum or major undertaking and submitted to the Board.

### V. BOARD MEETING REQUIREMENTS AND PROCEDURES (Refer to Bylaws Article V, Section 5)

A. Board Meeting Scheduling: There shall be at least six regular meetings of the Board of Directors annually including meetings convened in March and April in preparation for the scheduled Council or Convention. The President shall notify each member of the Board of Directors of all regular meetings at least one week before any such meeting, providing the time and place of the meeting.

#### B. Board Attendance

- 1. LWVDE board members are expected to attend all board meetings. Three consecutive absences from board meetings without prior notification to the President (or other convener) shall be deemed a resignation from the board.
- 2. LWVDE board meetings are open to all League members and potential members. Off-board chairs are urged to attend as often as possible.
- 3. Executive sessions may be called by the LWVDE president to consider business matters.

### C. Preparation for Board Meetings

- 1. When possible, inform the President of major items for the agenda *at least 48 hours* before the meeting.
- 2. Inform the President if you will not be attending.
- 3. To expedite business and ensure clarity of the minutes, Board members are expected to email their written reports to the Administrator 7 days before the Board meeting date, if possible. It is recognized that some portfolio chairs may be unable to comply with this time frame.
- 4. All Board members are expected to read pre-board reports before the meeting.
- 5. The "Pre-Board Meeting Reports" folder will hold each Board member's report on G-Drive until the Webmaster attaches them as an addendum to the minutes of that Board meeting. Minutes are then available on the LWVDE website under "Members Only."
- D. Virtual Meetings: Members of the LWVDE Board, or any committee designated by the board, may participate in a meeting of such board, or committee through conference telephone or other communications (e.g. ZOOM, GoogleMeet, Skype, conference call, etc.) as long as all participants have been notified *at least 48 hours* in advance; arrangements for participation have been made to be inclusive wherein all those participating can hear each other and a quorum can be expected to participate. (Refer to Bylaws Article V, Section 9 & 10 and P&P Chapter XXIII, J for ZOOM Meeting Guidelines.)
- E. Voting follows Robert's Rules of Order: Only LWVDE board members may vote.
- F. Meeting Etiquette: Codes of behavior a member ought to follow while attending meetings to ensure a pleasant and productive meeting.
  - 1. Come to the meeting with a positive attitude.
  - 2. Allow each committee member to introduce their previously submitted report, and respond to any questions from board members.
  - 3. Talk one at a time, waiting to be recognized by the committee chair or president.



- 4. Allow all members to speak once before speaking a second time.
- 5. Be patient when listening to other members speak and do not interrupt them.
- 6. Be respectful of other members' ideas or situations when they talk.
- 7. No side conversations.
- 8. Stay on the topic being discussed.
- 9. When a topic or agenda item has been fully discussed, do not revisit the same subject.

## VI. CRITERIA AND PROCEDURES FOR THE BOARD USING ELECTRONIC VOTES TO MAKE <u>EMERGENCY</u> DECISIONS

- A. To facilitate prompt decision-making between Board meetings when delay seems inadvisable, an electronic vote of Board members may be taken. To comply with Title 8, Section 141(i) of the General Corporate Law of Delaware, and the LWVDE Bylaws, the following procedures MUST BE FOLLOWED:
  - 1. When the President(s) deem(s) a prompt decision is necessary between Board meetings if delay seems inadvisable, an electronic vote of Board members may be taken
  - 2. Sufficient background information is supplied to board members to enable them to cast an informed vote;
  - 3. Board members MUST send their electronic yea or nay vote to ALL board members;
  - 4. There must be a unanimous vote by the Board for the proposed action to be approved;
  - 5. For documentation purposes, in the minutes of the next Board meeting, a brief synopsis of the issue must be provided, with the vote, yea or nay affirmed, and any documentation relevant to the issue attached to the minutes.

#### VII. COMMUNICATIONS FROM LOCAL LEAGUES MANDATED BY LWVDE

- A. Each local League is responsible for keeping the LWVDE office informed of the names, positions, and contact information of their Board members;
  - 1. Updates on members' names and contact information with the admonition that this information is only to be shared with LWVDE members.
  - 2. Changes in the names and contact information of local elected officials (to answer Voter Services inquiries).
- B. Information received by any local league member that deals with the welfare of that League should be brought to the attention of the LWVDE President and Board promptly.
- C. All Whistleblower Complaints should be brought to the attention of the LWVDE President promptly.
- D. The agenda and minutes, with committee reports attached, will be sent to the LWVDE Board President or designee/Administrator by each local league.
- E. When sponsoring Voter Services events, the local league should keep the LWVDE President(s), the state Voter Services Chair and the state League office informed about developments regarding their event.
- F. Each local league must provide the LWVDE President(s)/Administrator a copy of each local league's VOTER/Annual Report and updated Bylaws.
- G. Material printed and publicly distributed by each local league should be sent to the LWVDE Administrator by the author or editor of said document.
- H. Identification and Dating of Records: All League records, communications, memos, etc. should be identified as to League, subject, author, and date. Drafts of proposed statements or



correspondence should be dated drafts since they are subject to multiple revisions. Documents and forms should have an LWVDE logo header and board approval date noted in the footer. **Refer to templates in** Microsoft Word and Google Docs provided under "Members Only," with instructions on their use.

- I. Document Retention Policy is kept by the Administrator, the President, and the Secretary. (Refer to P&P Chapter XXIV for the complete policy.)
- J. Publications: The price and method of distribution of all LWVDE publications shall be determined by the LWVDE Finance Committee in collaboration with the Treasurer and with the members developing such publications.
- K. Online Communications: Refer to Policies for Online Communications as stated in P&P Chapter XXIII, J.

#### VIII. FINANCIAL ADMINISTRATION

- A. LWVDE, a 501(c)3 Nonprofit Entity. As of 7/21/19, the LWVDE and the LWVDE Education Fund merged under the name of League Women Voters of Delaware, Inc., a 501(c)3 entity. All funds donated to the LWVDE are deductible to the extent of IRS rules and regulations.
- B. Defining Treasurer's Role, Succession Planning and Responsibilities (Refer to P&P Chapter XIV, D 1-2: Budget Preparation)
  - 1. The Treasurer is an elected Board position who functions as the chief financial officer of the LWVDE.
  - 2. The fiscal year of the LWVDE shall be July 1 to June 30.
  - 3. If the office of Treasurer is vacated, the LWVDE Board President or an appointee of the LWVDE Board President shall assume the functions and responsibilities of that office until the President is able to appoint a new Treasurer.
  - 4. The Treasurer will present end-of-the-month financial updates to the Board and maintain financial records, authorize and write checks on behalf of the LWVDE for the timely payment of all contracts and invoices, provide timely payment and reports for federal and state taxes, licensing/registrations including IRS submissions and maintain financial and legal records as required and by LWVDE policy.
  - 5. If a private bookkeeper or accounting firm is contracted to maintain financial records, the Treasurer will authorize in writing (or by electronic means) all invoice or contract payments before a check is issued by the bookkeeper. The Treasurer will also monitor the timely payment of invoices, financial obligations including taxes, and federal and state licensing /registrations including IRS submissions.

## C. Finance Committee & Responsibilities

- 1. The Finance Committee and Finance Committee Chair are appointed by the Board President after the LWVDE Convention (odd-numbered years) for a term of two years. It is recommended that at least one member of the Finance Committee be an elected LWVDE Board member.
- 2. The Finance Committee will meet at least quarterly to develop and monitor the biennial budget for the LWVDE. As part of the budget monitoring, it will review all contracts that will require funding by the LWVDE and report to the LWVDE Board concerning the fiscal impact of the individual contracts. Service contracts, including insurance policies, and the LWVDE & LWVNCC Office Sharing Agreement will be reviewed *annually* (Refer below to P&P Chapter VIII, E. Financial Procedures)
- 3. The Finance Committee will report the recommendations for contract extensions (as contracts come due) and audit/audit review for the next fiscal year at the January LWVDE Board meeting for approval and direction for the next budget cycle.



- 4. *Annually*, if there are no changes, the Administrator's contract renews automatically. Any changes require that, *after review by the LWVDE Finance Committee*, the contract be signed by the Presidents of both LWVDE and LWVNCC, as well as the Administrator
- 5. Refer to #D below regarding the Finance Committee's role in the **Office Sharing Agreement** between the LWVDE and the LWVNCC.
- 6. Since the LWVDE fiscal year ends June 30th, the Finance Committee shall authorize one or more League member(s) to conduct a written annual or biennial financial review for presentation to the Board no later than the following January Board meeting. To eliminate any perception of self-policing, neither the Treasurer nor any of the LWVDE officers who served during the review will participate in the annual or biennial financial review. The Finance Committee will monitor the financial review and resulting report and, *when appropriate*, recommend and plan an audit in coordination with the LWVDE Board.
- 7. The Finance Committee shall include among its duties the ongoing fiscal oversight of the financial transactions. It shall evaluate proposals for all non-budgeted acquisitions and report to the Board concerning the fiscal impact of the acquisition.
- 8. Biennially (even years) in November the Finance Committee Chair will ask Board Members and Committee Chairs to submit their budget requests to be considered for inclusion in the biennial budget projections for budget presentation at Convention (odd years). (Refer to P&P Chapter XIV, D 2)
- 9. Biennially (even years) in March, the Finance Committee Chair will ask Board Members and Committee Chairs to submit any budget requests for consideration as budget *amendments* to the biennial budget at Council (even years).
- 10. At least quarterly, the Finance Committee Chair, or their designee, will present the Finance Committee minutes and Financial Statements with budget comparisons to the LWVDE Board, with a written discussion of the current LWVDE financial position.
- 11. Monitoring Grant Funding: Grants can only be accepted from groups that are non-partisan, and who practice diversity and inclusion policies.
  - a. A copy of all grants will be provided to the Treasurer to determine disbursement guidelines.
  - b. Treasurer will establish a sub-ledger for managing the grant funds;
  - c. Need to verify Grantee responsible for tracking, approving, and submitting Grant fund disbursements:
  - d. The Grantee and Treasurer should follow procedures outlined in the Financial Procedures (E), expenditures (4), sections b, c, and d.
  - e. The Treasurer will report the balance and transactions for each Grant in the monthly Financial Reports.
- 12. Biennially (odd years) the Finance Committee will present the proposed biennial budget at the April LWVDE Board meeting. This will include the recommendation for the LWVDE **per member payment (PMP)** for each year of the biennium. A copy of the budget shall be sent to each local League President, along with the PMP within one week following the regularly scheduled April LWVDE Board Meeting in that year. (Refer to Bylaw Article VIII, Section 3)



- D. Office Sharing Agreement: The Office Expenses Agreement details the costs shared between the LWVDE and the LWVNCC for operating an office. The Agreement details the apportioned costs incurred by each of these entities in maintaining the shared office responsibilities and equipment.
  - 1. Biennially (odd years) by July 1st, assuming the LWVDE Finance Committee's annual review finds no significant changes in functions/activities covered by the agreement, the Presidents of the LWVDE and the LWVNCC shall sign the Office Sharing Agreement, with these signed copies sent to the Treasurer of each organization.
  - 2. This Agreement should be reviewed by any interim Presidents and/or with any change of office staff.

#### E. Financial Procedures

#### 1. Mail

- a. All mail, including checks and invoices should be directed to the League Office at PO Box# 7224, Wilmington, DE 19803-9995
- b. The Administrator opens the mail.

#### 2. Receipt

- a. The Administrator endorses checks, records the name on the check and the amount, and notifies the Treasurer for recording. The Office Manager deposits checks at least monthly.
- b. The Treasurer documents revenue or oversees when the Administrator/bookkeeper processes this information.

#### 3. Cash

- a. Cash is accepted only in exceptional cases. (e.g. convention registrations, special workshops, League Day in Dover)
- b. The Administrator, Treasurer, or other responsible person monitors all situations where cash is expected, prepares a receipt in duplicate, and gives one to the payer.
- c. The person who receives the money will record the name of the person who paid it and the amount received and ensure that the money is deposited promptly.
- d. The receipt book will be available in the LWVDE Office for internal monitoring.

#### 4. Expenditures/Checks

- a. The Administrator examines invoices to verify that the item, price, and quantity invoiced are as ordered, marks them "ok to pay" and sends them to the Treasurer for approval and subsequent payment. An invoice or comparable documentation, including debit card receipts (refer to #5 below) must accompany all requests for payments.
- b. Out-of-pocket expenses incurred by LWVDE members are reimbursable within the budget or approved grants, for LWVDE business expenses. If the expenses were by a line item in the approved Budget or grant, approval by the LWVDE Board is NOT needed for reimbursement. ALL "donated hours" and out-of-pocket expenses, including mileage, should be recorded on the "In-Kind Contribution Report Form" for access by the Treasurer, whether or not reimbursement is requested. "In-Kind" contributions by LWVDE members are vital for fundraising, and required by certain funders. Other than for routine expenses, the Treasurer must be notified in advance of all purchases for which a bill will be received.



- c. The Treasurer will notify the Finance Committee Chair if an invoice is for an unbudgeted item or grant and will report the Finance Committee's recommendation regarding payment to the Board President(s).
- d. The Board President(s) must approve expenditures that are not budgeted or that exceed the budget or grant, by more than 10%.
- e. The Treasurer, or other authorized signer e.g. President(s), records transactions and prepares checks.
- f. The Treasurer or other authorized signer signs the checks or authorizes online payment unless the check is made out to the Treasurer or authorized signer. In this case, another authorized signer authorizes the check and reports the transaction to the Finance Committee Chair with the check number, date, amount, and verification of invoice.
- g. Every attempt will be made to see that two authorized persons sign checks of \$1,000 or more. The Board President must be immediately notified when the second person has not signed, except when the Board has approved said payments. Then the checks may be signed by an authorized signer. Persons authorized to sign checks include the President(s), Treasurer, or Assistant Treasurer (if any).
- h. Payment of invoices and scheduled contract payments will be paid within one month of the receipt of the invoice/bill or provision of approved service.
- i. Checks may never be written to "cash" or "bearer."
- j. Petty Cash account is not authorized.
- k. No blank checks shall be signed in advance. In exceptional circumstances, the request for signing a blank check will be substantiated and documented.
- 1. The Treasurer will maintain all backup documentation marked "PAID," including the date and check number, to prevent duplicate payment.
- m. The online banking access to monthly statements show canceled checks and recipients. The Treasurer will make this information available upon request to the Finance Committee and/or the Board. Bank statements of processed checks, records of deposits, and any backup documentation are available in the Cloud. Any hard copies of these documents are retained in the LWVDE Office files. These files can be accessed to verify that no checks are missing. These records along with the Treasurer's files are available for review by members of the Finance Committee. These files will be retained and disposed of in compliance with the LWVDE Document Retention Policy (Refer to P&P Chapter XXV).
- n. Blank checks are personally kept in a secure location by the Treasurer or the Treasurer's Designee.

#### 5. Use of Debit Card

The name on the Debit Card is "League of Women Voters of Delaware."

- a. The Administrator will physically hold the debit card to make purchases.
- b. The Treasurer will also have the debit card information to make online payments.
- c. The Treasurer will be alerted by email whenever the credit card is used by WSFS bank.
- d. The Administrator will forward the debit card receipts to the Treasurer for review, following the guidelines in section above E. Financial Procedures #4. Expenditures/Checks b, c, and d.
- e. The Treasurer will post and monitor transactions, following established procedures.



f. When another LWVDE member, such as a board member or committee or event chairs, wishes to use the card to purchase on behalf of the LWVDE, they must submit the request in writing to the President and the Treasurer. If the request is approved, the President and the Treasurer will authorize the Administrator to make the purchase.

### 6. Review and Reconciliation

- a. The Treasurer reviews the financial statements.
- b. The Treasurer receives these statements and when appropriate, may have the bookkeeper reconcile.
- c. During reconciliation, the sequence of check numbers shall be accounted for.
- d. Any voided checks are kept with the regular checkbook stub records and filed with other financial records held by the Treasurer.
- e. All hard copy financial records are placed in the secured financial files in the LWVDE office at the end of each fiscal year upon the Treasurer's resignation or replacement.

## 7. Data Security for Accounting Computer Records

- a. All accounting computer records must be kept secure. Persons authorized to edit or review the records must be given passwords by the Treasurer which enable only she/he/them to access the system. (Refer to P&P Chapter XXII. PASSWORD STORAGE, PROTECTION, PROTOCOL AND REGULATION)
- b. More than one person should be trained on the system.
- c. Accounting records should be backed up automatically on the Cloud or by similar electronic means with a copy of the data retained by the Administrator or other location different from the Treasurer's primary location. If a bookkeeper is retained, the bookkeeper's data security procedures will be retained by the Treasurer. This information will be shared with the Finance Committee upon request.
- d. The Treasurer retains data security procedures which are shared with the LWVDE Board of Directors.
- e. Required hard copies of the aforementioned records, invoices, check records and inventories will be kept in the LWVDE Office files, properly secured, and disposed of according to the LWVDE Document Retention Policy. (Refer to P&P Chapter XXV)

#### 8. Record Maintenance and Reporting

- a. The Treasurer shall oversee or keep all financial records in appropriate software. Required hard copy backup of specific records will be maintained by the Administrator in the LWVDE Office. The bookkeeper, a financial professional, contracted or designated internal auditor/LWVDE reviewer from the Finance Committee will have access to all the above.
- b. Monthly financial reports shall be prepared for the LWVDE Board by the Treasurer. These reports will show actual expenses versus budgeted expenses and a balance sheet.
- 9. Annual Obligations: Taxes and Insurance Premiums
  - c. LWVDE must pay a state franchise tax. This is due March 1st and is filed electronically.
  - d. As of May 2008, LWVDE is required to file a 990-N Electronic Notice by e-postcard within five months of the end of the fiscal year (June 30th). The treasurer



- notifies the LWVDE President/Administrator once the 990-N Electronic Notice is filed.
- e. The LWVDE is not required to file a Form 990 with the IRS until annual revenue equals \$50,000 in one fiscal year. LWVDE is not required to file a 990-T for unrelated business expenses until unrelated income (interest or other income not related to our mission) reaches \$1,000 in a fiscal year. Copies of the application for the Franchise tax and submission of the copy of the 990-N electronic e-postcard and the appropriate receipts must be supplied to the LWVDE Board at the time of submission and noted as part of the pre-Board report February/March and September/October respectively. A copy of the submission and the confirmation of receipt of the submission will be maintained in the LWVDE files.
- f. Annual premium payments for the Officers and Directors' Insurance, and for the Liability Insurance policies (the cost of which is equally divided between the LWVDE, the LWVNCC and LWVSCDE) will be reported to the Board by the Treasurer.

#### IX. REVIEWS/DEADLINES FOR CHANGES TO BYLAWS

- A. Review of the Bylaws (Refer to Bylaws Article XIV)
  - 1. In January of the biennial Convention (odd-numbered years), the LWVDE should solicit all local leagues and their membership for proposed changes to the LWVDE Bylaws before the regularly scheduled March LWVDE Board meeting.
  - 2. The President shall appoint a committee of 1-2 members to review the LWVDE
  - 3. Bylaws to consider and recommend changes for presentation to the Convention and to address any changes proposed by local Leagues before the regularly scheduled March LWVDE Board meeting.
  - 4. Any amendments to the first three articles of the Bylaws that are made at an LWVUS national convention must automatically also be made by local and state League bylaws; approval at an annual meeting/convention is NOT required to make the change (but the change should be announced). Per the LWVUS website publication "League Basics" #2, 6th paragraph Amending Bylaws.
- B. All LWVDE Bylaw amendments proposed by local league boards or individual members together with any recommendations presented by the committee appointed by the LWVDE Board must be sent to the local League Presidents via email within one week following the regularly scheduled April LWVDE Board meeting.
- C. The proposed LWVDE Bylaw changes will be considered for approval by the membership at the biennial Convention (odd-numbered years).
- D. Fifteen voting delegates other than the LWVDE Board of Directors shall constitute a quorum for the transaction of the business of the Convention, provided that there is representation from at least two local Leagues. (Refer to Bylaws Article X, Sec 6)
- E. The current version of the LWVDE Bylaws is available on the LWVDE website under "Members Only".

### X. REVIEWS/DEADLINES FOR CHANGES TO POLICIES & PROCEDURES

**A.** Biennially, in January (even-numbered years), the LWVDE President shall appoint a committee of 1-2 Board/League members to review the P&P. This process should include a review of all LINKS for accuracy. Any recommendations for changes to the P&P should be presented at the Board meeting before the Council meeting.



- **B.** Any proposals to adopt or amend the P&P require the approval of the majority of Board members at this meeting.
- C. The Chair of the Nominating Committee shall email a copy of the P&P to all Board of Directors nominees as soon as possible after their selection, with particular emphasis directed to the Non-Partisanship Policy. (LWVDE Bylaws Article II, Sec. 2, C; P&P Chapter II, A)
- **D.** No later than the second board meeting after the biennial election (odd-numbered years) of the new LWVDE Board Officers, the Board should review these P&P to familiarize all members with its content.
- **E.** The Chair of the Nominating Committee should always have an up-to-date copy of the P&P, which is available on the LWVDE website under the "Members Only" section.

#### XI. CONCURRENCE

A. The definition of Concurrence in the League is:

Concurrence is the act of agreeing with - or concurring with - a statement of position. A decision-making technique used by the League for some time, concurrence can work in several ways. Groups of League members or League boards can concur with:

- 1. Recommendations of a resource committee or a unit group;
- 2. Decision statements formulated by League boards, or,
- 3. Positions reached by another League or Leagues.
- B. In the Concurrence process, background materials presenting the pros and cons of the issue being considered are provided to League members.
- C. When the notice of the proposed Concurrence is given to the LWVDE board and the local League president, it will contain the following information:
  - 1. The position the LWVDE will be asked to adopt;
  - 2. The name of the League or resource committee whose position is recommended; when the study was done; a succinct but complete description of the extent of the study, the process used to develop the position, and instances of its application.
- D. When Concurrence is scheduled to take place at a LWVDE Convention, the following procedures will be followed to ensure that all delegates are given adequate notice so that each can cast an informed vote:
  - 1. The originating local League(s) or resource committee must submit the position to the LWVDE Board for consideration at its March meeting in a Convention year. If the LWVDE Board votes to include this Concurrence for adoption at Convention, it becomes a recommended item and can be adopted by a majority vote.
  - 2. If the LWVDE Board does not recommend the adoption of a Concurrence, and the local League or resource committee who originated the proposed new position still wants to submit this to the convention, they must notify the 3 local League presidents of this at least 30 days before the start of Convention. Any position not recommended by the LWVDE Board may be considered for adoption at the Convention provided the proposal to discuss this position is approved by a 3/5 vote. Subsequently, the position must be approved by a majority vote at the Convention.
  - 3. The local League or members who plan to move consideration of the Concurrence should attend the Convention prepared to give a copy of the notice with the above information to all delegates.
  - 4. Any needed assistance may be requested from LWVDE Board members.



#### XII. STATE-LEVEL STUDIES

- A. After the adoption of a STUDY by the Convention, the LWVDE Advocacy Corps (AC) is responsible for coordinating the study. The responsible portfolio chair should set up a statewide committee of AC members, local chairs, and/or other representatives of local Leagues. Representation from all three local Leagues is optimal. The Study Committee is responsible for the following steps:
  - 1. Developing, collecting, and distributing resource materials to Study Committee members;
  - 2. Coordinating program ideas with Study Committee members;
  - 3. Providing help to the local Leagues, as needed, with presentations;
  - 4. Developing consensus questions and obtaining approval for them from the AC;
  - 5. Evaluating local Leagues' responses to the consensus questions. If there is consensus, the wording of a position is based on those responses.
- B. The AC chair is responsible for presenting the proposed position to the LWVDE board. The LWVDE Board then votes to formally adopt or reject the position.
- C. C. After the adoption of the proposed position by the LWVDE Board, the position immediately becomes part of the LWVDE program for the current biennium and becomes a basis for action.
- D. All parts of the LWVDE PROGRAM (both study and action) are subject to revision, adoption, or rejection by subsequent LWVDE Conventions. (Refer to LWVDE Bylaws ARTICLE IX, Sec 2: PROGRAM regarding program adoption.)

#### XIII. STATE LEVEL ADVOCACY

**Introduction:** Much advocacy work is done on an informal basis in conversations with government officials or through participation on committees. Formal statements or communications usually need board approval or, at a minimum, the approval of the LWVDE President. Formal communication refers to letters or other communication (including meetings with State officials) that state a position of the League based on League policies. These approval requirements do not apply to the work products of the Advocacy Corps (AC), both in written and oral form, as long as positions taken by the AC are consistent with positions previously approved by the LWVDE Board.

- A. The AC is composed of the Chair, state board members who have a program portfolio, registered lobbyists, and other League members who attend its meetings regularly. Only League members are eligible to join the AC. However, any League member who is an announced partisan candidate for election (that is, aligned with a political party); or a Registered Lobbyist, officer, member of a Board of Directors, or a paid staff member of an organization that endorses candidates such as a PAC or 501–c (4) is not eligible to attend or participate in AC meetings. The AC has the authority to determine who shall be voting members.
- B. The LWVDE board, with the advice of the AC, is responsible for setting state action priorities. The AC is responsible for developing action strategies (including Action Alerts) and for overseeing implementation.
- C. Lobbying at the LWVDE level
  - 1. A person who represents the LWVDE to any member of the legislature (other than their own) must be authorized by the LWVDE and be registered with the State Public Integrity Commission.



- 2. New LWVDE lobbyists shall be appointed by the LWVDE President, with the approval of the Board. All LWVDE lobbyists shall be re-appointed at the beginning of each new General Assembly (i.e. every 2 odd-numbered years).
- 3. A League lobbyist must remember that their actions represent the League at all times.
- 4. A League lobbyist may also represent other organizations as a lobbyist provided that they receive prior approval from the LWVDE board to do so, and the lobbyist clarifies the other organization for which they are speaking.
- 5. As an individual or as a representative of another organization, a League lobbyist:
  - a. May not lobby any member of the legislature (including their own) for a position that conflicts with a LWV position;
  - b. May lobby on any subject for which the League has no position, but must make completely clear that they are not speaking for the League.
- 6. A person who has been a League lobbyist and who terminates service in that capacity should, for an appropriate period, make clear that they are no longer speaking for the League.

#### XIV. CONVENTION MEETING, NOMINATIONS, ELECTIONS and BUDGET

- A. Convention **Place, Date, and Call.** (Refer to LWVDE Bylaws Article X, Section 1)

  The LWVDE Convention shall be held *in odd-numbered years* between May 1 and June 15 inclusive, at a time and place to be determined by the LWVDE Board of Directors. The President(s) shall send a first call for the Convention to the presidents of the local Leagues in January of the year of the Convention. The Board of Directors may advance or postpone the opening date of the Convention by not more than two weeks. A final call for the Convention shall be sent to the presidents of the local Leagues *at least thirty days* before the Convention.
- B. Nominating Committee (Refer to LWVDE Bylaws Article VII)
  - 1. Per Bylaw Article VII, the chairperson and two members, who shall not be members of the LWVDE Board of Directors, shall be elected by the Convention.
  - 2. In January, the LWVDE President shall send the name and address of the chairperson of the Nominating Committee to the president of each local League. The local league President or secretary shall send suggestions for nominations by local Leagues to the chairperson of the Nominating Committee at least three months before the Convention. Any league member may send suggestions to the chairperson of the Nominating Committee.
  - 3. The Nominating Committee shall report its nominations for officers, directors, and the chairpersons and two members of the succeeding Nominating Committee. This report shall be sent to the local Leagues *one month before the date of the Convention*. The Nominating Committee's list of candidates shall be presented to the Convention at its first meeting. Following the presentation of this report, nominations may be made from the floor, provided that the consent of the nominee shall have been secured.
  - 4. Election. The election shall be in the charge of an Election Committee appointed by the LWVDE President at the first meeting of the Convention. The election shall be by ballot. When there is but one nominee for each office, the Secretary shall cast the ballot for every nominee. A majority vote shall constitute an election.
- C. Biennial Budget Preparation (Refer to LWVDE Bylaws Article VIII, Section 3)
  - 1. The Budget shall be prepared by the Treasurer, in consultation with the Finance Committee at least four months in advance of the Convention.



- 2. Biennially (even years) in November the Finance Committee will ask Board Members and Committee Chairs to submit their budget requests to be considered for inclusion in the budget projections for the subsequent year's biennial budget at Convention.
- 3. The LWVDE Board shall submit to the Convention for adoption a budget for the ensuing two years. A copy of the budget shall be sent to each local League president within one week following the regularly scheduled March Board meeting in each Convention (odd-numbered) year.
- **B.** Submitting Program Recommendations (Refer to LWVDE Bylaw Article IX)
  - 1. The Advocacy Corps and local League Boards shall make recommendations for a program at the March LWVDE Board meeting of each biennial Convention (even numbered) year.
  - 2. After considering the Advocacy Corps and local Leagues' recommendations, the LWVDE Board shall formulate a proposed Program. This shall be submitted to the local League Boards after the LWVDE March Board meeting and prior to each regularly scheduled local League Board meeting.
  - 3. Recommendations for program changes submitted by the Advocacy Corps and/or local League Boards shall be considered by the LWVDE Board at its regularly scheduled April meeting and at least two weeks prior to the Convention.
  - 4. Exception for Program Action at Council (Refer to LWVDE P&P Chapter XV, B; LWVDE Bylaws Article IX: Program, Section 4)
- C. Convention Attendance & Voting (Refer to LWVDE Bylaws Article X, Section 4)
  - 1. The LWVDE Board of Directors and Board Members are expected to attend the Convention.
  - 2. Each local League shall have four delegates, one of whom shall be the President or her/his/their designee.
  - 3. In addition, a League may have a delegate for the first 8 voting members and an additional delegate for each 8 voting members or major fraction (5 or more) thereof. The LWVDE Office has a record of the paid-up voting members for each local League as of January of the Convention year This number is used to calculate the number of eligible Convention delegates.
  - 4. Although all LWVDE members are welcome to attend the Convention and participate in the Program, only LWVDE Board of Directors and delegates are eligible to vote at the Convention.
  - 5. Fifteen voting delegates other than the LWVDE Board of Directors shall constitute a quorum for the transaction of the business of the Convention, provided that there is representation from at least two of the three local Leagues.

#### XV. LWVUS COUNCIL MEETINGS AND LWVDE COUNCIL MEETINGS/ACTION

(Refer to LWVDE Bylaws Article IX: Program, Section 4 and Article XI)

- A. Purpose: The LWVDE biennial Council (<u>even</u>-numbered years) provides the opportunity for the LWVDE Board to assess the financial situation of the LWVDE, amend the budget if needed, evaluate what has transpired in the prior year, and determine if any changes or updates need to be made in the program for the next year.
- B. The LWVUS National Council is held in <u>odd</u>-numbered years alternating between an eastern state location and a western state location.



- 1. The purpose of the LWVUS Council is to give guidance to the national board on program, budget, and methods of work.
- 2. A first call to the LWVUS Council shall be sent to the presidents of all state Leagues at least six months before the date.
- C. The LWVDE Statewide Council is held in <u>even-numbered</u> years between April 15th and May 31st. The LWVDE President shall issue invitations to the local league Presidents and Vice-Presidents, or their designees, as well as the LWVDE Board of Directors.
- D. LWVDE Council Action: Emergent issues arising between biennial Conventions may be adopted for study at the biennial LWVDE Council (even-numbered years) providing that the proposed study:
  - 1. Has been approved by the LWVDE Board;
  - 2. An affirmative vote from all local League Boards shall have been reported to the LWVDE President:
  - 3. Notice of the proposed vote at LWVDE Council shall have been given to local Leagues and the Advocacy Corps <u>at least two weeks before</u> Council

### XVI. NEW CITIZEN NATURALIZATION COMMITTEE

- A. The LWVDE New Citizen Ceremonies Committee Chair(s) coordinates with the Delaware federal court to attend every naturalization ceremony to welcome each new citizen after they receive their certificates of citizenship. LWVDE members, *traditionally from New Castle County (LWVNCC)*, provide each new citizen with a welcome packet of voting information, including a letter from the LWVDE, and a roster of their US and Delaware legislators and their contact information.
- B. Funding for this Committee's informational supplies has been provided by the Delaware Community Reinvestment Action Council (DCRAC) which requires a listing of expenses, an accounting of ceremonies, and approximate volunteer hours. Alternate funding sources are explored as needed.
- C. LWVDE Administrator interfaces with DCRAC, periodically requesting monies as needed to cover the cost of the newly printed materials. These monies are then transferred to the LWVDE Treasurer. The administrator prepares a report as needed by DCRAC when funding for more printed materials is required.
- D. Annually in January, the Chairperson prepares a report for the **LWVDE** President regarding the prior year's New Citizen Ceremonies activities.

#### XVII. VOTER SERVICES & POLICIES

Introduction: To retain its status as a nonprofit, tax-exempt organization, the League of Women Voters (LWV) is required to abide by regulations promulgated by the Federal Elections Commission (FEC) [Sec. 110.13(b)], the Federal Communications Commission (FCC) [Sec. 315(a)], and the Internal Revenue Service (IRS) [Revenue Ruling 86-95] for groups sponsoring appearances of candidates for elective office. Therefore, Voter Services activities must be designed and carried out so as not to give any candidate an advantage, or a *perceived* advantage.

A. VOTER SERVICES:



- 1. All Voter Services policies should be reviewed in January of election years (evennumbered years) by the Voter Services Chair and their committees.
- 2. Organize and provide non-partisan voter information to the general public about the federal, state, and local voting processes, including the promotion of LWVDE educational materials related to government functions, e.g. via YouTube.
- 3. When sponsoring Voter Services events, each local league's Voter Services chair must keep the LWVDE President(s) and Board and the LWVDE Administrator informed on developments regarding their voter services activities.
- 4. Organize Voter Registration Drives
  - a. Coordinate with educational institutions to hold onsite registrations
  - b. Develop community activities to hold onsite registrations and provide voting information
- 5. In election years when Candidate Forums are scheduled, the Voter Services Chair must provide monthly written updates to the LWVDE Board regarding any Committee activities.

#### B. VOTE 411 ONLINE VOTER GUIDES (4/30/21)

- 1. LWVDE may, at its option, participate in the LWVUS VOTE411 program or otherwise publish Delaware candidate data online. Candidate inclusion guidelines are different for online voter guides than for in-person forums. For VOTE411, the goal is to invite all candidates who will be on the ballot to submit their information, whether or not they have an opponent. If only one candidate for a race responds with his/her/their information, that race should still be published on VOTE411.
- 2. Detailed "How-To" guidelines for the VOTE411 program are provided by LWVUS each year when a state or local League signs up and pays the fee to participate.
- 3. The LWVDE VOTE411 Chair provides support and information to local leagues who want to participate in this program.

#### XVIII. LWVDE PUBLIC CANDIDATE FORUMS

- A. As it is the prerogative of the LWVUS to invite candidates for the federal election for President and Vice-President to participate in forums, it is the prerogative of the LWVDE to invite candidates for statewide office to participate in forums. Local Leagues wishing to host statewide candidates' forums must get *prior* approval from the LWVDE President and the Candidate Forum Chairperson.
- B. Candidates' Forum Policies & Forms:
  - 1. All Public Candidate Forum policies should be reviewed in January of election years (even years) by the LWVDE Candidate Forum Chairperson and their committee.
  - 2. The following three standardized forms required for Candidates' Forums have received Board approval and are available with directions under "Members Only" on the LWVDE website:
    - a. LWVDE Agreement to Participate in Candidates' Forums (allowing electronic signature)



- b. LWVDE PowerPoint Photograph and Video Release Form (allowing electronic signature)
- c. LWVDE Debate Guidelines for Candidate Forums.
- 3. Any changes to the above three LWVDE forms must be submitted to the LWVDE Board for approval, with the approval date noted in the footer.
- C. Candidates' Forums should serve to:
  - 1. Educate the public;
  - 2. Motivate voters to participate in the election;
  - 3. Provide voters the opportunity to hear the views of significant candidates.
- D. All candidates for a particular office who are legally qualified to be on the Delaware ballot should be invited to participate in state and local league-sponsored (or co-sponsored) preelection activities.
  - 1. Invitations to candidates and ground rules for participation should be sent by a traceable form of mail delivery (e.g. if USPS, with "return receipt requested"; or if email, with "email received" receipt). Be sure to keep the receipts!
  - 2. Invitations must include an "Agreement to Participate in Candidates' Forums" to be returned either electronically or by mail to the specified Candidates' Forum Chairperson with a signed "accept" or "decline." By signing this form, the candidate attests that they will not use any portion of the forum in a political advertisement. It is recognized that candidates who choose not to participate, frequently do not return signed decline forms. In this event, the chairperson will document this fact, noting what efforts were made to secure the candidate's signature and update the Board. All candidates' forms, signed either electronically or physically, must be retained by the Candidates' Forum Chairperson in paper or digital form for 3 years. (Please refer below to Chapter XXV, H #29.)
    - a. After clarifying that more than one person is running for a particular office, the Chairperson will ensure that each candidate or candidate representative is contacted by email or phone to confirm that the candidate is willing to participate in a forum sponsored by the LWVDE.
    - b. The Chairperson will assure that a venue for the forum is secured, e.g. Delaware State University.

#### E. Policies for all Candidates' Forums

- There must be at least two candidates for the office in question present at the same time for a candidate to be allowed to address the audience (i.e. debate, forum, questioning, presentation of any kind.) The LWVDE does not hold candidate forums for primaries.
- 2. No stand-ins for the candidates will be allowed. Unopposed candidates may be allowed to attend the event and be introduced but MAY NOT address the audience from the podium. The appearance of only one candidate, in whatever type of event, is regarded as giving an advantage to that person and is considered a campaign contribution (Refer to LWVDE P&P Chapter XVII VOTER SERVICES & POLICIES, Introduction).



- 3. For the protection of the candidates, no audio or video recording of the candidates will be allowed except by established media, as permitted by the sponsoring League, or the League itself. Cell phones are to be turned off as a matter of courtesy.
- 4. Per LWVUS recommendation, Leagues are advised to obtain a signed "Photograph & Video Release Form" from all candidates whose photo or video is taken during a League event with the potential to publish either on the League website or in a press release. All forms, signed either electronically or physically, must be retained in paper or digital form for 3 years. (Refer below to LWVDE P&P Chapter XXV, H #9.)
- 5. The order of appearance by the candidates will be determined by a random choice method (e.g. by drawing numbers/names). Alphabetical order is not a random choice. This is to avoid giving an advantage or perceived advantage to any candidate.
- 6. Any change of date, time, or location for the event should be transmitted to the candidates' campaigns immediately by telephone and then confirmed in writing. Keep a copy!
- 7. A copy of the "LWVDE Guidelines for Candidates' Forums" must be included with the invitations to Candidates requesting their participation.
- 8. The LWVDE Candidate Forum Chairperson must provide monthly updates to the LWVDE Board regarding any planned statewide candidates forums for contested offices.
- 9. Local Leagues sponsoring Voter Services events must keep the LWVDE President(s), the LWVDE Candidate Forum Chairperson and the LWVDE League Administrator informed on developments for their event.
- 10. The two statements below should be included in programs and must accompany each letter inviting candidates to LWVDE-sponsored or co-sponsored Candidate Forum events. If the event is co-sponsored, co-sponsors should be asked if they wish their names to be included in the second statement.
  - a. The League of Women Voters is a nonpartisan political organization that encourages informed and active participation in government. We do not support or oppose any political party or candidate. Non-partisanship does not mean that the League does not take positions on issues. The League of Women Voters has taken positions on issues, after member agreement, since the organization was formed in 1920.
  - b. In order to retain its status as a nonprofit, tax-exempt organization, the League of Women Voters is required to abide by regulations promulgated by the Federal Elections Commission [Sec. 110.13(b)], the Federal Communications Commission [Sec. 315(a)], and the Internal Revenue Service [Revenue Ruling 86-95] for groups sponsoring appearances of candidates for elective office. Should only one candidate for a particular office appear, the League cannot provide the opportunity for them to address the audience.



- F. To meet these goals, the LWVDE has determined that if a candidate has met all of the requirements of the state election laws as established by the Delaware Board of Elections, they may be included in LWVDE public forums for candidates for statewide and local offices.
- G. Co-Sponsored Public Candidate Forums:
  - 1. Preliminary discussions with potential co-sponsors of events must include the following:
    - a. Discussion of the non-partisan policies under which the LWVDE sponsors preelection events. (Refer to P&P immediately above: E, 10, a, and b)
    - b. Any agreement with co-sponsors should be written, and in explicit detail, as to the League's non-partisan policies as contained in the LWVDE "Debate Guidelines".
    - c. Responsibility for the program, contact with candidates, publicity, etc.
  - 2. If another organization requests that a LWVDE representative moderate a forum, that organization will be required to follow League policies as stated above in E.9, a and b, as well as in G.1. a., b., and c.
  - 3. After each public forum, the Candidate Forum Chairperson will complete a printed formal report evaluating the debate process and submit it at the subsequent LWVDE Board meeting.

# XIX. CRITERIA FOR APPROVING REQUESTS FOR ACTION AT THE FEDERAL LEVEL BY STATE AND/OR LOCAL BOARDS AS ADOPTED BY LWVUS (01/26/2002)

- A. Legislative priorities set by LWVUS Board
  - 1. Annually, the LWVUS Board adopts a set of legislative priorities to guide its advocacy work in Congress. The goals are:
    - a. To enhance the League's effectiveness by concentrating resources on priority issues;
    - b. To build the League's credibility and visibility by projecting a focused and consistent image;
    - c. To ensure that the League has sufficient issue and political expertise to act knowledgeably;
    - d. To enable the League to manage resources effectively.
  - 2. In setting legislative priorities, the Board considers the following:
    - a. Opportunities for the League to make an impact;
    - b. Program decisions made at convention and/or council;
    - c. Member interest:
    - d. Resources available to manage effectively.
  - 3. The LWVUS Board regularly reviews the legislative priorities and is prepared to make adjustments should new opportunities for effective action emerge.
- B. Requests from state/local leagues for permission to act at the federal level
  - 1. All action at the federal level must be authorized by the LWVUS Board. This includes any effort aimed at influencing the decision on a federal issue, such as communicating with an elected or appointed official, joining a coalition, taking part in a press conference or rally, or writing a letter to the editor. A state or local League wishing to



work in this way on an issue that is not an LWVUS legislative priority must consult with the LWVUS about the intended action.

As part of this consultation process, the state/local League is asked to provide the following information in writing:

- a. The proposed action and the message to be conveyed.
- b. The LWVUS position on which the action is based.
- c. Evidence that the issue is a priority for that state/local League.
- 2. If a local League is requesting permission to contact its U.S. Senator(s), it should also provide evidence that the action has been authorized by its LWVDE BD.
- C. Requests from state/local leagues for LWVUS action on issues not previously identified as priority by LWVUS.
  - 1. When a priority issue of a state/local League requires action at the federal level that goes beyond contacting its member(s) of Congress, the League may request lobbying assistance from the LWVUS. The request will be evaluated using the following criteria:
    - a. The issue is a high priority for the requesting League.
    - b. The requesting League is very knowledgeable about the issue.
    - c. The requesting League has worked on the issue for some time.
    - d. There is no objection to the action from any affected League(s).
    - e. The proposed action is consistent with LWVUS positions.
    - f. There is adequate lead time for LWVUS staff to determine the most appropriate opportunities for action and for the LWVUS Board to make necessary policy decisions.
    - g. The proposed action will not interfere with LWVUS action on legislative priorities or work on other organizational priorities.
    - h. The proposed action is limited in scope and in its demands on LWVUS resources.
- D. Requests for permission to urge other leagues/members to act on a national issue
  - 1. The LWVUS has sole responsibility for contacting state/local Leagues and League members about national issues.
- E. Requests for endorsement of initiatives sponsored by other organizations
  - 1. If the issue is national or international in scope, the LWVUS is the appropriate level to endorse the initiative. If the LWVUS declines to endorse the initiative, endorsement by state or local Leagues will not be appropriate.
  - 2. The LWVUS will endorse such an initiative if:
    - a. The action will further a current LWVUS advocacy priority and/or LWVUS endorsement would enhance an important relationship with the organization making the request, and
    - b. Resource demands associated with the endorsement are compatible with efforts to achieve current LWVUS advocacy goals.



(In evaluating the impact of the endorsement on League resources, the LWVUS will consider implications for the national office, the LWVUS Board, and state/local Leagues.)

#### XX. INTER-LEAGUE ACTION/ COORDINATION AND FUNDRAISING

Leagues are organized to reflect the structure of government: federal, state, and local. Following that structure, it is basic League doctrine that it is the prerogative and responsibility of the corresponding League level to communicate with officials at that level. Either written or electronic communication is acceptable. (see <u>LWVUS Management</u>)

- A. Only the President(s) or those persons designated by their respective presidents or boards may speak or correspond in the name of the League of Women Voters.
  - 1. When responding to Action Alerts, individual League members are encouraged to mention their League membership but may not indicate they speak on behalf of the League.
  - 2. Written correspondence should always be sent over the President's(s') name but may be written by portfolio chairs or others designated by the President(s). The Advocacy Committee (AC) chair will edit letters, get AC members' approval, and pass them along to the President(s) for editing, approval, and signatures. They are then approved or not (often electronically) by the entire board before being sent. If time is critically short, the President(s) may, at their discretion, send the letters before board approval and the letters will be submitted to the board at the time of the next board meeting.
- B. The LWVDE League and League lobbyists have the responsibility for contact with level officials and members of the General Assembly. Local Leagues may take state-level action based on a local, state, or national position with members of the General Assembly from their county but ONLY with prior approval of the state president and/or advocacy chair. Local Leagues are responsible for sending a copy of such action to the LWVDE President
- C. Local Leagues are responsible for sending to the LWVDE President(s) a copy of any official action taken by the local League on the national level (e.g. responses to Action Alerts).
- D. LWVDE pre-board reports and board minutes shall include all official actions taken by the LWVDE and shall be considered notifications to local Leagues. The purpose of this policy is to ensure that local Leagues know what the state League is doing.
- E. Coordination of LWVUS Action Alerts to the state and local Leagues:
  - 1. The state and local presidents, not the LWVDE Advocacy Chair, are responsible for responding to Action Alerts from the LWVUS. This can be done by phone, letter, or electronic communication in the name of the League which each represents. Calls to the Representatives' and Senators' local offices may be sufficient.
  - 2. When the LWVUS requests Letters to the Editor and encloses a sample letter
    - a. The LWV of Sussex County and the LWV of Kent County may send the letter, or one
      patterned on it, to their local papers from the local League and with the local
      President's signature. If the letter is accepted, send a copy of the printed letter to the
      LWVDE Office
    - b. The LWV of New Castle County may send the letter to the News Journal from their League and with the local President's (s') signature only after checking first with the LWVDE President(s) to make sure that they are not sending the letter or a similar one and that the timing is not in conflict with a state issue that the LWVDE is pursuing. The *News Journal*'s policy is to print letters from the same person or organization only once every few weeks.
- F. Any board member sending action-oriented e-mail to other League members should indicate clearly in the subject line whether the message is an Action Alert from the LWVUS, an



- Action Alert from the LWVDE, or merely an FYI memo on a subject in which members have an interest and wish to take action as individuals.
- G. The LWVUS adopted criteria for approving contact with the state's Congressional delegation at the federal level by state and/or local boards on Jan. 26, 2002. These criteria are listed immediately above in this P&P Chapter under b. and are NOT optional.
- H. Fundraising Coordination among Leagues
  The LWVDE will notify the local Leagues before contacting any non-individual sources for a
  contribution of money, goods, or other services. The local Leagues will similarly inform the
  LWVDE Board President before contacting any statewide companies (e.g. Verizon, Delmarva
  Power, *NewsJournal*, DuPont, statewide banks) should be contacted only by the LWVDE
  unless prior agreement is obtained.

#### XXI. CRITERIA FOR JOINING COALITIONS AND PARTNERSHIPS

The following criteria shall guide the Board in determining whether or not to join a coalition:

- A. The group's major goals are in accord with LWVDE program and/or organizational priorities. The aims of the group must not conflict with LWVDE positions.
- B. The group's activities will bring added effectiveness to the League's overall efforts to achieve its advocacy, educational, and/or organizational goals.
- C. The members of the group are organizations with which the LWVDE can serve effectively. The LWVDE has confidence in the leadership of the group and may itself serve in a leadership capacity with the group.
- D. The goals and activities of the group as a whole are nonpartisan.
- E. Resource demands involved in working with the group (including staff and volunteer time as well as direct and in-kind expenses) are worth the investment.
- F. Annually, the Board will review all Coalitions and Partnerships to confirm ongoing suitability and effectiveness.

### XXII. PASSWORD STORAGE, PROTECTION, PROTOCOL AND REGULATION

- A. Passwords have been established and entrusted to specific LWVDE members, including the President, Vice-President, Treasurer, Webmaster, Webmaster designee, and Administrator to protect and limit access to the various websites.
- B. All passwords, currently stored on flash drives and kept by the Administrator have been transferred to the 1Password storage system. The password for the Domain Name (currently Network Solutions), is maintained by the LWVDE Webmaster and the-Administrator.
- C. The Webmaster and the Administrator have the password for the Google account and/ the Google Drive. It is the same password for both and is stored on the 1Password system and the flash drive. When necessary, other board members with roles that require the use of the Gmail account may also have access to the password via 1Password.
- D. Passwords for social media Facebook, Twitter, TikTok, and Instagram, as well as YouTube are recorded on the 1Password system and the flash drive. The Webmaster administers the LWVDE website and assigns administrative capabilities to other members as needed. The President should always be listed as an Administrator.
- E. The Webmaster and/or Webmaster designee administers Facebook and may assign roles (e.g. Administrator, Editor, Moderator) to other members with a commensurate level of access.



- F. Folders created on the G-drive will have access limited to the specific person(s) in charge of that folder (e.g. Treasurer) and the President.
- G. The Treasurer maintains the passwords for Bank Accounts, including PayPal. These passwords are held on the financial shared drive, as well as a flash drive, and are accessible by the President and the Finance Committee Chair. These passwords are NOT stored on the 1Password system.
- H. When a new Webmaster, Treasurer, etc., is elected the password procedures will be conveyed to each successor.
- I. Whenever a password is changed, the 1Password system must be updated, with the admonition that <a href="https://www.lwvde.acmcast.net">lwvde.acmcast.net</a> should never be used to communicate these updates.

#### XXIII. POLICIES FOR ONLINE & PRINTED COMMUNICATIONS

- A. All LWVDE electronic communications shall adhere to the LWVUS's Mission, Goals, and Purposes. Refer to "LWVUS Communications 101"
- B. Procedures for Printed Publications
  - 1. As previously stated in Chapter VII, J., the price and method of distribution of all LWVDE state publications shall be determined by the LWVDE Finance Committee in collaboration with the Treasurer and with the members developing such publications
  - 2. All printed material should bear the LWVDE name and logo, be dated, and include page numbers.
  - 3. Non-League material is not to be distributed at League events without prior approval of the President(s).
  - 4. Materials written for, or enclosed in *The VOTER* should be League-related. Nothing may be included in *The VOTER* unless authorized by the President(s) and/or Board.
  - 5. *The VOTER* ads must be approved by the President and *The VOTER* Editor. No political ads will be allowed.
- C. Web pages are considered a "publication" and as such must follow the same approval procedures and guidelines as printed League publications, as cited above under B. Information about or relating to a national issue must be approved by LWVUS. Layout and other editorial maintenance should conform to the appropriate LWVUS style and logo guidelines (e.g. for use of "LWV", "League", etc.).
- D. As with other published documents, no copyrighted material may be used unless prior approval is obtained. For Web documents, note that this includes all images. Information in other Web documents should be assumed to be copyright protected and therefore not copied into a League page unless the document specifically says otherwise. Hypertext links to such documents are acceptable since, in that case, the document itself is not copied and the document content remains under the control of the author.
- E. Regarding Photos, Videos, or Conversations taken during a League event with the potential to be published either on the League website, in a press release, or subsequent public release As stated in the 4/14/21 document "Guidelines for Online Meetings" located under the "Members Only" area of the <u>LWVDE website</u>, Delaware is an "All-Party Consent" state for recording photos or conversations.



- 1. When a LWVDE or local League offers a <u>live public meeting</u> or presentation, the LWVUS recommends that the <u>NOTICE OF FILMING AND PHOTOGRAPHY</u> be posted near the registration table/check-in area, or posted on at least two walls. If held outdoors, with nowhere to post, have the photographers keep the statement to themselves to show others.
- 2. When a LWVDE or local League offers a *Zoom public meeting* or presentation that will be recorded, the following disclaimer should be displayed on the Zoom registration form:
  - "Please be aware that this meeting will be recorded for posting online. If you activate your camera or unmute yourself, you consent that your image or voice may be published on the public internet as part of this program."
- 3. A copy of each Zoom Event Registration Report is, per Zoom protocol, automatically retained for 1 year should any legal question arise regarding a registrant's awareness of the posted disclaimer cited above in #2.
- 4. This policy supersedes any LWVUS requirements.
- F. Hypertext links to the following sites are always permitted in LWV documents:
  - 1. Other League sites
  - 2. League-sponsored or co-sponsored sites or pages
  - 3. Any local, state, or federal government-run site
- G. Other sites can be "linked" only if appropriate in the context of the document. This is a content decision and must be approved by the appropriate League body as described above. For example, links to other compatible sites, even those that seem non-controversial, require approval by the LWVDE board.
- H. League membership lists will be used by the **LWVDE for League purposes only.** No personal contact information about members should be published except in restricted areas that have been carefully developed, e.g. "Members Only" section on the LWVDE website, or where permission is specifically granted for Web publishing. Under "Members Only" information would only include a member's name, email address, town of residence member status, and expiration date.
- I. Leagues can either make their arrangements for a site where their Web pages are stored or discuss with the LWVUS or other Leagues the possibility of using space on its website. Leagues wishing to use the "lwv.org" domain name should contact LWVUS for permission and procedures.
- J. Guidelines for Online Meetings under the Shared LWVDE Zoom Account Background: A Zoom account for web meetings was created in November 2018 for the LWVDE, at the urging of then Advocacy Chair Sandy Spence. In May 2020, due to increased usage of the LWVDE Zoom account by both the state and local Leagues during the COVID-19 outbreak, a committee chaired by Kim Wells convened to discuss best practices for the use of the shared account. The LWVDE Zoom Advisory Committee created *Guidelines for Online Meetings under the Shared LWVDE Zoom Account*, available on the LWVDE website under "Members Only" and includes an appendix with guidelines on Zoom Attendee Etiquette.

The following is a brief overview of the contents:

- 1. Do not share the LWVDE Zoom Account credentials with others unless authorized to do so.
- 2. Use the account for League business only.
- 3. Log out from the LWVDE Zoom Account when not actively using it.
- 4. Check for conflicts with other meetings when scheduling.
- 5. Use meaningful meeting names and include your name in the description.



- 6. If you must change account settings for a specific meeting, change them back again immediately afterward.
- 7. Always use meeting passwords.
- 8. For public meetings, also use registration and/or waiting rooms for added security.
- 9. For all but the smallest, most informal meetings, ensure that each Zoom web meeting has an LWVDE Host present to start the meeting and either stay to run it or designate another participant as Host before leaving.
- L. Planning Calendar Guidelines to Minimize Event Scheduling Conflicts

  The LWVDE Webmaster will provide appropriate instructions on the use of the new Planning
  Calendar to local league webmasters, the Advocacy Chair, and others. Relevant instructions
  will be found under LWVDE "Members Only" for access by the appropriate individuals.

  Subsequently, access to the calendar will be sent via an email from Google. When a League
  entity starts planning an event (either at a statewide or local level), information on the
  provisional event date will be entered. After the date is confirmed, the information will be
  entered into the LWVDE webpage Calendar by the LWVDE Webmaster (or her/his alternate)
  for all viewers to see. When the LWVDE agrees to co-sponsor an event with another
  organization, a Webmaster will add this event to the Event Planning Calendar. To maximize
  the benefits of this Calendar, all League entities are urged to implement its use.

#### XXIV. WHISTLEBLOWER POLICY

#### A. General

The LWVDE Bylaws, and the Policies and Procedures, herein known as the Code of Conduct or Code, require directors, officers, employees, or contract staff to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and/or representatives of the Organization, they must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

### B. Reporting Responsibility

It is the responsibility of all directors, officers, members, employees, or contract staff to comply with the Code and to report violations or suspected violations following the Whistleblower Policy.

#### C. No Retaliation

No director, officer, employee, or contract staff ("the individual") who in good faith reports a violation of the Code shall suffer harassment, retaliation, or adverse consequence to their employment or other role in the organization. Anyone who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or other positions in the organization. This Whistleblower Policy is intended to encourage and enable individuals to raise serious concerns within the Organization before seeking resolution outside the Organization.



### D. Reporting Violations

The Code addresses the Organization's open-door policy and suggests that individuals share their questions, concerns, suggestions, or complaints with the Chair of the Finance Committee. However, if the individual is not comfortable speaking with the Finance Committee Chair, the individual is encouraged to speak with the LWVDE President, a member of the LWVDE Executive Board. As a last resort, for suspected fraud, or when they are not satisfied or uncomfortable with following the Organization's open-door policy, individuals should contact the League of Women Voters US for guidance.

## E. Compliance Officer

The Organization's Finance Committee Chair is, in most instances, responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code regarding financial violations and shall advise the LWVDE Board President of non-financial Code violation complaints. If the complaint or allegation is brought directly to the LWVDE President and /or a member of the LWVDE Executive Board, that person will be responsible for investigating and resolving the matter. Confidential records of the complaint and resolution will be retained for seven years in the LWVDE Office in a secure location available only to the Board President, to others on a need-to-know basis after approval by the Board President, or Executive Board member, upon a written request for specific records or under subpoena.

## F. Responsible Committee

The Finance Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, and auditing, and will refer other non-financial complaints such as conflict of interest or other matters of code violations to the Board President/Executive Committee of the Board. If the complaint involves the Board President, another member of the Executive Committee of the Board will receive the report and will be responsible for investigating and resolving the matter.

#### G. Responsible Reporter

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated <u>and</u> which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

### H. Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant in writing. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

### I. Handling of Reported Violations

The person in receipt of the alleged violation will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.



#### XXV. DOCUMENT RETENTION POLICY

\*As was emphasized at the 6/28/23 Board meeting, the use of the terms "secured,", "secure location," and "secure files" throughout this P&P document need to be more clearly defined. Hard copies of documents are kept in the office in an unlocked standard metal file cabinet. Some files are backed up on a thumb drive and also on the computer, but they are NOT password protected.

#### POLICY:

The LWVDE shall retain documents of legal, financial, and historical significance in an organized fashion according to the Document Retention Schedule. The purpose of this Policy is to ensure that necessary records and documents are adequately protected and maintained and to ensure that records no longer needed or valued by LWVDE are discarded at the proper time.

In 2023, the LWVDE entered into an Agreement with the University of Delaware's (UD) Library to permanently store LWVDE files of legal and historical significance so that the general public can readily access these files either in person or in digital form. This policy applies to both physical records and electronic documents.

The LWVDE Board shall review the Document Retention Policy to ensure that it complies with local state and federal laws.

#### DATING OF RECORDS:

All League records, monthly reports, official communications, etc. should be created on an LWVDE template identified by the creator, on the title page along with the subject and date in footers on every subsequent numbered page. Refer to "Template for LWVDE Committees' on the website under "Members Only." This identification system applies to drafts of proposed statements or correspondence. Official Documents and Forms should include the Board's approval and approval date noted in the footer.

- A. Documents going to the UD Library will be donated every two (2) years by the office administrator, or as noted below, under I. LWVDE Document Retention Policy
- B. Documents will be donated either in their physical form or on a flash drive.
- C. For **seven** years records of all Whistleblower Complaints, Conflict of Interest sanctions, and investigations will be retained in a secure, confidential file, available to Board members with the LWVDE Board President's(s') written approval. They may not be transmitted to an outside agency for retention except under court order.
- D. Confidential records require written permission from the LWVDE Board President(s) to review. They are kept by the LWVDE Administrator in a secure file. They may not be transmitted to an outside individual or agency except under court order.
- E. At the end of the retention periods documents/records that have not been donated to the UD Library will be discarded by shredding, recycling, or electronic deletion from the LWVDE hard drive, as appropriate. The UD Library will exercise all reasonable care in the disposition of standard discards (such as shredding duplicates), or contacting the LWVDE for specific instructions on disposition or return to the LWVDE, as appropriate.
- F. Hard Copies of Permanent Records that are donated to the UD Library will be stored in acidfree containers with the expectation that the UD Library will assume responsibility for original records of historical significance.
- G. Electronic documents stored by LWVDE are not encrypted, but are stored by the Administrator on the One Drive System/Microsoft Cloud that is password protected.



## LWVDE DOCUMENT RETENTION SCHEDULE:

Category	Record Type	Retention Period	Digital or Paper	Donate to UD?	Comments
Corporate & Tax	1. Articles of Incorporation	Permanent	either	N	
	2. Bylaws and Policies and Procedures	Permanent	digital	Y	Donate after convention
	3. Conflict of Interest signed forms	7 years	digital	N	
	4. Employer Tax Identification Number	Permanent	Both	N	Scan hard copy upon receipt
	5. IRS Letter of Determination	Permanent	Both	N	Scan hard copy upon receipt
	6. IRS postcard submission and IRS acceptance	7 years	Both	N	Print upon receipt
Legal	7. Legal Correspondence including Whistleblower and Conflict of Interest sanctions and investigations	7 years	Digital in a secure cloud	N	
	8. Signed Agreement to Participate in Candidate Forums including not using recordings for political ads	3 years	Digital	N	
	9. Signed photo and video releases	3 years	Either	N	
	10. Trademark Registrations and copyrights	Permanent	Both	N	
	11. Zoom registration lists	1 year	Digital	N	Saved on Zoom
Insurance	12. Insurance policies, expired	3 years	Digital	N	
	13. Insurance Records/ accident reports / claims / policies	7 years	Digital	N	Keep hard copy on file for 2 years if there is one
Accounting & Finance	14. Accounts payable ledgers and schedules	7 years	Digital	N	
	15. Accounts receivable ledgers and schedules	7 years	Digital	N	
	16. Annual budgets	3 years	Digital	Y	
	17. Annual Financial Statements/Treasurer Reports	7 years	Both	Y	Print upon receipt Donate to UD after 4 years
	18. Audit records and work papers	7 years	Either	Y	



Category	Record Type	Retention Period	Digital or Paper	Donate to UD?	Comments
	19. Audit Reviews	7 years	Either	Y	
	20. Bank and brokerage firm statements	7 years	Digital	N	
	21. Chart of accounts	7 years	Either	N	
	22. Contracts	Active plus 3 years	Digital	N	
	23. Deposit slips	3 years	Both	N	Shred hard copies after audit review.
	24. Grants	7 years	Both	Y	
	25. In-kind contribution reports from volunteers	7 years	Digital	N	
	26. Invoices to local leagues, vendors, contractors	7 years	Digital	N	
	27. Purchase orders/invoices	3 years	Digital	N	
	28. Record of gifts related to securities or donations from IRAs	3 years	Either	N	
	29. Reimbursement requests	7 years	Digital	N	
	30. Wills and Bequests	10 years	Either	N	
	1	- 3			
Membership	31. Annual Membership list of local league	Permanent	Either	N	Membership list with join dates is maintained at LWVUS database
League business	32. Advocacy Corps minutes	Permanent	Digital	Y	To be donated to UD after 2 convention cycles
	33. Advocacy Corps testimonies/letters/ public comment	Permanent	Digital	Y	Donate to UD every two years
	34. Board meeting minutes	Permanent	Digital	Y	Donate to UD after two convention cycles
	35. Committee Reports/Minutes	Permanent	Digital		Donate after two convention cycles
	36. Consensus Studies	Permanent	Digital	Y	
	37. Convention and Council minutes with board members listed	Permanent	Digital	Y	
	38. General correspondence with members/vendors	3 years	Digital	Y	



Category	Record Type	Retention Period	Digital or Paper	Donate to UD?	Comments
	39. League Days brochures	Permanent	Digital	Y	Donate to UD every two years
	40. Publications, newsletters, pamphlets	3 years	Digital	Y	

## XXVI. CONFLICT OF INTEREST POLICY - 501(c)3 IRS requirement

- A. It is the responsibility of all Board members and employees to avoid any actual conflict of interest and the appearance of a conflict of interest.
- B. A Board member or employee or her/his/their family members may not participate in any decision-making process or recommendation, including voting or participating in the discussion of any matter, concerning a matter which would result in financial gain to the Board member, employee, or family member. In abstaining from voting or participating in the decision-making process or recommendation because of the existence of a conflict of interest or potential conflict of interest, the Board member or employee shall specifically disclose the reason for abstaining, and the abstention and non-participation in the matter shall be noted in the minutes of the meeting when abstention or non-participation occurs.
- C. In connection with any matter which must be disclosed as described above, the Executive Committee may decide whether the Board member, employee, or family member may participate in the business relationship which is to be conducted by, for, or with the LWVDE. Issues to be considered by the Executive committee include the terms, conditions, and nature of the proposed relationship. In no event shall a relationship be entered into with a Board member, employee, or family member unless the terms and conditions of the proposed relationship are at least favorable to LWVDE as could be obtained from a third party. In the absence of a decision by the Executive Committee, the Board shall make a decision.
  - Whenever possible and practical, LWVDE will request three (3) written estimates for products and services costing over \$100 from outside vendors before contracting for such products and services.
- D. Employment of a LWVDE employee by a person or organization other than LWVDE or ownership of a business by an employee is permitted if such person, organization, or business has no significant business relationship with LWVDE and if such employment or ownership does not interfere with an employee's job performance at LWVDE.
- E. No employee, member, or contractor of LWVDE shall place herself/himself/theirself or the League under an actual or perceived obligation to another person or entity as a result of a gift, personal favor, or financial transaction. Gifts of nominal value may be accepted by employees only if the acceptance of such gift is not likely to give the appearance of impropriety and does not interfere with the exercise of good judgment.



- F. A Board member and employee shall have a duty not to use confidential or proprietary information obtained as a result of her/her/their relationship with LWVDE other than the business of LWVDE.
- G. At the time a person becomes a Board member, or is employed by LWVDE, and on an annual basis thereafter, in June of each year, Board members and employees shall review the **Conflict-of-Interest Policy Statement** (form accessible on the LWVDE website under "Members Only") and shall digitally sign a certificate of compliance with same. This action is required for all 501(c)3 organizations by IRS regulations
  - 1. If Board member or employee believes she/he/they are involved in, or has knowledge of, a matter involving an actual or potential violation of the policy, a prompt disclosure shall be made by that person to the LWVDE Executive Committee or, if an employee or contractor, to the LWVDE Board President.
  - 2. It is the responsibility of the office manager to assure that all required **Conflict of Interest Policy Statements** have been signed.
  - 3. These digitally signed statements will be-stored in the 1Password system, either by the Webmaster or by the office manager, and kept for 7 years. Failure to comply with this policy may result in termination of Board service if the person in violation is a Board member, or disciplinary action if the person in violation is an employee or contractor.