

University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-437-2667 Office 805-437-2681 Fax

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DATE: June 1, 2008

POLICY NUMBER: 1.10

POLICY NAME: Cost Allocation

# **Policy on Cost Allocation Plan**

Per Executive Order No. 753 – Allocation of Costs to Auxiliary Enterprises ("EO 753"), the campus chief financial officer is charged with ensuring that auxiliary enterprises are charged for allowable direct costs plus an allocable portion of indirect costs associated with facilities, goods, and services that are provided by the University and paid for from the General Fund. EO 753 requires a written cost allocation plan documenting the basis and allocation of General Fund costs to auxiliary enterprises. The campus chief financial officer must approve the plan annually

# Background

University Glen Corporation ("UGC") is an auxiliary organization in good standing with the California State University and is therefore considered an auxiliary enterprise according to the definition provided in EO 753.

California State University Channel Islands Site Authority ("Site Authority") and California State University Channel Islands Financing Authority ("Financing Authority") are not considered auxiliary organizations with the California State University although they are related to the California State University.

The relationship between UGC, the Site Authority, Financing Authority, and California State University, Channel Islands ("CSUCI" or "University") is unique in that UGC exists to manage the daily operating activities of the Site Authority. The Site and Financing Authorities exist to provide affordable housing for faculty and staff and to generate funds for academic capital.

# **Cost Allocation Methodology**

Each of the divisions was examined to determine if it provided a service to UGC. If a division did provide services to UGC, the services were isolated to particular departments. Those departments were examined to determine whether the costs were direct or indirect or a combination of both.

There are two components to the determination of direct costs: (1) materials and supplies and (2) salaries and benefits. For all service areas, UGC will reimburse for materials and supplies that are solely and directly UGC related in their use. In examining the direct costs associated with salaries and benefits, if a specific position within the department could be identified as

being dedicated exclusively to UGC, the employee costs associated with that position were classified as a direct cost.

Following is an explanation of the allocation method used for each service area.

#### Public Safety

Public Safety (Police/Transportation/Parking) provides services for all areas of the campus. There is a Memorandum of Understanding between UGC and DPS regarding the services provided by DPS and the cost of those services.

# Administration and Finance: Accounting and Purchasing

The Accounting department provides accounting services for the University and UGC. Its functions include accounts payable, accounts receivable, University cashiering, purchasing, and financial reporting.

- Direct Costs, Materials and Supplies UGC will reimburse for materials and supplies that are solely and directly UGC related in their use if not paid directly.
- Direct Costs, Salaries and Benefits The staff will complete a survey of their time spent on UGC activities. Their total hours will be multiplied by their respective salary and benefits rate.
- Indirect Costs Indirect costs will not be allocated to UGC because virtually all other such costs are direct charged.

# Administration and Finance: Human Resources

Human Resources provides consulting services to UGC on a variety of issues. A Memorandum of Understanding is in development which will address detailed services and costs.

#### Direct Reimbursements

The Direct Reimbursements category consists of the salaries and benefits of University employees who services are directly tied to UGC.

- Direct Costs, Salaries and Benefits Direct reimbursements consist of the salaries and benefits of the Director, Sales Manager, office administration and any student help that may be utilized.
- Indirect Costs There are no indirect costs.

#### **Definitions**

The following definitions are extracted from EO 753 and the <u>Guidelines for General Fund Cost Allocation Plans</u> ("Guidelines").

- "Direct Costs" are those costs that can be readily assigned to a particular cost objective
  with a high degree of accuracy and without an inordinate amount of accounting.
  Examples of direct costs can include employee salaries, shipping charges, postage, and
  telephone usage.
- "Indirect Costs" are those costs that cannot be readily assigned to a particular cost objective without effort disproportionate to the benefits received. These costs are incurred for purposes common to a number or all programs or activities of the campus but cannot be charged directly to such programs or activities with any reasonable degree of accuracy and without an inordinate amount of accounting. They are sometimes referred to as overhead or administrative expenses and can include operation of plant and maintenance costs and general administration and general expense costs.
- Operation of plant and maintenance includes administration, supervision, operation, maintenance of the institution's physical plant such as janitorial and utility services,

- repairs, care of grounds, maintenance and operation of building and other plant facilities, security, environmental safety, hazardous waste disposal, insurance, facility planning and management, central receiving, allocable share of fringe benefit costs, depreciation and use allowances, and interest costs.
- General administration and general expense include those expenses incurred by administrative offices that serve the entire university such as executive administration, facilities management, business services, budget and planning, personnel management, risk management, legal services, and the operations of the administrative management information systems.
- "Incremental Costs" are those costs that would not have been incurred if the auxiliary organization were not present. These costs are generally direct costs but may include indirect costs.

#### References:

- Executive Order No. 753 Allocation of Costs to Auxiliary Enterprises
- Guidelines for General Fund Cost Allocation Plans by the CSU Financial Officers Association



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DATE: November 20, 2008

POLICY NUMBER: 2.20

POLICY NAME: Policy on Procurement

#### **Policy**

This policy applies to the purchase of materials, equipment, supplies and services paid from the California State University Channel Islands (CSUCI) auxiliary, University Glen Corporation (UGC), administered funding sources. This policy blends efficient business practices and governing policies that satisfy the requirements of federal, state and independent auditors. Travel, retention of artists, entertainers, catering and speakers are not subject to the provision of this policy.

All purchase orders must be approved by UGC prior to commitment; accordingly, requests for goods and services must be submitted to UGC prior to making purchases within the guidelines of this policy and procedure.

- A. Purchases shall be made in a manner that supports a competitive bidding process and at the lowest cost consistent with quality, specifications, service and product availability.
- B. Fitness and quality being equal, recycled products shall be considered for procurement in place of non-recycled products, whenever such products are available at not more than the cost of their non-recycled counterparts.
- C. Volume or pool purchase, annual purchase agreements and State Purchasing contracts may be utilized when deemed to be advantageous to UGC.

#### **Purchase Order Request Process**

- A. Purchasing materials, equipment and supplies from one vendor with a total cost (excluding shipping, handling, tax and freight) that exceeds \$3,000\* should be requested using the CSUCI UGC Request for Goods and Services (RGS) form with the exception of travel, retention of artists, entertainers, catering and speakers.
- B. Once the goods have been identified, the purchase should be evaluated to determine if competitive bids are required based on the following guidelines.

# **Guidelines for Purchase of Materials, Equipment & Supplies**

# \*Materials, Equipment and Supplies between \$3,000 and \$10,000

The authorized signer is required to submit a UGC Request for Goods and Services (RGS) with one price quotation from the vendor in order for Procurement to issue a purchase order.

# \*Materials, Equipment and Supplies over \$10,000

The authorized signer is required to submit a UGC Request for Goods and Services (RGS) with a minimum of three price quotations attached from vendors in order for Procurement to issue a purchase order.

# Materials, Equipment and Supplies over \$50,000

The authorized signer is required to submit a UGC Request for Goods and Services (RGS) and Procurement can help obtain three formal bids from providers based on written specifications, which recognize competitive pricing, responsiveness to specifications, and reputation of vendors. Procurement will complete the bid process and issue a purchase order.

# **Guidelines for Purchase of Services:**

#### \*Services under \$50,000

The authorized signer is required to submit a UGC Request for Goods and Services (RGS) with at least one or more bids from providers based on written specifications, which recognize competitive pricing, responsiveness to specifications, and reputation of vendor(s). Procurement will issue a service order or contract. Insurance shall be required for services that are to take place on the campus property.

# Services over \$50,000

The authorized signer is required to submit a UGC Request for Goods and Services (RGS) and Procurement can help obtain a minimum of three formal bids from providers based on written specifications, which recognize competitive pricing, responsiveness to specifications, and reputation of vendors. Procurement will complete the bid process and issue a service order or contract. Insurance shall be required for services that are to take place on the campus property.

# \*Excluded from formal competitive bid process are those thresholds indicated by asterisk above, as well as:

**Sole source purchases** on a non-competitive basis will require written justification and approval. The sole source written justification should include:

- A. Unique performance factors of the products/services specified,
- B. Why the factors are required.
- C. What other products have been evaluated and rejected and why

**Food service and other event-related items**. These purchases may be made upon the basis of a single quote from a reliable and convenient source of supply as determined by the authorized signer; however, quotes from multiple vendors may also be considered for the same event. In any case, travel, retention of artists, entertainers, catering and speakers are allowable

as direct pay. A more formal procurement process adds little value to these types of transactions. However, award shall be made on terms most advantageous to UGC based on quality, price, service and delivery.

**Retention of service contractors** should generally be on a time and material basis. Professional liability insurance may be required of service contractors depending on the nature and location of the services rendered. Authorized signer's approval must be obtained prior to the retention of service contractors.

**Conflict of Interest:** No UGC Board member, employee, or CSU employee shall personally derive any benefit or gain or receive preferential treatment related to the purchase of equipment, supplies or services for UGC.

**SBE/DVBE/MBE/WBE:** Some funding agencies may require the use of a process that affirmatively seeks bids from small business enterprises (SBE), disabled veteran owned business enterprises (DVBE), minority owned business enterprises (MBE) and/or women owned business enterprises (WBE). The UGC Project Director is required to seek such bids if specified in the award.

**Restrictions:** The purchase of materials, equipment, supplies and services are subject to the following restrictions:

- A. The purchase must be a reasonable, allocable and allowable charge.
- B. Equipment purchases are generally secured using a purchase order to ensure proper handling, warranty (where appropriate), and recording for inventory purposes. If equipment is purchased and then submitted on a check request for reimbursement, UGC has the discretion not to approve the purchase if proper information is not received or proper bidding procedures were not followed.
- C. Hazardous materials must be secured using a purchase order to ensure proper handling of the substances and University notification and approval.



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DATE: September 1, 2011

POLICY NUMBER: 3.20

POLICY NAME: Reserves

# **California State University Policy**

The establishment of adequate reserve polices for CSU auxiliaries is required to meet the California State University financial standards established in Education Code, Section 89904(b). Section 89904(b) states that auxiliaries shall implement financial standards that will assure fiscal viability by the establishment of reserve funds for current operation, capital replacement and new business ventures. The following policy follows the "Financial Standards and Fiscal Viability" for Financing and Risk Management as stated in Appendix G of the CSU Policies for Auxiliary Organizations.

#### **POLICY**

This Reserves Policy is therefore established to provide the basis for the annual review of fiscal viability, to comply with accepted accounting principles relative to balance sheet presentation of reserves, and to provide the criteria for distribution of reserves.

#### **TERMS AND DEFINITIONS**

#### Sources of funds

University Glen Corporation ("UGC") sources its operating capital from the following:

- Reserve contributions
- Management Fees
- Miscellaneous income

#### Use of funds

UGC expends funds for current operations and designated programs.

# Reserves

Reserves are generated from:

- An excess of revenues over expenses, and
- Budgeted reserves within Commercial Services.

# **Funding Reserves**

Allocations to reserves from the first source may be recommended in any year to any of the following UGC designated provisions when unrestricted revenues exceed expenses.

Working Capital & Current Operations

Allocations from Commercial Services are set aside for:

- New supplies and equipment not accounted for in the annual budget
- Planning for future expansion
- New food programs

# **FUNDING PRIORITY**

Excess revenues will be allocated as follows:

Working Capital and Current Operations and Commercial Services

This appropriation will be maintained at a reserve level until it is sufficient to provide for at least one (1) year of normal operating expenses for all UGC operations.

# **USE OF RESERVES**

All funding and expenses from the above reserves will be reviewed by the UGC Board and recommended for acceptance by the Board of Directors and University President. Expenses will be in accordance with the annual budget as approved by the Board and University President.



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DATE: June 1, 2008

POLICY NUMBER: 4.10

POLICY NAME: Cash Receipts and Disbursements

#### **CASH RECEIPTS**

All cash receipts must be logged on a Daily Receipt Log.

#### CASHIER'S OFFICE:

- Checks arrive at the University Cashier's Office.
- Check envelopes are sorted by a University Cashier.
- A University Cashier makes copies and endorses all the checks.
- A University Cashier prepares a DRL and initials it.
- A University Cashier processes all credit card transactions.
- A University Cashier hand delivers all DRLs with backup to an Accountant.

#### ACCOUNTING:

(Accounting deposits funds and records in their system with initial information from the DRL. After the formal batch report is completed, accounting can adjust entries if information indicates any changes are needed.)

- The Accountant reviews the DRL with back up and makes any necessary changes.
- The Accountant initials the DRL.
- The Accountant enters the information into QuickBooks and prepares the deposit slip.
- The Accountant makes a copy of the deposit slip, prints the deposit detail and attaches them to the DRL packet.
- The Accountant hand delivers the deposit to a University Cashier and he/she will prepare the paperwork to send the deposit with the armored car service.
- Deposits are picked up in the Professional Building on Monday, Wednesday and Fridays. The armored car service delivers the deposit to the bank vault.
   Note: The date of the deposit must be the date that the checks are actually taken to the bank.
- All DRLs are filed in the Accounting Office.

# **DISBURSEMENTS**

# **CHECK REQUESTS/ INVOICES:**

Expenses are processed once original invoices, not statements (with the exception of Credit Cards), are received by Accounting.

#### **INVOICES:**

- Accounting will date stamp all invoices received.
- Invoices will be forwarded to the Executive Director of UGC for the issuance of a check request. The Executive Director will sign the completed check request as the "requestor".
- The original invoice and check request will then be sent to the Executive Director's supervisor for final authorization.
- The Executive Director's supervisor will forward all to accounts payable for payment.
- Requests for payment generated at UGC office (i.e. UGC employee reimbursements) will follow steps 2-4.

Employee reimbursements are submitted via Check Request.

<u>Note</u>: In cases where UGC is paying for meals or catered events, a meeting agenda and list of attendees must also be attached to the check request or invoice. The purpose for the meeting must be clearly noted on the check request. If the event is community or campus wide and it is impractical to expect a list of attendees, an event flyer will suffice.

When it is unavoidable to pay from an invoice <u>copy</u>, AP must verify against records that the invoice has never been paid. The invoice must then be stamped with the non-payment affirmation stamp. The AP manager signs on the signature line of the stamp.

Accounting will enter data into the accounting system for payment. UGC checks are prepared every Thursday. Paperwork must be submitted to Accounting by the previous Friday.

# **CREDIT CARDS:**

Credit Card statements arrive once a month. Credit Cards are registered in the name of the Executive Director of UGC. The Credit Card reconciliation should be filled out on the proper reconciliation form for each Credit Card statement received.

- Accounting will date stamp card statement when received (currently Amex).
- Statement will then be forwarded to the Executive Director of UGC for reconciliation. A reconciliation form must be filled out. Additionally, original receipts for all purchases must be attached to the form and statement.
- Director of UGC (as cardholder) must sign the reconciliation form.
- All documents will then be sent to the Executive Director's supervisor for final signature.
- The Executive Director's supervisor will forward signed reconciliation form with all documents attached to accounts payable for payment.

Accounting will enter data into accounting system for payment. UGC checks are prepared every Thursday. Paperwork must be submitted to Accounting by the previous Friday.



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DATE: June 1, 2008

POLICY NUMBER: 7.10

POLICY NAME: Conflict of Interest Policy

# I. AUTHORITY

The California Education Code has specific requirements for the governing board of an auxiliary organization regarding conflict of interest. This Policy addresses those requirements.

<u>California Education Code, Section 89906:</u> No member of the governing board of an auxiliary organization shall be financially interested in any contract or other transaction entered into by the board of which he is a member, and any contract or transaction entered into in violation of this section is void.

<u>California Education Code, Section 89907:</u> No contract or other transaction entered into by the governing board of an auxiliary organization is void under the provisions of Section 89906, nor shall any member of such board be disqualified or deemed guilty of misconduct in office under said provisions, if the circumstances specified in the following subdivisions exist:

- (a) The fact of such financial interest is disclosed or known to the governing board and noted in the minutes, and the governing board thereafter authorizes, approves, or ratifies the contract or transaction in good faith by a vote sufficient for the purpose without counting the vote or votes of such financially interested member or members, and
- (b) The contract or transaction is just and reasonable as to the auxiliary organization at the time it is authorized or approved.

<u>California Education Code, Section 89908:</u> The provisions of Section 89907 shall not be applicable if the circumstances specified in any of the following subdivisions exist:

- a. The contract or transaction is between an auxiliary organization and a member of the governing board of that auxiliary organization.
- b. The contract or transaction is between an auxiliary organization and a partnership or unincorporated association of which any member of the governing board of that auxiliary organization is a partner or in which he is the owner or holder, directly or indirectly, of a proprietorship interest.
- c. The contract or transaction is between an auxiliary organization and a corporation in which any member of the governing board of that auxiliary organization is the owner or holder, directly or indirectly, of 5 percent or more of the outstanding common stock.
- d. A member of the governing board of an auxiliary organization is interested in a contract or transaction within the meaning of Section 89906, and without first disclosing such

interest to the governing board at a public meeting of the board, influences or attempts to influence another member or members of the board to enter into the contract or transaction.

<u>California Education Code, Section 89909:</u> It is unlawful for any person to utilize any information, not a matter of public record, which is received by him by reason of his membership on the governing board of an auxiliary organization, for personal pecuniary gain, regardless of whether he is or is not a member of the governing board at the time such gain is realized.

The purchase or lease of a home in University Glen shall not be considered a conflict of interest under any circumstances.

# II. PURPOSE

UGC is a legal entity under State law and subject to specific statutes, regulations, and policies of State, Federal, and some times local governments. To the extent that non-State funded activities occur on a campus, the campus President is directly responsible by State statute for ascertaining that all expenditures by UGC are in accordance with policies of the trustees, and to require that the UGC operate in conformity with policy of the Board of Trustees, the California Education Code and the campus.

UGC is to operate in accordance with applicable regulations and policies of the CSU Board of Trustees, the California Education Code and the campus. Even though auxiliary organizations may be organized as corporations, they are first and foremost auxiliary organizations of the CSU and must therefore operate pursuant to the specific statues and regulations applicable to auxiliary organizations.

Based upon the authority cited above, UGC is required to adopt a conflict of interest policy and procedures for members of their governing boards and employees.

Furthermore, members of the Board of Directors and officers of UGC serve the public trust and have a clear obligation to fulfill their responsibilities in a manner consistent with this fact. All decisions of the Board and officers are to be made solely on the basis of a desire to promote the best interest of UGC and the California State University Channel Islands and the public good. The integrity of UGC and the California State University Channel Islands must be protected and advanced at all times.

Most potential conflicts are and will be deemed to be inconsequential, it is everyone's responsibility to ensure that the Board is made aware of situations that involve personal, familial, or business relationships that may be troublesome for UGC or California State University Channel Islands. Thus, the Board requires each director and officer annually (1) to review this policy; (2) to disclose any possible personal, familial, or business relationships that reasonably could give rise to a conflict of interest involving UGC or California State University Channel Islands; and (3) to acknowledge by his or her signature that he or she is in accordance with the letter and spirit of this policy.

# III. POLICY GOVERNING BOARD OF DIRECTORS AND EMPLOYEES

No member of the governing board of directors or employees of University Glen Corporation shall be financially interested in any contract or other transaction entered into by the governing board that is not in accordance with the conflict of interest provisions set forth in Education Code 89906-89909.

To avoid contracts or transactions entered into by the governing board of the University Glen Corporation from being voided, a board member must disclose a financial interest which could be impacted by the action of the governing board. Under these circumstances the board member must refrain from any action to influence or approve such a transaction.

**IV. RESTRAINT ON PARTICIPATION**. Directors or officers who have declared or have been found to have a conflict of interest shall refrain from consideration of proposed transactions, unless for special reasons the board or administration requests information or interpretation. Persons with conflicts shall not vote, participate in discussion, nor be present at the time of the vote. Any proposed transaction in which a conflict of interest has been declared or found to exist must be approved by a majority of the disinterested members of the Board or the appropriate committee of the Board after disclosure of the conflict of interest.

#### V. REPORTING

University Glen Corporation Board of Directors shall provide to the Executive Director of the University Glen Corporation with a Conflict of Interest Statement indicating compliance with this policy. This report shall be forwarded annually by June 15. Violations of the conflict of interest policy shall be reported upon discovery. All directors and officers are required to disclose only those substantive relationships that they maintain (or members of their family maintain) with organizations that do business with UGC, California State University Channel Islands, or any related or affiliated organization, or which otherwise could be construed to potentially affect their independent, unbiased judgment in light of their decision-making authority or responsibility.

Any uncertainties as to the appropriateness of listing a particular relationship may be resolved by consultation with the Chair of UGC, who in turn may consult with legal counsel or the Board of Directors in executive session. Information disclosed or provided by any person pursuant to this policy shall be held in confidence except when, after consultation with that person, the best interests of UGC or California State University Channel Islands would be served by disclosure.

# **VI. DEFINITIONS**

"Business Relationship" - one in which a director, officer, family member is an officer, director, employee, partner, trustee, controlling stockholder, or the actual or beneficial owner of more than 5% of the voting interest of an organization.

"Conflict of Interest"- a conflict of interest is defined as participating in or making decisions which could reasonably affect a person's economic interests in a material way and that such participation would impact the person's economic interest differently than other persons with the same association with the auxiliary organization.

"Family Member" - a spouse, parent(s), sibling(s), child(ren) or any other relative of a director or officer if the latter resides in the same household as the director or officer.

"Substantive Relationship" - one in which a director, officer or family member, or an organization with which the director, officer, or family member has a business relationship,

- (1) does substantial business with UGC, California State University Channel Islands, or any related or affiliated organization or
- (2) has other direct or indirect dealings with UGC, California State University Channel Islands, or any related or affiliated organization from which the director, officer or family member benefits directly, indirectly or potentially from cash or property receipts totaling \$10,000 or more annually.

"Statement of Compliance" - The annual statement signed by each member of an auxiliary governing board which signifies that they have read and understood the provisions set forth in Education Code Sections 89906-89909 and are not financially interested in any contract or other transaction entered into by the University Glen Corporation.



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# ANNUAL CONFLICT OF INTEREST REPORTING FORM

The California Education Code addresses the monitoring of potential conflicts of interest between University Glen Corporation ("UGC") and its' Board of Directors. The UGC policy and pertinent sections of the California Education Code are attached. As a result, UGC has adopted the practice of annually updating its files with regard to this matter.

Please review the attached documents and complete and date this form.

1.	Have you read the UGC Conflict-of-interest-Policy?		
	Yes	No	
2.	Are you aware of any relationships between UGC, California State University Channel Islands, or any related or affiliated organization, and you or a member of your family as defined by the letter or spirit of this policy that may constitute a conf of interest?		
	Yes	No	
		orate such relationships and the details of annual or it as you can best estimate them.	
3.	or family receive, during the past 12 months, any gifts which UGC, California State University Channel Islar rganization buys goods or services or otherwise have s?	nds,	
	Yes	No	
	If yes, please list such le	pans or gifts, their source, and their approximate value	e.
I certify th	at the foregoing information i	s true and complete to the best of my knowledge.	
Name:		Signature:	
Date:			
Return to:	The University Glen Co Attn: Erik Blaine	rporation e, Executive Director	

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DATE: June 1, 2008

POLICY NUMBER: 8.10

POLICY NAME: <u>Procedures for Processing Discrimination Complaints</u>

# I. PURPOSE

The purpose of these procedures is to provide an opportunity to resolve matters alleging discrimination to University Glen Corporation (UGC) employees and to applicants and participants in UGC programs. Persons who believe they are being or have been subjected to Discriminatory Acts (as defined below) are encouraged to report such acts as soon as possible after an incident. They should also recognize that delay in taking formal action with respect to an incident for more than 180, or in some cases, 300 days might foreclose access to federal or state investigative agencies. Filing a complaint with the UGC is not a prerequisite to filing a complaint with a federal or state agency.

In addition to its general duty to create and maintain an environment free of discrimination and discriminatory harassment, the UGC also recognizes its obligations to all individuals involved in claims of discrimination, including claims of discriminatory harassment, to provide a fair framework for encouraging the resolution of such complaints.

# **II. JURISDICTION**

In carrying out the applicable policies of the UGC, the Appropriate Administrator (as defined below) or the UGC Board of Directors (Board) may designate a person to investigate complaints of discrimination at the UGC and make findings of fact following such investigation.

Upon receipt of a complaint against California State University, Channel Islands (University), the Executive Director of UGC shall promptly acknowledge receipt of the complaint in writing and refer the investigation and resolution of such complaint to the University.

# **III. DEFINITIONS**

- A. Appropriate Administrator means the Executive Director of the UGC or other person designated by the Board.
- B. "Cause" Finding means a determination made by the Appropriate Administrator that sufficient evidence exists to conclude that, more likely than not, a violation of UGC policies related to unlawful discrimination on the basis of race, color, gender, religion,

- age, sexual orientation, marital status, pregnancy, disability, veteran status or national or ethnic origin has occurred.
- C. Complaint means a written charge filed in accordance with these UGC procedures that alleges a violation of UGC policies related to unlawful discrimination.
- D. Complainant means a person who files a complaint against the UGC alleging that s/he has been the subject of Discriminatory Action.
- E. Day means calendar day, except as otherwise specified.
- F. Discriminatory Act/Action means any action that is taken in violation of UGC policies because of an individual's race, color, gender, religion, age, sexual orientation, marital status, pregnancy, disability, veteran status or national or ethnic origin. Discriminatory Act/Action also may include threats or other forms of improper conduct in retaliation against any person as a result of their filing of a Complaint of discrimination, participating in an investigation, or opposing a prohibited discriminatory practice or policy.
- G. Instructional Day means any day during which University classes are in session, excluding Saturday, Sunday or an academic holiday as defined in 5 CCR Section 42800. Summer session days are not considered Instructional Days.
- H. Investigator means that person designated by the Appropriate Administrator or the Board to investigate complaints of discrimination and to arrive at findings of fact.
- "No Cause" Finding means a determination made by the Appropriate Administrator that insufficient evidence exists to conclude that a violation of UGC policies related to prohibited discrimination on the basis of race, color, gender, religion, age, sexual orientation, marital status, pregnancy, disability, veteran status or national or ethnic origin has occurred.

# IV. INFORMAL INQUIRY

Individuals, who believe they are or may have been victims of discrimination and/or discriminatory harassment, may initiate either an informal inquiry or file a formal Complaint.

The intent of the informal inquiry process is to provide persons who are concerned that they might have a discrimination complaint with an opportunity to receive information and advice about the definition of discrimination, the legitimacy of their concerns, and the procedures that exist for resolving complaints. It seeks to provide an opportunity for an informal, yet fair, resolution of the inquiry, while preserving, to the greatest extent possible, the confidentiality of the parties involved in an atmosphere of mediation and conciliation.

The Appropriate Administrator shall receive informal inquiries from Complainants who believe they are or may have been victims of discrimination by UGC employees, applicants or participants in programs. In addition to giving information and advice, the Appropriate Administrator may seek to achieve informal resolution to problems by bringing together the two parties. This attempt will likely require the agreement of the inquirer to enlarge the scope of confidentiality to include the second party.

The UGC will endeavor to restrict confidentiality to the person making the informal inquiry and the designee receiving it, but this restriction cannot be guaranteed. As a means of fulfilling its obligation to create and maintain an environment free from discrimination and discriminatory harassment, the UGC may conduct reasonable and appropriate investigations designed to

assess whether a violation of the nondiscrimination policy has occurred and this may require enlarging the scope of confidentiality. A confidential record of informal inquiries shall be maintained in the UGC Office.

In the event this informal inquiry leads to a resolution, both parties are precluded from subsequently filing a formal Complaint under these procedures unless it is demonstrated to the satisfaction of the Appropriate Administrator that the terms and conditions of the resolution, if any, have been violated. Both parties are encouraged to keep the results of the resolution confidential.

The UGC, under the charge of protecting its employees, applicants and participants from discrimination, may have a legal duty to initiate an investigation, a resolution, or disciplinary action, even if a formal Complaint is not filed and independent of the intent or wishes of the person making the informal inquiry. This does not mean, however, that the UGC has a duty to immediately or necessarily conduct an investigation any time an informal inquiry is made or a formal Complaint is filed. Such a decision must be made by the Appropriate Administrator. At any time during the informal inquiry and resolution process, the person making the inquiry may initiate a formal Complaint as provided below.

# V. FORMAL COMPLAINT PROCEDURES

- A. Who May File a Complaint. Complainants, as defined in III.E, may file a Complaint with the Appropriate Administrator in accordance with these procedures.
- B. Time for Filing a Complaint. To be timely, a Complainant must submit a Complaint to the Appropriate Administrator no later than 20 Instructional Days after the last Instructional Day of the academic term in which the most recent allegedly Discriminatory Act occurred. The Appropriate Administrator may extend the deadline based on extenuating circumstances.
- C. Consultant. Complainants may, but are not required to, have a consultant of their own choosing present at their interviews conducted during the course of the investigation into the Complaint. The consultant shall not be a person admitted to the practice of law before any state or federal court. The role of the consultant is limited to observing and consulting with the Complainant.
- D. Requirements of a Complaint. Although not required to be accepted for filing, the Complaint should be on a form provided by the UGC. Each Complaint shall include the following:
  - 1. The full name, address and telephone number of the Complainant, who must be the individual claiming to be harmed by the discrimination;
  - 2. The name of person(s) alleged to have committed a Discriminatory Act;
  - A clear and concise written statement of the facts that constitute the alleged Discriminatory Act(s), including pertinent dates and sufficient information to identify any other individuals who may provide information during the course of an investigation conducted under these procedures and to bring the matter within the jurisdiction of the UGC to investigate;
  - 4. A statement by Complainant verifying that the information supporting the allegations of unlawful discrimination is true and accurate to the best of Complainant's knowledge;
  - 5. Complainant's signature;

- 6. The date of submission of the Complaint:
- 7. Information that establishes that both Complainant and person(s) alleged to have committed a Discriminatory Act have a sufficient relationship to the UGC to require application of UGC policies and procedures to the allegedly Discriminatory Act(s); and
- 8. The full name, address and telephone number of the Complainant's consultant, if any.
- E. Intake Interview. At or after the time a Complainant initiates a Complaint, the Appropriate Administrator shall conduct an interview with the Complainant.
- F. Signature by the Appropriate Administrator and Filing of Complaint. If the proffered Complaint fulfills the requirements set forth in subpart V.D above, the Appropriate Administrator shall sign the Complaint and provide Complainant a copy of the Complaint and the Complaint shall be deemed filed.
- G. Notice Regarding Complaint. With the exception of notice to person(s) alleged in the Complaint to have committed a Discriminatory Act, only those persons with a legitimate need to know will be apprised of the filing of and final disposition of a Complaint. Those persons may include, but are not necessarily limited to UGC administrators and University administrators who may have an obligation to monitor the workplace to ensure that retaliatory action does not occur during or after the investigative process concludes, and who may be required to implement recommendations resulting from the investigation of the Complaint.
- H. Access to Information Regarding the Investigation. Complainant, upon inquiry and during the course of an investigation, shall be advised of the status of the investigation.
- I. Amending the Complaint. If, during the course of an investigation, the Investigator determines that more information is required to enable a meaningful investigation, s/he may request Complainant to clarify or amplify allegations in the Complaint. Complainants may also be allowed to add a new charge of discrimination related to the original Complaint, so long as the addition falls within the time limits otherwise applicable to the filing of a Complaint pursuant to subpart V.B above.
- J. Dismissal Based Upon Insufficiency of Complaint. If a Complaint alleges conduct that, if true, would not constitute a violation of UGC policies related to unlawful discrimination on the basis of race, color, gender, religion, age, sexual orientation, marital status, pregnancy, disability, veteran status or national or ethnic origin, the matter shall be dismissed without further investigation by the Appropriate Administrator.
- K. Investigation of Allegations in Complaint. Following the filing of a Complaint, the Investigator will act as a neutral fact-finder. This Investigator shall assemble statements, documents and other relevant evidence, and interview witnesses and other identified individuals who have or may have information concerning the allegations set forth in the Complaint. The Investigator will make every reasonable attempt to complete the

investigation within 90 Instructional Days of the filing of a formal Complaint.

- L. Report of Findings of Fact. Upon completion of an investigation, the Investigator will make findings of fact regarding the allegations, which s/he shall reduce to an investigative report, which shall be submitted to the Appropriate Administrator.
- M. Finding of "Cause" or "No Cause". After review of the investigative report, the Appropriate Administrator shall evaluate the evidence in accordance with UGC policies related to unlawful discrimination, and shall make a Finding of "Cause" or "No Cause" regarding the allegations.
- N. Notice of Finding. The Appropriate Administrator shall notify Complainant in writing of the Finding of "Cause" or "No Cause". Such notice shall inform the Complainant of the outcome of the complaint, including sufficient detail so as to permit an informed decision as to whether to seek review of the finding. The Appropriate Administrator may also notify those persons with a legitimate need to know identified in subpart V.G of these procedures. This information is to be treated as confidential and is not to be disclosed to third parties.
- O. Corrective Actions. If the Appropriate Administrator finds "Cause", s/he may also issue a separate recommendation regarding corrective actions. This may include individual remedies for the Complainant or a range of formal or informal disciplinary measures or other personnel actions. Whenever any information concerning recommended corrective action in connection with allegations of discrimination is provided to the Complainant pursuant to subpart V.N above, such information shall be provided on a confidential basis. Failure on the part of the Complainant to respect confidentiality could result in civil action initiated by person(s) alleged in the Complaint to have committed a Discriminatory Act.
- P. Withdrawal of Complaints. Once filed, the UGC has an obligation to investigate Complaints raising significant claims of discrimination. However, in appropriate circumstances, and in the discretion and judgment of the Appropriate Administrator, the UGC may agree, upon a written and signed request to do so by Complainant, to withdraw a Complaint. A Complainant seeking to withdraw a Complaint must set forth reasons in the request that support withdrawal. The UGC shall notify Complainant of such withdrawal.

# VI. REVIEW

Complainants may petition the University to review the process used by the UGC in responding to a complaint of discrimination only to determine whether:

- The UGC's processing of the complaint conformed to federal civil rights laws and the
  policies of the California State University Board of Trustees and the University
  regarding unlawful discrimination;
- The UGC complied with its own complaint procedures, approved by the University; and

 The UGC applied good faith reasoned judgment in its processing of the complaint of discrimination.

The University shall not undertake a de novo review of the complaint, but shall limit its review to the above. If, after a review, the University determines that the UGC failed to comply with one or more of the above standards, the University shall remand the complaint to the UGC with a description of any deficiency and instruct the UGC to conform to these standards in processing the pending complaint.

The University shall also instruct the UGC to remedy any identified deficiency when responding to future such complaints of discrimination.

#### **VIII. GENERAL PROVISIONS**

- A. Confidentiality. Employees of the UGC and the Appropriate Administrator shall respect confidentiality of information obtained during the course of an investigation, except where disclosure is required by an obligation imposed on the UGC by law, to investigate a Complaint or to advise parties to the Complaint or an individual identified in subpart V.G of these procedures of the outcome of an investigation or to facilitate other legitimate UGC processes. As a means of fulfilling its obligation to create and maintain an environment free from discrimination and discriminatory harassment, the UGC may conduct reasonable and appropriate investigations designed to assess whether a violation of the UGC policies related to nondiscrimination has occurred and this activity may require enlarging the scope of disclosure.
- B. Retaliation; Cooperation. Threats or other forms of intimidation or retaliation against any person who files a Complaint of discrimination, participates in an investigation or opposes an unlawful discriminatory practice or policy are prohibited and shall form an independent basis for investigation under the procedures. Employees and participants in programs are expected to cooperate in an investigation into a Complaint of discrimination.
- C. Complaints Filed with Outside Agencies. The University acknowledges that individuals have rights to file charges with external agencies at any time within that agency's deadlines, and that those charges may be filed concurrently with Complaints that are filed with the UGC in accordance with these procedures. The fact that a charge has been filed with an external agency will in no way deter an investigation by the UGC concerning the same or similar events, so long as the Complaint is filed in a timely manner pursuant to these procedures



University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-384-9228 Office 805-384-0717 Fax

DATE: June 1, 2008

POLICY NUMBER: 9.00

POLICY NAME: Board Meetings

# I. PURPOSE

To establish meeting policy and authorize related practices for the Board of Directors and its Committees consistent with applicable law and regulations.

#### II. BACKGROUND

The University Glen Corporation ("UGC") is a nonprofit public benefit corporation under California law. Ca. Corp. Code 5200 et seq. UGC is also a recognized auxiliary organization operating within the California State University system in accordance with California Education Code 89900 et seq. and the California Code of Regulations, Title 5, Division 5, Chapter 1, Subchapter 6, at 42401 et seq.

As a public benefit corporation and auxiliary organization, UGC is required to comply with certain statutory and regulatory standards relating to meetings of the Board of Directors and its Committees.

This policy restates the governance meeting standards and implements them with more specific requirements, or authorizes conforming practices to be instituted by the officers, management, the Board and Committees in holding meetings.

#### III. DEFINITIONS

Certain words, terms and phrases used in this policy statement shall be defined and interpreted as follows:

- "Adjourned Meeting" means a meeting of a Body duly noticed and resulting from the
  action of the Body quorum, or in the absence of a quorum, a majority of Body members
  present at any meeting vote to adjourn the meeting to meet again at a stated date, time and
  place. Notice of the date, time, place and business to be transacted at such meeting shall be
  given to any Body members who were not present at the time of adjournment.
- "Annual Meeting" means an annual meeting of the Board of Directors held each year prior
  to the regular meeting. The purpose of the Annual Meeting shall be for election and designation
  of Board members and officers and considering reports on the affairs of the UGC, and
  transaction of such other business as may be properly brought before the Board.

- "Board" or "Board of Directors" means the governing Body of the UGC.
- "Body" means the Board or any of its Committees.
- "Closed Session" means a portion of any Body meeting closed to the public for the limited purpose of considering matters authorized under California Education Code section 89923.
- "Committee" means any Committee or sub-board established by the Board of Directors of the UGC, and given such powers as the Board shall assign, consistent with the Articles of Incorporation and the Bylaws. This term does not include advisory boards, working groups, councils or similar groups established by the Board or any Committee.
- "Employee" means an employee of the UGC. The term "employee" does not include a person elected or appointed to a corporate office.
- A "meeting" means a gathering (including Meeting-By-Teleconference) of a quorum of the Board or a Committee thereof to hear, discuss, deliberate or act upon any item within the purview of that Body. A meeting is not intended to include: a Board or Committee workshop or retreat convened for training or general planning discussion purposes; purely social or ceremonial occasions, absent business discussions by a majority of the Body; attendance at either the public meeting of another governing Body, or a conference at which only issues of general interest are discussed.
- "Meeting-by-Teleconference" means any meeting by a Body, held for Body members, through conference telephone, video screen communication, or similar technology, as long as all Body members participating in the meeting can hear one another.
   Participating Body members shall be deemed to be present in person at such a meeting. The conduct of Meeting-by-Teleconference shall be consistent with this policy statement.
- "Regular Meeting" means Board meetings that are normally held quarterly.
- "Special Meeting" means a meeting called and duly noticed by, or at the direction of, the University President or by a majority of the voting Board, to be held at such date, time and place as shall be designated in the meeting notice.

# IV. POLICY

<u>General.</u> It is the general policy of the Board of Directors to conduct its business in public meetings. All such meetings shall be open and public, and all persons shall be permitted to attend any meeting. This policy extends to Committees established by the Board, and it includes meeting practices and, in limited circumstances, closed sessions during meetings, as set forth below.

The place of Board meetings shall be held within California that has been designated from time to time by the Board. Committee meetings are generally held on or near the campus, but with concurrence of the Board Chair, may hold meetings elsewhere in California if necessary. The Board shall annually set a tentative schedule of its regular meetings, including dates, times and place(s). This tentative regular meeting schedule may need to be amended from time to time, but any meeting that departs from the annual schedule is subject to appropriate meeting call, notice, agenda and conduct requirements in this policy.

# Meeting Calls, Notice and Agendas

Regular Meeting notices shall be delivered personally or by mail, and shall be in written form that includes the date, day, time and location, and an agenda of matters scheduled to be considered at the meeting. Agenda items should be noted in sufficient detail to disclose the business to be conducted at the meeting. Written notice includes facsimile, electronic mail, or other electronic means.

Regular Meetings must be noticed in writing at least one week prior to the date set for the meeting. The meeting notice shall be given to any person or news media that has filed a notice request with the corporate Secretary; such request shall be effective and valid for one year from the date on which it is filed.

The Board Chair may call a Special Meeting of the Board, with at least 24 hours written notice to members, delivered personally, by mail, or by telegram, if such Special Meeting is necessary to discuss an unforeseen emergency condition. Written notice includes facsimile, electronic mail, or other electronic means and shall specify the time and place of the special meeting and the business to be transacted. Only business described in a Special Meeting call or notice can be considered at the meeting.

If a Meeting-by-Teleconference is planned, the meeting call, notice and agenda should disclose meeting teleconferencing arrangements, and the conditions required for a valid meeting by this technology.

The Executive Director, in concert with the Board Chair and corporate Secretary, shall develop meeting agendas. A meeting agenda should clearly identify and order the matters to be considered and include supporting information or documents available at the time the agendas are distributed.

# Conduct of Meetings

The Body Chair or a designee convenes and presides at meetings of the Body using Roberts Rules of Order principles most convenient and customary to the Body, rather than strict parliamentary rules.

#### Meeting-by-Teleconference

If one or more Body members are participating in a Meeting-by-Teleconference, all meeting participants must be able to hear one another in order for the conditions to constitute presence-in-person of those participating by teleconference. Therefore, all teleconferencing Body members should state their names for the record at the beginning of the meeting, and should state, both at the beginning and end of the meeting, that they are and were able to communicate with each other concurrently.

Participation in a meeting through use of electronic video screen communication or communication equipment other than conference telephone constitutes presence-in-person at the meeting if the following requirements are met:

- Each member participating in the meeting can communicate with all of the other members concurrently.
- Each Body member is provided the means of participating in all matters before the Body, including the capacity to propose or to interpose an objection to a specific action to be taken by the Body.
- Verification measures are adopted and used to ensure that the persons participating in the meeting are Body members, and that all actions and votes are taken or cast only by the Body members.
- The Executive Director shall establish and implement written teleconferencing verification practices as necessary.

# Public Comment on Meeting Agenda Business Items

At the discretion of the meeting Chair, or upon an affirmative vote of the Body, comment from the public at an open meeting may be heard on a business item on the agenda for that meeting. Such public comment shall be limited by the Chair to a reasonable time period consistent with the number and relative importance of other agenda items for the meeting and upon time available to the Body. Generally, public comment shall be heard following the staff report on the business item, after responses to questions from the Body, and before action is taken by the Body on the item. The number of persons wishing to make comment upon an agenda item may require additional planning arrangements established in advance of the meeting to help assure the Body hears the public comment on an effective and fair basis.

# **Closed Sessions**

A Body may hold a closed session during a meeting. A closed session may consider the following matters:

- Litigation
- Collective Bargaining
- Appointment, Employment, Performance Evaluation or Dismissal of Employee
- Complaint against Employee (unless employee requests public hearing).
- Upon a favorable majority vote of its members, a Body with investment jurisdiction may also hold a closed session to discuss investments where public discussion could have a negative impact on the corporation's financial situation. In such circumstances, any final decision by the Body shall only be made in public (open session).

#### Adjourned Meetings

If a meeting must be adjourned, the Body Chair presiding should set a date, time and place to hold the reconvened meeting. Appropriate meeting notices shall be sent, particularly to those not present at the time of adjournment.

# Meeting Minutes

Written minutes of all meetings shall be taken, promptly transcribed, approved by the Body and maintained by the corporate Secretary under guidelines the corporate Secretary may establish.

#### V. ADDITIONAL GUIDELINES

The Executive Director, with the Board Chair concurrence, may establish written guidelines to implement this policy statement. Such guidelines shall be reported to the Board and its Committee.



University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-437-2670 Office 805-437-2681 Fax

DATE: August 28, 2008

POLICY NUMBER: 10.00

POLICY NAME: Investments

#### I. BACKGROUND AND PURPOSE

The University Glen Corporation (UGC) will adopt as its own investment policy the California State University (CSU) policy. The CSU policy is referred to as "Investment Policy for California State University Systemwide Investment Fund Trust (SWIFT). The SWIFT Policy is attached for reference.

# II. ADMINISTRATION AND DELEGATION OF AUTHORITY

The SWIFT Policy contains specific language relating to communication and reporting information to the Chancellor's Office staff. The UGC Board recognizes the level of communication and reporting contained in the SWIFT would not be consistent with its own fiduciary duty of financial oversight. Therefore, the UGC Board modifies the communication and reporting sections of the SWIFT as indicated:

- Management responsibility for the investment program is delegated to the Executive Director and the Treasurer of the Board.
- The authority to execute investment transactions affecting the UGC's portfolio shall be under the general direction of the Executive Director and Treasurer of the Board.
- The Executive Director will submit to the UGC a monthly report, a quarterly summary report, and an annual summary report detailing the current portfolio holdings, market value, annualized yield, realized gain and income from all invested assets.



University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-384-9228 Office 805-384-0717 Fax

DATE: Revised August 25, 2011

DATE: Issued June 1, 2008

POLICY NUMBER: 11.10

POLICY NAME: <u>Travel Expense Reimbursement</u>

# I. BACKGROUND AND PURPOSE

This policy statement establishes the basis upon which the University Glen Corporation ("UGC") officers, directors, employees, agents, or other designated representatives shall be reimbursed for official business travel expenses.

# II. POLICY

The appropriate travel expense reimbursement rates are most frequently those used by the University. Therefore, the Board adopts the California State University ("CSU") revised travel policy effective April 1, 2011 as the UGC travel policy.

#### III. PROCESS

- A. The Executive Director is authorized to establish, with concurrence of the Board, management guidelines consistent with and in implementation of this policy statement.
- B. The current CI Travel Policy is located online at:
  <a href="http://www.csuci.edu/accountspayable/handbooks/CI Travel Procedures and Regulations">http://www.csuci.edu/accountspayable/handbooks/CI Travel Procedures and Regulations</a>
  <a href="http://www.csuci.edu/accountspayable/handbooks/CI Travel Procedures and Regulations">http://www.csuci.edu/accountspayable/handbooks/CI Travel Procedures and Regulations</a>
  <a href="http://www.csuci.edu/accountspayable/handbooks/CI Travel Procedures and Regulations">http://www.csuci.edu/accountspayable/handbooks/CI Travel Procedures and Regulations</a>
- C. The Current CSU Travel Policy is located online at: <a href="http://www.calstate.edu/icsuam/sections/3000/Travel\_Procedures\_G-001\_Final.pdf">http://www.calstate.edu/icsuam/sections/3000/Travel\_Procedures\_G-001\_Final.pdf</a>
- D. It should be noted that the CSU Travel Policy may be more general than the CI Travel Policy as the CSU Travel Policy serves as the minimum requirements. UGC shall follow the CI Travel Policy, which may be more restrictive than the CSU Travel Policy.



University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-384-9228 Office 805-384-0717 Fax

DATE: June 1, 2008

POLICY NUMBER: 12.00

POLICY NAME: **Drop Box Use for Payments** 

# I. BACKGROUND AND PURPOSE

This policy statement establishes the basis upon which the University Glen Corporation ("UGC") officers, employees, or other designated representatives shall be authorized to check the contents of the established drop box(s) at the UGC Offices.

The purpose of the drop box is for residents and prospective residents of University Glen and others doing business with UGC to make payments, to submit documents and other items to the UGC Offices 24 hours a day.

#### II. POLICY

It is the policy of UGC that only authorized staff can open the drop box to check the contents. The authorized staff shall include the Executive Director, Director of Rental Housing, Associate Director of Rental Housing, and the Leasing Agents. The drop box shall be checked by two staff members.

# III. PROCESS

There may be two drop boxes for UGC one located at each lobby entrance to the offices, the following process will be followed:

- The drop box will be kept locked at all times.
- The drop box must be checked by any two authorized staff as indicated in this policy whenever the drop box is opened.
- At their discretion, members of the Management Team, along with a second person, may also check the drop box on days that the UGC Offices are not open to prevent overflow of the box. This may occur during a holiday period or when the offices may be closed for consecutive days.
- Staff checking the contents of the drop box shall fill-out the Drop Box Log each time the drop box is checked. This log shall be kept in a Drop Box Log file for periodic review.
- Contents of the box will be delivered to the appropriate staff for action. Examples of
  contents include rent payments for the apartments, lease payments for the retail space,
  CAM payments from the homeowners, other payments from anyone, other documents
  and questions for various UGC staff.

The following general comments apply:

- Residents acknowledge in the UGC Lease Agreement (Page 1, Section 9) that use of the drop box is at their own risk. This means in the event of a dispute and in the absence of other verifiable documentation, the Drop Box Log shall be deemed accurate. For example, if a resident claims he or she left a check in the drop box, but it was never received by authorized staff, UGC staff may assume that payment was never made. If a resident claims that a check was deposited but UGC has no record of banking it, the resident must provide proof the check was deposited in the form of copies of both sides of a cancelled check.
- Payments received in the drop box on time are to be reviewed for overall accuracy, e.g. proper signature, date, and amount, payable to University Glen. Checks are placed in a bank bag to be turned over to the Associate Director at the end of each day.
- Payments made and/or received late shall be stamped with the date received, the time the drop box was checked, and the initials of the staff member who received the payment.
- Any payments received in the drop box the first time the box is checked after 11:59 PM on the last day of the payment grace period shall be considered received on time.
  - For residential tenants, payment is due on the 1<sup>st</sup> of the month and the grace period expires on the 3<sup>rd</sup> at 11:59PM.
  - For Common Area Maintenance payments made by homeowners and retail tenants, payment is due on the 10<sup>th</sup> of the month and the grace period expires on the 25<sup>th</sup> at 11:59PM.
  - For retail tenants, payment is due on the 1<sup>st</sup> of the month and the grace period expires on the 10<sup>th</sup> of the month at 11:59PM.



University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-384-9228 Office 805-384-0717 Fax

DATE: June 1, 2008

POLICY NUMBER: 13.00

POLICY NAME: Collections

# I. BACKGROUND AND PURPOSE

This policy statement establishes the basis upon which the University Glen Corporation ("UGC") will collect amounts due UGC from a variety of sources. The purpose of the collections policy is to ensure past amounts due to UGC are kept to a minimum and there is a method by which UGC engages in collections efforts.

# II. PROCESS

There are three types of past due amounts for UGC:

# 1. Current Resident Receivables

- On the 4<sup>th</sup> of each month an Aged Receivables Report from Yardi is generated.
- A late fee of \$50 is assessed to accounts that reflect delinquent rent.
- A Three Day Notice to Pay or Quit is served (mailed and posted) to the resident and posted on the account.
- Five days after the 3-day notice is sent the Aged Receivables Report is reviewed again for outstanding rent.
- Any resident who was served legal notice and still has an outstanding rent balance shall have their file sent to the UGC attorney, Kimball, Tirey & St. John, where an Unlawful Detainer action will be brought against the resident

### 2. Past Resident Receivables

- When a resident vacates a unit, a Statement of Deposit Accounting (SODA) is processed and mailed to the resident within 21 days of move out per California law.
- If there is a balance owed on the account, the past resident has 30 days to pay the balance.
- If the balance is not paid within 30 days the past resident is mailed a UGC Collection Account Letter along with another copy of the SODA. This letter provides an additional 30 days for payment or the account will be forwarded to a collection agency and reported to the credit bureaus.
- If payment is not received the residents file is sent to our debt recovery attorneys, Karsaz & Associates, where the third-party collection process begins.

# 3. Current Homeowner Receivables for Common Area Maintenance (CAM) Payments

- On the 26<sup>th</sup> of each month an Aged Receivables Report from Yardi is generated.
- A \$50.00 late fee is assessed to accounts that reflect delinguent CAM fees.
- A Monthly CAM Statement is mailed no later than the 31<sup>st</sup> of each month. This statement acts as a balance due letter since monthly invoices are not sent to homeowners.
- If payment is not paid and the balance exceeds two months fees a Notice of Failure to Pay Maintenance Rent is mailed to the homeowner.
- If payment is not paid within 60 days a second Notice of Failure to Pay Maintenance Rent is mailed to the homeowner with a copy sent to the homeowners Lender.
- If payment is not paid within 30 days a Notice of Ground Sublease Termination is mailed to the homeowner and the Lender.



University Glen Corporation 45 Rincon Ave. #104-A Camarillo, California, 93012

> 805-437-2667 Office 805-437-2681 Fax

DATE: April 30, 2009

POLICY NUMBER: 14.00

POLICY NAME: Leasing to Applicants with a Criminal History

# I. BACKGROUND AND PURPOSE

This policy statement establishes the basis upon which the University Glen Corporation ("UGC") officers, employees, or other designated representatives shall be authorized to evaluate and deny an applicant wishing to lease or rent space in University Glen in either an apartment or town-home.

The purpose of this policy is to protect the community.

# II. POLICY

It is the policy of UGC that only authorized staff can review and evaluate the rental applications. The authorized staff shall include the Executive Director, Director of Rental Housing, Associate Director of Rental Housing, the Leasing Agents, and third party vendors providing advice and counsel to UGC, e.g. credit check and legal consultation.

# III. PROCESS

A prospective residents' criminal history will be evaluated to determine whether the offense [if applicable] equates to a denial of the application. University Glen automatically denies any applicant(s) with a criminal history, whether felony or misdemeanor:

- Relating to the harming of people,
- Relating to the harming of property or
- Relating to an individuals' honesty, veracity or involves fraud.

There will be no exceptions to this policy. If a prospective resident provides any false, incomplete or inaccurate information concerning their criminal history, their application will be denied or subsequently terminated.



University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-437-2667 Office 805-437-2681 Fax

DATE: October 11, 2010

POLICY NUMBER: 15.00

POLICY NAME: **Employee Meals** 

# I. BACKGROUND AND PURPOSE

This policy statement establishes the philosophy of providing meals to employees during the course of their working hours.

### II. POLICY

It is the policy of UGC that providing meals to employees during their shift adds a level of quality control to the product, increases customer service and reduces the possibility of theft. Use of the employee meal program is a privilege subject to the conditions set forth in this policy. Any abuse of this policy by an employee may result in the suspension of meal privileges and or disciplinary action up to and including termination

#### III. PROCESS

The Employee Meals are subject to the following guidelines:

#### • Summary of the Rules and Regulations:

- Food must be consumed on the premises during your scheduled shift break period. Meal to go is not allowed.
- Employee Meals may not be used to provide food, drink or any items for anyone other than the employee.
- Employees who are working may consume beverages free of charge while on break or during their meal period as long as they use the provided Hospitality Services Employee Beverage mug. Any beverage not in the Employee Beverage Mug will be charged at full price.
- Employees must clock out for their meal period prior to ordering food.
- Employees may not:
  - Go behind counters and prepare your own food.
  - Take any Employee Meal food from the premises.
  - Eat any food during shift, during non-break times or in non-break areas.
  - Prepare "special food" as your Employee Meal.
- o Items not approved as part of this policy include:
  - Any item from the Sea Store

#### • Procedure:

- Islands Cafe: All employees who work 4 hours or more may receive a meal. Any
  meal may be chosen from that day's menu. No special items (not on menu) may
  be prepared for employee meals. Meals must be taken on the day the employee
  works.
- <u>Retail:</u> All employees who work a 3 hour shift or greater may receive a 50% discount on any meal they select up to a \$10 value. Any cost over \$10 must be paid by the employee. Meals must be taken on the day the employee works. Employees may select any item from the menu. No special items (not on menu) may be prepared for employee meals

# Eligibility:

- <u>Executive / Administration:</u> UGC Board of Directors, UGC supervisor, Executive Director and Director of Commercial Services. The business purpose for executive/administration meals is to provide quality control, and the opportunity to interact with staff, students, colleagues and guests.
- Management/Supervisors: Islands Café Executive Chef, Catering Manager, Meal Plan administrator, SUB Manager, and Freudian Sip JSB Supervisor. The business purpose for management/supervisor meals is to provide quality control, and the opportunity to interact with staff, students and guests.
- Hourly Staff: All hourly staff working at Islands Café, Lighthouse Café, Freudian Sip SUB, Freudian Sip JSB, and the Sea Store. The Business purpose for hourly staff is to provide quality control and to encourage employees to remain on site for the convenience of the employer.
- Student Staff: All hourly staff working at Islands Café, Lighthouse Café, Freudian Sip SUB, Freudian Sip JSB, and the Sea Store. The Business purpose for student staff is to provide quality control and to encourage employees to remain on site for the convenience of the employer.



University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-437-2667 Office 805-437-2681 Fax

DATE: January 13, 2011

POLICY NUMBER: 16.00

POLICY NAME: Meal To Go Policy

# I. BACKGROUND AND PURPOSE

This policy statement establishes the philosophy of To-Go Meals offered at Islands Café. Students, faculty and staff can enter the dining room and enjoy 'Open Dining'. There is no process in place, at this time, to allow someone to leave the building, re-enter, and get more food. Therefore, a To-Go Meal is offered to those who wish to eat on the patio or some other location.

# II. POLICY

It is the policy of UGC that only the person who has paid for the meal is receiving the benefit of the paid meal, e.g. people cannot use the To-Go Meal as a means to provide meals for other people.

# III. PROCESS

The To-Go Meal policy is subject to the following guidelines:

- A To-Go Meal container may be requested at the cash register when entering Islands Café.
- The entire selection of food taken must fit within that container.
- No additional plates, bowls or containers may be used to augment the To-Go Meal container, with the following exception:
  - o one beverage,
  - o one piece of fruit,
  - o one cup of frozen yogurt, or
  - o choice of one of the following:
    - one 6 ounce clear hinged container for salad only, or
    - one 12 ounce soup container for soup only.
- A To-Go Meal container cannot be used inside the dining room either by itself or with another plate from Islands Cafe.



University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-437-2667 Office 805-437-2681 Fax

DATE: July 1, 2011

POLICY NUMBER: 17.00

POLICY NAME: Management Fee

### I. BACKGROUND AND PURPOSE

This policy statement establishes the philosophy of assessing a management fee to various programs operated and supported by University Glen Corporation (UGC) staff and resources. This fees is intended to cover all UGC expenses and are developed to recover the cost of central support services, such as general administration, accounting, data processing, personnel, procurement, administration, and related functions.

Because of the size and diversity of UGC's involvement with campus activities, and other University-related and supported activities, it is prudent for the Board of Directors to adopt a formal policy statement. Such a policy is needed to assure equity in and general uniformity to the UGC's management fee program while allowing management flexibility in the application of such fees.

The relationship between UGC, the Site Authority, Financing Authority, and California State University, Channel Islands ("CSUCI" or "University") is unique in that UGC exists to manage the daily operating activities of the Site Authority. The Site and Financing Authorities exist to provide affordable housing for faculty and staff and to generate funds for academic capital.

### II. POLICY

- General. The UGC shall, as a general policy, charge a management fee to provide administrative support services that benefit organizational units, external entities, or functional program/projects.
  - The term management fee is assessed as a percentage of gross revenue and is intended to be a means by which to assess general oversight and support, including labor, material, and all other costs (such as supervision, supplies, rent, utilities, and equipment depreciation).
- <u>UGC Operations</u>. The cost of administrative support services rendered to sustaining UGC Commercial Services shall be recovered through a management fee which is outlined in the annual budget. The Board shall annually review and adopt a budget which outlines the management fee.
- <u>Site Authority Activity</u>. The cost of administrative support services rendered to Site Authority activities, such as: CI Power Plant, Home Sales, Rental Programs, Common

Area Maintenance, Maintenance Reserves, and General Administration shall be recovered through a management fee which is outlined in the annual budget. The Board shall annually review and adopt a budget which outlines the management fee.

### III. MANAGEMENT FEE

The total costs of UGC shall be recovered through a management fee assessed to each unit receiving the benefit of UGC resources. The management fee rate shall range up to 5% of gross revenue of the unit being assessed. The following rates are assessed to the indicated units until this policy is revised by the Board of Directors:

- Management Fee (percent of gross revenue)
  - o Islands Café: 5%
  - o Student Union Building (Lighthouse Café, Freudian Sip, Sea Store: 3%
  - o Freudian Sip Broome Library: 3%
  - o Rental Program: 5%
  - o Common Area Maintenance, Homeowners: 5%
  - o Common Area Maintenance, Town Center Retail: 5%
  - CI Power: .4% (CI Power is operated under an agreement with NAES which provides staff to operate the plant, therefore, CI Power's management fee is less.



University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-437-2667 Office 805-437-2681 Fax

DATE: September 19, 2011

POLICY NUMBER: 18.00

POLICY NAME: Food Service Inventory

#### I. BACKGROUND AND PURPOSE

This policy statement establishes the basis upon which the University Glen Corporation ("UGC") officers, employees, or other designated representatives shall be authorized to oversee the inventory process for all food service operations.

#### II. POLICY

Maintaining an adequate system of controls with regard to the inventory of food items in the food service operations spread over several locations is a priority. It is the policy of UGC to conduct rigorous and regular inventories of all food service goods.

### III. PROCESS

Food Service unit managers and supervisors are responsible for maintaining an inventory of products. Purchasing is performed on a daily or weekly basis.

### Deliveries

- When products arrive at a location they are received by the manager or a staff member that has been trained by the manager to perform this function.
- Items counts are verified by the receiver and any deviation from the actual products received to the delivery paperwork (packing slip, bill of lading, or invoice) is noted. The receiver date stamps the delivery paperwork and signs for the delivery.
- The Manager reviews the delivery paperwork for count and pricing errors and date stamps it as approved for payment.
- All paperwork forwarded to UGC to be coded to appropriate accounts for processing and final approval by the Director of Commercial Services and the Executive Director prior to payment.

#### Monthly Inventory

- Inventory takes place monthly and is conducted by two or more employees depending on size of operation and estimated number of items in inventory.
- An inventory count sheet is used including item descriptions, item price, and a blank quantity field.
  - Managers, supervisors, shift leaders and other UGC employees may participate in the inventory process. One person counts while another records the information on the count sheet. Due to staffing limitations, one person occasionally performs both duties but is then required to be randomly audited by another employee.

- Inventory information is reviewed by the submitting manager and the Director of Commercial Services for accuracy. A cover sheet is printed with current and previous month's inventory information and submitted to Accounting.
- The yearend inventory taken on June 30<sup>th</sup> for all operations will be audited by a representative from the Finance and Budget office.
- Waste, Spoilage, Shrinkage
  - Unit Managers are responsible for day to day ordering of product. Managers may only order from vendors listed on the UGC Approved Vendor List. Vendors are added to this list only with the approval of the Director of Commercial Services.
  - UGC food services use a "just in time" philosophy for food production. This not only provides a higher quality food product for its customers, but reduces waste and spoilage as overproduction is controlled by available inventory.
  - Food production is monitored and controlled by the Executive Chef who communicates daily production needs to his production staff. Waste is controlled through menu design by reconfiguring product left over from one day into the next day's menu items.
  - o Shrinkage- Islands Café. Shrinkage is minimized as storage areas are locked at the end of the business day. During the day when there are more supervisors and managers around, the inventory areas are left open due to impact on operations. In the evening hours and when there is limited staff, the inventory areas will remain locked.
    - o Access to inventory areas is limited to management and supervisors.
    - Storage areas include walk-in freezers, walk-in refrigerators and a dry storage area.
  - Shrinkage- Student Union Building and Library Freud. Shrinkage is minimized as storage areas are locked at the end of the business day.
    - Access to inventory areas is open as business operations would otherwise be adversely impacted.
    - There is a manager or supervisor always on duty to observe the operation to minimize shrinkage.



University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-437-2667 Office 805-437-2681 Fax

DATE: June 1, 2011

POLICY NUMBER: 18.00

POLICY NAME: Public Disclosure

### I. BACKGROUND AND PURPOSE

This policy provides guidance on how UGC will make its records and information available to the general public. The UGC desires to operate in a transparent manner while at the same time protect information that is confidential.

The general public may request access to certain UGC records and information. Not all information of the UGC is available to the public. Personal, sensitive or confidential information that could do harm to the UGC, its employees, donors or supporters if made public is protected by the UGC at all times. Certain trade secrets, proprietary data, contracts and non-disclosure agreements are not available to the general public. Access to UGC information is available through several means including the UGC website, reference to other public websites, public postings, and access to records upon specific request.

The relationship between UGC, the Site Authority, Financing Authority, and California State University, Channel Islands ("CI" or "University") is unique in that UGC exists to manage the daily operating activities of the Site Authority and provide auxiliary support to CI. The Site and Financing Authorities exist to provide affordable housing for faculty and staff and to generate funds for academic capital. Therefore the policy of UGC is also the policy of the Site Authority.

### II. POLICY

It is the policy of the University Glen Corporation to comply with all applicable laws that govern auxiliary organization and to be as transparent as possible in its business and support activities. Public records and reports that are likely to be of interest to the general public such as annual reports, policies, tax returns and information about the organization will be posted in an organized manner on the UGC website. Once posted on the website, UGC considers the item(s) as available to the general public. Records and information that exist and considered public, but not available on the UGC or other websites may be viewed by a requesting party by defining the document(s) desired and making a request to the UGC Administrative Office. Guidelines for making such a request are as follows:

- The requesting party is to make a written request at the UGC Administrative Office located at 45 Rincon Drive Suite 104-A, Camarillo, CA, 93012. The requesting party must define the document(s) or item(s) that they wish to view and whether a photocopy is also desired. Requests must be specific and may be made only for documents that exist. It is the responsibility of the requester to provide enough information to properly identify the item(s) requested. The UGC will not provide research for requests that are vague or that cannot be readily linked to an existing document.
- There will be a nominal per copy (per image) charge for photocopies. A UGC form is available to make a public records request but it is not required that the requester complete the form. The UGC Administrative Office representative can also complete the form for the requester. If the item(s) are requested to be mailed, a nominal mailing and handling charge will be added. Payment for any requested photocopies and mailing charges must be made at the UGC Administrative Office prior to the release the photocopies.
- If one only desires to view item(s) and does not need photocopies, one may ask the UGC Administrative Office representative how long it will take to retrieve the item(s) and arrange a viewing time that is during regular UGC business hours. Every effort will be made to retrieve documents in a prompt manner. The more complex a request is, the longer it is likely to take to retrieve the item(s).
- If one's request for item(s) is denied due to confidentiality, non-existence, or other reasons, an explanation will be provide to the requester.

If a request for information is made by a party, and that request is denied or not accommodated to the satisfaction of that party, any resulting appeal will be referred to the UGC Executive Director for review and final decision.

The Request for University Glen Corporation Documents or Records Form is attached to this policy.



University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-437-2667 Office 805-437-2681 Fax

### Request for University Glen Corporation Documents or Records

The University Glen Corporation is pleased to provide public access to its documents and records. In accordance with its policy on disclosure many, but not all, documents are available to the general public. Contact the UGC for further information regarding access to public records. Either the requester or UGC employee may complete this form.

Name of Requester:			Date o	f R	equest	
Contact Telephone:			Estima	atec	Date Item(s) Will Be Available	
Email (optional):			or Mail			
Specific Name and Date of Existing Record(s) or Document(s) Requested:						
Address (Complete only if item(s) are to b	e mailed)	Indicat	te with an	"X"	whether this request:	
			is	onl	y to view the item(s) or	
			is	for	photocopies of the item(s)	
There is a charge of \$.20 for each image copied. Copy charges are per image regardless whether single or double sided copying is used. If mailed, add \$1 for a letter sized envelope with postage/handling for 5 or fewer copies. For mailing 6-50 copies in 8"X12" envelope, add \$4.00. Charge for mailings more than 50 copies will be quoted on a case by case basis.						
Postage and Handling	\$				Date Completed	
Copy Charges .20 each	\$		<del></del>		Number of Copies	
Total Charge Due at Time of Release	\$				Confirm Payment Y or N	
Employee Servicing this Request:		R	eviewed b	oy:		
Reason if item(s) were not provided:						



University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-437-2667 Office 805-437-2681 Fax

DATE: January 1, 2012

POLICY NUMBER: 19.10

POLICY NAME: Public Disclosure

### I. BACKGROUND AND PURPOSE

The McKee Transparency Act (Education Code sections 89913 et seq.), became effective on January 1, 2012, and sets forth the public's right of access to auxiliary organization records. All records maintained by the auxiliary are potentially subject to disclosure under the Act, unless they fall into one or more of the authorized narrow exemptions. Details of the Act may be accessed at htto://www.leginfo.ca.gov/cgi-bin/displaycode?section=edc&group=89001-90000&file=89913-89919.

Records requested under the Act are not to be released until the cost of duplication has been paid. Based on a systemwide study by the CSU conducted to formulate a single cost recovery rationale, the auxiliary has modeled its documentation duplication fee after the fee of the CSU based on the fee established by the Internal Revenue Service. The auxiliary's document duplication cost is \$0.20 per page. This charge applies whether documents are produced in hard copy or electronic form, and includes computer discs that capture electronic images. The charge applies for all copies up to 8x14 inches. For other documents, such as blueprints or electronic back-up tapes, the actual cost will be determined on a case-by-case basis.

### II. POLICY

Records and information that exist and considered public, but not available on the UGC or other websites may be viewed by a requesting party by defining the document(s) desired and making a request to the UGC Administrative Office. Guidelines for making such a request are as follows:

- The requesting party may make an oral or written request at the UGC Administrative Office located at 45 Rincon Drive Suite 104-A, Camarillo, CA, 93012. The requesting party must define the document(s) or item(s) that they wish to view and whether a photocopy is also desired. Requests must be specific and may be made only for documents that exist. It is the responsibility of the requester to provide enough information to properly identify the item(s) requested.
- There will be a nominal per copy (per image) charge for photocopies. A UGC form is available to make a public records request but it is not required that the requester complete the form. The UGC Administrative Office representative can also complete the

form for the requester. If the item(s) are requested to be mailed, a nominal mailing and handling charge will be added. Payment for any requested photocopies and mailing charges must be made at the UGC Administrative Office prior to the release the photocopies.

If a request for information is made by a party, and that request is denied or not accommodated to the satisfaction of that party, any resulting appeal will be referred to the UGC Executive Director for review and final decision.

The Request for University Glen Corporation Documents or Records Form is attached to this policy.



University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-437-2667 Office 805-437-2681 Fax

### Request for University Glen Corporation Documents or Records

The University Glen Corporation is pleased to provide public access to its documents and records. Contact the UGC for further information regarding access to public records. Either the requester or UGC employee may complete this form.

Name of Requester:			Date of Request		
Contact Telephone:			Estimated Date Item(s) Will Be Available		
Email (optional):			or Mailed:		
Specific Name and Date of Existing Record(s) or Document(s) Requested:					
Address (Complete only if item(s) are to be mailed) Indica		ate with an "X" whether this request:			
			is only to view the item(s) or		
			is for photocopies of the item(s)		
There is a charge of \$.20 for each image copied. Copy charges are per image regardless whether single or double sided copying is used. If mailed, add \$1 for a letter sized envelope with postage/handling for 5 or fewer copies. For mailing 6-50 copies in 8"X12" envelope, add \$4.00. Charge for mailings more than 50 copies will be quoted on a case by case basis.					
Postage and Handling	\$		Date Completed		
Copy Charges .20 each	\$		Number of Copies		
Total Charge Due at Time of Release	\$		Confirm Payment Y or N		
Employee Servicing this Request:	F	₹e	viewed by:		
Reason if item(s) were not provided:					



University Glen Corporation 45 Rincon Drive, Suite 104-A Camarillo, California, 93012

> 805-437-2667 Office 805-437-2681 Fax

Date: March 29, 2012

### Open Records Request Copy Charge

The McKee Transparency Act (Education Code sections 89913 et seq.), became effective on January 1, 2012, and sets forth the public's right of access to auxiliary organization records. All records maintained by the auxiliary are potentially subject to disclosure under the Act, unless they fall into one or more of the authorized narrow exemptions. Details of the Act may be accessed at htto://www.leginfo.ca.gov/cgi-bin/displaycode?section=edc&group=89001-90000&file=89913-89919.

Records requested under the Act are not to be released until the cost of duplication has been paid. Based on a systemwide study by the CSU conducted to formulate a single cost recovery rationale, the auxiliary has modeled its documentation duplication fee after the fee of the CSU based on the fee established by the Internal Revenue Service. The auxiliary's document duplication cost is \$0.20 per page. This charge applies whether documents are produced in hard copy or electronic form, and includes computer discs that capture electronic images. The charge applies for all copies up to 8x14 inches. For other documents, such as blueprints or electronic back-up tapes, the actual cost will be determined on a case-by-case basis.



University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-437-2667 Office 805-437-2681 Fax

DATE: August 25, 2011

POLICY NUMBER: 20.00

POLICY NAME: Risk Management Policy

### I. BACKGROUND AND PURPOSE

This policy statement establishes how the University Glen Corporation ("UGC") will reduce or eliminate losses to which UGC may be exposed through the process of periodic risk identification and evaluation and appropriate risk management action.

In various Executive Orders, the Trustees of California State University ("CSU") require auxiliaries to formalize risk management policy, including procurement of property and casualty insurance coverage, and establish a framework within which UGC's services, programs and activities, together with those operated on joint basis with the California State University Channel Islands ("Cl"), can be effectively managed, while identifying and evaluating risk and determining the most advantageous method of treatment.

The UGC Board of Directors recognizes its role of stewardship over UGC assets. This responsibility requires due concern for the safety of the public, those involved with UGC services, projects, or programs with UGC sponsorship or participation, combined with a need to protect UGC resources. UGC practices a conservative approach to risk management and transfers risk of identifiable hazards to insurers through purchase of comprehensive insurance coverage.

### II. POLICY

- Management of Risks.
  - The management of the risks of loss to UGC shall be the responsibility of the Executive Director. It is the Executive Director's duty to identify risks, determine the means of eliminating, abating, transferring, or retaining these risks after consultation with appropriate staff, counsel, CI and CSU personnel.
- Risk Management Program Practices.
  - o UGC management shall establish and maintain documented risk management practices as an essential part of the program, including:
    - Analyze new activities, especially assumption of contractual liability, in terms of risks;
    - Provide periodic review of risks, exposures, activities and properties;

- Analyze any property purchases totaling \$50,000 or more, though it is automatically covered under the UGC property policy, for inclusion in the UGC property schedule as a specific line item;
- Provide periodic review of risk avoidance, mitigation and prevention processes and efforts;
- Maintain an accident/loss monitoring process that identifies where accidents and/or losses are occurring or will likely occur;
- Maintain a systematic claims assessment process to ensure that claims are being properly administered and that the activity participants are fully aware of the types of risks being assumed;
- Maintain a process whereby appropriate documentation of third party coverage and appropriate waivers of liability are consistently requested and received:
- Transfer of risk through contracts, leases, liability waivers and indemnification language, ensuring risk exposures are minimized
- Maintain a process that includes risk management as a component of management performance evaluations; and
- Develop preparedness plans for disasters.
- Periodic Review of Risks and Activities. The periodic review of risks, exposures, activities and properties of UGC shall include, but not be limited to:
  - o Criteria to identify hazards and risks for analysis;
  - o Quantification of activities, service, and support in which the UGC is involved;
  - o Minimum insurance coverage and limits by types of authorized activities;
  - Activity relationships in which there is, or may be, joint or shared responsibility and liability with respect to contracts, employment, occupancy of premises, or oversight of facilities, programs or services between the UGC and the CI or other entity; and
  - The exclusion of risks or activities that the UGC is clearly unwilling to undertake under any and all conditions, including those that may be prohibited or pose such a high degree of risk as to jeopardize the feasibility of the activity, or constitute a threat to the UGC.
- Insurance.
  - When UGC cannot eliminate or economically retain a risk of loss it shall be transferred by purchase of insurance. The form and sufficiency of various insurance policy limits for protection of UGC shall be determined by the Executive Director in consultation with the CI Risk Manager.
    - Limited Loss Retention.
      - UGC recognizes its ability to budget and self-fund limited and predictable risks of financial loss. It shall not attempt to insure such foreseeable losses and bearable expenses if alternatives are available consistent with sound business practice. Self insuring certain risk and/or purchase of property and casualty insurance with appropriate deductibles shall be determined by the Executive Director, in consultation with the CI Risk Manager, with due recognition of insurance market conditions.
    - Cooperative Insurance Programs.
      - UGC is a member of California State University Risk Management Authority ("CSURMA"), which is a joint powers authority that creates a quasi-public entity which provides pooled group insurance and related risk management functions to stabilize risk

- cost for the benefit of all who elect to join the CSURMA and to participate therein. CSU and all auxiliary organizations may be members.
- UGC will remain alert to opportunities for cooperative action with other entities that promote mutual benefit in treatment of risks that may require special consideration. Any such cooperative activity shall be evaluated by the Executive Director and an appropriate report submitted to the Board of Directors for consideration prior to agreement.
- Insurance Acquisition. UGC is not obliged by operation of any statute or regulation to award contracts for insurance to any insurance underwriter, broker, agent, risk retention group or other similar group or organization. UGC will continue to purchase insurance from insurers that are financially sound, with proven administrative ratings. Premium costs are an essential element of evaluating any proposal.
- Periodic Review of Insurance. UGC shall periodically review the following aspects of the casualty insurance program and revise and integrate as necessary within UGC's or an activity's operations:
  - Reviewing scope of coverage and the limits of insurance policies in relation to activities and liability exposure;
  - Evaluating the ability to partially or entirely self fund risk;
  - Monitoring insurance coverage and claims;
  - Conducting routine inspections;
  - Identifying areas and activities involving joint/shared risk;
  - Conducting an ongoing safe practice/risk avoidance training and reinforcement effort with employees covering all risks;
  - · Observing safe practices; and
  - Instituting disciplinary measures to insure that the practice of risk management is faithfully observed.
- Reporting. The Executive Director, or a designee, shall submit an annual report to the Board of Directors related to accounts receivable, workers compensation, and liability insurance losses, or filed claims, in excess of \$25,000.

### II. PROCESS

The Executive Director is authorized to establish procedures, guidelines and forms consistent with and in implementation of this policy.

### III. COMPLIANCE

All UGC units, departments and personnel must comply with this policy.

### IV. REFERENCES AND RELATED POLICY

- CSU Executive Order 715 California State University Risk Management Policy (1999) (superseded Executive Order 533)
- CSU Executive Order 849 California State University Insurance Requirements (2003)



University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-437-2667 Office 805-437-2681 Fax

DATE: September 12, 2011

POLICY NUMBER: 21.00

POLICY NAME: Food Service Transfers

### I. BACKGROUND AND PURPOSE

This policy statement establishes the basis upon which the University Glen Corporation ("UGC") officers, employees, or other designated representatives shall be authorized to oversee the transfer process of inventory for all food service operations.

### II. POLICY

Maintaining an adequate system of controls with regard to the transferring of food items in the food service operations spread over several locations is a priority. It is the policy of UGC to account for all department to department transfers on inventory. This includes food, paper supplies, cleaning supplies, Linens, and uniforms.

#### II. PROCESS

Food Service unit managers and supervisors are responsible for maintaining an inventory of products for each location where food service operations exist. Purchasing is performed on a daily or weekly basis and deliveries can be made to a central location. In these cases food and supplies may be required to be transferred to another food service location. The process for transferring food and supplies follows:

- A separate *Inventory Internal Transfer* form will be used for each department where food and/or supplies are transferred to.
- When a transfer occurs the manager of the department initiating the transfer will fill
  out the *Inventory Internal Transfer* form (attached). The following will be included on
  the form: food and/or supply, account code, unit of measurement for the transferred
  product, PeopleSoft department code, the number of units transferred, and the cost
  per unit.
- At the end of every month both the transferring manager and the receiving manager will sign the form to verify and authorize the transfer.
- All forms will be transmitted to UGC accounting.
- The Director of Commercial Services will review and sign the *Inventory Internal transfer* form.
- UGC accounting will utilize the *Inventory Internal Transfer* to create a journal entry to allocate expenses to the appropriate operation.
- The journal entry form with the attached *Inventory Internal Transfer* as backup will be delivered to CSUCI accounting for final review, signature, and entering into the PeopleSoft system.

### **Inventory Internal Transfer**

Month of: August 2011

**Transfer** 

From: 671 - Freudian Sip SUB Transfer To: 680 - Freudian Sip JSB



Product	Account Code	Unit	Number of Units	Cost Per Unit	Transfer Amount
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
Transfer Total Amount					\$ -

Transferring Manager Signature	
Receiving Manager Signature	Director of Commercial Services



University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-437-2667 Office 805-437-2681 Fax

DATE: September 14, 2011

POLICY NUMBER: 22.0

POLICY NAME: Unrelated Business Income Tax

### I. BACKGROUND AND PURPOSE

This policy statement establishes the basis upon which the University Glen Corporation ("UGC") will collect information on unrelated business income tax (UBIT) and will ultimately file appropriate income tax filings.

IRS Publication 598, *Tax on Unrelated Business Income of Exempt Organizations*, defines unrelated business income in section 3. as "Unrelated business income is the income from a trade or business regularly carried on by an exempt organization and not substantially related to the performance by the organization of its exempt purpose or function, except that the organization uses the profits derived from this activity."

Within Publication 598 under the heading "Excluded Trade or Business Activities," in the section on convenience of members, it states: "A trade or business carried on by a 501(c)(3) organization or by a governmental college or university primarily for the convenience of its members, students, patients, officers, or employees is not an unrelated trade or business."

Based on these statements all retail and Islands Café sales are considered to be non UBIT as they service the mission of the University. Sales within the catering department will be evaluated on an event by event basis. Those events not directly in support of the campus mission will incur UBIT tax.

### II. POLICY

Maintaining an adequate system of controls with regard to the collection of information on sales as it relates to UBIT and the filing of tax documents is a priority. It is the policy of UGC to collect all UBIT information and to file an annual tax return on this information.

### II. PROCESS

- Information details for the event are obtained by the Catering Manager who creates a Banquet Event Order (BEO) which is the contract with the client.
- There are two designations on the BEO for an Internal (I) or External (E) event.
- All BEO's are entered into the BEO Log.
- The Catering Manager, in conjunction with the Director of Commercial Services, will
  review the BEO's identified as External and make a determination of whether UBIT
  applies.
- Food Service administration will log events designated as external and UBIT on a monthly basis from the BEO Log into the Monthly UBIT Log.
- The monthly UBIT Log and a copy of the associated BEO's will be printed and placed into a file for backup detail in preparation of the annual tax filing



University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-437-2667 Office 805-437-2681 Fax

DATE: September 14, 2011

POLICY NUMBER: 23.00

POLICY NAME: Food Service Sales Returns

### I. BACKGROUND AND PURPOSE

This policy statement establishes the procedure upon which the University Glen Corporation ("UGC") food service personnel properly handle sales returns.

### II. POLICY

Maintaining an adequate system of controls with regard to providing sales returns to customers is a priority. It is the policy of UGC to maintain positive controls over customer sales returns.

### II. PROCESS

In addition to having appropriate controls over providing refunds to customers, providing good customer service is important.

- Apologize to the customer and inform him/her that the return will be taken care of right away.
- Ask the supervisor for assistance. If you are a supervisor ask the manager for assistance. Returns require two staff personnel to be present.
- Perform the return transaction on the Micros point-of-sales system:
  - a. Ring in the item the customer is returning.
  - b. Go to the tender screen.
  - c. Touch the *return item* button
  - d. At this point the supervisor is required to swipe his/her card for authorization.
  - e. Use the appropriate tender at this time. If the customer used a credit card, you can swipe it and the terminal will credit the account. If the customer paid with cash, return the money.
  - f. Print a copy of the refunded transaction.
  - g. The cashier writes the reason for the return on the receipt, signs it, and has the supervisor sign it.
  - h. All refunds using the Dining Dollars tender will be returned to the Administrative and Marketing Coordinator for entry into the Blackboard system.
  - i. **ALL** returns must have two employee signatures.
  - j. **ALL** return receipts must be attached to the Daily Cashier Report at the end of the shift and forwarded to UGC Accounting
  - k. UNDER NO CIRCUMSTANCES may the cashier return money to a customer and complete the return with the supervisor at a later time. Even if it inconveniences the customer somewhat, the return must take place with the customer and two employees present.



University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-437-2667 Office 805-437-2681 Fax

DATE: August 16, 2011

POLICY NUMBER: 24.00

POLICY NAME: Personnel Change Audit

### I. BACKGROUND AND PURPOSE

This policy statement establishes the basis upon which the University Glen Corporation ("UGC") shall audit, on a regular basis, any changes made to personnel data within the ADP payroll system.

### II. POLICY

Maintaining an adequate system of controls with regard to the information within the payroll system is a priority. It is the policy of UGC to ensure accurate information is in place at all times.

### II. PROCESS

UGC shall audit changes to the payroll system on a regular basis. Payroll is run on a semimonthly basis. The following process will be followed at the end of every payroll cycle.

- After payroll is run ADP generates two reports 1) Personnel Change Report and 2) New Hire Compliance Report.
- After each payroll these two reports will be copied, provided to a designated UGC staff person for review and that staff member will compare the reports to the actual personnel file.
- If there are no issues, the staff member will sign the report as being reviewed and the report will be placed in a Payroll Audit File.
- If there are issues, the staff member will discuss those issues with the HR person, the issue will be resolved, it will be noted on the report and in the personnel file, and placed in the Payroll Audit File.
- The Payroll Audit File will be made available for inspection by the auditors, the campus HR office or any other appropriate and authorized staff member.



University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-437-2667 Office 805-437-2681 Fax

DATE: September 19, 2011

POLICY NUMBER: 25.00

POLICY NAME: Change Fund Process

### I. BACKGROUND AND PURPOSE

This procedure is established to document the counting and control of change funds maintained by the Food Service units of University Glen Corporation (UGC).

### II. POLICY

Maintaining an adequate system of controls with regard to auditing change funds is a priority. It is the policy of UGC to maintain positive controls over operating unit change funds.

### II. PROCESS

In order to maintain sufficient cash on hand to operate the food service operations, change funds are maintained at three UGC operations. The Student Union Building (SUB) with a change fund of \$1,500.00, Freudian Sip JSB with a change fund of \$500.00, and Islands Café, with a change fund of \$1,000.00. The change fund at SUB services Lighthouse Café, Freudian Sip and the Sea Store which are all within one building. The change funds at Freudian Sip JSB and Islands Café serve those individual units.

- 1. Unit managers are required to audit their change funds once a week. This audit is performed with the manager and a second staff member present. The manager fills out the *Weekly Change Fund Audit* form with the appropriate change fund amount and then with the actual count. Any variances are noted. Both the Manager and second staff person initial the report.
- 2. The weekly change fund amount must remain constant at the appropriate designated amount.
  - a. Shortage. All registers should be audited to insure that inappropriate change (cash and coin) transactions were not made between the safe and operating registers. No operating shortages should exist in the Change Fund. If all registers, and receipts balance, the shortage amount in the Change Fund is to be made up from the operating register. Any shortage in the change fund made up from daily operating funds must be reported by email to the Director of Commercial Services on the day of occurrence.
  - b. Overage. If a cash overage is identified in the change fund, all registers should be audited to insure that inappropriate change (cash and coin) transactions were not made between the safe and operating registers. If all registers and receipts balance, the cash overage in the change fund should be put in the daily receipts for that operation and reflected as an overage. Any overage in the change fund deposited to daily operating funds must be reported by email to the Director of Commercial Services on the day of occurrence.
- 3. Any variance of greater than \$5.00 must be reported to the Director of Commercial Services. The Director of Commercial Services will conduct an investigation by the end

- of the next business day which may include audit of the change fund and interviewing staff members present during the shortage.
- 4. At the end of each week the manager is to provide the Weekly Change Fund Audit report by email to the Director of Commercial Services for review and filing. These forms will be maintained in file by the Director of Commercial Services.
- 5. Unit Managers are also responsible for maintaining the proper denominations of coin and currency in their change fund. To replenish the unit change fund, the Manager places an order by email with Rabobank for the necessary change. The Manager places the required order total in a change bag and seals it for pickup by the security service. Deposit bags and change bags are picked up on a daily schedule for SUB operations, and a Monday, Wednesday, Friday schedule for Freudian Sip JSB and Islands Café by an armored security service for transport to Rabobank. The security service also delivers the change order made by the Manager.
- 6. On a monthly basis and unannounced, a representative from CI's Division of Finance and Administration will audit the change funds as well. The results of that audit will be reported to UGC.



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> 805-437-2667 Office 805-437-2681 Fax

DATE: September 19, 2011

POLICY NUMBER: 26.00

POLICY NAME: Cash Shortages

### I. BACKGROUND AND PURPOSE

This procedure is established to document the mitigation, investigation and recovery of cash shortages in the food service units of University Glen Corporation (UGC).

### II. POLICY

Maintaining an adequate system of controls with regard to cash shortages is a priority. It is the policy of UGC to investigate and document cash shortages of \$10.00 or larger.

### II. PROCESS

The procedure for opening and closing of cash register drawers and reconciling daily receipts in all food service operations is outlined in the UGC on Opening and Closing. The purpose and intent of this policy is to outline mitigation, investigation and recovery of any cash shortages.

- 1. Unit managers are required to audit their change funds once a week. This audit is performed with the manager and a second staff member present. The manager fills out the *Weekly Change Fund Audit* form with the appropriate change fund amount and then with the actual count. Any variances are noted. Both the Manager and second staff person initial the report. This report is provided to the Director of Commercial Services at the end of each month.
- 2. Further mitigation and investigation is done independently by a representative of the campus accounting office. This is conducted unannounced and once a month.
- 3. Daily sales receipts are counted and compared to the daily Revenue Center Sales Detail report provided by the Micros register system. Shortages of \$10.00 or greater require that the manager count the change fund to insure that improper exchange of coin and bills necessary for daily operation between the registers and the change fund has not been made.
  - a. Any variance of greater than \$10.00 must be reported to the Director of Commercial Services. The Director of Commercial Services will conduct an investigation reviewing the following:
    - a) Audit of change funds, and all daily receipts for the day of shortage.
    - b) Develop a list of all staff working during shortage period.
    - c) Interview all staff present during shortage period.
    - d) Review cash handling procedures with manager and staff as appropriate.
- 4. Recovery of cash shortages can only occur through an investigation resulting in the positive identification of persons responsible for the shortage and associated personnel actions.
- 5. In potential extreme situations an insurance claim may be considered for the loss.



University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-437-2667 Office 805-437-2681 Fax

DATE: September 19, 2011

POLICY NUMBER: 27.00

POLICY NAME: Register Open / Close Process / Sales Reconciliations

### I. BACKGROUND AND PURPOSE

University Glen Corporation (UGC) operates multiple Food Service units on the California State University Channel Islands campus (CI). Each of these units contains a safe to hold cash receipts and cash register terminals for recording sales transactions. All cash register terminals are connected to the Micros Point-of-Sales system. This software system provides up to the minute sales information and a transaction log for each cash register terminal. This procedure is established to document the cash register opening and closing procedures and the register closing sales reconciliation for the food service units of UGC.

### II. POLICY

Maintaining an adequate system of controls with regard to opening and closing procedures and daily cash sales reconciliation is a priority. It is the policy of UGC to maintain positive controls over these processes.

#### II. PROCESS

- All cash registers start the day with \$150.00. At the beginning of each day the unit
  Manager or unit Supervisor takes the cash drawers from the safe and recounts the
  drawer to verify the beginning \$150.00 opening drawer amount. The manager fills out
  the Daily Cashier Report form and puts it into the Daily Sales Envelope.
- Once the drawer balance has been verified to be \$150.00, the manager or supervisor places a locked drawer cover on the cash drawer, and carries the cash drawer to the cash register.
- Only the unit Manager or shift supervisor is allowed to remove cash drawers. The supervisor places a locked drawer cover on the cash drawer and takes the drawer to the office.
  - The opening cash register procedure is as follows:
    - Swipe manager card to open drawer
    - Press Manager Screen button
    - Press Assign Till button
    - Press Assign New Till button
    - Press Cash Till button, press OK
    - Select cashier from list provided, press OK
    - Employee working register swipes their card
    - Register is now operable for business
    - Cashiers perform their work and process sales transactions. Cash drawers have to be closed before the next sales transaction can be processed.
  - The closing cash register procedure is as follows:
    - Swipe manager card

- Press manager screen button
- Press Sales Report button the report automatically prints
- Remove till from drawer, place all credit card receipts, coupons, and sales report in drawer and place locking cover on till.
- Cash drawers are removed at the end of a shift or at the end of the day.
- Sales Reconciliations (End of shift cash drawer handling and counting)
  - The shift supervisor and the unit supervisor have the responsibility of counting the cash drawers. The first supervisor:
    - Unlocks the drawer cover on the cash drawer.
    - Counts the Drawer to the \$150.00 start balance for the following day.
    - Counts the sales receipts and fills in the right side of the Daily Cashier Report (DCR).
    - Compares the Daily Revenue Center Sales Detail report from the register with the DCR counted sales receipts for reconciliation purposes.
    - Signs the DCR as counter.
    - The beginning till amount (\$150.00) is put back into the safe to be used again.
    - If there is a shortage or overage of \$10.00 or more, the counting supervisor will contact their supervisor immediately. See Cash Shortage Policy for details on these situations.
    - Places the DCR, the Terminal Tender report, and the cash/credit card receipts into an unlocked bag.
    - Places the unlocked bag in the safe.
  - o The second supervisor:
    - Retrieves the bag and beginning till from the safe.
    - Recounts the beginning till amount.
    - Recounts the bank deposit amount.
    - Reviews the DCR information.
    - Verifies any shortage or overage noted by first counting supervisor.
    - Signs the DCR as "verified by".
    - Prepares the bank deposit and the armored transport bag and log.
    - Puts the DCR, the Terminal Tender report, and the cash/credit card receipts into the Daily Sales Envelope.
    - Seals the bank deposit bag and places in safe.
    - Returns till to the safe.
- Multiple cashiers using one register during the day.
  - UGC has different types of employees:
    - Salaried employees.
    - Hourly employees would not normally work more than 8 hours.
    - Student employees work shifts to accommodate their class schedules and may work anywhere from 3 – 6 hours during a shift.
  - During any one shift, there is not a dedicated staff member for a cash register, e.g. the staff member assisting the customer will charge and receive payment for services.
  - The detailed and dual custody nature of the procedures outlined in this and other commercial services policies indicate there are more than adequate controls over cash handling within the retail operations.
  - These facts along with the downtime required to close out and open a new register mid-shift, thereby effecting our ability to provide service show that having multiple cashiers at one register during the day is acceptable.



University Glen Corporation 45 Rincon Drive #104-A Camarillo, California, 93012

> 805-437-2667 Office 805-437-2681 Fax

DATE: September 26, 2011

POLICY NUMBER: 28.00

POLICY NAME: Procedure for controlling inventory waste, shrinkage, and spoilage in food

service units.

### I. <u>BACKGROUND AND PURPOSE</u>

This procedure is established to document inventory waste, spoilage and shrinkage controls in the food service units of University Glen Corporation (UGC).

### II. POLICY

Maintaining an adequate system of controls with regard to inventory control, waste and shrinkage is a priority. It is the policy of UGC to maintain positive controls of its inventory and to control waste and shrinkage.

#### II. PROCESS

The following processes are in place to control inventory waste, spoilage and shrinkage:

- Unit managers are required to conduct a monthly inventory on the last operating day of every month. A copy of the inventory is forwarded to the Director of Commercial Services by the forth business day of the following month for review. The Director of Commercial Services forwards a copy of all inventories to University Accounting for entry into the PeopleSoft.
- 2. The final (June 30<sup>th</sup>) inventory is conducted with a representative of University Accounting present.
- 3. Unit Managers are responsible for day to day ordering of product. Managers may only order from vendors listed on the UGC Approved Vendor List. Vendors are added to this list only with the approval of the Director of Commercial Services.
- 4. All vendor deliveries are received by the manager or an employee trained by the manager to perform this function. The count for each item on the delivery receipt or invoice is verified by the receiver with all variations being noted on the invoice or receipt. All invoices are date stamped received and signed by the receiver.
- 5. The unit manager reviews all invoices, date stamps his approval and forwards all invoices to UGC Accounting for processing.
- 6. It is the responsibility of each unit manager to provide production guidance to their staff to insure that appropriate quantities of food are produced to correspond to anticipated business.
- 7. Within the retail operations food is prepared to order with the exception of pastries which reduces waste and spoilage. Where necessary pastry orders are modified to coincide with operational need.
- 8. At Islands Café, production is controlled by the Executive Chef who communicates daily production needs to his production staff. Waste is controlled through menu design by reconfiguring product left over from one day into the next day's menu items.
- 9. UGC production and storage facilities are small compared to the quantity of product produced in these areas. All perimeter doors are secured at the end of night securing product. UGC recognizes the risk to shrinkage by operating with unlocked storage areas during the day but believes that because we operate at minimum staffing levels and

constant access is necessary to product ingredients by production staff that the cost of required additional staffing to control storage access would be greater than the shrinkage it would control.